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Explanatory note

Definitions of statelessness and statelessness in the Palestinian context

The situation of Palestinian stateless people in Lebanon is described in this Country of Origin Information (COI) report. Its desk-based research is based on a variety of written sources that were published between June 30, 2020, and June 30, 2022.¹ A total of five sources with specialised knowledge of statelessness and Palestinians in Lebanon were interviewed and corresponded with for the report between October and November 2022. Our use of the term “stateless” for this report broadly leans on the meaning of statelessness set out in the 1954 Convention relating to the Status of Stateless Persons (the 1954 Convention): “[...] the term ‘stateless person’ means a person who is not considered as a national by any State under the operation of its law.”² This definition is considered to be international customary law. However, only 96 countries³ have acceded to the 1954 Convention, and as such, not all states apply this definition. The 1954 Convention outlines the international legal definition of “stateless person” and the norms of treatment to which such people are entitled, but it makes no mention of any method for classifying people as stateless. And as per guidance set out by UNHCR in their Handbook on Protection of Stateless Persons the 1954 Convention makes it clear that in order to uphold their obligations under the Convention, States must identify any stateless people who are present within their borders and give them the proper care.⁴ Among the 96 States that acceded to the 1954 Convention, only 20 or so countries have developed procedures that specifically deal with statelessness claims⁵. The country examined in this COI study, Lebanon, is not a signatory to the 1954 Convention.⁶ Thus it is important to note that differences in approach to the problem of statelessness often lead to protection gaps for Palestinians and other stateless groups.

The European Network on Statelessness (ENS) has advocated for Palestinians to be considered as stateless according to the definition in the 1954 Convention, because, among other reasons:

“[...]Palestine remains under occupation by Israel, does not have full sovereignty, does not have full control over issuance of official documentation or entry and exit to its territory, and because attempts to enact a Palestinian nationality law have failed. This does not negate the fact that Palestinians have an entitlement to Palestinian nationality under international law; rather it is a recognition that Palestinians are “not considered nationals by any state under the operation of its law.”⁷

Further definitional complexities can arise. For example, individuals who are experiencing statelessness may not themselves be aware of the concept of ‘stateless’, or may choose not to identify as stateless for a variety of reasons. As noted in a joint report by the Badil Resource Center and ENS relating to the case of Palestinians:

“Many Palestinians consider themselves to be Palestinian nationals in view of their long-standing ties to the areas currently known as Israel, Gaza, the West Bank, and Palestine, as well as their ethnicity, shared political and cultural affinity. It is important to acknowledge and respect Palestinians’ connection to Palestine and right to self-identify as Palestinian nationals. In addition, Palestinian nationality – in the legal sense – was established by an international treaty in 1923 and continues to be protected by international law.”⁸

-
- 1 Exceptions to the timeframe were made for rigorous academic studies addressing the history of Palestinian exile in Lebanon, and those addressing societal perceptions of Palestinians that were unlikely to rapidly change.
 - 2 UNHCR, [Convention relating to the Status of Stateless Persons](#), 1954, Article 1(1).
 - 3 UN General Assembly, 1954 Signatory States, Declarations and Reservations on the Reduction of Statelessness, 28 September 1954, available at: <https://www.refworld.org/docid/4fa368052.html>Refworld | [1954 Signatory States, Declarations and Reservations on the Reduction of Statelessness](#). In Europe, there were 25 signatories as of 2021. The European Network on Statelessness (ENS), Thematic Briefing: Statelessness determination and protection in Europe, 2021, p. 4
 - 4 UNHCR, [Handbook on Protection of Stateless Persons](#), 30 June 2014, paragraph 8
 - 5 UNHCR, [Good Practices Paper – Action 6: Establishing Statelessness Determination Procedures to Protect Stateless Persons](#), July 2020, p. 5
 - 6 UN General Assembly, 1954 Signatory States, Declarations and Reservations on the Reduction of Statelessness, 28 September 1954, available at: <https://www.refworld.org/docid/4fa368052.html>Refworld | [1954 Signatory States, Declarations and Reservations on the Reduction of Statelessness](#)
 - 7 ENS, [Briefing: Palestinians and the search for protection as refugees and stateless persons in Europe](#), 14 July 2022
 - 8 Badil Resource Center and European Network on Statelessness: [“Palestinians and the Search for Protection as Refugees and Stateless Persons”](#), June 2022, p. 12

The concept of statelessness may also be difficult to translate into various national contexts or languages, resulting in diverse terminology describing situations of statelessness. For example, groups who are experiencing statelessness in different geographical areas may be described using local terminology, which does not appear to relate to the concept of statelessness as defined by the 1954 Convention. The lack of universal terminology to describe the situation of statelessness informed our approach to this research. In particular, the research highlights the different legal statuses that exist amongst Palestinians in Lebanon and the terms used to describe those statuses, as well as the (lack of a) definition of statelessness in Lebanese law, the various Arabic terms that may be used to describe stateless groups in Lebanon, and who they refer to. Sources covering the situation of Palestinians in Lebanon often use the terms “Palestine refugees”⁹ (often referred to as PRL) and “Palestinian refugees”¹⁰, with the former referring to refugees under the mandate of UNRWA and the latter to refugees of Palestinian heritage more generally. Additional terms that are used to describe the status of Palestinians in Lebanon in the COI include the following:

Non-registered refugees: this refers to refugees of Palestinian origin who are registered with the Lebanese Directorate of Political Affairs and Refugees, but are not, for various reasons, registered with UNRWA.¹¹

Non-ID refugees: this refers to Palestinians who are neither registered as Palestine refugees with UNRWA, nor with the Lebanese Government. People belonging to this group do not have any kind of status in Lebanon.¹²

Palestinian refugees from Syria (often referred to as PRS): this refers to people of Palestinian origin who fled from Syria following the start of the Syrian conflict in 2011.¹³

This report also includes sources that make reference to non-Palestinian stateless persons, including those who have some form of documentation and undocumented persons. The latter are frequently known as Maktoumi al-Qaid (those who are not registered) in vernacular language, and the former as Qaid a-dars, meaning “under-study” as directly translated.¹⁴ Note that “Qaid” is sometimes spelled “Kayd” in the sources.

Whilst acknowledging the complexities that exist in defining the situation of Palestinians in Lebanon, and the varying and inconsistent ways in which the COI refers to this group, Asylos has chosen to refer to Palestinians in Lebanon as “stateless Palestinians”, as well as – where useful – using some of the terms outlined above, which refer to specific sub-groups of Palestinians in Lebanon. Where Asylos uses the term “stateless Palestinians”, this is used in a general sense, and can potentially encompass, “Palestine refugees”, “Palestinian refugees”, “non-registered Palestinian refugees”, “non-ID refugees” and “Palestinian refugees from Syria”.

Overlap between refugeehood and statelessness

Since available sources on the situation of Palestinians in Lebanon often use the term “refugee”, it is important to recognise that statelessness and refugeehood can be intertwined, as Colin Yeo noted in his most recent work, *Refugee Law*. The author highlights the overlap:

“[...] one of the major problems faced by a refugee is that they are de facto (effectively) stateless. A refugee is, by definition, outside their country of origin and has lost the protection of that country, leaving them without ‘the right

9 Francesca P. Albanese and Lex Takkenberg/Oxford University Press, [Palestinian Refugees in International Law](#), May 2020, Chapter 3.3.3, Legal Status and Treatment, pp. 275-279

10 Badil Resource Center and European Network on Statelessness: [“Palestinians and the Search for Protection as Refugees and Stateless Persons”](#), June 2022, p. 12.

11 Francesca P. Albanese and Lex Takkenberg/Oxford University Press, [Palestinian Refugees in International Law](#), May 2020, Chapter 3.3.3, Legal Status and Treatment, pp. 275-279

12 Francesca P. Albanese and Lex Takkenberg/Oxford University Press, [Palestinian Refugees in International Law](#), May 2020, Chapter 3.3.3, Legal Status and Treatment, pp. 275-279

13 Francesca P. Albanese and Lex Takkenberg/Oxford University Press, [Palestinian Refugees in International Law](#), May 2020, Chapter 3.3.3, Legal Status and Treatment, pp. 275-279

14 Frontiers Ruwad Association, [Invisible citizens, humiliation and a life in the shadows, a legal and policy study on statelessness in Lebanon](#), 2011, pp. 12-13.

to have rights' in a system of sovereign nation-states.¹⁹⁷ But, formally, a refugee will often retain the nationality of their country of origin. Some refugees may also be de jure (in law) stateless, as is recognized in the definition itself in the reference to a person 'who, not having a nationality and being outside the country of his former habitual residence'. However, it is not necessary for a refugee to also be stateless. As the preamble to the Convention Relating to the Status of Stateless Persons 1954 ('Stateless Persons Convention') observes, there are many stateless persons who are not refugees. Indeed, many are stateless within the country in which they were born and still reside."

¹⁹⁷ Arendt, H. (2017), [The Origins of Totalitarianism](#), London: Penguin, p.388

The refugee definition in the 1951 Convention relating to the Status of Refugees [see footnote for definition in the 1951 Convention¹⁵] requires an element of persecution whereas the stateless person who is not persecuted falls under the 1954 Convention – though that division can be unclear.¹⁶

Where a State or the UNHCR makes a refugee status determination, it should include a finding on whether or not a person could be stateless. However, refugee determination decision-makers may need to speak with foreign officials about applicants, which could jeopardise the confidentiality to which refugees and asylum seekers are entitled. When this occurs, UNHCR recommends, the determination of refugee status must go forward, and consideration of the statelessness claim must be put on hold.¹⁷

Statelessness in Country of Origin Information (COI)

In recent years there has been a growing recognition among actors working in the fields of international protection and statelessness that COI on statelessness does not meet the needs of those who may seek to use it, including decision makers, lawyers, and stateless persons. A UNHCR audit on statelessness determination in the UK published in 2020 "notes the limited availability of country information on statelessness", and at the same time highlights the important role that COI can play in determining statelessness claims.¹⁸ Findings from the audit led the UNHCR to recommend that "Relevant Home Office COI reports should include a section on 'nationality and citizenship'".¹⁹

Meanwhile, in its thematic review of U.S. Department of State Country Reports on Human Rights Practices, ARC Foundation drew attention to multiple deficiencies in the information presented on statelessness, including omissions or incomplete information on:

- The relevant laws and legal obligations these entail
- Law and policy in practice, including registering of births
- Profiling who the people most at risk of statelessness are
- The situation and treatment of stateless persons by the state and non-state actors
- The livelihood possibilities as well as access to basic services (e.g. documentation, health care, education, housing etc.) for those considered or classified as stateless.²⁰

15 UN General Assembly, Convention Relating to the Status of Refugees, 28 July 1951, United Nations, Treaty Series, vol. 189, Article 1, "For the purposes of the present Convention, the term "refugee" shall apply to any person who:[...] owing to well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former habitual residence as a result of such events, is unable or, owing to such fear, is unwilling to return to it."

16 Colin Yeo: [Refugee Law](#), 2022, pp.78-79

17 See for example para 79 of the [UN Handbook on Protection of Stateless Persons](#), Geneva, 2014

18 UNHCR, [Stateless Determination in the UK: A UNHCR audit of the Home Office approach to decision-making in the Statelessness Determination Procedure](#), see p.. 35, 2020

19 UNHCR, [Stateless Determination in the UK: A UNHCR audit of the Home Office approach to decision-making in the Statelessness Determination Procedure](#), see p.. 10, 2020

20 ARC Foundation, [Thematic Review](#), September 2021

Asylos' own unpublished analysis of UK Home Office Country Policy Information Notes (CPINs) found that coverage of the issue of statelessness is limited, with only a handful of CPINs dedicated solely to groups who are experiencing statelessness. COI on statelessness within other CPINs did not appear to be addressed in a consistent way, sometimes appearing under the sub-title "Citizenship and nationality", and other times, appearing under sub-titles relating to documentation, freedom of movement, or the legal framework. If the issue of statelessness was mentioned in CPINs where the main topic was not addressing a stateless group, references to relevant COI on statelessness were invariably brief and not addressed in any substantial way. Meanwhile some CPINs omit any mention of statelessness, even where it may be relevant.

Much Country of Origin Information (COI) is tailored to refugee status determination procedures, and statelessness may not be identified as a possible issue in COI reports or only very briefly addressed. Experts by experience, lawyers, NGOs and academics, who took part in consultations with Asylos repeatedly pointed to a general lack of awareness among decision-makers and legal counsel about the contexts in which a person may be affected by statelessness. In addition, it was suggested that statelessness is often overlooked unless seen as a factor in causing serious harm or persecution, and is often not understood as a protection issue in its own right. In particular, participants identified the need for COI tailored to address not just nationality and citizenship frameworks, but also how they are applied, and how stateless people are treated by the authorities in countries of habitual residence in practice. Furthermore, it was observed that COI often lacks due attention to the diversity of terminology that may be used to describe people who are experiencing statelessness in the context of their country of habitual residence, which can lead to misunderstanding a person's situation.

In developing this project, we conducted in-depth consultations with a range of stakeholders from those with lived experience of statelessness, to academics, lawyers and NGOs with expertise on statelessness. These consultations provided invaluable insight, helping us to further understand information gaps and inadequacies in the available COI on statelessness. Through the consultations, we sought to identify a research focus that could serve as a "case-study", providing relevant and up to date COI on a particular group of stateless persons, while also creating the opportunity to distil broadly applicable best practice principles when conducting COI research on the issue of statelessness.

Among the stakeholders we consulted, stateless Palestinians were one of the most commonly identified groups of people for whom available COI is often inadequate. This is due to many factors, including the fact that existing COI often fails to capture the complexity of their statuses in the different countries in which they reside. Furthermore, there is very little information on the kinds of documentation available to stateless Palestinians, the entitlements that come with those documents, how easy it is to renew them, and whether they fall under the mandate of the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA). The theme of stateless Palestinians in Lebanon was selected as a focus for this research project because it represents a prime example of the diverse and complex causes that can lead to and perpetuate the problem of statelessness, from state succession and discrimination, to gender-discriminatory laws, and displacement due to conflict (in the case of Palestinian Refugees from Syria), and illustrates a range of considerations that COI researchers need to address when conducting research on statelessness.

In undertaking this research, we faced a number of limitations. In particular, among the sources consulted, including those published by NGOs and grassroots organisations, Palestinians in Lebanon were rarely described as "stateless", sometimes making it challenging to verify whether information was of relevance to this report. Furthermore, Lebanon has undergone significant socio-economic changes in recent years, including political and financial crises that have affected the whole of society. Many sources we consulted focused attention on the political and economic turbulence that Lebanon has experienced, however, the situation of stateless Palestinians within this context lacked visibility.

It was difficult to determine the specific number of Palestinians who were stateless and living in Lebanon. This is primarily due to the fact that there has not been a proper census since 1932 and that many stateless individuals lack civil registration documents.²¹ Furthermore, despite the fact that the 1954 Convention defines a stateless person as someone who is "not considered as a national by any state under the operation of its law," and despite the fact that the UNHCR publishes information on stateless people in their Global Trends Report²² and estimates that there are 4.3 million stateless people in the world overall, the number of stateless people is still a contentious issue. To make matters more confusing, those who are covered by UNRWA's protection mandate are not included in UNHCR's statistics.

21 The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukuk Frontiers Rights et al, "Joint Submission to the Human Rights Council Universal Periodic Review", July 2020, p. 4

22 UNHCR, *Global Trends Report 2021*, p..4

COI for a number of questions was not found, but it is important to note that information gaps related to statelessness should not be regarded as confirmation that an issue does not exist. As noted in a COI research guide produced by ARC Foundation and Asylos, “plenty of things happen but do not make it into the world of information that is accessible to you”.²³ As stateless people do not have legal status, they lack visibility in societies and are often excluded from formal registration and documentation processes and from access to institutions and public services. This means their lives are not counted and recorded in the same ways, or to the same extent, as citizens of a country. Furthermore, the marginalisation that stateless groups often experience within societies may mean that there is a lack of information about them, or certain aspects of their experience. Information on the following research questions was not found in the sources consulted during the research timeframe:

7.3 Are stateless Palestinian children disproportionately exposed to exploitation and other types of harm such as physical violence, sexual abuse etc? [While no information was found indicating whether Palestinian children experienced comparatively more exposure to harm than Lebanese children, information on Palestinian children’s exposure to harm more generally was found and included in the report].

14.8 Is there any additional penalty eg. deportation for stateless Palestinians who committed offences, in Lebanon or outside of Lebanon?

15.2 Do stateless Palestinians experience any forms of reprisals as a result of gathering/protesting/gathering a public profile for speaking on a political issue?

Disclaimers

We want to emphasise that early on in this research project, Walaal Kayyal, a member of the Steering Committee with first-hand experience of the issue of statelessness, provided insightful information. After discussing with the other committee members and determining that there was no opposition, it was decided to include her testimony and allow her to continue serving on the committee.

We must also recognise that in failing to publish versions of this report in accessible formats (such as easy read, Braille, and audio versions) we exclude many persons with disabilities from reading it and making use of its content, which is inconsistent with the inclusive principles our [Disability COI](#) research was based upon. Unfortunately, we lacked the resources to make this undertaking and came to the view that it would still be of benefit to publish it in its current form for use as evidence in refugee status determinations.

Please note that as authors of this report we are not legally accredited nor “experts” in the matters we research and so cannot be classified as expert witnesses. We compile primary and secondary information to address certain country-specific questions, but we do not provide an assessment or analysis of the data. Similarly, we do not provide legal advice. The report was researched, written and edited by Asylos’ staff and its network of volunteer researchers.

The Country of Origin Information (COI) presented is illustrative, but not exhaustive of the information available in the public domain, nor is it determinative of any individual human rights or asylum claim. All sources are publicly available and a direct hyperlink has been provided for each. In addition to assisting further research, the list of sources and databases consulted and provided below will enable source assessments. For more information about our research methodology, please consult [Appendix A Methodology](#) of this report. This document is intended to be used as a tool to help to identify relevant COI and the COI referred to in this report can be considered by decision-makers in assessing protection applications and appeals.

Whilst every attempt has been made to ensure accuracy, the authors accept no responsibility for any errors included in this report.

23 ARC Foundation & Asylos, [Country of Origin Information \(COI\): Evidencing asylum claims in the UK](#), 2020

Background on the research project

This report forms part of a project to produce a series of reports that present new and innovative forms of COI, generated by conducting interviews alongside existing sources. Previous iterations of this project were published in partnership between Asylos and ARC Foundation. Past reports have covered topics related to asylum seekers in the UK for whom an absence of country information forms a barrier to protection. Previous reports include:

Asylos/ARC Foundation, [Nigeria: Children and Young People with Disabilities](#), October 2021

Asylos/ARC Foundation, [Ghana: State treatment of LGBTQI+ persons](#), March 2021

Asylos/ARC Foundation, [Vietnam: Returned victims of trafficking](#), May 2020

Asylos/ARC Foundation, [Albania: Trafficked Boys and Young Men](#), May 2019

Asylos, Afghanistan: [Young male 'Westernised' returnees to Kabul](#), August 2017 (Pilot report)

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Design by Iris Teichmann.

Feedback and comments

Please help us to improve and to measure the impact of our publications. We would be extremely grateful for any comments and feedback as to how the reports have been used in the refugee status and statelessness determination process, or beyond. If you would like to provide feedback, please contact info@asylos.eu.

Who we are

Asylos is a global network of volunteers providing free-of-charge Country of Origin Information (COI) research for lawyers helping people seeking international protection with their claim. Asylos works to ensure that people seeking international protection and their legal counsel have access to crucial sources and data to substantiate their claim. Asylos volunteers and staff use their research and language skills to access detailed information. More information can be found on [Asylos' website](#).

List of Acronyms

AAP:	Affected Populations
AUB:	The American University of Beirut
BBC :	The British Broadcasting Company
CALL :	The Council for Alien Law Litigation
CERD:	The International Convention on the Elimination of All Forms of Racial Discrimination
CERI:	Consolidated Eligibility and Registration Instructions
COI:	Country of Origin Information
CPINs:	Country Policy and Information Notes
CRC:	The Convention on the Rights of the Child
CRPD:	The Convention on the Rights of Persons with Disabilities
DGS:	Lebanese Directorate of General Security
DPRA:	Directorate of Political Affairs and Refugees (some sources also refer to it as “DPAR”)
DSG:	Directorate of General Security
EiE:	Education in Emergency
ENS:	The European Network on Statelessness
FGD:	Focus Group Discussions
GAPAR:	The General Administration for Palestine Arab Refugees
GS:	General Security
GSO:	General Security Office
IDEA:	The International Institute for Democracy and Electoral Assistance
ILO:	The International Labor Organization
IOM:	The International Organization for Migration
ISF:	Internal Security Forces
ISI:	The Institute on Statelessness and Inclusion
LACC:	The Lebanese : American Coordinating Committee
LAF:	Lebanese Armed Forces
LBP:	Lebanese Pound
LGBTQI+:	Lesbian, Gay, Bisexual, Trans, Queer and Intersex persons
LPDC:	The Lebanese:Palestinian Dialogue Committee
MAP:	Medical Aid for Palestinians
MCDR:	The Maronite Center for Documentation and Research
MCSP:	Microcredit and Community Support Program
MEAL:	Monitoring, Evaluation, Accountability, and Learning
MECC:	The Middle East Council of Churches
MeQ:	Maktoum el Qayd
MHPSS:	Mental Health and Psychosocial Support
MSF:	Médecins Sans Frontières
MSNA:	Multi:Sectoral Needs Assessment
Naba'a:	Development Action Without Borders
NR:	Non:Registered Palestinian refugees
NSSF:	The National Social Security Fund
OHCHR:	Office of the United Nations High Commissioner for Human Rights
PHRO:	Palestinian Human Rights Organization
PLO:	The Palestine Liberation Organization
PRC:	The Palestinian Return Centre
PRL:	Palestine Refugees in Lebanon
PRS:	Palestine Refugees from Syria
PSEA:	Protection from Sexual Exploitation and Abuse
PWDs:	Persons with disabilities
QeD:	The under study
RFRLs:	Refusal Letters
RPL:	Registered Palestine refugees
SEA:	Sexual Exploitation and Abuse

SGBV:	Sexual Gender Based Violence
SIC:	Special Identification Cards
TDPR:	Travel Documents for Palestinian Refugees
UDHR:	The Universal Declaration on Human Rights
UNDP:	The United Nations Development Programme
UNHCR:	The United Nations High Commissioner for Refugees
UNICEF:	The United Nations Children's Fund
UNRWA:	The United Nations Relief and Works Agency for Palestine Refugees in the Near East
USDOS:	The US Department of State
WFP:	The World Food Programme

Sources consulted and reference period

We chose to focus on the timeframe 30 June 2020 - 30 June 2022 and so the desk-based research includes written sources published during this period.

However, for some of the issues it was relevant to include more historic information. For example, exceptions to the timeframe were made for rigorous academic studies addressing the history of Palestinian exile in Lebanon and societal perceptions of Palestinians that were unlikely to rapidly change. Similarly, where more recent information was unavailable, we chose to include information produced by organisations before the beginning of the timeframe when it was clear that their mandate remained unchanged since.

When a source based its affirmations on other sources, the original source was retrieved and used, with the exception of academic sources and inaccessible internal sources.

All web sources were consulted between 30 June 2022 and 30 November 2022.

Not all of the sources listed here have been consulted for each issue addressed in the report.

Additional sources to those individually listed were consulted via database searches. This non-exhaustive list is intended to assist in further case-specific research. Anytime they were referenced in this report, a footnote was included. To find out more about an organisation, view the 'About Us' tab of a source's website.

International organisations

[United Nations Relief and Works Agency for Palestine Refugees in the Near East \(UNRWA\)](#)

[United Nations High Commissioner for Refugees \(UNHCR\)](#)

[United Nations Children's Fund \(UNICEF\)](#)

[United Nations Office for the Coordination of Humanitarian Affairs \(OCHA\)](#)

[United Nations Entity for Gender Equality and the Empowerment of Women – UN Women](#)

[United Nations Secretary-General reports](#)

[Council of Europe](#)

[United Nations Development Programme \(UNDP\)](#)

[United Nations Conciliation Commission for Palestine](#)

[Office of the High Commissioner for Human Rights \(OHCHR\)](#)

[World Health Organization \(WHO\)](#)

[World Food Programme \(WFP\)](#)

NGOs and think tanks

[European Network on Statelessness \(ENS\)](#)
[The Institute on Statelessness and Inclusion \(ISI\)](#)
[Equal Rights Trust](#)
[Peter McMullin Centre on Statelessness](#)
[Electronic Immigration Network](#)
[Resource Center for Palestinian Residency and Refugee Rights \(BADIL\)](#)
[Canadian Centre on Statelessness](#)
[International Detention Coalition \(IDC\)](#)
[Swedish Organization Against Statelessness \(SOAS\)](#)
[International Federation for Human Rights \(FIDH\)](#)
[Palestinian Centre for Human Rights \(PCHR\)](#)
[Forced Migration review \(FMR\)](#)
[The Lebanese Center for Human Rights \(CLDH\)](#)
[Human Rights Watch](#)
[Refugees International](#)

Media sources and blogs

[Al Jazeera](#)
[The Guardian](#)
[Thomson Reuters Foundation News](#)
[UN News](#)
[The new humanitarian Lebanon](#)
[Amnesty International](#)
[BBC Monitoring](#)
[Le Monde](#)
[France Info](#)
[Nouvel Observateur](#)
[Courrier International](#)
[L'Orient Le Jour](#)
[Arab News](#)
[Medical Aid for Palestinians \(MAP\)](#)
[France 24](#)
[Al Monitor](#)
[Orient Today](#)

COI databases and government bodies

[Danish Immigration Service](#)
[Dutch Ministry of Foreign Affairs](#)
[Dutch Immigration and Naturalisation Service](#)
[UK Home Office](#)
[The Norwegian Country of Origin Information Centre Landinfo](#)
[Immigration and Refugee Board of Canada](#)
[US Department of State \(USDOS\)](#)
[Federal Office for Migration and Refugees \(BAMF\)](#)

[Department of Foreign Affairs and Trade \(DFAT\)](#)
[Finnish Immigration Services \(FIS\)](#)
[ARC Foundation](#)
[European Country of Origin Information Network \(ecoi\)](#)
[Refworld](#)
[ReliefWeb](#)
[European Union Agency for Asylum \(EUAA\)](#)

Academic and closed access

Books

[Frontiers «Invisible Citizens»](#) Humiliation and a Life in the Shadows, A Legal and Policy Study On Statelessness in Lebanon. (English version 2011)

[Refugee Law](#), Colin Yeo (2022)

[Palestinian Refugees in International Law](#), Francesca P. Albanese and Lex Takkenberg (2020)

[Narratives of Statelessness and Political Otherness](#) - Kurdish and Palestinian Experiences, Barzoo Eliassi, (2021)

Articles

[American University of Beirut](#)

[Forced Migration review \(FMR\)](#)

[The Post-war Refugee Problem and Its Repercussions for 2015](#). (Cohen, G. D. (2022)

[Experiencing Ruptures in Migration](#) – The Ordinary and Unexpected Journeys of Global Migrants (Edited by Delphine Mercier, Víctor Zúñiga, Kamel Dorai, Mustapha El Miri & Michel Peraldi (2021)

[Falling Through the Cracks](#): Legal and Practical Gaps in Palestinian Refugee Status – A Case study of Unrecognized Refugees in Lebanon, Frontiers Association (2005)

Samih Eloubeidi & Tina Kempin Reuter (2023) [Restricting access to employment as a human rights violation: a case study of Palestinian refugees in Lebanon](#), The International Journal of Human Rights

Jason Tucker & Haqqi Bahram, '[I Must Be from Somewhere. I'm Not from the Moon](#)': Navigating the Politics of Labelling for Stateless Palestinian Refugees from Syria, 3 Statelessness & Citizenship REV. 330 (2021).

1. History of Palestinians' exile to Lebanon resulting in various legal statuses for Palestinians

1.1. "Which legal statuses do Palestinians residing in Lebanon have?"

UNRWA reports that it is struggling to meet targets for identifying Palestinians with 'specific protection issues':

"In 2021, the Agency's Protection and Neutrality Team in Lebanon continued to identify people with specific protection issues, which were mainly related to difficulties in accessing services. Underachievement against the target reflected: (i) restricted in-person contact due to COVID-19 operating conditions; and (ii) staff only recording cases that required significant follow up, with the result that less complex cases often went unrecorded. The team is reviewing protocols for reporting against this indicator in 2022."

(Source: UNRWA, ["Annual Operational Report 2021"](#) 27 October 2022, p. 123)

A 2022 OCHA report gives a summary of the four different groups of Palestinian refugees residing in Lebanon:

"[...]1. Palestine Refugees in Lebanon (PRL) who are descended from those who lived in Palestine during the period 1 June 1946 to 15 May 1948, and who lost both home and means of livelihood as a result of the 1948 conflict; 2. Those not registered with UNRWA who were displaced as a result of the 1967 and subsequent hostilities, and who are registered with the Lebanese Government (referred to as "Not-Registered" or NR by UNRWA) (numbers unknown); 3. Palestinian refugees who lack identity documents and are neither registered with UNRWA nor with the Lebanese authorities (referred to as "Non-IDs"), likely to be an estimated 5000; and 4. Palestinian refugees from Syria (PRS), who have arrived in Lebanon since 2013 and who may or may not have regular status in Lebanon."

(Source: OCHA, ["Increasing Humanitarian Needs in Lebanon, April 2022"](#), 14 April 2022, footnote 132, p. 26)

In a peer-reviewed article about Palestinians' access to the labour market in Lebanon published in 2022, academics Samih Eloubeidi and Prof. Tina Kempin gave an estimate of the number of Palestinian refugees in Lebanon:

"Close to half a million Palestinian refugees are registered in Lebanon, with about 180,000–260,000 estimated as permanent residents who have lived in the country since their displacement from Palestine in 1948.²⁴ The rest of Palestinian refugees are from elsewhere, including about 42,000 additional Palestinian refugees from Syria that have arrived in Lebanon since 2011."

(Source: Samih Eloubeidi & Tina Kempin/ The International Journal of Human Rights: ["Restricting access to employment as a human rights violation: a case study of Palestinian refugees in Lebanon"](#), 11 April 2022, p. 3)

In an academic chapter on family dispersion among Palestinian refugees in Lebanon and Syria published in 2021, geographer Dr. Kamel Doraï wrote that today ["Lebanon hosts the majority of Palestinian refugees from Syria who are fleeing war in Syria."](#) and that:

"In 2011, when the Syrian crisis began, many families gradually left Syria to seek asylum in neighboring countries. Palestinian refugees in Syria were gradually been caught up in the conflict and some of them were forced into exile. While most neighboring countries closed their borders very rapidly to this group of refugees, Lebanon adopted a more flexible approach (Doraï & Al Hussein, 2013). More than 50,000 Syrian Palestinians have found asylum in Lebanon. The geography of this exile is singular. "Lebanon is one of the countries in the region where the legal status of Palestinians is most precarious. More than half of the Palestinians in Lebanon still live in one of 12 refugee camps, where socio-economic conditions are very difficult. This polarization of Palestinian migration from Syria to these areas may, however, be explained by the historical ties between Palestinian refugees in both countries (Doraï, 2015). Forced migration related to the current conflict in Syria is based on forms of mobility developed since the 1948 exodus (*Nakba in Arabic*)."

24 UNRWA, ["Where We Work: Lebanon"](#)

(Source: Kamel Dorai, “[From Family Dispersion to Asylum-Seeking: Palestinian Refugees in Lebanon and Syria](#)”, 2021, p. 47)

The author further reported that:

“The conflict that began in 2011 pushed Palestinians in Syria back into a stateless situation and forced them to seek asylum abroad.

[...] In 2018, a total of 120,000 of them fled Syria, according to UNRWA figures, heading mainly to countries in the region (Lebanon, Jordan, Turkey, Egypt) as well as Europe. However, in Lebanon, this number decreased from more than 50,000 in 2015 to 31,000 in 2018, due to re-emigration, mainly towards European countries or a return to Syria.”

(Source: Kamel Dorai, “[From Family Dispersion to Asylum-Seeking: Palestinian Refugees in Lebanon and Syria](#)”, The Syrian Conflict: Towards a New Exile for Palestinians, 2021, pp. 53-54)

The same source stated:

“Like their counterparts who had settled in Lebanon decades before, just over half of the recently arrived Palestinian refugees from Syria were concentrated in one of the 12 existing refugee camps. Others settled in neighborhoods or rural informal settlements where there was a strong Palestinian presence. The geography of the Palestinian presence in Lebanon was not significantly modified by the new arrivals, with the exception of new settlements in the Beqaa Valley, which is close to Syrian border and a first stopping point for those who left Damascus by the main road that connects it to Lebanon. There was a densification of populated areas by Palestinians and a polarization of migration towards the outskirts of the main Lebanese coastal cities. This geography of asylum is based on the existing family relationships between the two groups in Lebanon and Syria. When the conflict escalated, the first Palestinians who sought refuge in Lebanon were those who had relatives there.”

(Source: Kamel Dorai, “[From Family Dispersion to Asylum-Seeking: Palestinian Refugees in Lebanon and Syria](#)”, The Syrian Conflict: Towards a New Exile for Palestinians, 2021, p. 55)

In its Protection brief, UNRWA analysed the situation of Palestinian refugees from Syria in Lebanon:

“• In 2011, at the onset of the Syrian conflict, the General Security Office (GSO) initially facilitated access of PRS to Lebanon. However, these measures were never formalised by the GSO and in August 2013 and May 2014 facilitating measures were removed and additional restrictions imposed. Restrictions on Syrian arrivals were in January 2015. Since then, entry visas are only granted at the border to PRS with either a verified embassy appointment in Lebanon or a flight ticket and visa to a third country. Most are issued with a 24-hour transit visa. In addition, a very limited number of PRS can secure a visa for Lebanon by obtaining prior approval from the GSO, which requires a sponsor in Lebanon and cannot be processed at border posts.

• Some PRS have sought to enter Lebanon through irregular border crossings, placing them at additional risk of exploitation and abuse both during the crossing and once they arrive in Lebanon.

• Irregular entry into Lebanon is an obstacle to later regularising one’s legal status and while several memoranda have been issued by the GSO since October 2015, allowing for a free-of charge renewal of residency documents, persons who have entered irregularly are exempted. A considerable number of PRS are therefore still unable to regularise their stay in Lebanon. In addition, lack of awareness has meant that some PRS have not renewed their documents and are therefore considered by the authorities as illegally staying in Lebanon.

• PRS children who turned 15 years old in Lebanon and who do not have a passport or national identity card are granted a temporary residency document by the Lebanese authorities if they present an individual status record that was issued in the last two years by the Syrian authorities in Syria (GAPAR) and officially stamped by the Lebanese Embassy in Syria and the Ministries of Foreign Affairs in Syria and Lebanon.

• The General Directorate of General Security announced on 17 July 2020 that Arab citizens and foreigners who entered Lebanon irregularly and those whose legal residency and work permit have expired are able to regularise their status between 31/07/2020 to 31/10/2020. However, regularisation is only possible by securing a sponsor and a work permit. Hence, the impact on PRS is expected to be minimal.

- The lack of legal residency means that, particularly in the South of Lebanon where the Lebanese Army controls entry and exit to camps, PRS often do not leave the camps in which they are living nor enter them if they live outside, restricting their movement out of fear of arrest, detention and deportation, which poses challenges to accessing basic services and justice functions. A survey conducted during the first half of 2020 indicated that 34 per cent of PRS in Lebanon do not hold valid residency documents. Out of this group, 79 per cent reported that their mobility was constrained.
- On 24 April 2019, a series of decisions announced by the High Defence Council in Lebanon resulted in stricter enforcement of national laws and the promulgation of a new regulation affecting refugees. The decision to deport Syrians who entered the country illegally after 24 April 2019, coupled with departure orders issued to Syrians and PRS without valid residency who entered before that date, has resulted in an increased fear of deportation among PRS. UNRWA recorded the first cases of PRS deportations, including of two women and four minors, in late 2019 and early 2020. However, deportations were also put on hold due to COVID-19 related border closures.
- In recent years, UNRWA has also recorded a number of spontaneous returns by PRS families and individuals to Syria. In 2019, UNRWA recorded the return to habitual residence of 2240 PRS individuals. The numbers for 2020 were significantly lower, including due to COVID-19 containment measures.”

The same source also addressed the condition of non-ID Palestinians in Lebanon:

“There are an estimated 4,000 Non-ID Palestinians in Lebanon. These are Palestinians who began to arrive in Lebanon in the 1960s and do not hold formal valid identification documents recognized by the Government of Lebanon (GoL). They are not registered as Palestine refugees with UNRWA in Lebanon and are not recognized by the GoL as they do not have valid legal status in the country. Without documentation and legal status in Lebanon, Non-ID Palestinians face restrictions on movement, risk detention and face severe obstacles in completing civil registration procedures. This situation has acute humanitarian consequences, in particular limiting access to public services from Lebanese educational and medical services, bank accounts and access to justice and formal employment. They are also denied the possibility to travel abroad. [...]”

(Source: UNRWA: “[Protection brief: Palestine refugees living in Lebanon](#)”, September 2020, p. 2)

The numerous statuses of Palestinians in Lebanon were covered in the widely acclaimed book that legal scholars Dr. Francesca Albanese (currently the Special Rapporteur on the situation of human rights in the Palestinian Territory) and Prof. Lex Takkenberg published in 2020:

“Registered Palestine refugees

Most Palestinians in Lebanon are ‘1948 refugees’, including descendants, and are registered as ‘Palestine refugees’ with UNRWA. As indicated earlier, out of almost half a million, less than half remain in Lebanon. They are also registered with DPRA [Directorate of Political Affairs and Refugees] and hold a DPRA-issued ‘Identification Card for Palestine Refugee’, which officially confirms their legal residence in Lebanon.

While registration gives Palestine refugees legal residence, a certain freedom of movement within Lebanon and eligibility for a TDPR [Travel Documents for Palestinian Refugees] with a validity of up to five years, in practice, they remain foreigners in the country. As foreigners, they experience restrictions, embedded in law and practice, in many areas of life, including with respect to employment, social security, property ownership, and mobility both within (in and out of the camps) and outside the country, as well as access to public services such as housing, education, (p.214) and health and other rights reserved for Lebanese citizens. Palestine refugees are also considered a ‘special category of foreigners’ not benefitting from specific refugee rights nor being allowed to naturalise, and subject to entry and exit controls that are tightened during periods of insecurity.”

[...] ‘Non-Registered’ Palestinian refugees

Approximately 35,000 refugees from Mandate Palestine and their descendants (i.e. ‘1948 refugees’), are not registered with UNRWA in Lebanon. They are often referred to as ‘NR’.³⁰⁷ Their lack of registration with UNRWA has various causes: they may have not been in need of humanitarian assistance in 1948, and hence not met UNRWA’s

registration and eligibility criteria; they may have taken refuge outside UNRWA's area of operations in 1948 and moved to Lebanon later on; or they may have arrived to Lebanon not in connection with the 1948 events (e.g. 1967, 1970). They are nonetheless registered with the Lebanese authorities and as such they hold the same DPRA-issued Identification Cards issued to registered Palestine refugees. The majority of them have a proof of nationality document from the Palestinian embassy in Lebanon. Lebanese authorities treat them similarly to UNRWA-registered refugees, except that their travel document is valid for up to three years instead of five years for those registered with UNRWA. UNRWA began assisting some of these refugees from 2004 onwards on (p. 217) the ground that they are also refugees from Palestine and receive no assistance from the Lebanese authorities.

Palestinians without permanent residency and Lebanese IDs

'Non-ID' refugees

Between 3,000 and 5,000 Palestinians in Lebanon are not registered with Lebanese authorities and therefore considered undocumented. Because they are unregistered, precise and up-to-date numbers are difficult to obtain. This non-homogenous group includes: 1) Palestinians in Lebanon since the late 1960s and 1970s who are not registered with either the Lebanese authorities or UNRWA in Lebanon, although they may be registered with UNRWA elsewhere; they may have some form of documentation to prove their Palestinian identity, either from one of UNRWA's 'fields' of operations (e.g. Palestinians holding valid or expired Jordanian IDs, who are unable to return to Jordan or the West Bank if the holder was originally from there prior to 1988; 2) Palestinians from the Gaza Strip with Egyptian TDPRs who are not allowed either to stay in Egypt or to return to Gaza (those who left Gaza before 1967); 3) Palestinians expelled by Israel from the oPt post-1967 and not allowed to return; 4) Palestinians from any Arab country (e.g. Iraq, Egypt) who for various reasons are unable to return there. As such, these Palestinians fall in the category of '[f]oreign nationals who do not hold identity papers from their country of origin [...], residence cards issued by the General Directorate of General Security [Sûreté Générale] or identity cards issued by [the DPRA]'.

Because they lack registration with Lebanese authorities, the Palestinians in this category have no legal status in Lebanon. They face harsher restrictions than Palestinians registered with Lebanese authorities and/or UNRWA in Lebanon, with respect to conducting civil registration procedures (birth, marriage, and death certificates), accessing public services and (formal) employment, freedom of movement inside Lebanon and abroad, and because of their irregular documentation status, they have generally been at risk of arrest and detention. As a result, many have confined themselves to the camps, out of reach of the Lebanese authorities. UNRWA provides Non-IDs with basic services such as primary healthcare and education, despite the fact they are not registered.

Until 1982, when the PLO was ousted from Lebanon, Non-ID Palestinians received assistance and support from the PLO. This included issuing an informal 'proof of nationality' card (watha'iq ithbat jinsiyyeh) that would facilitate their access to social services and jobs in the refugee camps. This was a proof of identity only, even though it was recognized by the (p. 218) Lebanese authorities, and gave no entitlement to legal residency. In 2006, the PLO resumed the issuance of 'proof of nationality' cards. In 2008, on the basis of an agreement between the Palestinian embassy in Lebanon and the Lebanese General Directorate of General Security (GDGS), the latter started issuing, under certain conditions, Special Identification Cards (SICs) (commonly known as bitaqat taarif), [not specific to Palestinians]²⁵ which constitute a proof of identity for undocumented Palestinians. In essence, this is equivalent to the PLO issued 'proof of nationality' card; while not constituting proof of legal residency, they are meant to give the holder a proof of identity that was recognizable by the Lebanese security apparatus (hence granting the holder freedom of movement). The cards were issued based on information provided by the PLO, valid for one year and renewable, at no cost. This operation has not achieved significant results, and is presently on hold.

Since 2011, the Palestinian Embassy, in agreement with the Lebanese authorities, has been providing Non-ID Palestinians with PA passports/travel documents (without national number). Though not sufficient to secure residency or freedom of movement within Lebanon, it provides Non-IDs the opportunity to travel abroad and apply for temporary residence permits in Lebanon.

25 Walaa Kayyal and Thomas McGee, (2019), *Statelessness and Service Provision Implications for Communities of Mobile Origin: the Bedouin and Nawar of Lebanon*. Unpublished.

Palestinian refugees from Syria

During the Syria crisis, over 45,000 Palestinian refugees from Syria approached UNRWA in Lebanon for assistance, and 29,000 were still in the country at the end of 2018. Forty per cent of them were reported to be without legal residence in 2016.

Palestinian refugees from Syria seeking refuge in Lebanon have experienced increasing difficulties in securing their entry and, once in the country, they often endure poor and unsafe living conditions. At the onset of the conflict in Syria, they were reportedly allowed entry into Lebanon using their Syrian ID cards or TDPRs, provided they had obtained a Syrian exit visa in advance. As of 2013, entry restrictions were imposed. Their stay has (p. 219) been conditional upon obtaining a residence permit, which became free of charge in 2017 for those who had arrived before September 2016. Progressively tighter restrictions on the entry of Palestinians into Lebanon have made legal entry extremely difficult. Those who have managed to enter the country have experienced difficulties in maintaining legal residency and accessing civil documentation, and have faced exploitation and abuse because of their socio-economic vulnerability. While no forced returns to Syria have been documented, between May 2014 and June 2018, cases of non-readmission in Lebanon of Palestinian refugees who had attempted to return to Syria due to the poor living conditions in Lebanon were reported. Because of the severe limitations on employment in Lebanon, Palestinian refugees from Syria are highly vulnerable to poverty and food insecurity and largely dependent on aid.

Those who are registered with UNRWA in Syria have access to UNRWA schools, health clinics and other services in Lebanon, representing a twenty per cent increase in the number of beneficiaries served by UNRWA, through limited means. This has given rise to further exploitation of the Palestinian workforce, including exploitation of minors. Conditions in Lebanon have led to many Palestinian refugees from Syria to attempt the arduous and hazardous journey to Europe, while others have returned to Syria, despite the uncertainty and possible dangers of the evolving situation in the country.”

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.3, Legal Status and Treatment, pp. 275-279)

Legal experts, Dr. Francesca Albanese and Prof. Lex Takkenberg also wrote in their book *Palestinian Refugees in International Law*:

“Comparatively more refugees in Lebanon than in Syria and Jordan have relatives abroad, an indication that emigration has been substantial for this refugee group. It is also a sign that more are likely to continue to leave as the situation worsens in Lebanon.”

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.2, p. 274)

1.2. How many Palestinians reside in Lebanon today? Are such figures collected by the Lebanese state?

Walaa Kayyal, a researcher who lives herself as a Palestinian in Lebanon, made the following remark during an interview conducted by Asylos for this report on 31 October 2022:

“I would like to mention a very deeply rooted phenomenon. The Lebanese state is afraid to disrupt the sectarian balance in the country. Therefore they do not count how many Lebanese inhabitants there are. Because if they count how many Lebanese are in the country, they have to count how many are Sunni, how many are Shiaa’, how many are Christian Maronites, how many are Christian Orthodox Etc. And they don’t want this because they don’t want to say that, for example the Sunnah is the largest group? This is why the last census that Lebanon made was in 1932, and this goes back to the French Mandate. When people were under the French Mandate, the French conducted a census for the Lebanese in order to know how many Lebanese they were, and this was before it was a free country. So you don’t have a census. And this is done on purpose, as I explained. And this also applies to the Palestinians, so Lebanon does not count how many Palestinians live in Lebanon. Therefore you can find several numbers of how many Palestinians are in Lebanon. The most used number for the number of Palestinians in Lebanon is 300 000-something. Why is this number exaggerated? Because Palestinians tend to leave the country? For example, I

can now leave for the UK, and I seek asylum, and I become a UK citizen. But my registration in Lebanon is still ongoing and I continue to be counted as a Palestinian in Lebanon. So, again let's say I give birth to four children. I will come to Lebanon, register them, although they are UK citizens. I register them in UNRWA and they get refugee cards. Most Palestinians tend to do this in order to keep their records in Lebanon. Also in the hope to retain their right to territorial Palestine. Because the Lebanese state does not follow up on this, they don't know if I got a UK citizen or US citizenship, etc. And thus, I can still be entitled to refugee status in Lebanon, and I can even come and show a refugee paper for my children without them knowing that I actually have another citizenship. Therefore, the number of Palestinians on record is exaggerated. In reality there are less, since the majority of Palestinians have travelled."

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

UNRWA, in their 2020 "Protection brief Palestine refugees living in Lebanon reported that:

"475,000 Palestine Refugees from Lebanon (PRL) are currently registered with UNRWA in Lebanon. However, this figure does not represent the actual number present in the country as, for example, many have left over the years. For planning purposes UNRWA and the Government of Lebanon (GoL) estimate that there are 180,000 PRL in Lebanon. According to a 2017 headcount nearly half of the PRL live in the country's 12 official Palestine refugee camps. Conditions in the camps are characterised by overcrowding, poor housing conditions, unemployment, poverty and lack of access to justice. The PRL arrived – or are descendants of those who arrived – in Lebanon following the 1948 conflict in Palestine. In addition, the conflict in Syria forced many people living in Syria to flee to neighbouring countries including Lebanon, which currently hosts around 1.5 million displaced Syrians and 27,700 Palestinian refugees from Syria (PRS)."

(Source: UNRWA: "[Protection brief: Palestine refugees living in Lebanon](#)", September 2020)

It should be noted that under the current Constitution, Palestinians are unable to naturalise in Lebanon.²⁶ However, of the 120, 000 persons who were granted Lebanese citizenship as a result of the Decree according to the source below, it is unclear how many Palestinians obtained Lebanese nationality:

A collective of NGOs working in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated that:

"12. While the exact number of stateless persons is not known, it is estimated that many thousands²⁷ live in the country. In 1994²⁸, there was a wide naturalisation decree that granted Lebanese nationality to over 120,000 stateless residents. In 2010, Lebanese citizenship was granted to over 400 foreigners. In 2018, Lebanese citizenship was granted to over 100 foreigners and a few stateless persons. This demonstrates the discretionary nature of the executive's use of naturalisation, while highlighting failures to address statelessness in the country.

13. Uncertainty regarding the number of stateless persons results from the very nature of statelessness and the lack of a census since 1932. The lack of data and difficulty to access available data contributes to perpetuating statelessness and to keeping stateless persons in Lebanon invisible and extremely marginalised. Also, insufficient priority is given to the implementation of measures to identify statelessness and protect the stateless. However, the stateless population in the country is understood to be increasing due to many families' multigenerational statelessness, and increased displacement and migration."

(Source: The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukuk Frontiers Rights et al, "[Joint Submission to the Human Rights Council Universal Periodic Review](#)", July 2020, p. 4)

26 Are Knudsen, Widening the Protection Gap: [The «Politics of Citizenship» for Palestinian Refugees in Lebanon 1948-2008](#), 2009, p. 54-55; Diana Allen, [Refugees of the Revolution: Experiences of Palestinian Exile](#), 2014, p. 23-24, 28; Lex Takkenberg en Francesca Albanese, [Palestinian Refugees in International Law](#), 2020, p. 212-213. Plus confidential source dated 13 October 2020.

27 This figure refers to "stateless persons of Lebanese descent".

28 The law permitting some Palestinians to apply for citizenship in Lebanon was approved in 1994, but little was known about it and few Palestinians actually benefited from it. Refugees International, [Nationality Rights for All](#) (March 2009)

In its 2020 submission to the Human Rights Council Universal Periodic Review for Lebanon, the UNHCR²⁹ wrote that:

“There are estimated to be tens of thousands of stateless persons in Lebanon, with the exact number difficult to ascertain. The primary reasons for this are the lack of an official census since 1932 and the fact that many stateless persons do not have civil registration records. Stateless persons fall into two categories, namely (1) unregistered persons (maktoum al kayd) who are not registered with Lebanese authorities and (2) registered stateless persons (kayd al dars) whose status is considered as ‘nationality under study’ but hold special legal status in terms of residency and rights. (p. 2)”

(Source: UN High Commissioner for Refugees (UNHCR), “[Lebanon: UNHCR Submission for the Universal Periodic Review – Lebanon – UPR 37th Session \(2021\)](#)”, July 2020, p. 2)

29 Although UNHCR has a protection mandate, it excludes from its status persons “presently receiving from organs or agencies of the UN, other than the UNHCR, protection or assistance”. When this clause is applied, Palestinian refugees residing in the UNRWA area of operation are excluded from the protection of the UNHCR Refugee Convention. [Article 1 D, 1951 Convention on the Status of Refugees](#)

2. History of UNRWA and its mandate

2.1. How did UNRWA's³⁰ mandate evolve to this date?

A 2022 report by Badil Resource Center and the European Network on Statelessness describes the limits of UNRWA's mandate especially regarding the agency's means to protect Palestine refugees:

"The UN established UNRWA in 1949, with a mandate to assist Palestine refugees. UNRWA is primarily a humanitarian relief institution, operating with a limited geographical remit. Its mandate has subsequently been extended to include some protection activities; however, as discussed below, these are limited and do not include seeking durable solutions for Palestinians.

[...] Although UNRWA's role is mainly humanitarian assistance, the Agency engages in some work it designates as protection work and adopted a protection policy in 2012.

[...] UNRWA clarified its mandate and the services it provides in a letter to UNHCR in September 2021, stating that UNRWA services consist mainly of education; primary healthcare; relief and social services; infrastructure and camp improvement; microcredit; and emergency assistance, including in situations of armed conflict. This letter further states that UNRWA 'contributes to the protection of Palestine refugees both through its service delivery and by advocating for their rights with relevant stakeholders.' It further confirms, however, that:

'UNRWA does not have a mandate to seek durable solutions for Palestine refugees.... UNRWA does not manage refugee camps and is not responsible for protecting the physical safety or security of Palestine refugees or maintaining law and order.... [UNRWA] cannot guarantee any individual's physical security. Registration with UNRWA ... does not confer any legal status, nor does it operate as a form of personal identification, proof of nationality or lack thereof. (p. 3)'"

(Source: Badil Resource Center and European Network on Statelessness: "[Palestinians and the Search for Protection as Refugees and Stateless Persons](#)", June 2022, p. 6)

In a joint report published in 2022, the Badil Resource Center and the European Network on Statelessness wrote about the history of UNRWA:

"While UNRWA's protective work has evolved over the years, as noted above, UNRWA does not have a mandate to work towards durable solutions nor does it provide a protective legal status (such as refugee status) to the refugees it serves. Thus, UNRWA does not offer protection in the sense in which that term is normally used in international refugee law. This means that Palestinian refugees who are excluded from the benefits of the 1951 Convention under Article 1D are less protected than refugees who fall within UNHCR's mandate, which includes granting refugee status, advising governments on the correct way to determine refugee status, monitoring cessation, cancellation and revocation of refugee status, referring for resettlement, facilitating local integration, and/or facilitating repatriation."

(Source: Badil Resource Center and European Network on Statelessness: "[Palestinians and the Search for Protection as Refugees and Stateless Persons](#)", June 2022, p. 6)

In a chapter of the book 'Refugee Law', authored by Colin Yeo, a specialist immigration and asylum barrister, the history of how UNRWA came to be established is briefly summarised:

"In 1948, the conflict in Palestine and the foundation of the state of Israel caused the displacement of around 750,000 Palestinian Arabs. The United Nations, having precipitated the crisis with a plan for partition of the territory, appointed an official mediator and then recognizing that the displaced Palestinians were refugees, created a temporary

30 The United Nations formed the United Nations Conciliation Commission for Palestine (UNCCP) in December 1948 to safeguard Palestine refugees and to provide protection and promote a durable solution. UNGA Resolution 194 (III), Palestine - Progress Report of the United Nations Mediator, 11 December 1948, A/RES/194, para. 11. By 1951, the UNCCP had informed the General Assembly, and began noting on an annual basis, that it was unable to find a means of achieving progress in the implementation of paragraph 11 of Resolution 194 (III). [UNHCR, Guidelines on International Protection No. 13: Applicability of Article 1D of the 1951 Convention relating to the Status of Refugees to Palestinian Refugees](#). December 2017, p. 2

relief agency, the United Nations Relief for Palestinian Refugees (UNRPR) [...] This was followed by UN Resolution 194, which resolved that ‘refugees wishing to return to their homes and live at peace with their neighbours should be permitted to do so at the earliest practicable date’ and created the United Nations Conciliation Commission for Palestine (UNCCP) ‘to facilitate the repatriation, resettlement and economic and social rehabilitation of the refugees and payment of compensation’ [...] The temporary relief agency was replaced in 1949 by the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) [...] The function of this new body was to carry out ‘direct relief and works programmes’ in order to ‘prevent conditions of starvation and distress ... and to further conditions of peace and stability’. UNCCP remained responsible for achieving what is now commonly referred to as a ‘durable solution’ for the refugees. But it became increasingly clear that repatriation was not going to happen and funding for UNCCP was eventually terminated.”

(Source: Colin Yeo, “[Refugee Law](#)”, 26 April 2022, chapter 6, p. 194)

In this letter dated 22 September 2021 addressed to UNHCR, UNRWA described the UNRWA mandate and services:

“[...] UNRWA (United Nations Relief and Works Agency for Palestine Refugees in the Near East) was established on 8 December 1949 by resolution 302 (IV) of the United Nations General Assembly to carry out direct relief and works programmes for Palestine refugees following their displacement and dispossession as a result of the 1948 Arab-Israeli conflict. In the absence of a just and durable solution to their plight, the General Assembly has repeatedly renewed UNRWA’s mandate, most recently by resolution 74/83 “Assistance to Palestine refugees” of 13 December 2019 extending it until June 2023.

While UNRWA’s mandate focuses on Palestine refugees, it also extends to other persons of concern to UNRWA who are ELIGIBLE TO REGISTER WITH THE Agency for the receipt of services as per the Agency regulatory framework and eligibility criteria contained in the UNRWA Consolidated Eligibility and Registration Instructions (“CERI”) of 2009, including, among others, “non-registered persons displaced as a result of the 1967 and subsequent hostilities”. Today, approximately 5.7 million women, children and men are registered with the Agency as Palestine refugees. A further approximately 700,000 persons are also registered with the Agency as eligible to receive services only. UNRWA’s field operations are Jordan, Syria, West Bank, including East Jerusalem, and Gaza. The Agency does not have a mandate to operate outside of its five fields, and therefore, other than maintaining regional representative offices, does not have offices anywhere else. UNRWA pursues its mission within its five fields of operations through the provision of humanitarian assistance and mandated services.

UNRWA mandate services are concerned with:

- Basic education,
- Primary health care,
- Relief and social services,
- Infrastructure and camp improvement, and microcredit, and,
- Emergency assistance, including in situations of armed conflict.

UNRWA basic education and primary health services are available on a principle of universality, whilst eligible criteria are applied to other types of assistance, including vocational and technical training, hospitalisation, social safety net programmes, and emergency relief. [...]

The Agency contributes to the protection of Palestine refugees both through its service delivery and by advocating for their rights with relevant stakeholders. UNRWA does not have a mandate to seek durable solutions for Palestine refugees.

UNRWA does not manage refugee camps and is not responsible for protecting the physical safety or security of Palestine refugees or maintaining law and order in UNRWA’s five fields of operations. The Agency cannot guarantee any individual’s physical security. Ensuring the physical security of Palestine refugees residing in any of UNRWA’s five fields is the responsibility of the respective host state or authority.

[...] Registrations with UNRWA based on the CERI criteria does not confer any legal status, nor does it operate as a form of personal identification, proof of nationality or lack thereof. [...]

Operating within a resource-constrained environment, and reliant on voluntary funding, UNRWA allocates its limited resources among the services provided to Palestine refugees, prioritizing the needs of the most vulnerable. The level of services that UNRWA is able to provide depends on the Agency’s funding situation, which is largely dependent on voluntary contributions by States, and may not correspond to the needs of Palestine refugees. The Agency’s funding

situation, which has steadily deteriorated over the past several years, reached a critical point in 2020. UNRWA received US\$ 940 million, US\$ 649 million short of total requirements and US\$ 60 million less than in 2019. The Agency's financial situation remains uncertain with a shortfall of US\$ 100 million as at mid-September 2021. As regards the situation of Palestine refugees in UNRWA fields of operations, the Agency regularly issues reports, emergency appeals, statements and press releases containing relevant information on political, economic and security developments as well as operational and organisational developments. These are all available on UNRWA's website at the following link: <https://www.unrwa.org/resources>. [...]."

(Source: UNRWA: "[Letter to United Nations High Commissioner for Refugees](#)", 22 September 2021)

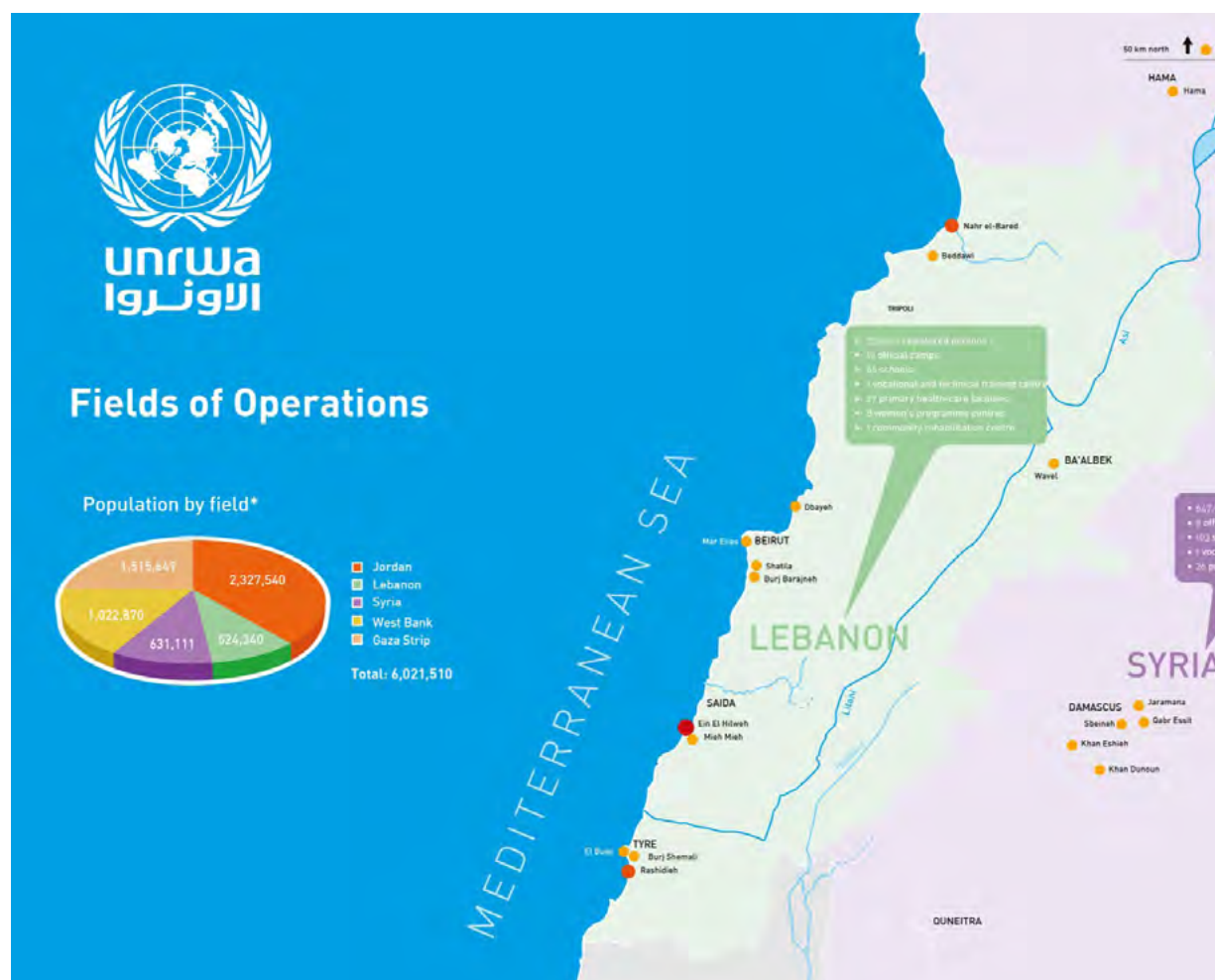
In its annual report for the year 2021, published May 2022, UNRWA's department of health gave a summary of its primary mission:

"UNRWA

The UNRWA primary mission is to assist Palestine refugees in Jordan, Lebanon, Syria, Gaza and the West Bank to achieve their full potential in human development, pending a just solution to their plight. UNRWA's services encompass education, health care, relief and social services (RSS), camp infrastructure and improvement, microfinance and emergency assistance. UNRWA is funded almost entirely by voluntary contributions. UNRWA has its headquarters (HQ) in Amman, Jerusalem and Gaza."

(Source: UNRWA, "[UNRWA Department of Health, Annual Report 2021](#)", 24 May 2022, p. 8)

This UNRWA map, published in January 2020 provides information on the number of registered Palestine refugees, official camps, UNRWA schools, health centres and other facilities.



³¹ (Source: UNRWA, "[Fields of Operations Map](#)", 1 January 2020)

³¹ Green text box in the image reads: 538,692 registered persons, 12 official camps, 66 schools, 1 vocational and technical training centre, 27 primary health-care facilities, 8 women's programme centres, 1 community rehabilitation centre.

In a 2009 UNRWA report containing eligibility and registration instructions, UNRWA describes the categories of persons eligible for its services as follows:

“Persons eligible to be registered in UNRWA’s Registration System and to receive UNRWA services

The persons and groups of persons listed below are eligible to receive UNRWA’s services upon being registered in the Agency’s Registration System and obtaining an UNRWA Registration Card as proof of registration. These eligible persons fall into two groups: those who meet UNRWA’s criteria to be described as Palestine Refugees, and those who do not meet those criteria.

1. Persons who meet UNRWA’s Palestine Refugee criteria

These are persons whose normal place of residence was Palestine during the period 1 June 1946 to 15 May 1948, and who lost both home and means of livelihood as a result of the 1948 conflict. Palestine Refugees, and descendants of Palestine refugee males, including legally adopted children, are eligible to register for UNRWA services. The Agency accepts new applications from persons who wish to be registered as Palestine Refugees. Once they are registered with UNRWA, persons in this category are referred to as Registered Refugees or as Registered Palestine Refugees.

2. Persons who do not meet UNRWA’s Palestine Refugee criteria

These persons are grouped in the categories listed below. While registered for the purposes of receiving UNRWA services, these persons are not counted as part of the official Registered Refugee population of the Agency. They consist of persons who at the time of original registration did not satisfy all of UNRWA’s Palestine Refugee criteria, but who were determined to have suffered significant loss and/or hardship for reasons related to the 1948 conflict in Palestine; they also include persons who belong to the families of Registered Persons. These categories are:

[...]

[...]

2.3 Compromise Cases

Persons who are currently registered in this category are entitled to receive UNRWA services. Their descendants, however, are not eligible to register to receive UNRWA services. UNRWA does not accept new applications from persons wishing to be registered in this category.

2.4 MNR Family Members

These are husbands and descendants of women who are Registered Refugees and are (or were) married to husbands who are not registered refugees. The husbands and descendants, including legally adopted children, of these women are eligible to register to receive UNRWA services.

2.5 Non-Refugee Wives

These are women who do not meet UNRWA’s criteria for Palestine Refugees and are (or were) married to Registered Refugees. These women are eligible to register to receive UNRWA services.

2.6 Kafalah Children

These are children who are receiving from a Registered Refugee or Other Registered Person parental care according to the terms of Islamic Kafalah practice. These children are eligible to register to receive UNRWA services during the period of their residence in the household of the Kafalah patron until they reach the age of 18 years. ”

(Source: UNRWA, “[Consolidated Eligibility and Registration Instructions](#)”, 1 January 2009, pp.. 3-6)

In the same report, UNRWA also outlines the categories of persons eligible to receive its services without being registered by them:

“B. Persons eligible to receive UNRWA services without being registered in UNRWA’s Registration System

These persons do not meet, or are unable to prove that they meet UNRWA’s Palestine Refugee criteria and they do not fall within any of the categories listed in section III. A. 2 above. While UNRWA’s programmes keep due records of these persons, they are referred to as non-registered persons because they are not registered in the Agency’s Registration System. This category includes:

- Non-registered persons displaced as a result of the 1967 and subsequent hostilities. UNRWA makes its services available to persons in this category in accordance with established practice and/or host country agreement. In resolution 2252 of 4 July 1967 and in other subsequent resolutions, the UN General Assembly has endorsed UNRWA's efforts "to continue to provide humanitarian assistance, as far as practicable, on an emergency basis, and as a temporary measure, to persons in the area who are currently displaced and in serious need of continued assistance as a result of the June 1967 and subsequent hostilities". The terms of resolution 2252 were most recently repeated in GA resolution 59/118 of 10 December 2004. In the Jordan Field, persons must prove their displacement status by presenting an official certificate from the Jordanian Department of Palestinian Affairs (DPA).
- Non-registered persons identified by the Commissioner-General as eligible to receive UNRWA services. For humanitarian and other policy reasons related to UNRWA's mandate, the Commissioner-General or Field Directors acting on the Commissioner-General's behalf may from time to time identify persons and groups of persons who are eligible to exceptionally receive UNRWA's services.
- Non-registered persons who exceptionally receive UNRWA assistance and services as beneficiaries under the Agency's Emergency Programmes in the occupied Palestinian territory. These beneficiaries and their dependents are administered specifically for the purpose of the Emergency Programmes.
- Non-registered persons who avail themselves of services provided under the Agency's Microfinance and Microenterprise Department (MMD). These persons meet the MMD's financial and lending criteria and are administered specifically for MMD's purposes.
- UNRWA Staff Members and their Family members may have access to Agency services in accordance with section V of these instructions as well as instructions issued by each of UNRWA's programmes.
- Non-registered persons who live in refugee camps and communities. These persons benefit from UNRWA services (e.g., sanitation and environmental health services) that are extended to refugee camps and communities as a whole."

(Source: UNRWA, "[Consolidated Eligibility and Registration Instructions](#)", 1 January 2009, pp. 6-8)

UNRWA describes the requirements for registration as follows:

"IV. Registration

[...]

4. The following summarizes the requirements for registration for UNRWA services. Those who wish to apply for registration must submit an application in writing. Further details of registration requirements and procedures are set out in the Registration Manual

A. New registration of Palestine Refugees

1. Those who wish to register as Palestine Refugees must appear in person at any of the Agency's Eligibility and Registration offices in any of its five Fields and present documentary evidence showing that they satisfy UNRWA's Palestine Refugee criteria, particularly in respect of the place of residence in Palestine during the period 1 June 1946 to 15 May 1948, and Family composition on 15 May 1948.

2. An applicant for registration who is a descendant of a Palestine Refugee, who was never registered with the Agency, must also present in accordance with section IV. A 1 and A 3 of these Instructions documentary evidence that the father meets UNRWA's Palestine Refugee criteria.

[...]

A. New registration of Palestine Refugees

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2. An applicant for registration who is a descendant of a Palestine Refugee, who was never registered with the Agency, must also present in accordance with section IV. A 1 and A 3 of these Instructions documentary evidence that the father meets UNRWA's Palestine Refugee criteria.

[...]

4. New registration applications may be presented by persons who lack any of the documents listed above, but who are registered as “Palestinian Refugees” by the relevant governmental authorities in the Field in question, according to the criteria applied by such authorities. Such persons may be registered by UNRWA as Palestine Refugees if they present original certificates from:

- The Directorate General for Political and Refugee Affairs (DPRA) in Lebanon. This document should show the date of the applicants’ inclusion in the first census of 1951/52 in Lebanon. [...]”

(Source: UNRWA, “[Consolidated Eligibility and Registration Instructions](#)”, 1 January 2009, pp. 9-11)

3. Assistance provided by UNRWA

3.1. What assistance does UNRWA provide for Palestine Refugees?

In their report titled ‘Palestinians and the Search for Protection as Refugees and Stateless Persons, BADIL and the European Network on Statelessness reported about the impact of UNRWA’s financial struggles on its ability to provide assistance to Palestinians:

“Belgium’s Council for Aliens Law Litigation (CALL – an asylum appeals body) has made several decisions relating to Article 1D in recent years. In several judgments in early 2021, the CALL concluded that because of the financial difficulties faced by UNRWA, the agency, in general, was no longer able to provide adequate assistance to Palestinians in Gaza and Lebanon, and it considered that UNRWA assistance had therefore ceased for the purposes of Article 1D.”

(Source: Badil Resource Center and European Network on Statelessness: [“Palestinians and the Search for Protection as Refugees and Stateless Persons”](#), June 2022, p. 24)

The German federal office for migration and refugees stated in a Briefing note published in 2022 that:

“The United Nations Relief and Works Agency for Palestine Refugees (UNRWA) appealed to the international community on 19.01.22 for urgently needed funding to continue providing assistance to Palestinian refugees in Lebanon. The severe economic crisis in Lebanon has exacerbated the situation of Palestinians on the ground, according to UNRWA, particularly affecting access to food and medical care.”

(Source: BAMF – [“Briefing Notes Group 62 – Information Centre for Asylum and Migration”](#), 24 January 2022, p. 8)

The news agency Aljazeera published an article in December 2021 about a refugee camp in Lebanon which stated:

“As Lebanon plunged deeper into one of the world’s worst economic meltdowns, the United Nations agency for Palestinian refugees (UNRWA) last week sounded the alarm about a major funding gap that could further cut access to basic services for about 200,000 Palestinian refugees.

The United Kingdom alone cut more than half its funding to UNRWA from 42.5 million pounds (\$56.5m) in 2020 to 20.8 million (\$27.6) this past year, while Gulf states that once contributed \$200m in 2018 only provided \$20m this year.

During a visit to Shatila last month, Olivier De Schutter – UN special rapporteur on extreme poverty and human rights – said camps in Beirut “suffer from a chronically decaying infrastructure as a result of competing sources of basic service delivery”.

“These communities have been living in the camps for at least three generations, and they deserve better – their right to work, own property, education,” De Schutter told Al Jazeera.”

(Source: Aljazeera, [“Refugees in Shatila camp pushed to the brink amid aid crisis”](#), 6 December 2021)

The Newspaper The Guardian published an article about UNRWA’s financial struggles in November 2021 which stated:

“Cuts to the budget of the UN’s relief agency for Palestinian refugees – including a halving of the UK grant – means the agency is close to collapse, the head of the agency, Philippe Lazzarini, has said. The UK has cut its core grant by more than 50% from £42.5m in 2020 to £20.8m in 2021.

Lazzarini, the commissioner general of UN Relief and Works Agency for Palestine Refugees (UNRWA), which serves Palestinian refugees in the West Bank and Gaza but also in Jordan, Syria and Lebanon, said the agency was in an existential crisis due to a \$100m (£74m) shortfall this year, but also because of a method of long-term funding that has proved unsustainable.

He said the mood among Palestinians was one of distress, boiling despair and hopelessness. When the UN agency is struggling financially to deliver the most essential services it creates a deep sense of abandonment, he said. [...] Lazzarini said UNRWA was “irreplaceable” when it came to providing education to Palestinian refugees. “It is a good question what happens to these children if we cannot educate them, and the schools are shut. There will be a void. We would enter into uncharted territory, and the question is, who will fill this gap in places like Gaza, in the refugee camps in Lebanon. We do not have the answer.”

(Source: The Guardian “[UN Palestine refugee aid agency ‘close to collapse’ after funding cuts](#)”, 5 November, 2021)

The news and information services company Thomson Reuters wrote on 8 April 2021 that:

“Palestinian refugees on Thursday welcomed the U.S. announcement that it will renew humanitarian aid, marking a break with the Trump era.

President Joe Biden’s administration said on Wednesday that it will provide \$235 million to the Palestinians and restart funding for the United Nations Relief and Works Agency (UNRWA), which assists 5.7 million registered Palestinian refugees.”

(Source: Thomson Reuters Foundation “[Palestinian refugees welcome U.S. decision to restart aid](#)”, 8 April 2021)

The British Broadcasting Company (BBC) reported in April 2021 about Biden administration’s financial assistance to UNRWA:

“US President Joe Biden’s administration plans to provide \$235m (£171m) of aid to Palestinians, restoring part of the assistance cut by Donald Trump. Two-thirds will go to the UN’s agency for Palestinian refugees, UNRWA, which has suffered a financial crisis since it lost \$360m of US funding in 2018.

[...] This news has come as a huge relief to Palestinians. Their economy is propped up by international donors and was left reeling by the dramatic cuts of the Trump administration.

[...] At Qalandia refugee camp in the occupied West Bank, Hassan Abu al-Eish, 85, said he had felt the effect of the cuts in aid and was left unable to afford the basics. «When Trump arrived, he stopped all the Unrwa funds and closed all the doors on us,» he commented.”

(Source: BBC News, “[Biden administration to restore \\$235m in US aid to Palestinians](#)”, 7 April 2021)

4. Legal and policy frameworks and their implementation

Stateless Palestinians in Lebanese law

4.1. Does Lebanon recognise Palestinian refugees as ‘stateless’? Is Lebanon party to the 1954 and 1961 Statelessness Conventions? Any reservations? Is there a statelessness determination procedure?

The liberal Arabic media network based in Beirut Raseef22 published an English translation of an article containing a testimony by a Palestinian speaking about discretionary interpretations of his identity documents:

“Al-Ayyi indicates that “the suffering of a Palestinian begins with the absence of his ‘legal personality’ in Lebanon. The authorities recognize him as a refugee, but he lacks his personality and identity when it comes to laws and when brought before the judiciary. Here, we discover the discretion when dealing with him, as sometimes he is treated as a foreigner, sometimes as a stateless person, and sometimes as an Arab citizen. As such, there isn’t any interaction where rights and duties are actually made clear, so he is deprived of his basic human rights, and this would result in the refugee losing the feeling of belonging to Lebanon and acquiring a feeling of permanent apprehension of the future, as no justice is achieved for him. In short, he lives on the margins of the law because his presence is not linked to legal legislation.”

(Source: Raseef22, “[A fourth generation of Palestinians living in Lebanon “on the fringes of the law”](#)”, 6 December 2021)

Susan M Akram, a Clinical Professor at Boston University School of Law, wrote in her 2018 journal article titled «The Search for Protection for Stateless Refugees in the Middle East: Palestinians and Kurds in Lebanon and Jordan³² that:

“The difficulty in defining Palestinian and Kurdish as stateless refugees is the first hurdle to identifying solutions in Jordan and Lebanon, two states that have steadfastly rejected the definitions of ‘stateless person’ and ‘refugee’ in the relevant international instruments.”

(Source: Susan Akram: “[The Search for Protection for Stateless Refugees in the Middle East: Palestinians and Kurds in Lebanon and Jordan](#)”. December 2018, p. 11)

Refugee rights

In an academic chapter on family dispersion among Palestinian refugees in Lebanon and Syria published in 2021, geographer Dr. Kamel Doraï wrote that:

[...] The refugee status of Palestinians is linked to their country of residence. When they leave their country of residence, they do not fall under the mandate of the UNHCR and can only access limited humanitarian assistance provided by the UNRWA. Conflict tends to transform Palestinian refugees into asylum-seekers, and most of the time they are seen as illegal migrants in their country of temporary residence. As they are stateless, they cannot even seek the protection of their country of origin. The singularity of the Palestinian experience is related to the non-resolution of the Arab-Israeli conflict, to their stateless status, and their exclusion from the 1951 conventional asylum system.”

(Source: Kamel Doraï, “[From Family Dispersion to Asylum-Seeking: Palestinian Refugees in Lebanon and Syria](#)”, 2021, p. 57)

In its series of country reports for 2021, the US Department of State wrote about Lebanon in 2022:

“Access to Asylum: The law does not provide for the granting of asylum or refugee status. Nonetheless, the country hosted an estimated 1.5 million refugees, the vast majority of them Syrian.”

(Source: US Department of State (USDOS) “[2021 Country Reports on Human Rights Practices: Lebanon](#)”, Section 2. Respect for Civil Liberties, March 2022, p. 24)

32 Even though this information is not within the research period, it was included since it is pertinent to the lack of status of Palestinians as stateless in the Lebanese law.

In Lebanon in general

4.2. What are the ways in which nationality is acquired and lost in Lebanon?

It should be noted that under the current Constitution, Palestinians are unable to naturalise in Lebanon,³³ however the following information may be relevant to the children of Lebanese women and Palestinian men.

The Institute on Statelessness and Inclusion reported in June 2020 about Lebanon's citizenship laws:

"Lebanon is one of the twenty five³⁴ countries worldwide that do not allow women to confer nationality upon their children on an equal basis as men, and one of the approximately fifty countries that deny women the right to pass their nationality onto a foreign spouse [Global Campaign for Equal Nationality Rights]. This means that children and foreign spouses are at risk of statelessness, and are not afforded the same rights as Lebanese nationals, often having to rely on visas to remain in the country."

(Source: Institute on Statelessness and Inclusion: ["Stateless in a Global Pandemic"](#), June 2020, pp. 22-23)

A collective of NGOs working in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated:

"The Lebanese constitution is silent on issues of nationality and statelessness, save for stating that 'Lebanese nationality and the manner in which it is acquired, retained, and lost is to be determined in accordance with the law.'"

(Source: The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukouk Frontiers Rights et al, ["Joint Submission to the Human Rights Council Universal Periodic Review"](#), July 2020, p. 7)

The same source further reported that:

"Gender discrimination in acquisition of nationality

25. The acquisition of Lebanese nationality follows the jus sanguinis and jus soli principles. The main source of nationality law is the 1925 Nationality Law [Decree No 15]. Article 1 provides that every child born to a Lebanese father is Lebanese. This applies to children born within marriage, and in limited circumstances, to children born outside of legal marriage. According to the law, a Lebanese woman can only pass her nationality to a child born outside of legal marriage [EUDO CITIZENSHIP OBSERVATORY COUNTRY REPORT: LEBANON Melkar el-Khoury, Thibaut Jaulin September 2012].

26. The jus soli principle only applies if no other nationality can be attributed to a child when they are born. The child can acquire nationality only if both parents are unknown or have unknown nationality [Art. 1, sec. 3 Decree No 15].

27. In principle, minors born to a naturalised father become Lebanese by operation of the law (Article 4 of Decision 15/1925). However, minors born to an unmarried naturalised father face difficulties to acquire this derivative nationality automatically and have to resort to court. Minor children born to a naturalised mother and foreign father become Lebanese, only if their foreign father is deceased.

28. A stateless woman married to a Lebanese man may acquire the Lebanese nationality by marriage one year after the registration of marriage by a judicial decision, based on Article 5 of the nationality law. Foreign wives may apply for nationality by a simple administrative procedure. The obstacles to securing nationality by marriage is therefore much greater for stateless women, who must secure a favourable judicial decision."

(Source: The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukouk Frontiers Rights et al, ["Joint Submission to the Human Rights Council Universal Periodic Review"](#), July 2020, pp. 6-7)

33 Are Knudsen, [Widening the Protection Gap: The «Politics of Citizenship» for Palestinian Refugees in Lebanon 1948-2008, 2009](#), p. 54-55; Diana Allen, [Refugees of the Revolution: Experiences of Palestinian Exile, 2014](#), p. 23-24, 28; Lex Takkenberg en Francesca Albanese, [Palestinian Refugees in International Law, 2020](#), p. 212-213. Plus confidential source dated 13 October 2020.

34 Since this excerpt, this number has dropped to 24, as Liberia has amended its laws to give women and men equal rights to pass on their nationality to their children. [#IBelong Campaign Update](#), July-September 2022

A collective of NGOs working in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated that:

“6. Despite not being party to the Statelessness Conventions, Lebanon is a party to core international human rights treaties and conventions that confer on the state certain obligations in relation to the right to a nationality and non-discrimination. These include, among others, the Convention on the Rights of the Child (CRC), the International Covenant on Civil and Political Rights (ICCPR), the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the Convention on the Rights of Persons with Disabilities (CRPD), and the International Convention on the Elimination of All Forms of Racial Discrimination (CERD). Moreover, the right to a nationality is protected under article 15 of the Universal Declaration on Human Rights (UDHR).

7. While Lebanon acceded to CEDAW, it maintains reservations to several of its articles. Notably Lebanon maintains a reservation on Article 9(2) which obligates signatories to uphold women’s right to confer nationality on children on an equal basis with men and Article 16(1)(c), which promotes equal rights and responsibilities during marriage and its dissolution. The CEDAW Committee has stated that reservations to article 16, irrespective of the reasons for which such reservations are lodged, are “incompatible with the Convention and therefore impermissible.” The co-submitting organisations consider the state’s reservation to CEDAW Article 9 equally to be contrary to the object and purpose of the Convention. We further believe that the provisions of Decree No15 on Lebanese Nationality that distinguish between men and women in respect of their ability to confer nationality contravene the general obligation to eliminate all forms of discrimination against women which arises under Article 2 of CEDAW.

8. Lebanon’s unwillingness to withdraw its reservations to CEDAW and to pass reform [to] its antiquated and discriminatory nationality law, under which a Lebanese woman cannot pass nationality to her child unless the child is born outside of legal marriage, constitutes a breach of its international obligations. Further it is inconsistent with Lebanon’s assertions in its 2015 UPR submission that it is “motivated by its desire to protect and promote human rights for all its citizens without distinction, and for the foreigners resident in its territory”.”

(Source: The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukuk Frontiers Rights et al, “[Joint Submission to the Human Rights Council Universal Periodic Review](#)”, July 2020, p. 3)

4.3. Is Lebanon party to the 1954 and 1961 Statelessness Conventions? Any reservations? Is there a statelessness determination procedure?

Based on reports by the European Network on Statelessness from 2019 as well as by Human Rights Watch from 2020 and figures collected in 2017 by the Lebanese Palestinian Dialogue Committee, The Collective further affirmed that:

“Lebanon’s International Obligations

5. Lebanon is not party to the 1954 Convention Relating to the Status of Stateless Persons, the 1961 Convention on the Reduction of Statelessness or the 1951 Convention relating to the Status of Refugees and its 1967 Protocol. Statelessness amongst refugees in Lebanon is widespread. Lebanon hosts the world’s largest number of refugees per capita, including an estimated 1.5 million refugees from Syria 11 and approximately 174,000 longstanding Palestinian refugees registered with UNRWA.³⁵ Lebanon’s continued unwillingness to accede to the Refugee and Statelessness conventions in this context is regrettable and contributes to the lack of a legal framework to deal with the significant numbers of stateless people in the country.

The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukuk Frontiers Rights et al, “[Joint Submission to the Human Rights Council Universal Periodic Review](#)”, July 2020, pp. 2-3

The same source also indicated that:

“There is no legal framework for statelessness in Lebanon. Stateless persons lack legal status. There are no statelessness determination procedures to identify, register and protect stateless persons. There are no records for

35 Population and Housing Census in Palestinian Camps and Gatherings in Lebanon, 2017, Key Findings Report, Lebanese Palestinian Dialogue Committee, February 2018

stateless persons who are simply non-existent for the State – except for those known as ‘Qayd Dars’ (under study) who have a specific register as foreigners of unidentified nationality. Lebanese laws do not define statelessness and rarely mention the term ‘stateless’, for example in relation to provisions on the jurisdiction of penal courts that extend to ‘stateless persons’, and to the issuance of laissez passer to ‘foreigners of unidentified nationality’, and to hospitalisation in public hospitals that is allowed for “needy persons who have no nationality”. The term ‘Maktoumin’ (unregistered) is used to define those who fall under the treaty of Lausanne and Decision 2825.”

(Source: The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukuk Frontiers Rights et al, “[Joint Submission to the Human Rights Council Universal Periodic Review](#)”, July 2020, p. 5)

Middle East Online (meo) wrote in an article, titled “Citizenship sale exposes Lebanese political hypocrisy”, the source indicates that wealthy Palestinians have been naturalised through this practice:

“Throughout Lebanon’s 15-year civil war, much of the country’s internal debate centred on how the naturalisation of the country’s Palestinian refugees could be halted, with the predominantly Christian right-wing opposing the Palestinian Liberation Organisation within Lebanon and accusing it of working towards naturalising the Palestinians and establishing Lebanon as a surrogate state.

The post-civil war settlement in 1990 resulted in a clear amendment to the preamble of the Lebanese Constitution, dismissing the likelihood of either the settlement or naturalisation of any foreigners within the country. Nevertheless, following the outbreak of the Syrian crisis and the influx of more than 1 million refugees, the spectre of naturalisation has returned to the Lebanese stage with most Lebanese opposed to the idea.

This has led Lebanese cabinets to adopt xenophobic measures intended to make refugees feel unwelcome in Lebanon, barring them from work and limiting their ability to purchase property. Despite this anti-naturalisation policy, many non-Lebanese have acquired citizenship through a special decree issued by the Lebanon’s president, who, by the provisions of the constitution, has the discretionary authority to bestow medals, special pardons and, it seems, nationality.

As has become the custom, each departing president would have towards the end of his term bestowed this privilege on affluent Arab businessmen and their families — mostly Palestinian and Syrian — making it possible for them to own property and avoid the hassle of red tape and residency requirements.

[...]

[...] the recent naturalisation decree signed by Aoun, granting approximately 400 individuals Lebanese citizenship, unleashed a gale of criticism and deafening cries of hypocrisy. Chief among the allegations against Aoun are those of corruption, with payments totalling millions of dollars thought to have taken place, further exposing the hypocrisy of the anti-naturalisation camp led by Aoun.”

(Source: Middle East Online (meo), “[Citizenship sale exposes Lebanese political hypocrisy](#)”, 10 June 2018)

In relation to Palestinians specifically:

4.4. What principal legislation related to nationality and statelessness exists in relation to Palestinians in Lebanon?

In its series of country reports for 2021, the US Department of State wrote about Lebanon in March 2022:

“Palestinian refugees residing in the country could not obtain citizenship and were not considered citizens of any other country. Palestinian refugee women married to citizens were able to obtain citizenship after one year of marriage. By law the father transmits citizenship to children. Palestinian refugees, including children, had limited social and civil rights and no access to government-provided health, education, or other social services. Children of Palestinian refugees faced discrimination in birth registration, as bureaucratic and administrative procedures at the Directorate of Political Affairs and Refugees (DPRA) made it difficult to register these children after the age of one year. Additionally, many Palestinian refugee children had to leave school at an early age to earn an income.

[...]Citizenship is derived exclusively from the father, resulting in statelessness for children of a citizen mother and a noncitizen father when registration under the father's nationality is not possible. This legal discrimination particularly affected Lebanese, Palestinians, and increasingly Syrians from households headed by women. Moreover, undocumented Syrian refugees were unable to register their marriages and births of their children due to their lack of official status. Additionally, some children born to citizen fathers did not have their births registered due to administrative obstacles or a lack of understanding of the regulations. There were no official statistics on the size of the stateless population”.

(Source: US Department of State (USDOS) “[2021 Country Reports on Human Rights Practices: Lebanon](#)”, Section 2. Respect for Civil Liberties, March 2022, pp. 29-30)

Based on a 2020 book by scholar Dr. Nora Stel, and other sources, the Dutch Ministry of Foreign Affairs reported in 2021 that:

“10.1.1 Legal Status

PRL do not have the same rights as Lebanese citizens, other refugees or foreigners and fall into the so-called protection gap in which their legal status is one of exclusion; there are no national, regional or international laws that the Lebanese government follows. The Department of Affairs of Palestinian Refugees has the official task of establishing an institutional framework for the presence of Palestinians in Lebanon. Sources state that there is a lack of such an institutional framework. Academics and NGOs see the ambiguity of the lack of legislation as a tactic more often used by the Lebanese authorities on other controversial topics. Dr. Nora Stel of Radboud University, for example, states that decisions by this government body remain unclear about what rights the Lebanese government gives to PRL and that Lebanese authorities deliberately strive for institutional ambiguity. By including few rules about Palestinian refugees, the government does not have to bear much responsibility for this.” (In-house translation. The translator is a native Dutch speaker)

ORIGINAL SOURCE

“10.1.1 Juridische status

PRL hebben niet dezelfde rechten als Libanese burgers, andere vluchtelingen of buitenlanders en vallen in de zogenaamde protection gap waarin hun legale status een van exclusie is; er bestaan geen nationale, regionale of internationale wetten die de Libanese overheid volgt.²⁹⁵ Het Department of Affairs of Palestinian Refugees heeft officieel de taak om een institutioneel kader op te zetten voor de aanwezigheid van Palestijnen in Libanon.²⁹⁶ Bronnen stellen dat het ontbreekt aan een dergelijk institutioneel kader.²⁹⁷ Academics en ngo's zien de ambiguïteit van het ontbreken van wetgeving, als een tactiek die vaker door de Libanese autoriteiten wordt toegepast bij andere omstreken onderwerpen. Zo stelt dr. Nora Stel van de Radboud Universiteit dat besluiten van dit overheidsorgaan onduidelijk blijven over welke rechten de Libanese overheid aan PRL geeft en dat Libanese autoriteiten bewust naar institutionele ambiguïteit streven. Door weinig regels over Palestijnse vluchtelingen op te nemen hoeft de overheid ook weinig verantwoordelijkheid te dragen hiervoor.”

(Source: Dutch Ministry of Foreign Affairs, “[Thematisch ambtsbericht Palestijnen in Libanon](#)”, January 2021, p. 47)

The Dutch Ministry of Foreign Affairs added the following about naturalisation, citing numerous academic reports, the UNHCR, and a 2016 Fact-Finding Mission of the Finnish Immigration Service:

“Palestinians cannot naturalize in Lebanon, descendants of Palestinians in Lebanon are registered as Palestinian refugees through the male line with the DPAR³⁶. Opposition to the naturalization of Palestinians, who are largely Sunni, is widely supported among the Lebanese population and authorities. This would put pressure on the current balance of power between the various sectarian groups in Lebanon.³⁷ In some cases it is possible to obtain Lebanese nationality, including for Palestinians (see 3.2). UNHCR argues that the terms of naturalization are highly politicized and fall under the discretion of the Lebanese state.

36 FIS, ‘[Fact-Finding Mission Report: Syrian and Palestinian \(in Lebanon and exiting Syria\) refugees in Lebanon](#)’, 29 September 2016.

37 UNHCR Lebanon, [Statelessness Update](#), August 2014, p. 2.

Palestinians are not eligible for Lebanese nationality on the basis of Article 1 of Decree No 15 on Lebanese Nationality January 19, 1925. Article 1 grants Lebanese nationality to persons born in the territory of Lebanon who do not have a foreign nationality by descent, or persons whose parents have an unknown nationality. However, under the 1989 Ta'if Peace Agreement, the naturalization of Palestinians in Lebanon was declared unconstitutional.³⁸ The 1990 constitution confirms that non-Lebanese are not allowed to settle in Lebanon.³⁹ The naturalization of Palestinians, informally worded as *tawteen*, is seen as an infringement of Lebanese sovereignty.⁴⁰ A child born in Lebanon of Palestinian parents is registered as a Palestinian refugee.” (In-house translation. The translator is a native Dutch speaker)

ORIGINAL SOURCE

“3.1 Naturalisatie in Libanon

Palestijnen kunnen in Libanon niet naturaliseren, nakomelingen van Palestijnen in Libanon worden via de mannelijke lijn geregistreerd als Palestijnse vluchteling bij de DPAR.⁵⁶ Verzet tegen de naturalisatie van Palestijnen, die grotendeels soennitisch zijn, is breed gedragen onder de Libanese bevolking en autoriteiten. Hierdoor zou de huidige machtsbalans tussen de verschillende sektarische groepen in Libanon onder druk worden gezet.⁵⁷ In sommige gevallen is het wel mogelijk om de Libanese nationaliteit te verkrijgen, ook voor Palestijnen (zie 3.2). UNHCR stelt dat de voorwaarden van naturalisatie erg gepolitiseerd zijn en onder de discretionaire beleidsvrijheid van de Libanese staat vallen.

Palestijnen komen niet in aanmerking voor de Libanese nationaliteit op basis van artikel 1 van Decree No 15 on Lebanese Nationality 19 januari 1925. Artikel 1 kent de Libanese nationaliteit toe aan personen geboren op het grondgebied van Libanon die niet door afstamming een buitenlandse nationaliteit hebben, of personen waarvan de ouders een onbekende nationaliteit hebben. Echter, onder het Vredesakkoord van Ta'if van 1989 werd de naturalisatie van Palestijnen in Libanon onconstitutioneel verklaard.⁵⁹ De constitutie uit 1990 bevestigt dat niet-Libanezen zich niet mogen vestigen in Libanon.⁶⁰ De naturalisatie van Palestijnen, informeel verwoord als *tawteen*, wordt gezien als een inbreuk op de Libanese soevereiniteit.⁶¹ Een in Libanon geboren kind van Palestijnse ouders wordt geregistreerd als Palestijnse vluchteling.”

(Source: Dutch Ministry of Foreign Affairs, “[Thematisch ambtsbericht Palestijnen in Libanon](#)”, January 2021, p. 15)

In 2020, a group of nongovernmental organisations (NGOs) working with Palestinians in Lebanon submitted a combined report to the Universal Periodic Review.

“Lebanese legislation has not developed a law providing a definition for a Palestinian refugee in Lebanon, taking into consideration the special legal situation of Palestinian refugees, with the exception of the personal identification cards issued by the Ministry of Interior’s General Directorate of Political Affairs and Refugees, whereby the Ministry’s General Directorate of General Security classifies refugees as a special category of foreigners. Nevertheless, Law 296/2001 denies Palestinian refugees from the right to own real estate and classifies them as stateless. Furthermore, the Lebanese Labor Law and the Plan to Combat Illegal Foreign Workers in Lebanon considers them as any other foreigners residing in Lebanon.”

(Source: Najdeh Association, Development Action Without Borders (Naba’a), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, p. 3)

38 Sima Ghaddar, [Second-Class Citizenship: Lebanese women fight to pass nationality to children and spouses](#), April 2017.

39 Preamble I, Part One, Lex Takkenberg en Francesca Albanese, [Palestinian Refugees in International Law](#), 2020, p. 209.

40 Are Knudsen, [Widening the Protection Gap: The «Politics of Citizenship» for Palestinian Refugees in Lebanon 1948-2008](#), 2009, p. 54-55; Diana Allen, [Refugees of the Revolution: Experiences of Palestinian Exile](#), 2014, p. 23-24, 28; Lex Takkenberg en Francesca Albanese, [Palestinian Refugees in International Law](#), 2020, p. 212-213. Plus confidential source dated 13 October 2020.

Dr. Francesca Albanese and Professor Lex Takkenberg, legal specialists and authors of the 2020 book *Palestinian Refugees in International Law*, wrote:

“The treatment of Palestinians in Lebanon largely depends on their arrival and status. Besides those Palestinians – mainly wealthy Christians and others with family connections – who acquired Lebanese citizenship between 1952 and 1958, the vast majority of Palestinians in Lebanon remain without citizenship, and in a precarious situation. Among these stateless Palestinians, only those registered in Lebanon – and holding a Lebanese ID – according to Lebanese regulations are considered legal residents (see Palestinians with permanent residency (holders of Lebanese IDs)).

Initially registration with UNRWA (and prior to that with the League of Red Cross Societies in 1948) was considered a prerequisite for legal residency of the refugees. Since 1959, registration and civil procedures for Palestinian refugees in Lebanon have been handled by the Department of Political and Refugees Affairs (DPRA), which administers the (p. 213) presence of the refugees and issues civil documentation, including personal IDs, family records and travel documents for Palestinians registered in Lebanon. Since 2010, DPRA has been renamed ‘Directorate of Political Affairs and Refugees’ (DPAR).

(Source: “Francesca P. Albanese and Lex Takkenberg/Oxford University Press, [Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.3 Legal status and treatment, p. 275)

Palestinian refugee women

4.5. Can Palestinian refugee women pass on their legal status to their children?

In a blog post published in July 2022, political scientist and former UNHCR employee Alexandre Casella wrote about UNRWA’s definition of Palestinian refugee status that:

“The fact that the Palestinian refugee status can only be passed down from the father constitutes gender-based discrimination. It guarantees that the problem will only get worse - and that Palestinian women will be treated as second-class citizens, who - contrary to men - cannot pass down their refugee status to their children.” (In-house translation, the author is a French native speaker)

ORIGINAL SOURCE:

“Le fait que le statut de réfugié palestinien soit transmis uniquement par la “lignée patrilinéaire” constitue clairement une discrimination fondée sur le sexe. Et si elle garantit qu’avec le temps le problème ne peut que s’aggraver, elle fait aussi des femmes palestiniennes des citoyennes de seconde classe qui, contrairement aux hommes, ne peuvent transmettre le statut de réfugié à leurs descendants.”

(Source: Alexandre Casella/Le Temps, “[Réfugiés palestiniens: copie à revoir?](#)”, 8 July 2022)

A collective of NGOs working with Palestinians in Lebanon made a joint submission to the Universal Periodic Review in 2020 in which they stated that:

“9.3. Denying Palestinian refugee women their right to pass on their legal status to their children

Lebanese laws discriminate against women in general, denying Lebanese women from their right to pass on their nationality to their children. Palestinian refugee women registered at the Directorate of Political Affairs and Refugees and married to foreigners are denied the right to provide discretionary residence permits to their husbands, on equal standing with women with Lebanese citizenship. Furthermore, their husbands cannot obtain annual residency permits in exchange for a fee, similar to Palestinian refugee husbands registered at the Directorate of Political Affairs and Refugees and married to a foreigner.”

(Source : Najdeh Association, Development Action Without Borders (Naba’a), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, p. 4)

4.6. What rights to a nationality do the children of stateless Palestinian parents have?

Reacting directly to the below quote by UNICEF, Mr Ziad El Sayegh, Executive Director of the Civic Influence Hub in Beirut and former Policy and Communication Advisor to the Lebanese-Palestinian Dialogue Committee [a Lebanese inter-ministerial government body formed in November 2005 to implement the policies of the Lebanese government towards Palestinian refugees in Lebanon] was the sole interviewee who considered that the birth registration procedure does not pose a problem:

“There is no complication across the procedure at all. We have a department of Palestinian refugees within the Ministry of Interior and Municipalities in Lebanon, and you have also another registration at UNRWA. [...] It’s very simple. Once they register through the UNRWA, they should go also to have a kind of an official paper from a responsible [authority] within the region [where] they are living. After, it can be approved by the Embassy of Palestine of Lebanon and registered directly to the department of Palestinian refugees within the Ministry of Interior and Municipalities in Lebanon. [...] a Lebanese citizen is obliged to pay [...] - and it’s an official rate – for the responsible authority in the region to give him an official paper and after, go to the Ministry of Interior and Municipality to submit a request. [...] we cannot ask the Lebanese citizens to pay for this and the Palestinian refugees will not pay. And for me, the solution is very simple. The UNRWA should have a special budget to cover this cost if any Palestinian refugees cannot pay for it. They should cover this cost. [...] For me, there is another problem. I’m not sure that all the Palestinian refugees are registering their newborns [...] Or [...] if they are not registering it within the Lebanese state and [with] the Palestinian embassy only [or] at UNRWA only. There is a lack here of collaboration between the Lebanese Ministry of Interior and Municipality and UNRWA and the Embassy of Palestine. This is the main problem, the cost is not the problem. The problem is there is a lack of a coordination mechanism to make sure that all the newborns are registered officially in Lebanon to make sure that they are not stateless in the future.”

(Source: Ziad El Sayegh, [interview record](#), 31 October 2022)

Katherine Harbord, a lecturer in human rights specialised in the Middle East whom we interviewed for this report in October 2022 reacted directly to the quoted excerpt below from the UNICEF report:

““[...] it’s a very bureaucratic process that requires lots of forms and authorisation and you need to get this form stamped, and then you need to go away and that form entitles you to another form and the back and forth. And because of the problems of the state structure in Lebanon, particularly at the moment, because of the financial crisis and other things that are going on, I think this just compounds the problems. [...] It’s quite a prolonged process. It sort of takes months rather than weeks is my understanding. But that also may be not because of inherent the process itself, but more because of the other problems involved in interacting with state structures in Lebanon.”

(Source: Katherine Harbord, [interview record](#), 13 October 2022)

The Jordanian Political Economist and long-time commentator on the Israeli-Palestinian dialogue Riad Al Khouri who was interviewed for this report in October 2022 spoke about the difficulty for Palestinian men and their children to obtain the Lebanese nationality:

“The procedure in most Arab countries, including Lebanon, is for the children to inherit the nationality of their father. [...] And this is the case with the refugees in Lebanon. If a Palestinian refugee woman marries a Lebanese man, then her children become Lebanese nationals. But if a Palestinian refugee man marries a Lebanese woman, then the children do not get Lebanese nationality, and this causes problems. Now about the birth certificate, I have no direct information, except to note that the [...] cost of birth certificates and the time they take in Lebanon is respectively high and complicated, including for birth certificates, but also covering other issues.”

(Source: Riad Al Khouri, [interview record](#), 7 October 2022)

In a report published in March 2022, UNICEF Lebanon wrote about the registration of displaced Syrian and Palestine refugee children that:

“In 2018, the Personal Status Department issued a memorandum allowing for the registration of displaced Syrian and Palestine refugee children from Syria above the age of one year and born in Lebanon between 1 January 2011 and 8 February 2018. In September 2019, this waiver was further extended to children born between 9 February 2018 and 9 February 2019. However, children born after 9 February 2019, Palestinian refugee children from Lebanon, Lebanese children and children of other nationalities are still subjected to the complicated and costly birth registration procedures, including a one-year deadline for registration at the Noufous level, beyond which a court procedure is required to finalise the registration.” (p. 99)

(Source: UNICEF Lebanon, “[The situation of children and young people in the Lebanese crisis](#)”, March 2022, pp 99)

The UNDP office in Lebanon wrote in 2020 that:

“Stateless people in Lebanon are deprived of all rights including right to identity and to registration. Without active Government support, the current situation may lead to an increase in the stateless population due to the high likelihood among the most vulnerable to abandon the registration of their children after birth because of lack of financial means. As stateless individuals are already amongst the most financially insecure, these multiple crises are pushing many deeper into poverty and exacerbating protection risks such as exploitation, child labour and homelessness.”

(Source: UNDP/UN Lebanon “[Rapid Socio-Economic Impact Assessment Lebanon](#)”, 2 November 2020, p. 63)

Documentation

4.7. Can stateless Palestinians legally and practically obtain identification documents? If not, why?

Registered Palestine refugees

In its Protection Monitoring Report for the 1st quarter of the year 2022, UNRWA reported that:

“Access to civil registration processes reportedly remained limited for PRS and non-IDs, and difficulties registering PRL children’s births after more than a year, were highlighted in Central Lebanon Area [...] Difficulties in receiving legal documents, the high cost of legal aid, and practical obstacles to accessing available services were also highlighted. Meanwhile, the time taken to issue civil documentation for PRL reportedly increased, with processing times of three to four weeks compared to one to two weeks previously. As among the Lebanese community, waiting times to obtain travel documents increased significantly.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 1 \(Q1\) 2022](#)”, 1 July 2022)

The US department of state stated:

“Approximately 3,000 to 5,000 Palestinians were not registered with UNRWA or the government. These Palestinians began to arrive in the country during the 1960s and do not hold any formal valid identification documentation. The government does not recognize their legal status in the country.”

(Source: US Department of State (USDOS) “[2021 Country Reports on Human Rights Practices: Lebanon](#)”, Section 2. Respect for Civil Liberties, G. Stateless Persons, March 2022, p. 30)

The same source further reported that:

“The Directorate of Political and Refugee Affairs (DPRA) is responsible for late registration of children of Palestinian refugees. According to the law birth registration of children older than one year requires a court procedure, an investigation by the DGS in some cases, and final approval from the DPRA. Where paternity is in doubt or where the applicant is age 18 years and older, he/she may also be required to take a DNA test. Birth registration can take more than a year and was extremely complex for all Palestinian refugee children whose parents were registered with DPRA.”

(Source: US Department of State (USDOS) “[2021 Country Reports on Human Rights Practices: Lebanon](#)”, Section 2. Respect for Civil Liberties, March 2022, p. 31)

‘Non-registered’ Palestinian refugees

The Palestinian Refugees Portal, a Palestinian refugees-led website reported in February 2022 about prospects of changing the Palestinian refugee card into a magnetised card:

“The head of the Lebanese-Palestinian Dialogue Committee, Dr. Basil Al-Hassan, said that his committee is working on completing the necessary technical studies to change the card of Palestinian refugees in Lebanon to a magnetised card. [...] and Hassan talked about “a unified state policy towards the Palestinian topic in Lebanon, whether at the level of the state’s ministerial, administrative or security institutions,” referring to common views that will turn into a unified policy very soon, according to him. Since 1948, the Directorate for Palestinian Refugee Affairs in Lebanon has issued handwritten identity cards that are large in size and easy to damage, and they have always caused confusion and problems for Palestinian refugees, at security checkpoints, due to the lack of clarity in the registered data.” (In-house translation. The author is an Arabic native speaker)

ORIGINAL SOURCE :

قال رئيس "لجنة الحوار اللبناني الفلسطيني" الدكتور باسل الحسن، إنّ لجنته تعمل على إنجاز الدراسات الفنية اللازمة، لتغيير بطاقة اللاجئين الفلسطينيين في لبنان إلى أخرى ممغنطة. [...] وتحدث حسن عن "سياسة موحدة للدولة تجاه الموضوع الفلسطيني في لبنان، سواء على مستوى مؤسسات الدولة الوزارية أو الإدارية أو الأمنية" مشيراً إلى آراء مشتركة ستتحول إلى سياسة موحدة قريباً جداً وفق قوله. وتصدر "مديرية شؤون اللاجئين الفلسطينيين" في لبنان، منذ العام ٨٤٩١، بطاقات هوية مكتوبة بخط اليد وكبيرة الحجم وسهلة التلف، وطالما تسببت في التباسات وإشكاليات للاجئين فلسطينيين على الحواجز الأمنية لعدم وضوح البيانات المسجلة

(Source: Palestinian Refugees Portal: “[Al-Hassan: The identity card of the Palestinian refugees in Lebanon will be changed to a magnetic one](#)”, February 22, 2022)

AlAraby, an international Arabic newspaper and website, published testimonies by Palestinian refugees of their difficult access to identity papers:

“Alaa Al-Dein Jaber, a Palestinian refugee born in Gaza in 1976 and lives in Ein El-Hilweh Refugee Camp in Lebanon, says: «My wife remains registered under her family as a single woman because the Lebanese state refused to register the marriage, using 1967’s Nakba as an excuse. Palestinians of the 1967 Nakba do not have the right to do this without going back to the Palestinian Ministry of Foreign Affairs that has the right to issue us papers that prove our identity. We tried it multiple times, but we couldn’t reach anything, the Palestinian embassy in Lebanon didn’t serve us in this issue, while ambassador Abbas Zaki was content with only securing us an identity card after having to carry forged identity cards because we didn’t have an alternative.» [In-house translation. The author is an Arabic native speaker]

ORIGINAL SOURCE :

و يقول [علاء الدين الجابري الذي ولد في قطاع غزة عام ١٩٧٦ وقيم في مخيم عين الحلوة]: لا تزال زوجتي مسجلة حتى اليوم على قيود أهلها بأنها عذراء لأن الدولة اللبنانية رفضت تسجيل الزواج بحجة أن فلسطينيين نكبة عام ١٩٦٧ لا يحق لهم ذلك من دون العودة إلى وزارة الخارجية الفلسطينية التي تملك حق إعطاء أوراق تثبت هويتنا. وقد حاولنا فعل ذلك مرات، لكننا لم نستطع الوصول إلى أي شيء، فالسفارة الفلسطينية في لبنان لم تعمل لخدمتنا في هذا الشأن، في حين اكتفى السفير عباس زكي بتأمين بطاقة تعريف لنا بعدما كنا نحمل بطاقات هوية مزورة لأننا لا نملك غيرها.”

(Source: AlAraby - [Palestinians without IDs in Lebanon](#), January 13, 2022)

The same source further stated that:

ويقول عطية [لاجئ فلسطيني الذي ولد في لبنان عام ١٩٨٣ ويقيم في مخيم عين الحلوة للاجئين الفلسطينيين]: «أحمل فقط ورقة تعريف أصدرتها سفارة دولة فلسطين في لبنان سابقاً، وأيضاً ورقة من الأمن العام اللبناني تؤكد هويتنا، والتي كنت أستفيد منها سابقاً باعتبارها بطاقة تعريف شخصية لي، لكن أحداً لم يعد يعترف بها اليوم، علماً أن جنود الجيش اللبناني يضحكون لدى إبرازي لها. وهي لا تخولني شراء خط تلفون أو استصدار دفتر قيادة ووثيقة للسفر».

Atiya, a Palestinian refugee born in 1983 in Lebanon who lives in Ein El-Hilweh Refugee Camp, says: “I possess an identification document issued by the former Ministry of the State of Palestine in Lebanon, and a document from the Lebanese General Security department that confirms our identity, which I used to benefit from as a personal identification card, but nobody acknowledges it today, given that soldiers at the Lebanese army make fun of me when I take it out. It doesn’t even authorise me to buy a phone number or issue a driver’s licence or a travel document.”

(Source: AlAraby – “[Palestinians without IDs in Lebanon](#)”, January 13, 2022)

‘Non-ID’ refugees

In its Protection Monitoring Report for the 1st quarter of the year 2022, UNRWA reported that:

“Access to civil registration processes reportedly remained limited for PRS and non-IDs, and difficulties registering PRL children’s births after more than a year, were highlighted in Central Lebanon Area [...] Difficulties in receiving legal documents, the high cost of legal aid, and practical obstacles to accessing available services were also highlighted. Meanwhile, the time taken to issue civil documentation for PRL reportedly increased, with processing times of three to four weeks compared to one to two weeks previously. As among the Lebanese community, waiting times to obtain travel documents increased significantly.

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 1 \(Q1\) 2022](#)”, 1 July 2022)

In its Protection Monitoring Report for the last quarter of the year 2021, UNRWA reported that:

“According to focal points, the three main issues people face in accessing civil registration remained largely the same through the year: the cost of the process, the lack of required documents, and some refugees’ lack of residency. Lacking the required documents was particularly reported Tyre. The two main groups who find it most difficult to access civil registration were PRS and Non-ID. Non-IDs were especially mentioned in Saida while PRS were mentioned more in Beqaa. In CLA focal points linked the lack of legal residency to not be able to move freely in the camps. In Saida focal points noted it was taking more time than before to issue new passports or civil reports for PRL. (p. 8)”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter Four 2021](#)”, 6 April 2022)

Another collective of NGOs working with Palestinians in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated among others that:

“Unsustainability of solution regarding legal personality of non-ID Palestinians

The State of Lebanon had started issuing ID documents valid for one year and which can only be used to travel inside Lebanon. Very few who had lost their IDs (non-ID) were able to benefit from those cards in 2008 and in an unsustainable manner. During the UPR’s 9th Session in 2010, Lebanon reported the issuing of documents for non-IDs as one of its achievements. However, the Lebanese state has yet to provide a reply to Recommendation 84.11. More than 5000 people from this category are still denied their most basic human rights, such as the right to a legal personality, the right to health and hospitalization, education, especially university, and work. It also remains impossible to register marriage contracts if one of the spouses was non-ID, and thus their children are denied the right to be registered with official departments.”

(Source: Najdeh Association, Development Action Without Borders (Naba’a), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, p. 3)

Palestinian refugees from Syria (PRS)

In its Protection Monitoring Report for the 2nd quarter of the year 2022, UNRWA reported that: weeks compared to one to two weeks previously. As among the Lebanese community, waiting times to obtain travel documents increased significantly.

“The closure of government offices as a result of the ongoing public sector strike impacted the ability of both Palestinians and Lebanese to register civil events and obtain civil documentation, driving licences and passports in Q2. Palestinian refugees reported their frustration at the unpredictability of government service provision after paying for transport only to find offices unexpectedly closed. In addition, office closures hampered PRS in obtaining or renewing residency, thus exacerbating the challenges they face in moving freely, particularly outside the camps. In the Beirut area, focal points reported that the GSO are also repeatedly delaying PRS residency renewals, impacting freedom of movement and ability to register marriages. (p. 8)”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 2 \(Q2\) 2022](#)”, 26 August 2022)⁴¹

In its Protection Monitoring Report for the 1st quarter of the year 2022, UNRWA reported that:

“Access to civil registration processes reportedly remained limited for PRS and non-IDs, and difficulties registering PRL children’s births after more than a year, were highlighted in Central Lebanon Area [...] Difficulties in receiving legal documents, the high cost of legal aid, and practical obstacles to accessing available services were also highlighted. [...] As among the Lebanese community, waiting times to obtain travel documents increased significantly.

Focal points highlighted that lack of residency continued to be a problem for the increasing number of PRS who entered Lebanon irregularly, as well as those who entered regularly but faced other practical obstacles to obtaining residency. In addition, those who did hold residency were reportedly often finding themselves unable to renew it due to associated costs and the irregular opening hours of the GSO offices. Some PRS in Saida were said to be afraid of approaching GSO to renew their papers after hearing of cases of people issued with departure orders while doing so.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 1 \(Q1\) 2022](#)”, 1 July 2022)

In its Protection Monitoring Report for the last quarter of the year 2021, UNRWA also reported that:

“According to focal points, the three main issues people face in accessing civil registration remained largely the same through the year: the cost of the process, the lack of required documents, and some refugees’ lack of residency. Lacking the required documents was particularly reported Tyre. The two main groups who find it most difficult to access civil registration were PRS and Non-ID. Non-IDs were especially mentioned in Saida while PRS were mentioned more in Beqaa. In CLA focal points linked the lack of legal residency to not be able to move freely in the camps. In Saida focal points noted it was taking more time than before to issue new passports or civil reports for PRL. (p. 8)”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter Four 2021](#)”, 6 April 2022)

In March 2022, UNICEF Lebanon published estimates of undocumented children among Palestinian refugees:

“According to UNICEF’s Baseline Study (2016), UNRWA’s registration of children under five years of age in the PRL [Palestinian refugees in Lebanon] cohort was at 99.5 per cent. For PRS [Palestinian refugees from Syria in Lebanon], almost 2,900 new births were recorded by UNRWA between 2011 and 2018. By conservative estimation, at least one third of parents were unable to finalise the birth registration process in Lebanon due to its costs or lack of a valid legal status or requisite documentation. In fact, more than one third of parents had already registered their newborn children in Syria, with some doing so to avoid the burdensome process in Lebanon. UNRWA has been monitoring the implementation of new circulars to minimise barriers to marriage and birth registration of Palestinian families and children in Lebanon, which would further increase the risk of “undocumented” Palestine refugees, who would therefore be barred from accessing education services, employment opportunities and even relocation. [...] Existing undocumented Palestinian children, adolescents and young people already face severe restrictions on their rights to freedom of movement and access to services; are at higher risk of being arrested and detained

⁴¹ For the purposes of this report, even though this excerpt is not within the research period, it was included since it is pertinent.

indefinitely; and are unable to complete civil registration procedures for important events such as birth, marriage, divorce and death. The only provider of essential services for this population is UNRWA, and access to specialised services, for example in healthcare or public examinations, are key challenges.

(Source: UNICEF Lebanon, [“The situation of children and young people in the Lebanese crisis”](#), March 2022, pp. 99-100)

In June 2020 the Danish Immigration Service reported that:

“Persons residing illegally in a country, such as some PRS in Lebanon and Jordan, would have problems with obtaining official birth or marriage certificates. This makes it difficult to update these events with UNRWA and therefore to have such updates reflected in the family registration card.”

(Source: Danish Immigration Service, [“Palestinian Refugees Access to registration and UNRWA services, documents, and entry to Jordan”](#) June 2020, p. 21)

In its series of country reports for 2021, the US Department of State wrote about Lebanon:

“Since 2015, the DGS has issued several memoranda allowing refugees to renew their residency documents free of charge, and in 2017 a memorandum was issued granting unlimited free renewals on a six-month basis to PRS who entered Lebanon regularly before September 2016, with no financial penalty for delays. But this did not include anyone who entered Lebanon irregularly in the first place or received a departure order before September 2016. In September the DGS issued a statement also allowing those who entered legally but received a departure order before 2016 to regularize their residency status free of charge.

Since 2017 the government has waived the condition of valid residency for birth and marriage registration for the PRS, expanding the application of a previous circular issued in 2017 applicable to Syrians. Since 2018 the Ministry of Interior has waived the costly court proceedings to obtain birth registration of PRS and Syrian refugee children older than one year who were born in Lebanon between 2011 and 2020. The proof of marriage requirement remained in effect during the year, and a valid residency permit of at least one of the parents was needed to obtain a marriage certificate.

PRS turning 15 years old have been obliged either to obtain identity documents through Syria, risking getting an exit stamp on their identity documents and therefore no longer being able to maintain residency in Lebanon, or to obtain a passport through the Syrian embassy at a cost of at least 600,000 Lebanese pounds (\$400), which is beyond the means of most. In September DGS issued a statement indicating that 15-year-olds may use their birth certificates as a substitute identity document until the age of 18. Residency and identity documents for those turning 18, however, remained a problem.”

(Source: US Department of State (USDOS) [“2021 Country Reports on Human Rights Practices: Lebanon”](#), Section 2. Respect for Civil Liberties, March 2022, p. 25)

A survey conducted by UNRWA on PRS in Lebanon indicated the challenges of obtaining or renewing residence permits and how their mobility and emotional well-being were affected as a result:

“Since 2014, all PRS have faced difficulties in entering Lebanon and obtaining or renewing residence permits, whatever their IDs. The 2015 AUB (American University of Beirut) reported residence regulations were fluctuant and their implementation inconsistent. [...] Those who entered illegally or entered after that date [16 September 2016] are not eligible for residence. Freedom of movement may be thwarted, and they may be issued a departure order by the GSO (General Security Office). [...] Over one third of PRS respondents (33.7 per cent) reported that they did not carry valid resident permits with area of residence variations ranging from 43.7 per cent in the Beqaa area to 26.6 per cent in the Saida area.¹¹ Possessing a valid residence permit facilitates mobility: 23.2 per cent of PRS carrying a valid residence permit reported mobility issues compared to 79.7 per cent of those who did not. [...] The survey indicates legal status vulnerability as expressed by references to “anxiety due to irregular residence” (25.7 per cent), “fear of deportation” (35.1 per cent) or of “detention” (13.1 per cent).”

(Source: UNRWA, [“Socio-economic Survey on Palestine Refugees from Syria Living in Lebanon”](#), 28 April 2021, pp. 17 & 19)

A collective of NGOs working in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated among others that:

“As a result of the lack of legal status and records, stateless persons cannot register their marriages and the births of their children, perpetuating statelessness between generations. Their deaths are not registered.”

(Source: The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukuk Frontiers Rights et al, [“Joint Submission to the Human Rights Council Universal Periodic Review”](#), July 2020, p. 11)

In its 2022 Emergency Appeal, UNRWA reported that:

“Legal status continues to be a key determinant of vulnerability in Lebanon given the importance of residency for the freedom of movement and the right to work. This particularly impacts PRS without residency permits who report that civil registration services continue to be more difficult to access due to transport and other associated costs.”

(Source: UNRWA, [“Syria, Lebanon and Jordan Emergency Appeal 2022”](#), 18 January 2022, p. 40)

“Civil Registration

Until October 2017, a valid legal status was a prerequisite for most civil registration processes in Lebanon. Difficulties in obtaining legal residency documents had a far-reaching impact on PRS and Non-ID Palestinians. Based on a circular issued by the Ministry of Interior in October 2017, valid legal residency is no longer required for all parties in civil registration of births, marriages, deaths and divorces. The fears and lack of awareness of the community related to the complexities of legalizing their stay remain obstacles for registration of births and marriages with the Lebanese authorities, leading to children not having a legal status, creating long-term difficulties for them.”

“In March 2019, a new circular was issued by the Ministry of Interior, no longer requiring costly court proceedings to obtain birth registration of PRS children aged one year or older who were born in Lebanon between January 2011 and February 2019. There is still a need, however, for proof of marriage – for which a legal residency of at least one party is still a requirement.”

(Source: UNRWA: [“Protection brief Palestine refugees living in Lebanon Updated in September 2020”](#), p. 3)

5. Freedom of movement

In its Protection Monitoring Report for the 2nd quarter of the year 2022, UNRWA reported that:

“As in previous months, the rising cost of fuel and transportation inhibited movement for some Palestinian refugees; some in Beddawi camp were said to be regularly walking the 5-6 kilometres to central Tripoli to save on travel costs. People were reportedly otherwise limiting their transport to essential tasks only, which exacerbated challenges in accessing services and employment. (p. 3)”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 2 \(Q2\) 2022](#)”, 26 August 2022)

The same source further stated that:

“Freedom of movement remains a concern for many Palestinian refugees, especially PRS and non-IDs who often lack residency and official documentation. Many are apprehensive about being stopped at checkpoints and given departure orders due to lack of legal status; accordingly, they limit their own movements. This issue is particularly pronounced for those living in camps in the south, where residents must pass through Lebanese Armed Forces (LAF) checkpoints to enter or exit the camps. UNRWA is noting a significant increase in PRS entering Lebanon and residing outside the camps, which may be linked to fears of passing through such check points. On the other hand, reports continued that the financial crisis was limiting the LAF’s engagement around some Palestinian camps and lessening the authorities’ ability to keep people under arrest. Some people in Tyre reported that movement in and out of the camp had become easier.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 2 \(Q2\) 2022](#)”, 26 August 2022, p. 5)

In its series of country reports for 2021, the US Department of State wrote about Lebanon:

“Without documentation and legal status, nonregistered Palestinians faced restrictions on movement, risked arrest or detention, and encountered obstacles completing civil registration procedures.”

(Source: US Department of State (USDOS) “[2021 Country Reports on Human Rights Practices: Lebanon](#)”, Section 2. Respect for Civil Liberties, March 2022, p. 31)

The same source further reported that:

“D. FREEDOM OF MOVEMENT AND THE RIGHT TO LEAVE THE COUNTRY

The law provides for freedom of internal movement, foreign travel, emigration, and repatriation. The government generally respected these rights for citizens but placed extensive limitations on the rights of refugee populations and asylum seekers, most of whom were from the West Bank and Gaza, Syria, and Iraq [...]

In-country Movement: Armed nonstate actors hindered or prevented movement in areas they controlled. Armed Hizballah members controlled access to some areas under Hizballah’s control, and the Popular Front for the Liberation of Palestine prevented access to a border area under its control, according to the security services. Within families, men sometimes exercised considerable control over female relatives, restricting their activities outside the home or their contact with friends and relatives.”

(Source: US Department of State (USDOS) “[2021 Country Reports on Human Rights Practices: Lebanon](#)”, Section 2. Respect for Civil Liberties, March 2022, p. 22)

“Palestinian refugees from Syria in Lebanon

[...] The lack of legal residency means that, particularly in the South of Lebanon where the Lebanese Army controls entry and exit to camps, PRS often do not leave the camps in which they are living nor enter them if they live outside, restricting their movement out of fear of arrest, detention and deportation, which poses challenges to accessing basic services and justice functions. A survey conducted during the first half of 2020 indicated that 34 per cent of PRS in Lebanon do not hold valid residency documents. Out of this group, 79 per cent reported that their mobility was constrained [UNRWA, 2020 socio-economic survey] .

(Source: UNRWA: “[Protection brief Palestine refugees living in Lebanon Updated in September 2020](#)”, p. 2)

“Non-ID Palestinians

There are an estimated 4,000 Non-ID Palestinians in Lebanon. These are Palestinians who began to arrive in Lebanon in the 1960s and do not hold formal valid identification documents recognized by the GoL. They are not registered as Palestine refugees with UNRWA in Lebanon and are not recognized by the GoL as they do not have valid legal status in the country.

Without documentation and legal status in Lebanon, Non-ID Palestinians face restrictions on movement, risk detention and face severe obstacles in completing civil registration procedures. This situation has acute humanitarian consequences, in particular limiting access to public services from Lebanese educational and medical services, bank accounts and access [sic] to justice and formal employment. They are also denied the possibility to travel abroad. UNRWA has extended a number of Agency services to Non-ID Palestinians.

(Source: UNRWA: “[Protection brief Palestine refugees living in Lebanon Updated in September 2020](#)”, p. 1)

5.1. Can stateless Palestinians obtain travel documents to facilitate their movements inside and outside of Lebanon?

Walaa Kayyal, a researcher living as a Palestinian in Lebanon herself, commented directly on the aforementioned prerequisites to apply for a travel document when interviewed for this report by Asylos in October 2022:

“Palestinians in Lebanon; they don’t have a passport.[...]The passport is issued by the GSO, the General Security Office and there are definitely requirements to apply for the travel document because we don’t have a passport. [...] You should apply with your ID, which is a blue ID as they call it, and the UNRWA card. One important thing to mention here is that even the GSO office for the Lebanese is different from the Palestinians. The Palestinians have a separate office even for issuing travel documents. We do not interact with the Lebanese. And definitely, the papers required are different for the Lebanese and the Palestinians. Also, the duration of when you have to renew your passport is different. For example, a Lebanese person can renew his or her passport for 10 years. For Palestinian it’s up to 5 years. It’s either 1 year, 3 years, or 5 years. For Lebanese, it’s 1 year, 3 years, 5 years, or 10 years. Also we did not have biometric passport. I think since three, four years ago we started to have biometric passports, the Palestinian travel documents are also biometric. The Palestinian travel document has the migrant sign on it, two oblique lines. We have this on our travel document just to identify us as migrants and not citizens. Before the passport was biometric, the Lebanese used to have a navy blue colour for their passport and it’s smaller in size, while the Palestinians used to have a larger size of the passport and it was brown. After they became biometric, it became the same size but the Lebanese passport is navy blue and the Palestinian passport is [...]a lighter blue colour. This is something one has to know about Lebanon: They have to discriminate in any way. You can see these discriminatory actions without words, they have to differentiate Lebanese from Palestinians in any way possible.

[...] If you do not submit all your complete papers, they simply reject your order. Because they review the papers in front of you and say ‘if you don’t complete your file, we are not going to at the first place to apply for you to issue a travel document’.

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

Mr Ziad El Sayegh, Executive Director of the Civic Influence Hub in Beirut and former Policy and Communication Advisor to the Lebanese-Palestinian Dialogue Committee [a Lebanese inter-ministerial government body formed in November 2005 to implement the policies of the Lebanese government towards Palestinian refugees in Lebanon] relativised the difficulties faced by Palestinians to move within the country:

“This is not to say that the problem is solved. No. But there is a serious essay [essai] within the DSG, Directorate of General Security to try to find a transitional solution until-- and this is the role of the Lebanese Palestinian Dialogue Committee. I don’t know if they are following this now. It seems to me this is not the case. And of course, this is paralysing the freedom of movement for travel only. But within the country, it is not paralysing anything. They can move within the country. They can move within the country, and there is a constructive collaboration between the Palestinian authorities, stakeholders in the country, and also the Lebanese government, and also the Lebanese military and security forces.

[...] I don’t know how many [Palestinian refugees in Lebanon who are not registered with the DPAR nor with UNRWA who managed to access a travel document], but I knew that some of these people succeed in terms of an official

request to the Directorate of the General Security in the country. They succeeded in getting a travel document, but I don't know how many there are."

(Source: Ziad El Sayegh, [interview record](#), 31 October 2022)

Katherine Harbord, a lecturer in human rights specialised in the Middle East whom we interviewed for this report in October 2022 shared her knowledge of the attribution of travel documents based on an interview with an agent of the Lebanese Ministry of International Affairs:

"I last spoke about this perhaps two years ago with somebody that I knew who worked at the Ministry of Internal Affairs, who worked at a fairly low level but processing these kinds of queries, who wanted to remain anonymous. Without pointing me to a legal paragraph, what they said confirmed that applying for travel documents requires an ID card and an UNRWA registration card. The problem is of course that not all stateless Palestinians are necessarily eligible to be registered with UNRWA. So if you are UNRWA-registered and you have a Lebanese ID, then you are eligible to apply for a travel document. If you already have a travel document from somewhere else, for example, an Egyptian travel document, of course, you aren't eligible for a Lebanese travel document. You must travel on your Egyptian equivalent or your Jordanian equivalent or whatever. So it's a solution purely for Lebanese registered, UNRWA-registered stateless Palestinians with no other nationality or any kind of travel documents. It also isn't automatic. So just presenting your ID card and your UNRWA registration card doesn't entitle you to receive these documents, but it entitles you to be considered to receive these documents. So it's possible and assuming there are no security issues for this individual, it's my understanding that these are granted, but it's certainly not automatic. So it's a very small subset of 1948 refugees and their descendants only. If you're a 1967 refugee, it's technically possible, but my understanding from this contact was that ordinarily, these people aren't able to move freely out of Lebanon because it's very difficult for them to register with UNRWA. Difficult to impossible."

(Source: Katherine Harbord, [interview record](#), 13 October 2022)

When asked to comment on the possibility for Palestinians to obtain travel documents in Lebanon, Jordanian Political Economist Riad Al Khouri who was interviewed for this report in October 2022 spoke about the difficulty for Palestinian refugees and Palestinian refugees from Syria to obtain travel documents:

"[...] the procedures for these people, whether they are Palestinian refugees in Lebanon or Palestinian refugees from Syria who came to Lebanon at various times over the past few years, the procedure is difficult and complicated. And in any case, once you have this travel document, there is not much you can do with it in terms of travelling without a visa or obtaining a visa to travel.
[...] Before you obtain the document, there is a procedure to go through which can be time-consuming, and otherwise, it is not easy. It is not a useful document."

(Source: Riad Al Khouri, [interview record](#), 7 October 2022)

Based on confidential sources as well as the 2020 Universal Periodic Review and a 2016 Fact-Finding Mission by the Finnish Immigration Service, the Dutch Ministry of Foreign Affairs stated in 2021 that:

"4.2.2 Travel document

Adult PRL men and women can apply for a travel document from the GS [General Security]. This requires an ID card and UNRWA registration card. Palestinians can use the travel document to enter and leave Lebanon and obtain visas from other countries. Previously, this travel document was a passport-sized paper booklet with a dark blue cover with the logo of the Lebanese cedar tree with the text 'document voyage') and 'Palestinian refugee' (lajien falistiniya). Since 2016, the travel document has been biometric while retaining the same information as before.

"[...] PRL who do not have a registration with both the DPAR and UNRWA, and whose father is only registered with the GS, can apply for a travel document. The application will then be considered. Palestinians registered by Lebanon from the '67 group' who are not registered with UNRWA may be able to receive a laissez-passer. This document is brown in color and is valid for one year. A source indicates that after acquiring a third nationality, i.e. not Palestinian or Lebanese, PRL are no longer entitled to the travel documents issued by the Lebanese authorities. This information has not been confirmed by other sources." (In-house translation. The translator is a native Dutch speaker)

ORIGINAL SOURCE

“4.2.2 Reisdocument

Meerderjarige PRL-mannen en –vrouwen kunnen een reisdocument aanvragen bij de GS. Hiervoor is een ID-kaart en UNRWA-registratiekaart nodig. Palestijnen kunnen het reisdocument gebruiken voor het in-en uitreizen van Libanon en het verkrijgen van visa van andere landen. Voorheen was dit reisdocument een papieren boekje van paspoortformaat met een donkerblauwe omslag met het logo van de Libanese cederboom met de tekst ‘reisdocument’ (document voyage) en ‘Palestijnse vluchteling’ (lajien falistiniya). Sinds 2016 is het reisdocument biometrisch met behoud van dezelfde informatie als voorheen.

[...] PRL die zelf geen registratie hebben bij zowel de DPAR en UNRWA, en waarvan de vader alleen bij de GS is geregistreerd, kunnen een aanvraag doen voor een reisdocument. De aanvraag wordt dan in overweging genomen. Door Libanon geregistreerde Palestijnen uit de ‘groep van 1967’ die niet zijn geregistreerd bij UNRWA, kunnen mogelijk een laissez-passer ontvangen. Dit document is bruin van kleur en heeft een geldigheidsduur van één jaar. Een bron geeft aan dat na het verkrijgen van een derde nationaliteit, dus geen Palestijnse of Libanese, PRL geen recht meer hebben op de reisdocumenten uitgegeven door de Libanese autoriteiten. Deze informatie is niet bevestigd door andere bronnen.”

(Source: Dutch Ministry of Foreign Affairs, [“Thematisch ambtsbericht Palestijnen in Libanon”](#), January 2021, pp. 22-23)

5.2. How do checkpoints affect stateless Palestinians’ free movement?

Mr Ziad El Sayegh, Executive Director of the Civic Influence Hub in Beirut and former Policy and Communication Advisor to the Lebanese-Palestinian Dialogue Committee [a Lebanese inter-ministerial government body formed in November 2005 to implement the policies of the Lebanese government towards Palestinian refugees in Lebanon] was much more affirmative in saying that checkpoints run by militia pose the greatest threat:

“[Official checkpoints] don’t affect [Palestinians’ freedom of movement]. If you go to all the camps, you can see in the north and in the south inside and equally, and the camps are mainly connected now to the Lebanese areas and the Lebanese villages and the Lebanese-- they are connected. They are working together. They are living together. They are sharing together. The checkpoints are still there to supervise the situation of the Palestinian arms inside and outside the camps. And this is another story. This is not to do with the Palestinian refugees themselves. Now it is due to the Hezbollah intervention and not allowing the Lebanese state to put an end for these arms.[...] The Lebanese are saying these camps are out of law, and we should control these camps. And some Palestinian factions that are not aligned with PLO are saying we should keep our arms to protect ourselves because the Lebanese state is coming to kill us. The PLO declared clearly that no need for arms inside and outside the campus, and the Lebanese sovereignty should be respected. Both narratives are not true if you see the Lebanese and Palestinian now living. They are living together. This kind of polarisation is political. [...] There is a close collaboration today between the Lebanese people and the Palestinian Refugees. And there is a close collaboration, if I may say, between the Lebanese army and the Palestinian political factions. They are in close collaboration. This is where this kind of checkpoints narrative should change on both sides.

[...] [There are checkpoints run by] the Palestinian themselves within the camps [such as] Hezbollah. It’s very simple. Even if it is informal sometimes. When I say Hezbollah militia, if I may say, it is not directly only Hezbollah. Sometimes it is Ansar Allah who are Palestinian militia, but close to Hezbollah. This is how Hezbollah is dealing. who are close to the Syrian regime, close to Hezbollah. This is how Hezbollah is treating the militias inside and around the camps.”

(Source: Ziad El Sayegh, [interview record](#), 31 October 2022)

Walaa Kayyal, a researcher living as a Palestinian in Lebanon also insisted in her interview with Asylos on mobile and volatile checkpoints in addition to fixed checkpoints at the entry of cities:

“You can find checkpoints anywhere and you also have mobile checkpoints. So for example, they would call army officers and say, «Go open a checkpoint in this area» and this can be for different reasons. Their number did not decrease. They close one and open another one. They usually do this very, very abruptly. Let me give you an example. Many people here in Lebanon don’t register their motorcycle, or they might not have a driving licence because it costs money, and they are already poor. Now on a Sunday the military decides to put a checkpoint in the middle of Beirut and start stopping all the motorcycles that are driving by, collecting the motorcycles that are not properly registered, and the government cashes the money.

[...] I am not aware of all [the checkpoints], but I can tell you that you have a checkpoint before you enter Sidon [a city in Lebanon], you have a checkpoint before you enter Tyre [a city in Lebanon], before you enter Tripoli then you have a checkpoint before you enter South of Lebanon, so you have a checkpoint actually before you enter any district where they just stop you, you show them your ID, and they say go or they ask you some questions before. Also gradually through the years, the Palestinian camps which did not have any army checkpoints, started to add checkpoints. So now if you want to enter any camp, there is an army checkpoint before you enter. They usually ask you why you’re entering. If they find you strange, they check you, they check your car, they check your documents and ask why you are entering, if you’re distributing anything, if you are carrying anything with you. Usually when we go to camps with my work, we have permission from the Lebanese government to distribute food parcels or to distribute laptops, tablets, etc.”

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

The same source added that “Usually, the people who are arrested at checkpoints are those who don’t have IDs.” She described controls, arrests and conditions of detention as follows:

“They are arrested and they are placed in a police office until someone comes and testify that this person’s name is that, they know his mother, his father, this is the name of his mother, this is the name of his father, and this is his birth date. For stateless individuals, it is very hard because they don’t even have an identification document. They have what they call an identification card and this card is literally written by hand by the mayor of the village where the stateless person is residing. Usually, also Syrians, Palestinians from Syria, and Palestinians from Lebanon, they are stopped at checkpoints, and the army, first, they ask for ID. If you have a Syrian ID, a Palestinian from Syria or a Palestinian from Lebanon, it will show right away since the ID of Palestinians in Lebanon is very well known and visible since it is big and has a different blue colour. As I also explained to you, in Lebanon, there is a lot of discrimination, so if you show the Lebanese card, they let you pass, and if you show the Palestinian identification document, they stop you. They ask you questions such as “where do you live?” If you tell them you live in Beirut: “why are you going to the north?” “Do you have relatives there?” “What are you going to do?” “Are you going to have fun?” “Who are you going to visit?” So they open such a mini investigation, and if they want to arrest you, they can arrest you. They can just put you under arrest, move you to a police station, have you do some investigation, let you spend some time in the room, in the police office just doing nothing, and then at night, they tell you, we have crossed your information through our systems and there is nothing, so now you can leave to your house, simply. So the army, they have a system where they check your name. They just, for example, type your name and they see all your basic information and they see if you have any criminal record, and based on what comes out, they deal with you. If they see something in your record they will interpret it as related to your current travel and say «Oh, so you’re going there to steal”, they can decide to keep you longer or even to transfer you to a closer police station. And all of this, if I may say, depends on the army staff or those who are at the checkpoint. If they are in a good mood, and they love Palestinians (because in a lot of Lebanese families they are Palestinians), if their mother is Palestinian or – I don’t know – their brother-in-law is, if they have this Lebanese-Palestinian relationship, this might be a very good excuse to let you go at checkpoints. So this process is very much subjective.”

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

Katherine Harbord, a lecturer in human rights specialised in the Middle East whom we interviewed for this report in October 2022 shared her knowledge on checkpoints specifically in the North of Lebanon:

“So I have a very little bit of information, but this relates to checkpoints in the north, near to the camps near Tripoli. What I have been told by stateless Palestinian asylum seekers from Lebanon is that Lebanese armed forces checkpoints or Lebanese police checkpoints are not much of a problem any more, problems rather come from militia, Hezbollah and others. It was certainly my interlocutors’ understanding that they felt that Palestinians, those with Lebanese registration or Palestinians from Syria, were disproportionately being detained at checkpoints and sometimes stripped of their freedom of movement, sometimes detained. Generally speaking, my understanding is that they will be arrested or detained the first time and usually either given a warning, sort of, «We don’t want your sort here, or you can’t pass through here.» And if they persist, then they might be sort of roughed up a little bit, slapped or beaten. This was corroborated by three individuals that I’ve spoken to separately about this in the last few years. As I say, they were all connected with the Tripoli region. But I heard similar stories from each of them, which led me to kind of conclude that there probably is some consistency. In one case, the man that was detained was beaten quite badly, and this was because he was a Sunni man who was married to a Shia woman and it was a Shia militia that detained him. So the problem, in that case, was not his Palestinian identity if you like, but rather a sectarian question. All of them felt they were being discriminated against because they were Palestinians, but there may also be other elements to it. I’ve heard of one person who was arrested but this is going back about five or six years. He was arrested by the police. He was a non-ID man. He was ostensibly arrested because of his lack of ID and kind of suspicion of illegal status or something like that. He was removed to a detention centre, not exactly prison. He reported ill-treatment. And his family was able to secure his release through payment of a bribe. And again, he felt that his status as a non-ID Palestinian was behind this and that his arrest was an opportunity for a bribe. Certainly anecdotally based on the numbers of persons I talked to on this matter, but Syrian Palestinians perceived that they experience more discrimination than other Palestinian groups and receive more verbal abuse and sort of racist “behaviour.” There’s a lot of prejudice against them. There’s obviously a lot of prejudice against stateless Palestinians, full stop, especially in Lebanon. But this is kind of magnified for the Syrian Palestinians. [...] So my understanding with the militias was that they detain people either at the checkpoint or at a quasi-military base. With the police, the man who was detained was taken first to a local police station and later to a detention centre in Beirut.”

(Source: Katherine Harbord, [interview record](#), 13 October 2022)

The Jordanian political economist and long-time commentator on the Israeli-Palestinian dialogue Riad Al Khouri who was interviewed for this report in October 2022 considered that checkpoints “may have been a problem in the past but are no longer a major problem”:

“Now, to clarify, we are talking about two distinct kinds of checkpoints here. One would be an official checkpoint of the Lebanese army or the Lebanese police. And there are few problems or restrictions in this regard, including arbitrary arrest. I do not think this is a real problem. The other checkpoints are informal. Lebanon is full of militias. These are not government bodies, they are private. They may, in a certain area, be representative of people. In other words, they are not just criminal gangs, they are somehow politically or socially based, and they may from time to time have checkpoints. But again, talking about the present, this is not a major problem. It was a major problem in the past going back to the 1970s in ‘80s, it would be possible to hold people or even imprison or even kill at these checkpoints, including Palestinian refugees. But this was 40 years ago. We are talking about the present. This is no longer a major problem.”

(Source: Riad Al Khouri, [interview record](#), 7 October 2022)

In a series of written responses to questions sent by Asylos for this report, Dr. Jasmin Lilian Diab, Director of the Institute for Migration Studies at the Lebanese American University indicated in October 2022 that:

“Stateless Palestinians remain at risk of detention or arrest if they reach a checkpoint and do not have documentation. This is why a significant number of them opt out of moving from region to region entirely. Many stateless Palestinians avoid checkpoints entirely, and remain in the camps/informal tented settlements where they are located. Presently, though they are detained/arrested for not having documentation, the Internal Security Forces (ISF) has been known to release them after paying a fine.

There are several main checkpoints across the country that do not move, such as those located in the North and South of the country, and ones before and after specific areas around the Beirut airport. These checkpoints are permanent (largely) and are on the radar of refugees, stateless persons and other people who wish to avoid them. The issue is with ad hoc checkpoints that are set up following political tension/a political event, or in the case where there is a perceived security threat, or the army/police is looking for a specific profile of people. In many cases, this is where the arrests happen (i.e. when the checkpoint is not routinely located there)."

(Source: Dr. Jasmin Lilian Diab, [written communication with Asylos](#), 6 October 2022)

The Dutch Ministry of Foreign Affairs published a report on Palestinians in Lebanon in January 2021 which stated that:

"5.1 Domestic

[...] A source indicates that Palestinians who have the right papers also face discrimination and risk being unjustly arrested at checkpoints. The probability of this varies by situation and depends on the militia guarding the checkpoint. Checks are carried out randomly, but one source indicates that people based on their skin colour or appearance, who may be associated with Palestinian and Syrian refugees, are more likely subject to questioning and possible discriminatory treatment at checkpoints." (In-house translation. The translator is a native Dutch speaker)

ORIGINAL SOURCE

"5.1 Binnenland

[...] Een bron geeft aan dat ook Palestijnen die over de juiste papieren beschikken te maken hebben met discriminatie en kans hebben onterecht opgepakt te worden bij controleposten. De kans hierop verschilt per situatie en hangt af van de militie die de controlepost bewaakt. Controles worden willekeurig uitgevoerd, maar een bron geeft aan dat personen op basis van hun huidskleur of uiterlijk, die mogelijk geassocieerd worden met Palestijnse en Syrische vluchtelingen, meer kans op ondervraging en mogelijke discriminatoire behandeling ondervinden bij controleposten."

(Source: Dutch Ministry of Foreign Affairs, "[Thematisch ambtsbericht Palestijnen in Libanon](#)", January 2021, pp. 27-28)

Based on a Whatsapp survey in Palestinian camps and gatherings in Lebanon, the UNDP stated in August 2020 that:

"Mieh Mieh Palestine refugee camp vs. Mieh Mieh village

[...] Entry and exit restrictions for people and goods in the camp is a persistent inconvenience. Indeed, one young person exclaimed that 'the number of checkpoints add a lot of stress on people who live in the camp, sometimes you have to get out an hour earlier to make sure you are not late because of the checkpoints'. Many FGD [focus group discussion] participants also claimed that what can or cannot be brought into the camp depends on the mood of the soldiers monitoring these checkpoints: one man told us they 'spend hours at checkpoints, to explain the entry of necessities. [The guards] require permits to enter food and basic equipment, such as heaters in the winter, gas tanks, water, a TV. I don't understand why all this, especially after the withdrawal of weapons!' Another said that 'they stop sick people at checkpoints, and even when we give them proof that they are sick or dying, they insist on IDs, even dead people need permits to pass'. Regarding this last point, we found that these delays often meant that some people did not make it to the hospital alive. A young woman in our FGD became emotional as she spoke of the tragic death of her father: 'my father had a heart attack in the middle of the night and due to the lack of any medical facilities in the camp, we tried to take him to a hospital outside, but they made it hard on us at the checkpoints and he died on the way'."

(Source: UNDP, "[Nothing and Everything to Lose: Results from a Qualitative Whatsapp survey of Palestinian Camps and Gatherings in Lebanon](#)", August 2020, p. 27)

5.3. Are stateless Palestinians free to leave Lebanon on a temporary or permanent basis?

Palestinian researcher Walaa Kayyal answered the following regarding the chances to re-enter Lebanon after leaving the country without travel documents:

“How will they exit the country without a travel document in the first place? [...]On the borderlines we have checkpoints. There is no way to cross borders unless you are smuggled or illegally passed. And the chances for you to come back to the country will be very minimal because maybe the first time you were lucky to cross borders without anyone, I don’t know, observing you-- or noticing you crossing, but it is more risky if you want to come back to Lebanon because they will ask you for any identification document, for your passport, etc. And one more thing that I wanted to add is that it becomes harder when you cross borders illegally and then you are put-- for anything in the country that you travel to, where they’re going to ask, «Where is your ID?» or, «Where is your passport?» And you say, «I don’t have--» so they may arrest you. You might stay in their prison forever without anyone knowing anything about you because there’s no identification. There’s no document that would identify that this is your name, this is your birth date, you’re married, you’re not married, this is your father, this is your mother, etc.

Let me give you an example. So if I am a person with no papers and I want to go to Syria, which is very close to Lebanon. [...]There is a whole GSO office there to stamp my passport that I have left Lebanon on this date. And [...]the government of Syria where they stamped that I entered Syria on this date, and on my way back, the Syrian stamp on my passport that I have left Syria on this date. And again I stamped in the Lebanon GSO that I have entered Lebanon[...] on this date. So there is no way to cross borders if we’re talking by car or walking, whatever. So not by an airplane.”

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

A collective of NGOs working with Palestinians in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated that:

“15. Right to freedom of movement, residence, and travel

15.1. Segregation of most Palestinian refugee camps through checkpoints and surrounding them with barrier walls

Palestinian refugees face hindrances to their freedom of movement inside the country and to travel abroad. Spatial marginalization has worsened, exposing the camps and their residents to additional psychological and life stress. This marginalization is illustrated through the transformation of the camps into islands semi-isolated from their surrounding environments, through the installation of electronic gates at the entrances and exits of some camps and surrounding them with walls, like in Ain el-Helwe and Mieh and Mieh. (pp. 10-11)”

15.2. Discrimination between refugee categories in terms of travel documents and their validity

The Lebanese state provides Palestinian refugees with a travel document with a limited validity, which differs depending on the category of registration. Those registered with UNRWA are provided with a document valid for five years. Those who are not registered with UNRWA are provided with a one-year laissez-passer, limiting their work and educational opportunities outside Lebanon.”

(Source: Najdeh Association, Development Action Without Borders (Naba’a), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, pp. 10-11)

Another collective stated in its own joint submission to the UPR in 2020 that:

“Stateless persons cannot move freely and face the risk of arrest for not holding an ID. Usually, stateless persons use a certificate issued by the mukhtar as an identification document. However, this document has no legal value since it relies on the information provided by the persons to mukhtars and on mukhtars acquaintance with them and is not endorsed by any official authority. Stateless persons may obtain a laissez passer from the General Security, valid for one year renewable and for multiple entries. This document is used to identify the person and for travel. However, it grants no other rights, is costly (60.000 LBP equivalent to 40UD per person per year) [please note that these figures are based on the currency exchange rate at the time the submission was drafted] and has to be renewed annually.”

(Source: The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukouk Frontiers Rights et al, “[Joint Submission to the Human Rights Council Universal Periodic Review](#)”, July 2020, p. 11)

5.4. Are stateless Palestinians able to re-enter Lebanon after exiting the country?

Mr Ziad El Sayegh, Executive Director of the Civic Influence Hub in Beirut and former Policy and Communication Advisor to the Lebanese-Palestinian Dialogue Committee [a Lebanese inter-ministerial government body formed in November 2005 to implement the policies of the Lebanese government towards Palestinian refugees in Lebanon] whom we interviewed for this report considered that stateless Palestinians are legally entitled to re-enter Lebanon, even though practices may sometimes diverge from the law:

“No, they can re-enter Lebanon. There was a decision in 2007 to not allow them to be back in Lebanon, and in 2008, the Lebanese Government put an end to this because we relied on a convention that Lebanon signed and approved, and it was an Arab League, [...] If they go, they can go back, and if they have another nationality, they can keep [...] the Palestinian refugees document. This was solved in 2008 based on that [...] Lebanon should respect the United Nations resolutions and conventions and the Arabic resolution and conventions. If you tell me everybody is coming back without any difficulty, I cannot assure you. Maybe when they arrive to the airport, they will be subject to some difficulties, but legally speaking, it is solved. [...]but in Lebanon, as everywhere sometimes, not only Lebanon, you have the law, and you have some administrative measures based on some facts and information. Maybe they can modify such an implementation of the law, but the law is very clear.”

(Source: Ziad El Sayegh, [interview record](#), 31 October 2022)

Katherine Harbord, a lecturer in human rights specialised in the Middle East whom we interviewed for this report in October 2022 shared the experience of one of her research participants who managed to re-enter Lebanon:

“This is information I’ve heard from one person plus one person who has experienced this. This individual told me that if you have received permission to live outside of a camp rather than at your registered address which would be in one of the camps, then it is possible for you to go and return. But his opinion was that outside this specific case it would not be possible. Or if you don’t have residence at all, you won’t be able to return. And he claimed that it’s more difficult for those who are residents of camps than those who are permitted to reside outside.”

(Source: Katherine Harbord, [interview record](#), 13 October 2022)

In a series of written responses to questions sent by Asylos for this report, Dr. Jasmin Lilian Diab, Director of the Institute for Migration Studies at the Lebanese American University indicated in October 2022 that:

“Palestinians that leave the country are always at risk of not being permitted to re-enter. This is less likely if they have the Lebanese government issued PRL document; however, there have been many cases where they have not been permitted to enter. For those who leave the country through irregular means, or following a rejected asylum application in a third country, they are typically not permitted to re-enter Lebanon.”

(Source: Dr. Jasmin Lilian Diab, [written communication with Asylos](#), 6 October 2022)

In their 2022 report, BADIL Resource Center and the European Network on Statelessness quoted a Dutch court decision based in part on the inability of Palestinian refugees from Lebanon to return to Lebanon :

“The Court also observed that pursuant to the decision in Germany v XT, both UNRWA’s ability to provide protection or assistance commensurate with its mission and the applicant’s ability to actually enter an UNRWA field of operation were relevant considerations. There was evidence indicating that return might be impossible:

‘Since the Lebanese elections in May 2018, [Palestinian refugees from Lebanon] living abroad without a [Lebanese] residence permit cannot obtain travel documents from the Lebanese authorities. Their return to Lebanon is stalled.’

(Source : Badil Resource Center and European Network on Statelessness: “[Palestinians and the Search for Protection as Refugees and Stateless Persons](#)”, June 2022, p. 26)

In its series of country reports for 2021, the US Department of State wrote about Lebanon:

“The DGS [Lebanese Directorate of General Security] facilitated the entry of PRS [Palestinian Refugees from Syria] into Lebanon during the early stages (2011-2013) of the Syria conflict. DGS support for PRS border transit was never formalized, and restrictions were imposed on PRS trying to enter Lebanon from 2013. Since 2014, entry visas were only granted at the Syria-Lebanon border to PRS who have either a verified embassy appointment in Lebanon, a pre-approved visa from DGS, or an airline ticket and visa to a third country. Most visas were only granted for 24-hour transit.”

(Source: US Department of State (USDOS) “[2021 Country Reports on Human Rights Practices: Lebanon](#)”, Section 2. Respect for Civil Liberties, March 2022, p. 24)

The Danish Immigration Service stated in a 2020 published report that:

“In Lebanon, Palestinians will not have any rights and the Lebanese authorities will not let a Palestinian who previously resided in Lebanon back in once they have left.”

(Source : Danish Immigration Service, “[Palestinian Refugees Access to registration and UNRWA services, documents, and entry to Jordan](#)” June 2020, p. 48)

The independent digital media platform in Arabic Daraj published testimonies by Palestinians in Lebanon about their mobility:

“Abu Taha (30 years old) is a Palestinian engineer born in Lebanon, like his father, where he received his education and worked. However, he recently moved to Dubai looking for a job, before COVID crisis unfolded and airports closed their doors. Abu Taha waited for his flight, as part of a series of flights organised by Lebanon for the return of its expatriate nationals, weeks after the airport was closed as part of the general mobilisation plan to combat the Coronavirus. However, his trip did not materialise after the General Security Department officer denied him from boarding the plane because he was “a rogue Palestinian”. Abu Taha tells “Daraj”, “it is the first time he felt humiliation and discrimination due to his Palestinian nationality. After hours of waiting due to holding a travel document issued by the Lebanese Republic which was not recognized by the officer, Abu Taha had to stand on the external stairs of the plane in the middle of a sand storm, because the officer himself humiliated him due to his nationality, and said: “This document is for rogues, the whole world would not get him on this plane,” according to Abu Taha’s narration.” [In-house translation. The author is an Arabic native speaker]

ORIGINAL SOURCE:

أبو طه (٣٠ سنة) هو مهندس فلسطيني وُلد في لبنان، كما والده، وحصل تعليمه وعمل في لبنان، إلا أنه أخيراً انتقل إلى دبي للبحث عن وظيفة، قبل أن تحل أزمة “كورونا” وتُغلق المطارات أبوابها. انتظر أبو طه رحلته، ضمن سلسلة رحلات جوية أعدها لبنان لعودة رعاياه المغتربين بعد أسابيع من إقفال المطار في إطار خطة التعبئة العامة لمكافحة فايروس “كورونا”. إلا أن رحلته لم تكتمل بعدما رفض ضابط من المديرية العامة للأمن العام صعوده على متن الطائرة لأنه “فلسطيني أزعج”. يقول أبو طه لـ “درج”، إنها المرة الأولى التي يشعر فيها بالهانة والتمييز بسبب جنسيته الفلسطينية. فبعد ساعات من الانتظار بسبب حمله وثيقة سفر صادرة عن الجمهورية اللبنانية، والتي بالمناسبة لم يتعرف إليها الضابط، اضطر أبو طه للوقوف على درج الطائرة الخارجي بينما عاصفة رملية كانت تهب، لأن الضابط نفسه أهانه بجنسيته، فقال “هيدي الوثيقة للزعران... الذي كلها ما بطلعو ع الطائرة”، وفق رواية أبو طه.

(Source: Daraj, “[Republic of Racism: The Denial of a Palestinian his Return to Lebanon](#)”, 4 May 2020)

The same source further analysed:

“The General Directorate of the General Security of Lebanon issued a circular to Middle East Airlines (No. 5932 / m) on April 30, stating that Palestinian refugees, who live in Lebanon, are not allowed to return to Lebanon on aeroplanes designated to evacuate Lebanese expats. The circular stipulated amending the meaning of “Lebanese returning “ to a Lebanese family (husband, wife, children) without escorting servants and persons of Palestinian nationality who are refugees in Lebanon.

The Directorate released a statement, after the outrage and negative reactions received on social media, that it initiated an investigation into the officer's inappropriate behaviour and treatment of Abu Taha and will take action in light of the investigation results.

It also clarified that it «works in accordance with the decision of the Council of Ministers to exclusively return Lebanese in this stage, provided that the return of non-Lebanese who have the right to enter Lebanon occurs in later stages.»

The Lebanese Palestinian Dialogue Committee said in a statement, “it was carrying the required communication at the highest levels, to amend the decision issued by the National Committee for the Management of Disasters and Crises to deny Palestinian expats from returning to Lebanon who hold travel documents issued by the relevant Lebanese authorities.”[In-house translation. The author is an Arabic native speaker]

ORIGINAL SOURCE:

المديرية العامة للأمن العام اللبناني أصدرت تعميماً إلى طيران الشرق الأوسط (الرقم ٢٣٩٥/م) بتاريخ ٣٠ نيسان/ أبريل يقضي بعدم السماح للأشخاص من التابعية الفلسطينية اللاجئين في لبنان بالعودة إليه على متن طائرات إجلاء اللبنانيين من الخارج. ونصّ التعميم على تعديل المقصود بالبنانيين العائدين إلى عائلة اللبناني (زوج، زوجة، أولاد) من دون السماح بمرافقة الخدم والأشخاص من التابعية الفلسطينية اللاجئة في لبنان

إلى أن عادت المديرية وأعلنت في بيان، بعدما لاقت هذه الحادثة ردود فعل سلبية على مواقع التواصل الاجتماعي، أنها باشرت التحقيق مع الضابط حول ما ورد من معلومات عن تعاطيه بطريقة غير لائقة مع أبو طه، ليصار إلى اتخاذ الإجراءات على ضوء نتيجة التحقيق.

كما أوضحت أنها “تعمل وفقاً لقرار مجلس الوزراء القاضي بعودة اللبنانيين حصراً في هذه المرحلة، على أن يصار إلى عودة غير اللبنانيين الذين يحق لهم الدخول إلى لبنان في مراحل لاحقة”.

“لجنة الحوار اللبناني الفلسطيني” قالت في بيان، “إنها تقوم بإجراء الاتصالات اللازمة على أعلى المستويات، لتعديل القرار الصادر عن اللجنة الوطنية لإدارة الكوارث والأزمات، بمنع المقيمين الفلسطينيين المغتربين من العودة إلى لبنان ممن يحملون وثائق سفر صادرة عن السلطات اللبنانية المختصة”.

(Source: Daraj, “[Republic of Racism: The Denial of a Palestinian his Return to Lebanon](#)”, 4 May 2020)

In the internationally recognised book they published in 2020, legal scholars Dr. Francesca Albanese [currently Special Rapporteur on the situation of human rights in the Palestinian Territory] and Professor Lex Takkenberg wrote:

“Over the decades, hundreds of thousands of Palestinians have reportedly left Lebanon as the disparity between registered refugees and current residents demonstrates. In addition to the twelve thousand Palestinian refugees who were ‘deregistered’ by the Lebanese authorities in 1982 (when the PLO was ousted from Lebanon and relocated to Tunis), on the ground that they had acquired residency or nationality abroad, and those who were expelled in the 1990s, Palestinian refugees have often experienced difficulty in renewing Lebanese travel documents allowing them to return to the country. For example, when Mu’ammar Gaddafi expelled Palestinians from Libya in 1995, the Lebanese government introduced regulations preventing Palestinians originally registered in Lebanon from returning without a special re-entry visa issued by the Lebanese mission in the country of (p. 212) residence (it did not apply to those residing in Syria). This made return to Lebanon impossible for many Palestinians. These factors, together with the discrimination and violence that prompted refugees who could do so to seek asylum and better lives in Europe, have over time confirmed what anthropologist Rosemary Sayigh refers to as an undeclared Lebanese policy encouraging Palestinian emigration from Lebanon. This situation is compounded by the fact that, since the end of the civil war, and most dramatically since the Oslo process in the 1990s, most countries that used to grant political asylum to Palestinians from Lebanon in earlier years have stopped doing so.”

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.3, Legal Status and Treatment, pp. 274-275)

6. Access to health care

6.1. Do stateless Palestinians have access to any existing Lebanese public healthcare system/healthcare insurance?

In a UN new brief, Dr Akihiro Seita noted that UNRWA was the only solution for Palestinian refugees needing primary hospital care.

“In Lebanon, where there are around 480,000 refugees registered with UNRWA, its medical director Dr Akihiro Seita, said that the agency was the “only solution” for primary and lifesaving hospital care for these displaced people.”

(Source: UN News, “[News in Brief 24 May 2022](#)”, 24 May 2022)

In a paper published in the Global Journal of Health in March 2022, it was noted that Palestinian refugees in Lebanon are ineligible for the State’s healthcare services.

“Lebanon currently also has approximately half a million Palestine refugees who are registered with the UNRWA. Close to half of these reside in camps with complicated health problems emerging from the deteriorating living conditions, low wages, high poverty and deprivation. Palestinian refugees in Lebanon are ineligible for the State’s health care services. They can only access health care through private sectors, which have high fees, or by international organizations such as UNRWA. UNRWA operates 28 primary health care facilities, providing both preventive and curative care. The UNRWA formed an agreement with Palestine Red Crescent Society (PRCS) to provide equity for Palestinian refugees in accessing secondary health care services. The UNRWA also works on decreasing the financial burden borne by the refugees by providing services such as family planning, preconception care, antenatal and postnatal follow-up, infant care, school health, oral health, outpatient consultations, diagnostics, laboratory services, vaccination, among others. In other words, UNRWA is playing the role of the Ministry of Health to provide Palestine refugees with essential health care services.”

(Source: Shadi Saleh, Sarah Ibrahim, Jasmin Lilian Diab, Mona Osman, “[Integrating refugees into national health systems amid political and economic constraints in the EMR: Approaches from Lebanon and Jordan](#)”, 12 March 2022, Volume 12, Journal of Global Health)

In its series of country reports for 2021, the US Department of State wrote about Lebanon:

“Palestinian refugees typically could not access public-health and education services [...]”

(Source: US Department of State (USDOS) “[2021 Country Reports on Human Rights Practices: Lebanon](#)”, Section 2. Respect for Civil Liberties, March 2022, p. 29)

In a public letter to the UNHCR published by UNRWA in June 2021, the relief agency stated that:

“Palestine refugees have limited access to public services in Lebanon [UNHCR 2016]. As such most Palestine refugees rely entirely on UNRWA for health care unless they can afford private health insurance. For Palestine refugees registered with UNRWA in Lebanon, UNRWA health services comprise primary health care that includes preventive interventions and general medical consultations, in addition to the coverage of 90 per cent of the costs of secondary hospital admissions and 60 per cent for tertiary admissions in selected hospitals. However, due to the significant costs of hospitalization in Lebanon for Palestine refugees without private health insurance, the sum not covered by UNRWA is still considered high, particularly for those with complex and/or chronic needs. Currently, for example, with limited exceptions [50 per cent of the cost for selected medication for cancer cases, 80 per cent for multiple sclerosis, and 95 per cent for thalassemia cases]. UNRWA is also not able to provide medications for chronic conditions. As a consequence, UNRWA is not able to provide comprehensive medical support to persons with disabilities with chronic medical needs. The additional costs will be prohibitive for many Palestine refugee families.”

(Source : UNRWA, “[Letter from UNRWA to UNHCR in the case of NB and AB v. SSHD before the Court of Justice of the European Union \(Case C-349/20\)](#).”, 21 June 2021, p. 5)

Human Rights Watch reported in an article about Lebanon's vaccination campaign in April 2021 that:

"They [Palestinians] can get health care only through the private sector, which charges prohibitively high fees, or through international organizations like UNRWA."

(Source: Human Rights Watch, "[Lebanon: Refugees, Migrants Left Behind in Vaccine Rollout Ensure Greater Information Access](#)", 6 April 2021)

UNRWA noted that even those Palestine refugees in Lebanon who work and contribute to the National Social Security Fund are excluded from the sickness fund.

"PRL who have the right to work, are required to contribute to the Lebanese National Social Security Fund (NSFF) but are "still excluded from family allowance and the sickness and maternity fund"

(Source: UNRWA: "[Protection brief Palestine refugees living in Lebanon Updated in September 2020](#)", Updated September 2020, p. 1)

The World Food Programme reported in June 2020 about the majority of Palestinian refugees in Lebanon without access to health insurance:

"Impact on healthcare

Public and private health care in Lebanon vary significantly as public health practitioners have always been underpaid compared to those providing private health care. Private hospitals account for 82 percent of Lebanon's health care capacity [Human Rights Watch 2019], which is unaffordable and inaccessible to many. Since mid-2019, medical equipment importers, for both public and private hospitals in Lebanon, began facing difficulties in bringing medical supplies into the country due to the shortage of US dollars, which was exacerbated further in November due to the unofficial devaluation of the Lebanese pound. This has become more alarming with the emergence of the global pandemic. Around 95 percent of Palestinian refugees do not have health insurance in Lebanon which means they are heavily reliant on the UN Relief and Works Agency for Palestinian refugees (UNRWA) and other sources to cover hospital fees. As a result, most are completely dependent on Palestinian Red Crescent Society (PRCS) hospitals for medical care."

(Source: WFP "[Assessing the Impact of the Economic and COVID-19 Crises in Lebanon](#)", June 2020, p. 17)

In the internationally recognised book they published in 2020, legal scholars Dr. Francesca Albanese [currently Special Rapporteur on the situation of human rights in the Palestinian Territory] and Professor Lex Takkenberg wrote:

"As foreigners, Palestinian refugees do not have access to Lebanese public health services and rely mainly on UNRWA for health services, in addition to assistance from charities. Through UNRWA, they can access primary health care, although not all medical services and treatments are possible through UNRWA clinics; UNRWA financially assists refugees with partial cost coverage for treatment in secondary and tertiary health care in UNRWA-contracted hospitals. UNRWA's frequent funding shortages hamper its capacity to meet refugees' demands."

(Source: "[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)", May 2020, Chapter 3.3.3, Legal Status and Treatment, p. 276)

6.2. Is there evidence that stateless Palestinians have difficulties accessing health care? If so, what are the reasons?

Despite UNRWA providing support, stateless Palestinians have difficulty accessing health care:

“Lebanon: Sector specific interventions: [...] During the reporting period, 348 refugees (251 PRL, 10 PRS and 87 PRL/PRS cancer and chronic disease patients) were supported under the MHF [Medical Hardship Fund] to top-up their hospitalisation coverage or to purchase medications for chronic illnesses. Hospitals now require patients to settle their accounts in US dollars, which is not affordable for the majority of refugees and results in a reduction in the number of patients seeking tertiary care. In addition, the absence of cancer medications, usually distributed by the MoPH [Ministry of Public Health] at a subsidised rate, resulted in a decrease in the number of Palestine refugees receiving treatment.”

(Source: UNRWA, “[Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022](#)”, 3 November 2022, p. 27)

UNRWA struggles to meet the health needs of Palestine refugees:

“During the year, Agency operations were adapted to address the impact of the financial and economic crises that continued to affect Lebanon [...] As the crisis deepened, violent incidents against Agency staff increased, particularly in health centres where demand for otherwise unobtainable medicines spiked. From July, fuel shortages also forced many Area staff residing in camps to work from home. This arrangement was challenged under chronic power cuts with many staff having access to only two-hours of electricity per day for much of the summer and autumn.”

[...] In 2021, there were closures of UNRWA installations for at least 53 days in Lebanon, in addition to 24 partial closures. Closures were mostly the result of strikes and protests by beneficiaries and general civil unrest. Palestinian factions closed UNRWA installations on several occasions to demand further support from UNRWA due to the growing vulnerability and socio-economic challenges faced by PRL.”

(Source: UNRWA, “[Annual Operational Report 2021](#)” 27 October 2022, pp. 11-12, and p. 16)

UNRWA also published an article in October 2022 outlining the increasingly limited access to healthcare and affordable medical treatment following rising costs:

“The cost of water, fuel, electricity, gas, transport and health care is now three to five times higher. Medicines are increasingly unavailable on the market and families are unable to afford them since government subsidies have been lifted. Too many Palestine refugee families are no longer able to afford secondary health care. Some are skipping lifesaving treatment to avoid accumulating debts.”

(Source: UNRWA, “[Hitting Rock Bottom - Palestine Refugees in Lebanon Risk Their Lives in Search of Dignity](#)”, 21 October 2022)

In their “Syria, Lebanon and Jordan Emergency Appeal 2022, UNRWA wrote:

[...] UNRWA also contributes 50 per cent of the total cost of medications not available at UNRWA health centres for around 640 patients (with an annual ceiling of US\$ 8,000 per patient) to cover treatments for cancer, thalassemia, multiple sclerosis and sickle cell anaemia. [ft. 34, notes, “The report also notes “Hospitalization costs per patient are higher in Lebanon than in the Agency’s other fields of operation. UNRWA contributes to tertiary care for invoices up to US\$ 4,000, mainly for PRL patients registered with the SSNP as well as for PRS. For this purpose, a refined Medical Hardship Fund (MHF) was instituted in 2016 as part of the hospitalization reform which introduced cost co-sharing with patients (tertiary care: 60 per cent UNRWA and 40 per cent patient; secondary care: 90 per cent UNRWA and 10 per cent patient at non-PRCS (Palestine Red Crescent Society) hospitals for secondary care).”

[...] Shortages of medicines in the local market and the massive price increase for vital NCD medications and other medicines and medical supplies necessitates the need to secure funds through this EA to maintain sufficient stocks for PRL and PRS patients.”

(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 36)

UNRWA in this report titled: [Palestine Refugees in Lebanon: Struggling to Survive](#), wrote:

“ESCWA estimates that the share of households deprived from health care rose to 33 per cent in 2021 from 9 per cent in 2019, which corresponds to around 400,000 households out of a total of 1,210,000. [ESCWA, Multidimensional poverty in Lebanon (2019- 2021), September 2021]. The situation will deteriorate further if the government completely ends subsidies on health care and medicine. Given that some 55 per cent of the population are not covered by any form of health insurance, an end to government subsidies will be detrimental. In mid-November, the government lifted additional subsidies on medicine drugs used for cholesterol, blood pressure and other diseases [As reported in Al-Arabiya on 17 November 2021, “From bad to worse: Lebanon lifts more medicine subsidies”] and there are concerns about devastating consequences if subsidies on drugs needed for chronic diseases are completely removed. [...] There are alarming reports on Palestine refugees who are forgoing essential treatments for chronic diseases due to their inaccessibility and lack of health insurance coverage. The Agency’s hospitalization policy covers only a percentage of hospital expenses and an increasing number of Palestine refugees are now unable to cover the remaining cost of care.”

(Source: UNRWA, [“Palestine Refugees in Lebanon: Struggling to Survive”](#) 18 January 2022, p. 12)

UN News stated in May 2022 about UNRWA’s difficulties to meet Palestinian refugees’ medical needs:

“The health and wellbeing of many Palestinian refugees is at risk if greater funding is not found soon to offset higher costs caused by the global economic crisis, the UN relief agency for Palestinians, UNRWA, said on Tuesday.

In Lebanon, where there are around 480,000 refugees registered with UNRWA, its medical director Dr Akihiro Seita, said that the agency was the “only solution” for primary and lifesaving hospital care for these displaced people.

But medicines now cost more because of price inflation, and hospital costs for those with mental health problems in Lebanon had risen from \$90 per night before the current economic crisis, to \$200 per night now, Dr Seita explained.

(Source: UN News, [“News in Brief 24 May 2022”](#), 24 May 2022)

In its annual report for the year 2021, UNRWA’s department of health gave a summary of its primary mission:

“In 2021, the Syrian crisis entered its tenth year. Approximately 40 percent of the 438,000 Palestine refugees in the country have been internally displaced and more than 120,000 Palestine refugees have fled to neighbouring countries, including Jordan and Lebanon. Being doubly displaced, Palestine refugees from Syria (PRS) are often identified as highly vulnerable and more reliant on UNRWA services. During the reporting period, political unrest continued in Lebanon, with the financial crisis in the country deepening, causing fuel scarcity, rampant inflation and shortages of medicines, all of which posed significant challenges for the continuity of UNRWA health services.”

(Source: UNRWA, [“UNRWA Department of Health, Annual Report 2021”](#), 24 May 2022, p. 10)

The UN Office for the Coordination of Humanitarian Affairs stated in April 2022 that:

“Compared to the Lebanese population, more than half of all PRL [Palestinian refugees in Lebanon] households reported that they have at least one member in the household with a health problem who needed to access health care in the three months prior to the assessment [Lebanese Crisis Response Plan 2022, Food Security Section]. The main barriers reported by PRL households in accessing health were the costs related to treatment, consultation, and transportation, same as for Lebanese and migrants [REACH Initiative, Multi-Sectoral Needs Assessment (MSNA), December 2021]. The main coping strategies adopted by households included going to the pharmacy instead of the doctor or clinic, switching to a healthcare facility closer to home, or delaying or cancelling doctors visit or other treatment. More than two-thirds of PRL households (70 percent) across all regions reported that because medication was too expensive, they did not access the needed medication.[REACH Initiative, Multi-Sectoral Needs Assessment (MSNA), December 2021]”

(Source: OCHA, [“Increasing Humanitarian Needs in Lebanon, April 2022”](#), 14 April 2022, p. 27)

In its series of country reports for 2021, the US Department of State wrote about Lebanon:

“Palestinian refugees typically could not access public-health and education services [...]”

[...] “Palestinian refugees who fled Syria for the country since 2011 received limited basic support from UNRWA, including food aid, cash assistance, and winter assistance, such as cash to purchase fuel for heating. Authorities permitted children of PRS to enroll in UNRWA schools and access UNRWA health clinics.”

(Source: US Department of State (USDOS) “[2021 Country Reports on Human Rights Practices: Lebanon](#)”, Section 2. Respect for Civil Liberties, March 2022, p. 29)

UNRWA has also noted what they have done to curb the effects of COVID-19:

“Finally, the impact of COVID-19 has been keenly felt among Palestine refugees. By 31 October, 15,443 Palestine refugees had been infected with the virus, with 1,819 requiring hospitalization and 443 losing their lives. Amongst UNRWA staff, there have been 888 positive cases and five deaths. Vaccine hesitancy is high among Palestine refugees, with 45,831 having received one dose and 35,309 two doses of the vaccine, either at a Lebanese hospital or UNRWA facility. In order to address emerging needs across the Palestine refugee population, the 2022 EA focuses on ensuring regular cash assistance for vulnerable groups amongst PRS and PRL. Under this appeal, UNRWA is expanding support towards vulnerable PRL families who have been disproportionately affected by the crises impacting Lebanon. The Agency will provide 162,301 PRL, PRS and other eligible populations²¹ with emergency cash assistance to support them meet their most basic needs. Other essential services such as health, education and protection will also continue, adjusted to the COVID-19 context to ensure the safety of staff and beneficiaries. Under this appeal, UNRWA will ensure the continuity of learning for 39,129 Palestine refugee students; will continue to provide primary, secondary and tertiary health care to PRS, as well as additional secondary and tertiary care to 6,210 of the most vulnerable PRL affected by the crisis; and will ensure that Palestine refugees with protection concerns are supported, including with referral pathways.”

(Source: UNRWA, “[Syria, Jordan and Lebanon Emergency Appeal 2022](#)”, January 2022, p. 16)

In a public letter to the UNHCR published by UNRWA in June 2021, the relief agency stated that:

“Palestine refugees have limited access to public services in Lebanon [UNHCR 2016]. As such most Palestine refugees rely entirely on UNRWA for health care unless they can afford private health insurance. For Palestine refugees registered with UNRWA in Lebanon, UNRWA health services comprise primary health care that includes preventive interventions and general medical consultations, in addition to the coverage of 90 per cent of the costs of secondary hospital admissions and 60 per cent for tertiary admissions in selected hospitals. However, due to the significant costs of hospitalization in Lebanon for Palestine refugees without private health insurance, the sum not covered by UNRWA is still considered high, particularly for those with complex and/or chronic needs. Currently, for example, with limited exceptions [50 per cent of the cost for selected medication for cancer cases, 80 per cent for multiple sclerosis, and 95 per cent for thalassemia cases]. UNRWA is also not able to provide medications for chronic conditions. As a consequence, UNRWA is not able to provide comprehensive medical support to persons with disabilities with chronic medical needs. The additional costs will be prohibitive for many Palestine refugee families.”

(Source : UNRWA, “[Letter from UNRWA to UNHCR in the case of NB and AB v. SSHD before the Court of Justice of the European Union \(Case C-349/20\)](#)”, 21 June 2021, p. 5)

Human Rights Watch reported in an article about Lebanon’s vaccination campaign in April 2021 that:

“Many [Palestinians] have very little trust in the Lebanese government, which has systematically discriminated against them and barred them from getting government social services, including health care. They can get health care only through the private sector, which charges prohibitively high fees, or through international organizations like UNRWA.”

(Source: Human Rights Watch, “[Lebanon: Refugees, Migrants Left Behind in Vaccine Rollout Ensure Greater Information Access](#)”, 6 April 2021)

UNRWA noted that even those Palestine refugees in Lebanon who work and contribute to the National Social Security Fund are excluded from the sickness fund.

“PRL who have the right to work, are required to contribute to the Lebanese National Social Security Fund (NSFF) but are “still excluded from family allowance and the sickness and maternity fund”

(Source: UNRWA: “[Protection brief Palestine refugees living in Lebanon Updated in September 2020](#)”, p. 1)

The same source also discussed the bigger picture:

“[...] In the last quarter of 2021, Lebanon was fluctuating between the third and fourth COVID-19 community transmission phase, according to WHO daily briefs. By October 2021, 76,000 Palestine refugees had received both doses of the COVID-19 vaccination. UNRWA will continue to support national vaccination efforts, through raising awareness of the importance of vaccination across the Agency’s staff and Palestine refugees. Through this EA the Agency will also continue to cover the cost of PCR tests for 10,000 PRL and PRS, in addition to providing medications and hospitalization costs for approximately 1,000 refugees requiring COVID-19 treatment. UNRWA will maintain COVID-19 prevention and control through multiple interventions aimed at vulnerable refugees and Agency staff, including: (i) awareness raising on good hygiene practices; (ii) the use of appropriate disinfectants; and (iii) the provision of PPE to all health staff. Based on the situation in 2021, there will be a need to hire 112 additional health staff in 2022 to cover the work of staff who are absent due to contracting COVID-19 or who need to self-isolate or quarantine.”

(Source: UNRWA, “[Syria, Jordan and Lebanon Emergency Appeal 2022](#)”, January 2022, p. 36)

The World Food Programme reported in June 2020 about the majority of Palestinian refugees in Lebanon without access to health insurance:

“Impact on healthcare

Public and private health care in Lebanon vary significantly as public health practitioners have always been underpaid compared to those providing private health care. Private hospitals account for 82 percent of Lebanon’s health care capacity [Human Rights Watch 2019], which is unaffordable and inaccessible to many. Since mid-2019, medical equipment importers, for both public and private hospitals in Lebanon, began facing difficulties in bringing medical supplies into the country due to the shortage of US dollars, which was exacerbated further in November due to the unofficial devaluation of the Lebanese pound. This has become more alarming with the emergence of the global pandemic. Around 95 percent of Palestinian refugees do not have health insurance in Lebanon which means they are heavily reliant on the UN Relief and Works Agency for Palestinian refugees (UNRWA) and other sources to cover hospital fees. As a result, most are completely dependent on Palestinian Red Crescent Society (PRCS) hospitals for medical care.”

(Source: WFP “[Assessing the Impact of the Economic and COVID-19 Crises in Lebanon](#)”, June 2020, p. 17)

In the internationally recognised book they published in 2020, legal scholars Dr. Francesca Albanese [currently Special Rapporteur on the situation of human rights in the Palestinian Territory] and Professor Lex Takkenberg wrote:

“As foreigners, Palestinian refugees do not have access to Lebanese public health services and rely mainly on UNRWA for health services, in addition to assistance from charities. Through UNRWA, they can access primary health care, although not all medical services and treatments are possible through UNRWA clinics; UNRWA financially assists refugees with partial cost coverage for treatment in secondary and tertiary health care in UNRWA-contracted hospitals. UNRWA’s frequent funding shortages hamper its capacity to meet refugees’ demands.”

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.3, Legal Status and Treatment, p. 276)

A survey from UNRWA revealed the high dependency of RPS on UNRWA health services:

All PRS are entitled to primary health care in UNRWA health centres and referrals to contracted hospitals for secondary and (subsidized) tertiary care and ambulatory services. [...] Since UNRWA does not run any hospitals in Lebanon, its hospitalization services consist mainly of referral services towards contracted Lebanese hospitals. Over three quarters of PRS seeking hospitalization (79.3 percent) had access to such UNRWA services. This relatively high figure can be explained by the fact that virtually no PRS (99 percent) have health insurance cover other than through UNRWA.

(Source: UNRWA, [“Socio-economic Survey on Palestine Refugees from Syria Living in Lebanon”](#), 28 April 2021, pp. 36 & 37)

6.3. How has Covid 19 impacted access to healthcare?

In October 2021, the UK-based NGO Medical Aid for Palestinians (MAP) submitted a letter to the UN Special Rapporteur on Extreme Poverty and Human Rights, ahead of his visit to Lebanon in November 2021. In a blog article about the submission, MAP quoted a May 2021 interview with “Inas*, a resident of the Ein el Helweh refugee camp: *“When we go to a hospital for any problem, they won’t receive us without a negative PCR [COVID-19] test, which costs 75,000 to 180,000 Lebanese Pounds [£35 to £85 GBP]. We don’t have this money, so we decided not to go to the hospital even for essential matters”*. MAP further stated that:

“In the submission, MAP highlights how these issues have disproportionately affected people with disabilities; pregnant women, nursing mothers and infants; and young Palestinian refugees. MAP has invited the Special Rapporteur to visit affected Palestinian refugee communities on his visit.

(Source: MAP, [“MAP highlights plight of Palestinian refugees in Lebanon to UN Special Rapporteur on Extreme Poverty”](#), 12 October 2021)

In its annual report for the year 2021, UNRWA’s department of health stated that:

“Palestine refugees in all fields have been affected by COVID-19. By the end of 2021, the accumulated number of cases from Jordan, Lebanon, Palestine and Syria since the beginning of the pandemic totalled 2,315,550, resulting in 29,626 deaths, of which, 147,651 cases and 1,559 deaths were reported among Palestine refugees. The number of confirmed cases increased dramatically in all fields during 2021. As anticipated, the deterioration of the epidemiological situation continued with new variants emerging. In 2021 alone, the confirmed cases reached 1,672,027 and 21,674 deaths, of which, 120,519 cases and 2,063 deaths were reported among Palestine refugees. Many more Palestine refugees continue to suffer from the consequences of lockdown and health measures that were put in place to control infection. The pandemic has exacerbated the existing poverty and vulnerability of Palestine refugees.”

(Source: UNRWA, [“UNRWA Department of Health, Annual Report 2021”](#), 24 May 2022, p. 11)

The same source further reported that:

“As shown in the graph below, Jordan reported 8,819 cases and 928 deaths. Lebanon reported 13,246 cases and 348 deaths, Syria reported 689 cases and three deaths and West Bank reported 23,723 cases and 95 deaths. In Gaza, the largest number of cases among Palestine refugees were recorded, with 74,042 cases and 689 deaths. These numbers include UNRWA staff who are also a part of the refugee community.”

(Source: UNRWA, [“UNRWA Department of Health, Annual Report 2021”](#), 24 May 2022, p. 12)

Table 3: Number of COVID-19 cases reported among Palestinians refugees in 2021

UNRWA fields of operations	Number of cases	Number of deaths
Jordan	8,819	928
Lebanon	13,246	348
Syria	689	3
Gaza	74,042	689
WB (including East Jerusalem)	23,723	95
Total	120,519	2,063

UNRWA, in a separate report, also noted that:

“With the ongoing social and economic crisis, Palestine refugees are facing difficulties in covering their most basic health care needs, which were already inaccessible even before the crisis. There are alarming reports on Palestine refugees who are forgoing essential treatments for chronic diseases due to their inaccessibility and lack of health insurance coverage. The Agency’s hospitalization policy covers only a percentage of hospital expenses and an increasing number of Palestine refugees are now unable to cover the remaining cost of care. The reported numbers of COVID-19 related deaths show that the mortality rate for Palestine refugees is three times higher than the rates for Lebanese citizens [...] as a result of the living conditions and cramped camps where social distancing is almost impossible. As of 31 December 2021, 489 Palestine refugees have died as a result of COVID-19.”

(Source: UNRWA, “[Palestinian Refugees in Lebanon: Struggling to Survive](#)”, January 2022, p. 12)

The news and information services company Thomson Reuters wrote in February 2021 that:

“Palestinian refugees in Lebanon are three times more likely to die with COVID-19 than the population as a whole, according to U.N. figures that highlight the pandemic’s outsized impact on the community.

[...] Most Palestinians who died after contracting the disease in Lebanon had health conditions such as cardiac or pulmonary issues, which are aggravated by poverty and conditions in the camps, said UNRWA spokeswoman Hoda Samra.

Cramped living conditions and the need to go out to work meant Palestinian refugees were more likely to be exposed to the virus, she added.

«Vulnerable communities tend to have poorer baseline health conditions, hence more co-morbidities and chronic health conditions,» said Joelle Abi Rached, an associate researcher at Sciences Po University in Paris.”

(Source: Thomson Reuters Foundation News “[Palestinian refugees in Lebanon three times more likely to die with COVID-19](#)”, 16 February 2021)

The World Food Programme reported in June 2020 about Palestinian refugees’ access to medicine in Lebanon:

“Out of respondents who had to buy medicine in the last month, 56 percent of Lebanese respondents reported facing challenges in accessing medicine, while 71 percent of Palestinians and 73 percent of Syrians reported encountering challenges. With vast majorities not being able to afford medicine.”

Chart 20: Perceived change in health care provision

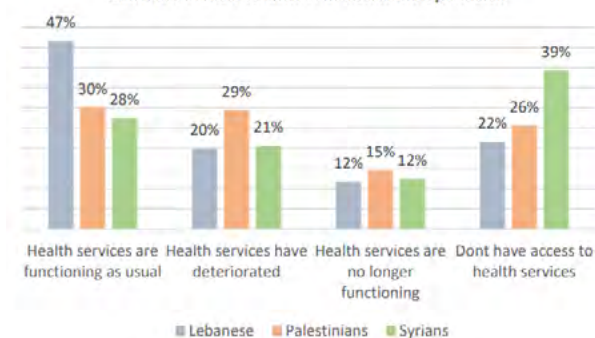
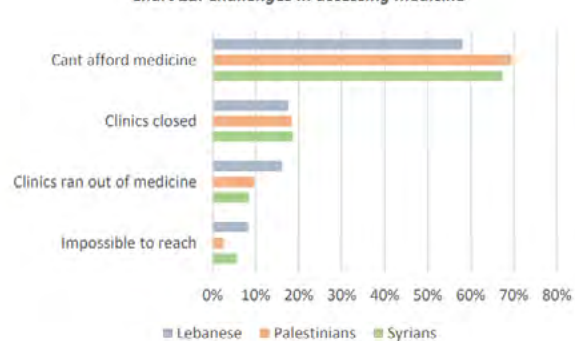


Chart 21: Challenges in accessing medicine



(Source: WFP “[Assessing the Impact of the Economic and COVID-19 Crises in Lebanon](#)”, June 2020, pp. 17-18)

The New Humanitarian (formerly IRIN News) reported in April 2020 about the impacts of COVID-19 on the refugee population in Lebanon:

“Assaf, a Syrian refugee, underwent treatment for breast cancer last year and is still prescribed medication for that diagnosis, as well as for chronic heart problems and diabetes.

Until recently, a local NGO brought her the medication she needs to stay healthy. But on 15 March Lebanon instituted a nationwide night-time curfew, and various municipalities put in place their own restrictions on the movements of the country’s estimated 1.5 million refugees. Some have also limited the ability of aid workers to enter camps like the one Assaf lives in, even though these informal settlements have so far had no documented cases of COVID-19. As of 20 April, Lebanon had 677 confirmed cases of the virus, and 21 deaths.

Aid groups say they are having a harder time getting non-coronavirus medical care to refugees, and clinics that serve Syrians say they have seen a drop-off in visitors.

[...]Differing regulations

While MSF and Amel are still reaching patients in more remote parts of Lebanon, some – mostly smaller – NGOs that previously provided mobile medical services told TNH they had been being blocked from entering the camps.

This appears to be partly due to new restrictions on refugee movement, like extra curfews, rolled out, according to a recent Human Rights Watch count, by at least 21 municipalities. There are no hard and fast rules for when NGOs can enter the camps or when people can leave them, enforcement varies, and access often seems to depend on location and pre-existing relationships with local authorities.”

(Source: The New Humanitarian, “[How COVID-19 is limiting healthcare access for refugees in Lebanon](#)”, 21 April 2020)⁴²

(Lack of) access to anti-Covid19 vaccination

6.4. Was vaccination made available for stateless Palestinians in Lebanon?

UNRWA stated in its 2021 Annual Operational Report that:

“During the second half of 2021, COVID-19 infection rates continued to decline; however, cases started to increase again at the beginning of December. To mitigate the spread of the virus, the government introduced new preventive measures and imposed country-wide movement restrictions in the evenings for anyone who had not been vaccinated. To increase coverage, the MoPH secured vaccines for a nationwide “vaccination marathon” over several weekends, targeting all eligible persons aged 12 and over. By the end of the year, 38.9 percent of Lebanon’s

⁴² Publication date is outside of this reports reference period, however this excerpt was as it contained relevant information on curfew.

residents had received two doses of the vaccine. Only 118,684 vaccines were administered to Palestine refugees with only 25.2 percent receiving one dose, 19 percent receiving a second dose, and 1.6 percent receiving a booster shot by 31 December.”

(Source: UNRWA, “[Annual Operational Report 2021](#)” 27 October 2022, p. 117)

In their “Syria, Lebanon and Jordan Emergency Appeal 2022, UNRWA wrote:

“The impact of COVID-19 has been keenly felt among Palestine refugees. By 31 October, 15,443 Palestine refugees had been infected with the virus, with 1,819 requiring hospitalization and 443 losing their lives. Amongst UNRWA staff, there have been 888 positive cases and five deaths. Vaccine hesitancy is high among Palestine refugees, with 45,831 having received one dose and 35,309 two doses of the vaccine, either at a Lebanese hospital or UNRWA facility.”

(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 16)

The UNHCR reported in June 2021 about the Lebanese national vaccination strategy:

“Good practices

A number of national vaccination strategies do not differentiate between residents based on legal status or nationality:

[...] In Lebanon, stateless persons are included in national vaccination plans and can register for vaccines. Following advocacy efforts, a stateless-ness option was added to the required nationality field in the online registration platform, enabling stateless persons to register.”

(Source : UNHCR, “[The impact of covid-19 on stateless populations](#)”, June 2021, p. 5)

Human Rights Watch denounced Lebanon’s vaccination campaign in an article published in April 2021:

“The Lebanese government’s Covid-19 vaccination program risks leaving behind marginalized communities, including refugees and migrant workers, Human Rights Watch said today. Despite the government’s promises of an equitable program, the effort has been tainted by political interference and a lack of information.

United Nations data shows that Syrian and Palestinian refugees have died from Covid-19 at a rate more than four and three times the national average, respectively. Yet, according to the government’s online Covid-19 vaccine registration and tracking platform, only 2.86 percent of those vaccinated and 5.36 percent of those registered to receive vaccinations are non-Lebanese, even though they constitute at least 30 percent of the population.

[...] Although the 200,000 Palestinian refugees do not face the same fears over arrest and deportation, many have very little trust in the Lebanese government, which has systematically discriminated against them and barred them from getting government social services, including health care.

Mistrust of the Lebanese government runs so deep that Palestinian refugees told Human Rights Watch they fear that even if they were to register, they would not actually receive the vaccine and would have to pay a fee they could not afford.

[...] Lack of Information Among Refugees, Migrants

[...] The Palestinian refugees that Human Rights Watch spoke with also lacked awareness about the government’s vaccination plan and their eligibility and expressed fear that they would be discriminated against in the rollout, given the Lebanese government’s history of discriminating against them in access to virtually all social services.”

(Source: Human Rights Watch, “[Lebanon: Refugees, Migrants Left Behind in Vaccine Rollout Ensure Greater Information Access](#)”, 6 April 2021)

The news and information services company Thomson Reuters wrote in March 2021 that:

“Lebanon has also committed to providing COVID-19 vaccines to about 1.2 million Syrian and Palestinian refugees living within its borders in a process being overseen by U.N. agencies. So far, only a small number of them have been vaccinated.

The vaccine roll-out has been overshadowed by favouritism towards the well-connected, inspiring little confidence that marginalized groups will end up getting the jab, said Farah Baba of local human rights NGO the Anti-Racism Movement.”

(Source: Thomson Reuters Foundation News “[No papers, no jab: Lebanon’s migrants face barriers to COVID-19 vaccination](#)”, 1 March 2021)

Communicable diseases other than Covid-19

6.5. Are other communicable diseases affecting stateless Palestinians in Lebanon?

Walaa Kayyal, a researcher who lives herself as a Palestinian in Lebanon who was interviewed for this report also confirmed the recent spread of Hepatitis but indicated that it did not concern Palestinians or Syrians specifically:

“Hepatitis A is a communicable disease spread through water. The more polluted the environment you reside in, higher the risk you will get hepatitis A. For Lebanese, they live in bigger houses with better infrastructures but are still getting hepatitis A because their water comes from the same source. Let me give you an example. Last month we went to my mother, who is Lebanese and lives in a village. My brother got hepatitis A from there. My uncle, who is rich and lives in a mini villa, also got hepatitis A, because the water is polluted. But from a public health perspective, when you are more vulnerable, it means you are living in a harsher situation, in a harsher environment where access to services is minimal. When the services are available, they are of a bad quality. So a person who is living in a luxurious place getting hepatitis A and a person who is living in a camp or an informal settlement can both get hepatitis A but the risk of the second and the third are higher than for the first.”

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

Walaa Kayyal, a researcher who lives herself as a Palestinian in Lebanon who was interviewed for this report also mentioned cases of Cholera:

“We have cholera now in Lebanon. However the Lebanese government is not openly saying how many cases there are and where they are concentrated. As usual, they are blaming the Syrians for transmitting cholera to the country. They say that all the cholera cases are concentrated among Syrians. So you will never know unless you contract it. When COVID-19 hit the country, the Lebanese government also said that it was among Syrians, that they brought it to the country, etc. Then the number of COVID-19 infections started rising and rising and they started to collect data on the nationality, place of residence and age of those infected. So now we have cholera, but I cannot tell you how bad the epidemic is. Until now I heard of 300-something cholera cases and maybe up to 13 deaths from cholera. But I cannot tell you where this is actually concentrated because the Lebanese government does not communicate.”

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

The Jordanian political economist and long-time commentator on the Israeli-Palestinian dialogue Riad Al Khouri who was interviewed for this report in October 2022 shared his concerns about the spread of a cholera outbreak from Syria to Lebanon:

“There is now a major problem with an outbreak of cholera in Syria. This happened over the last few weeks. The reason for this outbreak is due to polluted water. The water is not clean. This is partly because of the fighting in Syria and the situation of violence and militias and foreign armies and so forth, partly because of the gradual breakdown of public services that has been going on now for decades... [...]”

(Source: Riad Al Khouri, [interview record](#), 7 October 2022)

In its annual report for the year 2021, UNRWA's department of health wrote about an increase of hepatitis A among the population of Palestinian refugees in the countries where the organisation works:

"Other Communicable Diseases Viral Hepatitis

The Agency-wide incidence of suspected cases of viral hepatitis (mainly hepatitis A) increased from that in 2020; the reported cases from Gaza were at 262 versus 53 cases in 2020, same for Syria at 362 versus 184. At the same time, Lebanon reported 60 cases in 2021. Jordan and West Bank reported 20 and 9 cases, respectively. Agency-wide incidence went up from 10.73 in 2020 to 23.07 per 100,000 in 2021. Such increase is most probably related to poor hygienic conditions inside some camps as well personal related issues, more adherence to cleanliness and personal hygiene measures are required."

(Source: UNRWA, "[UNRWA Department of Health, Annual Report 2021](#)", 24 May 2022, p. 24)

Non-communicable diseases

UNRWA Annual Operational Report 2021, published in 2022, reported that:

"The prevalence of NCDs among Palestine refugees is increasing, with diabetes mellitus (DM), hypertension, cardiovascular and chronic respiratory diseases being the primary cause of death across all UNRWA fields of operation. In 2021, the overall number of NCD patients under care at Agency health centres increased to 291,333- from 283,584 in 2020- with these conditions being aggravated by an ageing population and sedentary and unhealthy lifestyles. Palestine refugees, particularly the estimated 48,000 PRS in Jordan and Lebanon, remained especially vulnerable to NCDs as those who have fled violence with limited resources endure conditions of prolonged displacement and deepening poverty, and thus struggle to pursue healthy lifestyles."

(Source: UNRWA, "[Annual Operational Report 2021](#)" 27 October 2022, p. 34)

Mental health and psychosocial-related disorders among stateless Palestinians

6.6. Are stateless Palestinians particularly affected by mental health disorders?

Walaa Kayyal, a researcher living as a Palestinian in Lebanon who was interviewed for this report in October 2022 indicated that:

"UNRWA has been working very recently on mental health, so usually the UNRWA clinics, when they started they were focusing on chronic diseases, communicable diseases, providing awareness, providing dental services, et cetera. Because mental health was and still is a taboo in Lebanon, you cannot say «I'm seeing a psychologist to help me do one, two, three.» People would answer «Oh what, are you crazy?» ... But then many Lebanese organizations started saying, «No, people should talk, mental health is not a taboo,»... So within all of this time when the awareness on the importance of mental health started to rise, UNRWA started to include mental health services inside their clinics, where there is a psychologist who comes maybe two days per week in order to see patients.... But I don't have solid information about this. This is what I know from a project that I worked on with UNRWA but I wouldn't say that there is a clear structure in place. Also, the Lebanese Ministry of Public Health has a mental health department, they say that their services are open for all nationalities, not only for Lebanese. A lot of the NGOs also have a hotline where you can call, but then you should be calling from your [phone] credits."

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

In its Protection Monitoring Report for the 1st quarter of the year 2022, UNRWA reported that:

“In a March 2022 multi-sectoral needs assessment by REACH, Palestinian refugees reported higher rates of psychological and physical distress stemming from Lebanon’s overlapping crises than other population groups. Fifty percent of assessed households reported at least one adult member had been affected by such distress, compared to 45 percent among the Lebanese population and 34 percent among other refugee or migrant households. Focal points reported that Palestinian refugees continued to experience difficulties coping with day-to-day living, with some also noting a sense of general hopelessness among community members. Parents remained anxious about providing basic necessities for their families, and some worried about the safety of their children in the insecure environments of the camps and surrounding areas. Difficulties accessing mental health services and the high cost of medication remained a gap particularly for those needing psychiatric intervention.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 1 \(Q1\) 2022](#)”, 1 July 2022, p. 3)

In its annual report for the year 2021, UNRWA’s department of health wrote:

“Ongoing protracted and acute conflicts, occupation, the lack of a just and durable solution for Palestine refugees’ status and the added burden of COVID-19 continue to affect the population’s physical, social and mental health. Assessment, diagnosis and treatment of mental health and psychosocial-related disorders show that their prevalence is increasing throughout the fields of UNRWA operation. To address this trend, the Agency introduced a MHPSS programme in all five fields in 2018 which aims to identify and address mental illnesses, particularly in Gaza. MHPSS services are heavily integrated into UNRWA PHC and work towards ensuring that all Palestine refugees enjoy the highest attainable mental health level. In 2021 all 140 HCs across five fields of operations continued to integrate the MHPSS within its services.”

(Source: UNRWA, “[UNRWA Department of Health, Annual Report 2021](#)”, 24 May 2022, p. 10)

The same source further reported that:

“Integrating the MHPSS [Mental Health and Psychosocial Support] Programme into UNRWA PHC [Primary Health Care] and the FHT [Family Health Team] Approach

UNRWA aims to protect and promote the mental health of Palestine refugees through its MHPSS programme that is implemented in all Agency HCs. Reports from fields during the last four years have confirmed a high prevalence of mental health problems and psychological distress among Palestine refugees. The COVID-19 in addition to challenging social and economic situations aggravated these conditions.”

(Source: UNRWA, “[UNRWA Department of Health, Annual Report 2021](#)”, 24 May 2022, p. 23)

The UN office for the coordination of humanitarian affairs reported in April 2022 about the impact of COVID-19 on mental health:

“Additionally, the crisis is taking a huge toll on the mental wellbeing of many and psychosocial needs among households are becoming alarming, with almost two in three (62 per cent) PRL households reporting that members (including adults and children) had experienced some form of psychological distress as a result of the crisis. Discrimination, particularly related to access to employment, stigma and isolation are exacerbating the severity of needs of this population group.”

(Source: OCHA, “[Increasing Humanitarian Needs in Lebanon, April 2022](#)”, 14 April 2022, p. 28)

Particularly vulnerable groups

6.7. Is there evidence that certain groups of stateless Palestinians have more difficulties accessing healthcare than others?

In its Protection Monitoring Report for the 1st quarter of the year 2022, UNRWA reported that:

“The general shortage of medicine stocks in Lebanon and high prices for medication continued to have a particularly pronounced impact on those with special medical needs, including those with serious illnesses or conditions, and older people. Some focal points noted the particular challenges that children with disabilities faced in accessing transportation.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 1 \(Q1\) 2022](#)”, 1 July 2022, p. 4)

In a public letter to the UNHCR published by UNRWA in June 2021, the relief agency stated that:

“The cost of assistive devices, specialized educations institutions, and therapeutic services is also extremely high in Lebanon. This creates significant barriers for children with severe disabilities in terms of participation in society, access to services and maintaining independence in daily life. In general, Palestine refugees have extremely limited access to such assistive devices due to this high cost, and many are entirely dependent on UNRWA and partners to fill the gaps in those needs. While UNRWA aims at the inclusion of persons with disabilities in all its core services, many persons with disabilities still face considerable obstacles given the limited specialized services available, their high cost, and limited funding made available to UNRWA.”

(Source: UNRWA, “[Letter from UNRWA to UNHCR in the case of NB and AB v. SSHD before the Court of Justice of the European Union \(Case C-349/20\)](#).”, 21 June 2021, p. 6)

7. Child protection

7.1. Are child protection/social services available to Stateless Palestinians, who is it provided by and what assistance do they provide?

In a series of written responses to questions sent by Asylos for this report, Dr. Jasmin Lilian Diab, Director of the Institute for Migration Studies at the Lebanese American University, directly commented on [Article 1 (Paragraph 1) of Law 422/2002] :

“This law, though intended to cover the rights of all children from all nationalities, unfortunately does not extend to refugees as much as it outlines. This has been the case with Syrian and Palestinian children who largely fall outside the scope of the law in many cases. For children residing in camps, their largely “autonomous” nature, coupled with the inability of the Lebanese government to be actively present/engaged with them, renders it increasingly difficult for policies and legal frameworks to extend to stateless, migrant and refugee children. On a broader level, the overall culture of impunity in Lebanon, at all levels, renders it close to impossible to enforce the law, and has pushed many families to resort to negative coping mechanisms that the government strategically does not interfere with. i.e. sending children to work for instance, etc.”

(Source: Dr. Jasmin Lilian Diab, [written communication with Asylos](#), 6 October 2022)

A collective of NGOs working with Palestinians in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated among others that:

“12.2. Palestinian refugee children, especially those living the camps, do not benefit from the Juvenile Protection Law or the Law on Domestic Violence

Article 1 (Paragraph 1) of Law 422/2002 on the protection of minors in contact with the law or those at risk deprives refugee children from its legal protection and jurisdiction to intervene for their protection due to the absence of due process inside the camps, where children are subjected to several forms of violations.”

(Source: Najdeh Association, Development Action Without Borders (Naba’a), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, p. 7)

UNRWA describes its Children and Youth programme to eligible individuals as follows:

“2. Social services

Social services are extended through a network of more than 100 refugee administered community-based organizations (CBOs) which create social, cultural, economic and educational opportunities. UNRWA provides training and technical support to the CBOs to strengthen their institutional capacity and enhance refugee participation in the formulation and implementation of social services in their respective communities. Social services are available to the entire community. The four key social services sub-programmes are as follows: [...]

2.3 Children and youth programme: enhances the well-being of children and youth and promotes their participation in constructive activities consistent with the objectives of the Convention on the Rights of the Child (CRC).”

(Source: UNRWA, “[Consolidated Eligibility and Registration Instructions](#)” , 1 January 2009, pp. 21-22)

In its 2021 Annual Operational report, UNRWA reported that:

“The preparatory dropout rates in Lebanon and Syria both increased. In Lebanon, national grade promotion criteria reverted to academic performance and, in the context of over a year of disrupted learning, led to an increase in the repetition rate and subsequently, to a higher dropout rate. Male students were also particularly impacted by the country’s deteriorating socio-economic situation, with high unemployment rates reducing motivation to learn whilst, at the same time, generating pressure to find paid employment in order to support household income.”

(Source: UNRWA, “[Annual Operational Report 2021](#)” 27 October 2022, p. 39)

In its 2022 Emergency Appeal Progress Report for the reporting period 1 January - 30 June UNRWA reported that:

“In Lebanon, against a target of 11,838, only 7,348 students could be provided with transportation to support their attendance at school. Due to the socio-economic crisis, an increasing number of families are struggling to cover the costs of fuel and transportation to ensure their children regularly attend school. Under such conditions, the Agency’s support is crucial to prevent drop-outs.”

(Source: UNRWA, “[Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022](#)”, 3 November 2022, p. 6)

“The physical learning environment is an important enabler in ensuring quality, inclusive and equitable education and can have a profound impact on student and educator outcomes. For students, school design can affect health, access for those with disabilities, behaviour and overall learning performance. For educators, the physical environment can affect commitment, effort and retention rates. To enhance the physical environment within UNRWA schools, the Agency either constructed, reconstructed or upgraded four schools in 2021 through project funding, including one in Gaza, two in Jordan and one in the West Bank [...] In 2021, project funding helped the Agency come close to meeting its annual target in most fields, although in Lebanon, no schools were constructed, reconstructed or upgraded, due to lack of funds.”

(Source: UNRWA, “[Annual Operational Report 2021](#)” 27 October 2022, p. 43)

UNRWA, also reported in its Syria, Lebanon and Jordan Emergency Appeal 2022:

“In 2022, irrespective of the learning modality, UNRWA will continue to provide educational services to all Palestine refugee students in Lebanon registered at UNRWA schools. Preliminary results of the class formation for the 2021/2022 academic year showed total student enrollment at 39,129 students (20,237 girls, 18,892 boys), an increase of 1,558 students from the previous year. This may be due to the shift from private schools to UNRWA schools due to the deteriorating socio-economic conditions, since many families are unable to continue to afford private education. On the other hand, there is also concern that there may be a high number of at-risk students leaving school or having low attendance, since the economic crisis creates conditions for abuse and exploitation, with an expected increase in students exposed to negative coping mechanisms (substance use, child labour and early marriage) in order to help meet their families’ basic needs. Students are at-risk for a number of reasons, including: (i) barriers to learning (transportation/communication costs, lack of school supplies and other actual costs related to learning); (ii) loss of motivation/interest/hope resulting from psychological distress and requiring PSS; and (iii) feeling overwhelmed, leading to them falling behind in learning and in need of tutoring and resources to support them to continue their education.

The educational experiences of children and youth have been profoundly impacted due to the socio-economic crises in Lebanon, as well as the constant shocks and stressors facing families, resulting in increased psychological and behavioural distress. [It is footnoted here that, “These findings are also reflected in a recent United Nations Children’s Fund (UNICEF) study that indicates that in Lebanon, including in the Palestine refugee camps, financial hardship has impacted all areas of people’s lives, leading them to be more exhausted and stressed. See UNICEF July 2020. Underneath the Surface: Understanding the root causes of violence against children and women.”]

[...] The increased electricity outages and the national fuel crisis have led to a substantial increase in transportation costs, as well as widespread electricity cuts. As such, it is anticipated that transportation and/or communication assistance needs will substantially increase in 2022 as will the need for PSS and tutoring/educational support due to the learning loss resulting from the closure of schools for over one year.”

(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 37)

UNRWA, reported in their “Palestine Refugees in Lebanon: Struggling to Survive:

“Child and Youth deprivation: [...] At the educational level, UNRWA estimates that more than 1,275 Palestine refugee students left school during the school year 2020-2021 in Lebanon, of whom 55 per cent left school as a result of psychological distress.

[...] Even after the end of the lockdowns and the reopening of schools, students are still facing many challenges in attending their classes and enjoying an adequate learning experience. The rise of transportation costs is disrupting the students' commute to school and the electricity cuts affect their studying hours."

(Source: UNRWA, "[Palestine Refugees in Lebanon: Struggling to Survive](#)", 18 January 2022, p. 11)

7.2. Do Palestinians who are stateless have trouble getting access to child protection?

The Jordanian political economist and long-time commentator on the Israeli-Palestinian dialogue Riad Al Khouri who was interviewed for this report in October 2022 provided the following general analysis to contextualise child protection among the population of stateless Palestinians:

"[...] most Palestinian refugees are Muslim [and] tend to have lower standards, more common child marriages, more common child labour, and others. And this problem has been getting worse over the past few years for economic reasons. Child labour is an obvious example. But child marriage is also an economic issue, whereby you sometimes get rich people, particularly from the Arab Gulf, coming to Lebanon and offering families substantial amounts of money for a young bride who may be below the legal age of marriage [...] and is also becoming more common now in Lebanon."

(Source: Riad Al Khouri, [interview record](#), 7 October 2022)

UNRWA stated in its 2021 Annual Operational Report:

"Palestine refugees were already among the most vulnerable and marginalized communities in Lebanon with deteriorating conditions adding to their hardship. Through a crisis monitoring survey conducted by UNRWA in 2021, 58 percent of respondents reported consuming fewer meals per week, while 25 per cent reported eating less to provide for their children. The Agency also registered: (i) cases of students dropping out of UNRWA schools due to the need to take paid employment; (ii) an increased number of children suffering from psychological distress; and (iii) increases in cases of child labour, child marriage, child abuse and harassment and violence against girls and women".

(Source: UNRWA, "[Annual Operational Report 2021](#)", 27 October 2022, p. 9)

UNRWA stated in its Protection brief titled 'Palestine refugees living in Lebanon':

"Overcrowded living conditions, insufficient livelihood and employment opportunities and high poverty rates are some of the factors exacerbating the exposure of Palestine refugee children to different forms of violence, exploitation and abuse in Lebanon. Violence within the home is a main child protection issue. The use of physical and psychological violence against children, including violent discipline and hitting, is considered as a generally accepted and commonly applied method of discipline in PRL and PRS households. Overall 77 percent of PRL children and 72 percent of PRS children experienced psychological aggression, while 59 per cent of PRL children and 55 per cent of PRS children were subjected to some form of physical punishment (citing UNRWA, Violence affecting Palestine Refugee Children in Lebanon, Situation analysis, January 2018)

- Palestine refugee children risk being exposed to armed violence in the Palestine refugee camps particularly, including recruitment and use of children by armed actors, with disruption of education and severe consequences on their wellbeing and development (Report of the SG on Children and armed conflict, 9 June 2020)
- Child labour and families resorting to negative coping mechanisms are increasing. Five per cent of PRL and four per cent of PRS children are reportedly involved in different forms of child labour, with a rise among Palestine refugee families' common belief that labour provides more opportunities than education in a context of limited access to the job market (citing Drivers and Causes of Intimate Partner Violence, VAC, Child Marriage and Child Labour, Magenta & Unicef Lebanon, August 2019). As a result, many children are spending a considerable amount of time on the streets, vulnerable to all kinds of exploitation, and missing out on their education in the process. In November 2018,

an estimated 4,500 Palestine refugee children were engaged in different forms of child labour. (citing In Focus: Child Labour in Lebanon, Interagency Coordination Lebanon, November 2018).

- Substance abuse and involvement in often violent drug related networks is anecdotally reported as on the rise, in particular for adolescents, youth, and even children, with an increasing number resorting to the distribution or transportation of drugs. Data is limited on this growing phenomenon due to its sensitive nature.”

(Source: UNRWA: “[Protection brief Palestine refugees living in Lebanon Updated in September 2020](#)”, Updated September 2020, p. 3)

7.3. What are the obstacles to the protection of Stateless Palestinian children?

Walaa Kayyal, a researcher living as a Palestinian in Lebanon who was interviewed for this report in October 2022 emphasised the fragility of the funding on which child protection programmes rely in Lebanon:

“Most importantly, if you are talking specifically about child protection services, most of these services are covered by international or local NGOs. So again, they’re not structured. For example, now I work at an international NGO that provides child protection case management, and they provide for the case management. They provide emergency cash assistance and these projects are based on funds. So, for example if UNHCR stopped giving us, we will cut the service. We will not give any more child protection services. In brief, no, we don’t have a structure. There are scattered services through the nongovernmental organization scope, but these are based on funds. So, if the fund is cut, the services are cut. We have some initiatives by UNRWA and the Ministry of Public Health, but these are more broadly into mental health rather than child protection.”

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

The same source pointed to the causality between the economic crisis in Lebanon and the increase of child labour:

“Since the economic crisis, child labour increased because we have a devaluation of the Lebanese Lira, and the father of the family cannot afford to support the whole family. So Lebanese generally, their social status has dropped because of the devaluation of the currency. However, the poorer became the most poorer, and the majority of people now are under the poverty line. So without being able to quote any figure or any study, I can say that child labour has increased in Lebanon in general. This is because people have to eat, parents cannot afford anything anymore, so they send their children to work. Before the economic crisis we saw child labour in Lebanon but it increased. Inside the camps, UNRWA schools are free of charge. So children can enter and just pay something very negligible in order to enter the UNRWA school. But then some families still decide not to send their children to school so that they come and help them with their own work. So sometimes the father is a painter, and instead of getting another person to help him, he takes his child out of school to help him. Mostly, boys are involved in child labour. You see this inside the camp more than you see it outside the camp also because inside the camp it’s a closed community, they don’t have much interaction with the surrounding around them. In this closed community it is very acceptable for a child, even if they are in school, to help their dad with the work during summer, even if he’s 10 years old or 12 years old. The belief is also that the boys helping their fathers during summer will become more masculine. So, this concept of child labour is very acceptable, and it’s encouraged if the child is working with their father and/or mother.”

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

UNRWA reported on school dropouts in their Protection Monitoring Report covering the 1st quarter of 2022:

“Strained family incomes were said to continue to push families to send children – often boys – to work, sometimes withdrawing them from school to do so. According to focal points, child labour and school dropouts were the most common issues they saw in quarter one, with child labour a particularly prominent concern in the North, and dropouts the most evident in Saida. [...] Reports of child marriage persisted as families continued to struggle economically, with Tyre focal points suggesting the practice was increasing in camps there. However, focal points suggested that cultural practices, including parents’ lack of awareness about the negative impact, also contributed to

this, as well as poverty, reflecting child marriage as a long-term phenomenon in the Palestinian refugee community. Reports also continued of isolated instances of families pressuring children into worked for armed groups, which often pay in dollars, or criminal gangs.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 1 \(Q1\) 2022](#)”, 1 July 2022, p. 4)

The UN office for the coordination of humanitarian affairs reported in April 2022 about child labour is in Palestinian households:

“Child labour is also a phenomenon that is becoming more frequent as households struggle to cope with the worsening economic situation. One in four PRL [Palestinian refugees in Lebanon] households reported children to be working or supporting the household, contributing significantly to children dropping out of school and exposing them to grave physical harm as they risk their lives.

In addition, the risk of child marriage is on the rise, namely for girls. According to the MSNA 2021 data, child marriage rates for PRL revolve around 0.72 per cent, and 1 per cent for girls; although these figures are likely underreported [UN Women, Gender and Social Inclusion Analysis based on MSNA, December 2021 data].”

(Source: OCHA, “[Increasing Humanitarian Needs in Lebanon, April 2022](#)”, 14 April 2022, p. 28)

The same source further reported that:

“Finally, 32,000 Palestine children in Lebanon (48 per cent boys and 52 per cent girls) are estimated to be in need of specialized child protection services. Saida and Sour districts reported the highest number of PRL [Palestinian Refugees in Lebanon] children in need with 10,000 children and 6,000 children respectively. This is driven by the deteriorating socioeconomic situation, violence within the home and on the street, and harmful coping mechanisms such as child labour, child marriage or joining armed groups.”

(Source: OCHA, “[Increasing Humanitarian Needs in Lebanon, April 2022](#)”, 14 April 2022, pp. 30-31)

In its Protection Monitoring Report for the last quarter of the year 2021, UNRWA reported that:

“More than in other areas, focal points in CLA and NLA felt that children did not report incidents that affected them. While children were said to be most likely to turn to family members, UNRWA staff and NGOs, low reporting was attributed to potential stigma, the lack of trust in the system and no clear directions on how to do so. (p. 8)”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter Four 2021](#)”, 6 April 2022)

In its Protection brief of 2020, UNRWA also pointed out that:

“Child labour and families resorting to negative coping mechanisms are increasing. Five per cent of PRL and four per cent of PRS children are reportedly involved in different forms of child labour, with a rise among Palestine refugee families’ common belief that labour provides more opportunities than education in a context of limited access to the job market. As a result, many children are spending a considerable amount of time on the streets, vulnerable to all kinds of exploitation, and missing out on their education in the process. In November 2018, an estimated 4,500 Palestine refugee children were engaged in different forms of child labour.”

(Source: UNRWA: “[Protection brief: Palestine refugees living in Lebanon](#)”, September 2020, p. 3)

A collective of NGOs working with Palestinians in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated among others that:

“Violent practices and violations are prevalent on the social and household levels, impacting Palestinian women and children refugees in Lebanon and from Syria, particularly through increased child labor and child marriage used by parents as mechanisms to cope with the economic situation and increasing financial constraints. The application of a child protection system and its related mechanisms is still lacking on the national level generally and in Palestinian

refugee camps, in particular, due to the absence of due process, where eight out of ten Palestinian children suffer from violence. (p. 3)”

(Source : Najdeh Association, Development Action Without Borders (Naba’a), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, p. 3)

7.4. Are Stateless Palestinian children exposed to exploitation and other types of harm such as physical violence, sexual abuse etc?

In its Protection Monitoring Report for the 2nd quarter of the year 2022, UNRWA reported that:

“Focal points in Tyre, Beqaa and the north reported that the prevalence of child labour was increasing as the summer school holidays began, and in response to the economic situation. Focal points in north and central areas noted that child labour was more common among Syrian refugees than Palestinians, but that some PRL and PRS have been involved. Common activities for child workers include collecting garbage and plastic, working in supermarkets, gas-stations, and bakeries, or as mechanics and delivery-boys. Some were also said to be involved in organised criminal activity such as theft of public utility equipment like man-hole covers and the delivery of drugs. Children engaged in child labour include school drop-outs as well as some who work after school or during holidays. Focal points in Saida noted that the growing financial and psychosocial pressures on families, which are often manifested in increased child labour, are having effects on children’s performance at school and thus their future prospects. Child marriage was also mentioned as an ongoing concern in most areas though some focal points described it as more widespread amongst Syrian than Palestinian refugees. Among Palestinians, it is said to be more prevalent among PRS than PRL, except in Ein el Hilweh camp in Saida where both PRL and PRS were reported to be involved. Focal points in central Lebanon and Tyre areas speculated that rates of child marriage may be dropping due to families allocating scarce savings to basic needs rather than the costs associated with marriage.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 2 \(Q2\) 2022](#)”, 26 August 2022, pp. 7-8)

In their “Syria, Lebanon and Jordan Emergency Appeal 2022, UNRWA wrote:

“In Lebanon, UNRWA recorded the arrival of 409 PRS families from Syria during the first half of 2021, the highest number of arrivals since 2017. During the same period, PRS returns to Syria dropped. [...] in Lebanon. As a result of the economic decline and COVID-19, the protection situation for many Palestine refugees has sharply deteriorated. Over the course of 2021, there has been an increase in interpersonal disputes escalating into violence in the camps as people have become more frustrated and desperate. Violence against women and children has continued to increase, closely linked to people’s mental well-being and their ability to constructively cope. Instances of conduct in breach of the rights of the child and human rights and humanitarian law have reportedly increased, including child labour, drug abuse amongst the youth and related participation of boys and girls in drug-distribution networks, as well as children’s involvement with armed groups.”

(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 16 citing UNRWA Protection Quarterly Monitoring Reports, Q1 and Q2, 2021)

UNRWA outlined also the involvement of children in drug distribution and transportation:

“Substance abuse and involvement in often violent drug related networks is anecdotally reported as on the rise, in particular for adolescents, youth, and even children, with an increasing number resorting to the distribution or transportation of drugs. Data is limited on this growing phenomenon due to its sensitive nature.”

(Source: UNRWA: “[Protection brief: Palestine refugees living in Lebanon](#)”, September 2020, p. 3)

In its Protection Monitoring Report for the last quarter of the year 2021, UNRWA reported that:

“3. Child Protection

A large majority of focal points considered children felt either not safe at all or faced some safety concerns, with children’s feelings of safety said to be similar to during quarter three. They attributed this to the economic situation and parents’ focus on survival. However, the return to school was said to have a positive impact generally, leading to children spending less time on the streets and being less engaged in child labour.

[...] Despite the return to school, the most frequently reported child protection concerns continued to be child labour, violence against children and street-connected children. Most focal points considered all groups were equally affected. Focal points in Tyre highlighted the impact of the Bourj Shemali explosion and subsequent shootings on children’s mental health and wellbeing, and in Ein El Hilweh they described the lasting effects on children of the September shootings and the murder outside the school.

The number of focal points reporting that they were aware of children being physically harmed was similar in quarter four to quarter three, with 11 reporting that they were aware of children being injured as a result of violence and four reporting being aware of child victims of sexual abuse. Almost half focal points had heard of substance use or dealing among children at least once in the last month, and while generally focal points reported that children were working less, in Tyre they reported that children were increasingly involved in exchanging money and in the Beqaa that families were sending children to work to support them financially. Boys in the north were singled out as being less safe than girls because girls do not often leave the camps, whereas boys are unsafe when doing so. Focal points in Tyre indicated that there had been an increase in child sexual harassment in camps during the quarter and that too often perpetrators are well-connected, undermining accountability mechanisms.

The economic situation, combined with ongoing COVID-19 related restrictions, continued to impact children’s wellbeing. Focal points explained children had no toys, could no longer play games such as football and expressed worry they were not having a typical childhood. In NLA, focal points described the example of a student wrapping his shoes with nylon bags to prevent the rain from reaching his feet as illustrative of the struggles families are facing. A nation-wide survey on nutrition found that four percent of Palestinian refugee children suffered from wasting the most immediate, visible and life-threatening form of malnutrition where children become too thin and their immune systems are weak – compared to 1.8 percent of Lebanese and 2.4 per cent of Syrians.¹⁷ Across areas, food insecurity was a rising concern for children, reported to contribute to feelings of unsafety among children in CLA and progressively emphasised in areas such as Saida.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter Four 2021](#)”, 6 April 2022, pp. 6-7-8)

8. Access to education for children

8.1. Do stateless Palestinian children have access to education? If not, what are the obstacles they face?

Walaa Kayyal, a researcher living as a Palestinian in Lebanon who was interviewed for this report in October 2022 emphasised the negative impact of a lack of identity papers to pursue an education, despite UNRWA's policy to open schools to Palestinian children outside of their "mandate" population:

"UNRWA welcomes all Palestinians to get an education, I would say, regardless of their legal status. However, they need to see an identification paper and UNRWA registration card in order to register people before giving them assistance. Sometimes the UNRWA allows children without papers to come to learn how to write and read. In Lebanon during the 9th grade all students in Lebanon- whether Syrian, Lebanese, Palestinians, etc. – take an official exam planned by the Lebanese government in all disciplines. If they pass, they go to the secondary level, high school. Those who don't pass have to repeat their class. This is what we call the "brevet" similar to the baccalaureate that students do during the 12th grade. So, if the principal of the school is very welcoming, they would allow stateless children to come to learn how to write and read, without doing all the homework, but attending the English and Arabic sessions for example, just enough to become literate. But then when they reach the 9th grade, they cannot apply to take the official "brevet" exam because they need to have an ID for that, they need to have something to tell who they are and in order to identify them, where a card from the government is issued based on their ID in order to access the exams."

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

In its Protection Monitoring Report for the 2nd quarter of the year 2022, UNRWA reported that:

"Fears about the impact of transport costs on access to education were highlighted by many school principals, particularly as Palestinian children living outside the camps or at a distance from UNRWA schools are increasingly unable to access Lebanese public schools, leaving them obliged to travel to UNRWA schools. As children prepare to return to school full-time for the first time since the 2018– 2019 school year, transport costs risk being a significant barrier to education. (p. 3)"

(Source: UNRWA, "[UNRWA Protection Monitoring Report – Quarter 2 \(Q2\) 2022](#)", 26 August 2022)

Refugee Net, which, according to its website, is a "Palestinian Refugee News Network in Lebanon", published a statement by the Palestinian Teachers Union in Lebanon:

"The department also considered that UNRWA bears the responsibility for the state of the educational sector, and today's results is an example and requires a serious review of the educational process, including the policy of automated grading and negativity in dealing with employees; the difficult economic conditions and decrease in the quality of education due to the employment policy under the pressure of the contrived financial crisis. The number of education staff in Lebanon decreased from 2,082 in 2017 to about 1,655 in 2020 and below that in 2021, despite the increase in the number of students from 3,688 in 2017 to 37,586 in 2020, which had a direct impact on today's low rates. [...] The success rate in all UNRWA schools in Lebanon was 49.29%, while the success rate in all Lebanese public and private schools was close to 79%, according to the Ministry of Education in the Lebanese caretaker government, Abbas Halabi." [In-house translation. The author is an Arabic native speaker]

ORIGINAL SOURCE:

كما اعتبرت الدائرة، أنَّ وكالة «الأونروا» تتحمّل مسؤولية ما آلت إليه أوضاع القطاع التربوي، وتشكل نتائج اليوم إحدى نماذجها وهي تتطلب مراجعة جديّة للعملية التعليمية التي من ضمنها سياسة الترفيع الآلي والسلبية في التعاطي مع الموظفين والأوضاع الاقتصادية الصعبة وانخفاض جودة التعليم بسبب سياسة التوظيف تحت ضغط الأزمة المالية المفتعلة، إذ انخفض عدد موظفي التعليم في لبنان من ٢٠٨٢ عام ٢٠١٧ إلى نحو ٥٥٦١ موظفاً عام ٢٠٢٠ وإلى ما دون ذلك في عام ٢٠٢١، رغم زيادة عدد الطلبة من ٣٦٨٨ طالباً عام ٧١٠٢ إلى ٣٧٥٨٦ عام ٢٠٢٠، وهو ما كان له الأثر المباشر على النسب المتدنية اليوم. [...] وبلغت نسبة النجاح في عموم مدارس «الأونروا» على مستوى لبنان، ٩٢,٩٤٪، فيما قاربت نسبة النجاح في عموم المدارس اللبنانية الرسمية والخاصة ٩٧٪ بحسب وزارة التربية في حكومة تصريف الأعمال اللبنانية عباس حليبي.

(Source: Refugee Net: "[A warning sit-in by the Palestinian Teachers Union in front of the UNRWA headquarters in Beirut](#)", July 5, 2022)

The UN office for the coordination of humanitarian affairs reported about the increasing needs in Lebanon in April 2022:

“Based on the Multi-Sectoral Needs Assessment (MSNA) conducted by the REACH Initiative in December 2021, OCHA reported in 2022 that:

“Around 81 percent of PRL [Palestinian refugees in Lebanon] children were reportedly enrolled during the 2020-2021 school year. Among them, 3.8 percent reported that engagement in labour outside or in the home has consistently disrupted their learning. Additionally, almost 10 percent of PRL households with individuals being enrolled reported changing schools on account of affordability (e.g. shifted from private to public or UNRWA-schools) to adapt to new or increased barriers to accessing education during the 2020-2021 school year. [Footnote 178 on page 35] Among PRL, the number of enrolled children is around 34,000, 18,000 girls and 16,000 boys, all considered particularly vulnerable

Overall, almost 4 percent of PRL children out of those enrolled dropped out of school during the 2020-2021 school year. The main drivers for school drop-out are very similar to the ones reported by Lebanese parents and include COVID-19-related school closures at 37.7 percent and inability to afford the education related costs (including tuition fees, learning materials and transportation), lack of interest / priority from parents and child working to support family, all at 25 percent.”

(Source: OCHA, “[Increasing Humanitarian Needs in Lebanon, April 2022](#)”, 14 April 2022, p. 27)

UNRWA describes its educational services to eligible individuals as follows:

“ C. Education Services

1. School education

UNRWA provides elementary and preparatory education services (ages 6-15) in all Fields and secondary education in the Lebanon Field only (ages 16-18). The Education Technical Instruction for Admission to UNRWA Schools (ETI No 1/2005) addresses conditions, cases and exceptions in respect of admission to UNRWA schools. UNRWA’s Education services are available to all categories of persons specified in section III of these Instructions.

2. Vocational education

Technical and vocational education and training are provided through eight vocational training centres (three in the West Bank, one in the Gaza Strip, one in Lebanon, two in Jordan and one in the Syrian Arab Republic) to enable students become productive citizens and contributors to the well being of their communities. Two kinds of vocational services are provided by the centres: trade and technical.

- Admission to the vocational (trade) courses requires successful completion of the basic education cycle (9 or 10 years of schooling, depending on the system applied in the host country). The trade courses offered include automotive engineering, building and woodworking, climatization and sanitation, electrical power, electronics, metal fabrication and machining, and traditional women’s crafts.

- Admission to the technical courses requires successful completion of 12 years of schooling; courses offered cover specializations in the fields of architecture and art, commerce, computer technology, electronic engineering, home management, paramedical services, surveying and civil engineering.

- Admission to training centres is further covered by the Education Technical Instructions (ETI No. 13/2001). Due to the limited number of places available in each course in each Field, Field Offices issue further instructions on a yearly basis to cover the admission for each course.

[...]

3.2 Teacher training

Given the shortage in Lebanon of University graduates who can become teachers UNRWA provides two-year teacher training services only in that Field. Students admitted to this programme should have a general secondary school certificate. Admission is further covered by the Education Technical Instructions (ETI No. 5/1998).

4. Placement and career guidance

UNRWA established a Placement and Career Guidance Office (PCGO) to assist graduates from all the Agency’s training centres and educational institutions to secure suitable jobs in the local and regional labour market. The function of the PCGO includes career guidance and counselling services for students at schools”

(Source: UNRWA, “[Consolidated Eligibility and Registration Instructions](#)”, 1 January 2009, pp. 23-25)

The main education providers may differ depending on learner's area of residence, as this UNRWA survey regarding Palestinian Refugees from Syria living in Lebanon pointed out:

"PRS children heavily depend on UNRWA for their elementary and preparatory (primary) education, with 81.8 percent attending its primary schools instead of government schools (12.7 per cent) or private schools (5.5 per cent). [...] While camp and non-camp dwellers share more or less the same educational profile, their main educational services provider varies significantly. Camp dwellers who live relatively close to UNRWA facilities are more dependent on the UNRWA education system. More specifically, 98.1 percent of PRS camp children (mostly in the 6-15 age group) attend UNRWA schools at elementary and preparatory levels compared to 69.2 percent of PRS non-camp children. Outside camps, 26.8 percent of PRS children are enrolled in government schools and 7.9 per cent private schools. UNRWA in Lebanon also provides secondary education (up to the baccalaureate) and remains the leading provider of services in that education cycle, providing education to 69 per cent of PRS secondary schools students, ahead of government (19.7 per cent) and private (11.3 per cent) schools."

(Source: UNRWA, "[Socio-economic Survey on Palestine Refugees from Syria Living in Lebanon](#)", 28 April 2021, p. 33)

Impact of economic hardship on school drop-out

8.2. Is the education of stateless Palestinian children and young people free? At what level of education?

In a written statement to the UN Human Rights Council, submitted by BADIL Resource Center for Palestinian Residency and Refugee Rights, a nongovernmental organization in special consultative status wrote about the UNRWA schools:

"Living Conditions for Palestinian Refugees in Lebanon

These conditions are exacerbated by an underfunded United Nations Relief and Works Agency (UNRWA) that is constantly facing Israeli-led attacks and defamation campaigns aimed at delegitimizing and invalidating the Agency. As such, UNRWA is gradually becoming less able to provide adequate services to all Palestinian refugees. This is particularly so considering that most Palestinian refugees in Lebanon depend on UNRWA schools for education due to high schooling expenses elsewhere, as well as health care due to their inability to access the public health system in the country."

(Source: Badil Resource Center: "[Written statement*](#) submitted by BADIL Resource Center for Palestinian Residency and Refugee Rights, a nongovernmental organization in special consultative status", 23 May 2022, p. 2)

In a public letter to the UNHCR published by UNRWA in June 2021, the relief agency stated that:

"UNRWA is aware that there has been additional pressure on public schools in Lebanon in 2020 due to students not being able to pay the fees for private schools. On 28 July 2020, the Minister of Education issued a circular (no. 339/M/2020) opening school enrolment for Lebanese students only, with a follow up circular on 23 October 2020 (no.490/M/2020) for the enrolment of students of other nationalities. According to information available to the Agency, in practice, most schools are making efforts to keep all students already enrolled, so the impact is mostly felt by new students."

(Source: UNRWA, "[Letter from UNRWA to UNHCR in the case of NB and AB v. SSHD before the Court of Justice of the European Union \(Case C-349/20\)](#)", 21 June 2021, p. 8, footnote xxi)

In the internationally recognised book they published in 2020, legal scholars Dr. Francesca Albanese [currently Special Rapporteur on the situation of human rights in the Palestinian Territory] and Prof Lex Takkenberg wrote:

"In the field of education, Palestinian refugees generally cannot access Lebanese schools and state-run universities, though there is no legal barrier. As a consequence, Lebanon is the only country where UNRWA operates secondary schools (grades 10–12). Most Palestinian refugees complete their elementary, primary, and secondary education in one of sixty-six UNRWA schools. Dropout rates are high as some children seek work in order to help their families. Palestinian refugee illiteracy in Lebanon remains high. Access to (p. 216) higher education is further limited for Palestinian refugees because many cannot afford tuition fees."

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.3, Legal Status and Treatment, p. 276)

8.3. Are there reports/evidence of additional practical challenges for certain groups of stateless Palestinian children and young people more than others? For example, on the basis of gender, class, religion or disability?

In its series of country reports for 2021, the US Department of State wrote about Lebanon:

“[...]Palestinian refugees who fled Syria for the country since 2011 received limited basic support from UNRWA, including food aid, cash assistance, and winter assistance, such as cash to purchase fuel for heating. Authorities permitted children of PRS to enrol in UNRWA schools and access UNRWA health clinics.”

(Source: US Department of State (USDOS) “[2021 Country Reports on Human Rights Practices: Lebanon](#)”, Section 2. Respect for Civil Liberties, March 2022, p. 29)

AlAraby, an international Arabic newspaper and website, published testimonies by Palestinian refugees on the impact of their lack of documentation for their children’s access to education:

“Mohammad Atiya says, whose father comes from Gaza, and was born in Lebanon in 1983 without the Lebanese state providing him with official documentation, and who works currently as a taxi driver and lives in Ain El Helweh Refugee Camp in Saida (south), to The New Araby (Al-Araby Al-Jadeed) : “I was enrolled in school using the power of the Palestinian Liberation Organisation (PLO) that my father belonged to. But today, my children do not have official documentation that would enable them to be enrolled in school, and I personally do not belong to any Palestinian political party that I could benefit from its power, but with the pressure of humanitarian mercy, I was able to enrol my children in a governmental school in Lebanon, where they were registered as students under consideration because we do not have any documentation to prove our nationality.” [In-house translation. The author is an Arabic native speaker]

ORIGINAL TRANSLATION:

يقول محمد عطية، الذي يتحدر والده من غزة، وولد في لبنان عام ١٩٨٣ من دون أن تمنحه الدولة اللبنانية وثائق رسمية، ويعمل حالياً سائق سيارة أجرة ويقيم في مخيم عين الحلوة للاجئين الفلسطينيين في مدينة صيدا (جنوب)، لـ “العربي الجديد”: “تعلمت في المدرسة بقوة نفوذ منظمة التحرير الفلسطينية التي انتمى والدي إليها. أما اليوم فلا يملك أولادي وثائق رسمية تسمح بالتحاقهم بمدارس، ولا أنتسب شخصياً إلى أي فصيل فلسطيني للإفادة من نفوذه، لكنني استطعت تحت ضغط الرحمة الإنسانية أن أدخل أولادي لمدرسة حكومية في لبنان، حيث جرى تسجيلهم في خانة التلاميذ قيد الدرس لأننا لا نملك أوراقاً تثبت جنسيتنا”.

(Source: AlAraby “[Palestinians without IDs in Lebanon](#)”, January 13, 2022)

In a public letter to the UNHCR published by UNRWA in June 2021, the relief agency stated that:

“While in principle Palestine refugees have equal access to public education in Lebanon, in practice they only do so where there is space in the relevant public school, with priority given to Lebanese citizens. UNRWA aims to support the inclusion and accessibility of education for all Palestine refugee children in UNRWA primary and secondary schools as part of its Inclusive Education Policy. That policy extends to children with disabilities. However, the practical constraints on funding – described above – mean that this is not always possible. For example, UNRWA is not in a position to host multidisciplinary teams at schools, so therapists are not available for daily rehabilitation sessions (such as physiotherapy, speech, and language therapy) that children with some severe disabilities such as movement disorders, or severe health needs, require. UNRWA is also unable to cover the costs of a shadow teacher to support the movement of children who need it. The result is that UNRWA provides educational support, to the extent that it is able, but it is not able to provide educational support to all disabled children in its fields of operation.”

(Source: UNRWA, “[Letter from UNRWA to UNHCR in the case of NB and AB v. SSHD before the Court of Justice of the European Union \(Case C-349/20\)](#)”, 21 June 2021, p. 5)

The Dutch Ministry of Foreign Affairs reported in 2021:

“10.6 Access to education

[...] For Non-ID refugees, access to education after high school is almost impossible because they cannot pass an official admission test or leave the refugee camps without a legal residence permit. Preparatory education is the highest level of education available in the camps. Non-ID refugees cannot attend vocational education through UNRWA. (Pp. 58-59)” (In-house translation. The translator is a native Dutch speaker)

ORIGINAL SOURCE

“10.6 Toegang tot het onderwijs

[...] Voor Non-ID vluchtelingen is toegang tot opleiding na de middelbare school bijna onmogelijk omdat zij zonder legale verblijfsvergunning niet aan een officiële toets voor toelating kunnen voldoen of de vluchtelingenkampen niet kunnen verlaten. Het voorbereidend onderwijs is het hoogste opleidingsniveau wat er in de kampen beschikbaar is. Non-ID vluchtelingen kunnen geen beroepsonderwijs via UNRWA volgen.”

(Source: Dutch Ministry of Foreign Affairs, “[Thematisch ambtsbericht Palestijnen in Libanon](#)”, January 2021, pp. 58-59)

School drop-out and impact of Covid-19

8.4. Are data available on the impact of Covid-19 on school drop-out?

The Middle East Monitor, a not-for-profit press monitoring organisation and lobbying group that largely focuses on the Israeli–Palestinian conflict, reported on the topic of Palestinian refugee children’s education in Lebanon:

“The Palestinian Return Centre (PRC) has highlighted its concerns about the condition of refugee children in Lebanon, Safa News Agency reported on Monday. Speaking at the 49th meeting of the UN Human Rights Council, the representative of the advocacy group explained the economic and social difficulties facing Palestinian refugee children in Lebanon and called for urgent relief for them. ‘The Palestinian refugee children in Lebanon are still suffering due to the harsh economic conditions which were aggravated due to the Covid-19 pandemic and the closure of schools for more than a year,’ he explained. ‘They are living and working under very difficult conditions and are subject to mistreatment and exploitation.’ The PRC pointed out that the UN Relief and Works Agency for Palestine Refugees (UNRWA) has registered more than 60,000 children among Palestinian refugees in Lebanon, making up 30 per cent of the total. Most of them are unable to attend Lebanese schools.”

(Source: Middle East Monitor: “[Palestinian advocacy group highlights condition of refugee children in Lebanon](#)”, 15 March 2022)

The news agency Al Jazeera published an article in December 2021 about child labour among Palestinian refugees in Lebanon:

“Rochdi [UN Humanitarian Coordinator for Lebanon] sounded the alarm on child labour, child marriage and psychological distress among Palestinian refugees in Lebanon, a country hit by one of worst economic crises in more than a century, according to the World Bank.

UN officials said that since last summer, almost 60 percent of Palestinian refugees in Lebanon have eaten fewer meals to cope with high medical and food prices. Some 1,200 students have dropped out of school.”

(Source: Al Jazeera, “[UNRWA in ‘race against time’ for Palestinian refugees in Lebanon](#)”, 19 January 2022)

In an advocacy paper titled ‘Palestine refugees in Lebanon: Struggling to survive, UNRWA wrote:

“The students who had access to distance learning during the pandemic experienced learning losses due to the closure of schools and the under-developed communications infrastructure in Lebanon and inside the camps, which is not conducive to online learning. The lack of a stable internet connection, access to smart devices and academic support at home (from parents and relatives) have pushed some students to disengage from school. [...] “UNRWA indicates that the cases of child labour, including begging, rubbish collection and working regularly on the street, have risen during the pandemic, in addition to increased cases of child marriage, child abuse and harassment and violence against girls and women.”

(Source: UNRWA, “[Palestine Refugees in Lebanon: Struggling to Survive](#)” 18 January 2022, p. 11)

UNRWA also noted in 2022 that:

“At the educational level, UNRWA estimates that more than 1,275 Palestine refugee students left school during the school year 2020-2021 in Lebanon, of whom 55 per cent left school as a result of psychological distress. The students who had access to distance learning during the pandemic experienced learning losses due to the closure of schools and the under-developed communications infrastructure in Lebanon and inside the camps, which is not conducive to online learning. The lack of a stable internet connection, access to smart devices and academic support at home (from parents and relatives) have pushed some students to disengage from school. Even after the end of the lockdowns and the re-opening of schools, students are still facing many challenges in attending their classes and enjoying an adequate learning experience. The rise of transportation costs is disrupting the students’ commute to school and the electricity cuts affect their studying hours. There are also reports [...] highlighting rising distress and violence against adolescents and young within the household, community or at school. Stress and violence have been increasing, especially that the pandemic-related tensions have been exacerbated by the economic and financial hardships that households are currently facing. UNRWA indicates that the cases of child labour, including begging, rubbish collection and working regularly on the street, have risen during the pandemic, in addition to increased cases of child marriage, child abuse and harassment and violence against girls and women.”

(Source: UNRWA, “[Palestinian Refugees in Lebanon: Struggling to Survive](#)”, January 2022, p. 11)

UN News reported in October 2021 that:

“At least 1.2 million children, including Syrian and Palestinian refugees, have had their education disrupted for more than a year, according to the UN Children’s Fund.”⁴³

(Source: UN News, “[\\$383 million humanitarian plan to address ‘living nightmare’ in Lebanon](#)”, October 1, 2021)

A UNRWA report from 2021 provided information on the impacts of anti-Covid-19 measures on school attendance of Palestine refugee children in Lebanon, noting among others that “In Lebanon, girls reported an increase in online harassment and blackmailing through social media.”:

“3.2.4. Addressing school drop-out

In 2020, despite the COVID-19 pandemic, the cumulative drop-out rate showed Agency-wide improvement for elementary school and preparatory school students compared to 2019. This improvement may be linked to the decision for automatic grade level promotion, which may have motivated students to stay in school. However, this improvement was not shown for all students. Indeed, drop-out rates increased in Lebanon and Jordan for elementary school students for both boys and girls. For both male and female preparatory school students, the drop-out rate increased in Lebanon, and the drop-out rate increased Agency-wide for female preparatory school students.

⁴³ We were unable to clarify if this excerpt was referring to (Palestinian Refugees from Syria (PRS) or Syrian refugees who are not Palestinians.

Due to COVID-19, UNRWA schools and VTCs closed in all 5 UNRWA fields of operation in March 2020, and the Agency had to reconceptualise its overall Education in Emergency (EiE) approach to support learning continuity. The focus was on supporting learning remotely. However, a May 2020 phone-based survey conducted by UNRWA found that although 96 per cent of UNRWA students have at least one internet-capable device, only 57 per cent of them are able to use a smartphone on a daily basis. Minimal gender differences were found in smartphone use overall in younger children (grades 1 to 6), but they increased with age, with girls using smartphones more than boys on average, across all fields of operation. The Agency is aiming to conduct a survey directly with students in early 2021 to verify whether there may be any gender gaps in access to technology or remote learning which may affect students' educational outcomes. UNRWA is also currently reviewing results on key indicators such as dropout and grade repetition in 2020 to identify any trends of concern for boys and girls.

The start of the new 2020/21 school year continued to be uncertain regarding the possible modalities of learning (i.e. remote, face to face, or hybrid/blended) amidst the constantly-evolving context of COVID-19. In Jordan, the school year began with a blended learning modality and then moved to full remote learning. In Lebanon, the school year started using a hybrid/blended learning modality, with some shifts to fully remote. The West Bank followed the hybrid/blended model. Syria was the sole UNRWA field where students returned to full school-based, face-to-face learning. In Gaza, the school year started through remote learning, then shifted to the hybrid model, but eventually went back to being fully remote.

[...] It must be noted that the COVID-19 pandemic may impact girls' and boys' education differently. For girls, challenges may arise due to parental concerns surrounding their safety, or to social and economic difficulties leading girls to drop out from schools to assist in housework or be married early.

In Lebanon, for example, women reported an increase in child marriages as a negative coping mechanism in the face of economic burden. Boys, on the other hand, may drop out from school to help support their family economically. A rapid impact assessment conducted by UNRWA in Syria, for example, revealed that, due to challenges in covering basic needs, negative coping strategies such as child labour have emerged: 8 per cent of Palestine refugee households reported that children below 18 are working, with no relevant gender differences noted. Both boys and girls may face challenges in staying safe online, and both may have higher exposure risks to domestic violence."

(Source: UNRWA, [UNRWA Gender Equality Strategy 2016-2021: annual implementation report January-December 2020](#), May 2021, pp. 10-11)

9. Access to the labour market, means of basic subsistence

9.1. What does the law say with regards to stateless Palestinians seeking employment? E.g. Do they have the right to work on an equal basis with Lebanese citizens?

Walaa Kayyal, a researcher living as a Palestinian in Lebanon whom Asylos interviewed for this report in October 2022 outlined the limits to Palestinians' access to the labour market as follows:

“Palestinians can work in the informal sector. So for example, I can open a bakery without telling the government so that I don't pay taxes. They can work as painters, plumbers, butchers, they can work in a grocery store, they can work in a market. However, when they want to work in a formal sector, they should apply for a work permit. Usually it is the organisation you would like to work for which should apply for work permits. For example I work in an international NGO here which applies every year for a work permit for me. Some organisations say «We don't apply for you. You should go to the Ministry of Labor and apply for it yourself.» Then you apply for a work permit and you pay for it. And even if the organisation applies on your behalf, they pay for you. It's not for free, but you pay a negligible administrative fee.”

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

A collective of NGOs working in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated that:

“The legal status given to the more than 479,000 Palestinian refugees, where they are still categorized and treated as foreigners rather than refugees, prevents them from obtaining a work permit, limiting them to jobs in the informal sector that are low-paid and do not offer any social protection.”

(Source: Badil Resource Center: “[Written statement* submitted by BADIL Resource Center for Palestinian Residency and Refugee Rights, a nongovernmental organization in special consultative status](#)”, 23 May 2022, p. 2)

A report of the Special Rapporteur on extreme poverty and human rights observed that Palestinian refugees in Lebanon are excluded from 39 syndicated professions, including law, medicine and engineering.

“36. Palestinian refugees are excluded from practicing 39 syndicated professions, such as law, medicine and engineering, a difference of treatment that may be seen as prima facie discriminatory. The principle of national preference, coupled with a requirement for a work permit, makes it practically impossible for Palestinian refugees to obtain a decent formal job, confining them to low-paid, low-skilled work in the informal sector without labour or social protections. Even for the minority of Palestinian refugees employed in the formal sector, social protection is almost non-existent: although they are required to contribute 23.5 per cent of their salary to the National Social Security Fund, they do not receive any social security benefits except for end-of-service indemnity, which is only equivalent to approximately 8.5 per cent of their contribution. [...]”

(Source: OHCHR, “[Visit to Lebanon – Report of the Special Rapporteur on extreme poverty and human rights](#)”, Olivier De Schutter, 11 April 2022, p.9)

The same report noted that the legal statuses of Palestinian Refugees from Syria, and non-ID Palestinians in Lebanon are more precarious, and these groups face significant challenges in being able to secure any formal employment.

38. Over 28,000 Palestinian refugees from the Syrian Arab Republic and 3,000–5,000 “non-ID” Palestinians who arrived in Lebanon without identity documents after the 1960s, have a precarious legal status in Lebanon. Without legal status, non-ID Palestinians face restrictions on movement and difficulties in completing civil registration procedures and accessing public services, formal employment and the justice system. Palestinian refugees from the Syrian Arab Republic face similarly insurmountable obstacles, given the inconsistent application of policies and practices regarding the renewal of their residency status by the General Security Office. Owing to their irregular status and restrictions on formal employment, 92 per cent of Palestinian refugees from the Syrian Arab Republic rely

heavily on UNRWA assistance as their main source of income.[...] However, that meagre cash assistance is donor-dependent and may soon end, given the agency's dire financial situation."

(Source: OHCHR, "[Visit to Lebanon – Report of the Special Rapporteur on extreme poverty and human rights](#)", Olivier De Schutter, 11 April 2022, p.9)

In a peer-reviewed article about Palestinians' access to the labour market in Lebanon published in 2022, academics Samih Eloubeidi and Prof. Tina Kempin wrote:

"With regards to employment, Palestinians are barred from working in 39 high-wage professions outside the camps, including law, medicine, and engineering, and from owning real estate property outside the camps. Men tend to work in construction (34%) while women work in the food processing sector (18%), specialised retail (15%), and health and social services (14%).[...] Many others work in the informal sector as agricultural labourers, salespeople, service workers, and cleaners, which renders them more vulnerable to dangerous working conditions and offers them no health coverage and no paid holiday or sick leave.

Palestinians have to abide by laws established for foreigner's access to employment, many of which are based on the principle of reciprocity of rights and obligations, meaning that foreigners can only hold positions that would be available to Lebanese people in the foreigner's country of origin. This creates a problem for Palestinians because of the inception of the state of Israel. In addition, it has been difficult for Palestinians to obtain work permits, which require an employment contract, a document many Palestinians cannot acquire."

(Source: Samih Eloubeidi & Tina Kempin Reuter/ The International Journal of Human Rights, "[Restricting access to employment as a human rights violation: a case study of Palestinian refugees in Lebanon](#)", 11 April 2022, pp. 3-4)

In its series of country reports for 2021, published in March 2022, the US Department of State wrote about Lebanon:

"The law allows a special account to provide end-of-service indemnities or severance pay to Palestinian refugees who retire or resign. These benefits were available only to Palestinians working in the legal labour market. Palestinians did not benefit from national sickness and maternity funds or the family allowances fund. UNRWA continued to bear the cost of basic medical, maternity, or family health-care expenses (excluding worker's compensation). Palestinian refugees received partial access to the benefits of the National Social Security Fund if they worked in the regular labour market and had a work permit. A law expanding employment rights and removing some restrictions on Palestinian refugees was not fully implemented, and Palestinians remained barred from working in 39 skilled professions, including medicine, law, and engineering that require membership in a professional association, although since July they were permitted to practise nursing when no Lebanese candidate was available."

(Source: US Department of State (USDOS) "[2021 Country Reports on Human Rights Practices: Lebanon](#)", Section 2. Respect for Civil Liberties, March 2022, p. 28)

Freedom House wrote in its annual report for the year 2021 about Lebanon in, published March 2022:

"Some 45 percent of those already residing in Lebanon prior to the Syrian civil war live in 12 designated refugee camps and are restricted from 39 professions, contributing to widespread poverty, unemployment, and underemployment. In 2019, Lebanese authorities issued new regulations requiring foreigners to possess work permits, further restricting Palestinians' access to the labor market."

(Source: Freedom House, "[Freedom in the World 2021](#)", March 2022)

AlAraby, an international Arabic newspaper and website, published an analysis of the evolutions in Lebanese labour law concerning Palestinian refugees:

“Here are the simplest examples in the amendment of the Lebanese Labor Law, which took place under the pressure of live forces and Lebanese parties in August 2010. Only “mitigating” measures were nominated in the same mechanism, where the Palestinian refugee remained among the foreign workers category, but was considered one of the special groups, meaning that he was exempted from fees and was excluded from the principle of reciprocity because he does not have a state, which means that his rights as an original resident will continue to be curtailed and he will be subject to administrative procedures related to the Minister of Labor and not to state laws. Until today, no implementing decrees have been issued related to end-of-service compensation, which means that the Palestinian refugee continues to be subjected to exploitation by employers. He remains prohibited from practising dozens of professions, including liberal professions such as medicine, engineering and law, and he was still prohibited from owning an apartment. It is not reprehensible after nine years of this “amendment” that the administrative mechanism would subject the refugee again to an arbitrary decision by the Minister of Labor, Camille Abu Suleiman, in the summer of 2019, in which he prevented Palestinians from working in the “fight against foreign labour.” This decision came within the framework of a political bidding against other opponents who wanted to hold the Syrian refugees responsible for the economic collapse in the country on the eve of the October 17 revolution, shops and institutions owned by Palestinians were closed, and this led to the ignition of the uprising of the camps, which was based on popular and non-factional youth movements. The Lebanese street in many cities and regions supported Palestinian refugees and parliamentary blocs to overthrow this decision. It is known that Palestinians work on free trade and private projects, in addition to working within associations, civil society and non-governmental organizations, the Palestine Liberation Organization (PLO) and UNRWA, as well as as workers in construction sites, and the camps depend on the support of the qualified expatriate youth.” [In-house translation. The author is an Arabic native speaker]

ORIGINAL SOURCE:

هنا أبسط الأمثلة في تعديل قانون العمل اللبناني والذي جرى تحت ضغط قوى حيّة وأحزاب لبنانية في أغسطس/آب ٢٠١٠، لم يرشح سوى عن إجراءات «تخفيفية» في الآلية نفسها، حيث ظلّ اللاجئ الفلسطيني من العمال الأجانب لكنه إعتبر من الفئات الخاصة، أي أنه أعفي من الرسوم وإستثني من مبدأ المعاملة بالمثل لكونه لا دولة له، ما يعني استمرار تحجيم حقوقه كمقيم أصيل وإخضاعه لإجراءات إدارية تتعلّق بوزير العمل لا بقوانين دولة، وحتى اليوم لم تصدر المراسيم التطبيقية المتعلقة بتعويض نهاية الخدمة، ما يعني استمرار تعرّض اللاجئ الفلسطيني لاستغلال أرباب العمل. وبقي محظوراً عليه مزاولة عشرات المهن ومنها المهنة الحرة كالتطبّ والهندسة والمحاماة، وظلّ ممنوعاً من امتلاك شقة سكنية. ولم يكن مستهجنّاً بعد تسعة أعوام من هذا «تعديل» أن تعود الآلية الإدارية وتخضع اللاجئ لقرار تعسّفي من وزير العمل كميل أبو سليمان صيف ٢٠١٩ الذي منع الفلسطينيين من العمل ضمن «مكافحة العمالة الأجنبية»، جاء هذا القرار في إطار مزايدة سياسية على خصوم آخرين أرادوا تحميل اللاجئين السوريين مسؤولية الانهيار الاقتصادي في البلاد عشية ثورة ١٧ تشرين، تمّ إغلاق مصالح ومؤسسات يمتلكها فلسطينيون، وأدى ذلك لاشتعال انتفاضة المخيمات التي قامت على حراكات شعبية وشبابية غير فصائلية، ساند الشارع اللبناني في كثير من المدن والمناطق اللاجئين الفلسطينيين وكتل نيابية لإسقاط هذا القرار، ومن المعروف أن الفلسطينيين يعملون على تجارات حرة ومشاريع خاصّة إضافة للعمل ضمن الجمعيات والروابط الأهلية والمنظمات غير الحكومية ووظائف منظمة التحرير الفلسطينية (م ت ف) وأونروا، وكذلك كعمال في ورش البناء، وتعتمد المخيمات على دعم كفاءات شبابها من المغتربين.

(Source: AlAraby.co.uk, “[What is left of the Palestinian asylum in Lebanon?](#)” 28 November 2021)

The UN Office for the Coordination of Humanitarian Affairs published a statement by the UN special rapporteur on extreme poverty and human rights on his visit to Lebanon in November 2021:

“Lebanon also hosts Palestine refugees, estimated at about 181,000 by UNRWA (which provides services to about 257,000 persons in total). Most have lived in the country since 1948. Yet, these refugees continue to have ambivalent legal status and live at the margins of society. They face multiple barriers to access education, decent employment and social protection, leaving them almost entirely dependent on UNRWA’s assistance and services, which, in turn, are precarious due to limited resources and fluctuations in donor funding. By virtue of series of laws, ministerial decrees and decisions, Palestinian refugees are excluded from practising 39 syndicated professions, such as law, medicine and engineering, and the principle of national preference, coupled with a requirement for a work permit, makes it practically impossible for Palestinian refugees to obtain a decent job in the formal labour market. Employment prospects for Palestinian refugees are often reduced to low-paying, low-skill work in the informal sector, without any form of social protection. While a marginal minority of Palestinian refugees working in the formal sector are required to contribute to the National Social Security Fund at 23.5 percent of the value of salary, they are considered as foreigners of a country with which Lebanon has no reciprocity agreement, and they therefore do not receive any social security benefits, except the end of service indemnity, which is only worth approximately 8.5 per cent of the paid value.

[...]Over 28,000 Palestinian refugees from Syria are in particularly vulnerable situations, as a considerable number of them are unable to regularize their status in Lebanon and hence the vast majority of them – 92 per cent – heavily rely on cash assistance provided by UNRWA as the main source of income. As for many other humanitarian assistance programs, however, this cash assistance program of \$100 per family per month is donor-dependent and due to be withdrawn at the end of 2021, leaving the beneficiary families with very little alternative sources of income.”

(Source: OHCHR, “[Statement by Professor Olivier De Schutter, United Nations Special Rapporteur on extreme poverty and human rights, on his visit to Lebanon, 1-12 November 2021](#)”, 12 November 2021, p. 1)

UN Women wrote in its sectoral examination of feminist and women’s right issues in Lebanon in July 2021 that:

“Palestinian, Syrian, and other refugee populations, as well as migrant domestic workers and stateless persons living in Lebanon, are all effectively excluded from the Lebanese labour law entirely. Even though the vast majority of Palestinians residents were born in Lebanon, they are still considered foreigners and are required to obtain a work permit prior to employment in specific jobs, which is a lengthy administrative process. PRLs are prevented from obtaining employment in at least 39 professions (such as medicine, law, engineering, etc.) (UNRWA 2015). Changes to Lebanese law in 2005 and 2010 have, in principle, improved the rights of Palestinians in Lebanon (PRLs) to access formal employment and strengthened related social protection mechanisms, giving them partial access to the National Social Security Fund. However, significant gaps remain. Within this difficult legal context for Palestinian refugees where there are limited prospects for jobs, Palestinian women are even less likely to work.

(Source: UN Women, “[European Union Sector Specific Gender Analysis: An in-depth sectoral examination of feminist and women’s rights issues in Lebanon](#)”, July 2021, p. 28)

One of the reasons for the prevalent absence of work permits among PRS workers is the inability to obtain legal status or comply with legal requirements.

“Reflecting the informal status of the vast majority of male and female PRS workers (especially amongst the 43.3 per cent employment in seasonal/irregular jobs), their work is commonly based on an oral agreement - 97 per cent of the male workers and 89.6 per cent of female workers do not enter into a written employment contract. Furthermore, very few PRS workers (1.4 per cent) have a work permit. These are workers who are married to PRL or Lebanese nationals or PRS males with a Lebanese mother. More than half of the respondents (51.9 per cent) said that the absence of work permits was due to the inability to comply with the legal requirements for work permits (such as obtaining a valid residence permit). At the same time, one quarter stated that they did not see any benefit in holding a work permit as they worked in a sector (cleaning, construction and agriculture) where casual labor is tolerated.”

(Source: UNRWA, “[Socio-economic Survey on Palestine Refugees from Syria Living in Lebanon](#)”, 28 April 2021, p. 46)

It was noted in the National Report submitted as part of the Universal Periodic Review in 2020 that:

“196. The Ministry of Labour issued memorandum No. 1/7, dated 22 January 2013, to exempt Palestinian workers registered with the Ministry of the Interior and Municipalities from provisions relating to insurance policies and medical examinations, when applying for a work permit. For its part, Decree No. 1/29, dated 15 February 2018 and defining the professions reserved for Lebanese, is not applicable to Palestinians who were born in Lebanon and are officially registered with the Ministry of the Interior and Municipalities. The needs of the labour market have opened the way for non-Lebanese – and, in particular, Palestine refugees – to work in areas reserved for Lebanese, such as nursing. On 5 August 2019 the Minister of Labour issued resolution 93/1 on the documentation necessary for Palestinians – both employees and employers – to obtain a work permit.”

(Source: OHCHR, “[Universal Periodic Review - Lebanon: National Report, 12 November 2020](#)”)

In an effort to learn more about the lives of Palestinians in Lebanon, the United Nations Development Programme (UNDP) and the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) conducted a qualitative WhatsApp survey. According to the results:

[...] “Palestinian respondents described unemployment as ‘the core of all their problems’ with devastating economic and social consequences (e.g., poverty, stress, depression, and drug abuse), particularly for youth. Rather than fierce competition for jobs amongst different nationalities, a lack of employment opportunities compounded by legal exclusion from the labour market was identified as the root cause of these problems. Palestinian respondents demand an integrated approach to their situation that addresses both their needs, and their civil and economic rights in Lebanon.”

“Palestinian refugees have been living in Lebanon for more than 70 years. The LPDC census in 2017 found that 165,549 PRL and 17,706 PRS reside in Lebanon’s camps and gatherings alongside 12,030 Lebanese and 28,317 Syrians (LPDC, 2017, 21). Many Palestinian refugees are deprived of basic civil and socioeconomic rights, such as the right to work or practice liberal professions, run businesses and own property outside gatherings and camps. As a result, more than half (53%) of PRS and 23 per cent of PRL are unemployed (AUB and UNRWA 2016, 2). Perhaps reflective of this, most Palestinian refugees are partially dependent on humanitarian assistance, with the vast majority (90%) of PRS and 65 percent of PRL living below the poverty line in Lebanon (AUB and UNRWA 2016, 2).”

Unemployment in Mieh Mieh camp:

[...] “Many respondents emphasised that their inability to find work was politically engineered. For them, work is a basic right that is unjustly denied to Palestinians due to their nationality: You’re asking about the reasons for unemployment, while we as Palestinians are deprived of our basic rights. We’re not allowed to work, and when we work, we can’t take any days off or receive service indemnity, and we can’t have any property. We’re deprived of all of our rights. You’re asking me while I’m a Palestinian? There is unemployment because of the lack of job vacancies. As a Palestinian, I’m only allowed to work as a freelancer. (Palestinian Plumber, male, 52 years old, Mieh Mieh camp)

This situation was compounded by the Ministry of Labour initiative in July 2019 to enforce laws which required Palestinian workers to obtain permits and which penalised businesses that did not comply with the regulation. Companies fear legal repercussions for hiring Palestinian workers through inspections by the field teams of the Ministry of Labour.”

[Generally speaking] “Job opportunities are scarce in Lebanon, not only for Palestinians, but also for the Lebanese as well. You know what’s happening in Lebanon. Only those who have means of nepotism, or have important acquaintances- like politicians- who can support them, will be hired, while regular people who are qualified aren’t being hired. Many engineers, doctors, and well-educated people work in unbelievable types of jobs.” [Quote by a Palestinian nurse, unemployed, male, 40 years old, Mieh Mieh camp.]

(Source: UNDP, “[Nothing and Everything to Lose: Results from a Qualitative WhatsApp Survey of Palestinian Camps and Gatherings in Lebanon](#)”, 06 October 2020, pp. 10-37)

UNRWA Protection brief “Palestine refugees living in Lebanon” cited the right to work as a major protection concern. Palestine refugees in Lebanon are prevented from employment in 39 syndicated liberal professions, including medicine, law and engineering.

“According to available data, in 2015 the unemployment rate of PRL was estimated at 23 per cent [...]. Positive changes to the Lebanese legal framework in 2005 and 2010 have in principle improved PRL’s right to access formal employment and related social protection mechanisms, removing the principle of reciprocity between countries on labour issues, allowing PRL to access 75 professions, and giving them partial access to the National Social Security Fund (NSSF). However, while PRL are required to fully contribute to the NSSF, they are not able to fully benefit from the system, as they are still excluded from family allowance and the sickness and maternity fund. They are also still required to obtain an annual work permit through a lengthy administrative process which depends on the willingness of the employer to request it from the Lebanese authorities. Syndicated liberal professions have not been required to amend their bylaws, and as a result, PRL are prevented from employment in 39 professions such as medicine, law and engineering. [...]

(Source: UNRWA: “[Protection brief: Palestine refugees living in Lebanon](#)”, September 2020, p. 1)

The same source stated:

“Palestine refugees consistently report experiencing discrimination in hiring practices and opportunities for employment. They are faced with informal restrictions on the types of jobs and industries they can be hired for due to additional bureaucracy around contracts and work permits, and discrimination; in 2015, 36 percent employed in occupations such as agricultural labourers, domestic workers and construction workers Palestine refugees are often unable to access better paid positions and are paid less than their Lebanese counterparts for the same work. Beyond this, Palestine refugees face precarious working conditions including lack of written contracts and lack of employment benefits, as well as insecure job tenure. Differential treatment in the workplace is also an issue. Their precarious status vis-à-vis the Lebanese labour law, coupled with the ongoing economic crisis, has left many Palestine refugees vulnerable to exploitation. [...]”

(Source: UNRWA: “[Protection brief: Palestine refugees living in Lebanon](#)”, September 2020 “, p. 1)

UNRWA observed that both Palestine Refugees in Lebanon and Palestinian Refugees from Syria face obstacles accessing the labour market.

“They [PRLs] are also still required to obtain an annual work permit through a lengthy administrative process which depends on the willingness of the employer to request it from the Lebanese authorities. Syndicated liberal professions have not been required to amend their bylaws, and as a result, PRL are prevented from employment in 39 professions such as medicine, law and engineering. Moreover, PRS, like Syrian Refugees, do not benefit from any labour law facilitation, even the standards applicable to PRL. As a result, 93 percent of employed PRS work in the informal private sector, leaving them vulnerable to abuse. 98 percent of PRS do not hold a work permit, and 49 per cent of PRS families report severe food-insecurity. 93 per cent of PRS households rely on UNRWA assistance as their main source of livelihood (UNRWA, socio-economic survey, 2020).”

(Source: UNRWA: “[Protection brief Palestine refugees living in Lebanon Updated in September 2020](#)”, September 2020, p. 1)

Based on a Whatsapp survey in Palestinian camps and gatherings in Lebanon, the UNDP stated in August 2020 that:

“Rather than fierce competition for jobs amongst different nationalities, a lack of employment opportunities compounded by legal exclusion from the labour market was identified as the root cause of these problems.”

(Source: UNDP, “[Nothing and Everything to Lose: Results from a Qualitative Whatsapp survey of Palestinian Camps and Gatherings in Lebanon](#)”, August 2020, p. 10)

A collective of NGOs working with Palestinians in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated that:

“12.5. Restricting Palestinian refugees from accessing the Lebanese labor market

Lebanon’s Labor Law discriminates between Lebanese and non-Lebanese citizens. It is not sensitive to the status of Palestinian refugees in Lebanon, who fall under laws governing foreign labor. Despite the Labor Law Amendment 129/2010, namely Article 59, which exempted them from the principle of reciprocity and work permit fees, they are required to obtain a work permit in some professions that must be preceded by registering at the NSSF. The annual registration requirement leads to instability.

12.6. Denying Palestinian refugees the right to work in the liberal professions

Palestinian refugees in Lebanon are barred from working in what is called the «liberal professions» that require membership in the related syndicate. Laws regulating such professions require Lebanese nationality. For example, the Bar Association’s laws stipulate that practicing lawyers must be Lebanese for at least the past ten years. Other professions call for reciprocity and the right to practice in their country of origin, such as the Lebanese Order of Physicians (applying Decree 1659 of 1979), the Order of Pharmacists, and the Order of Engineers and Architects.

Although Amendment 129/2010 exempted Palestinian refugees from the condition of reciprocity, their denial of membership in syndicates deprives them their right to practice any of the unionized professions.

12.7. Denying Palestinian refugee workers their right to benefit from the NSSF

12.8. Law 128/2010 amended Article 9 of the Social Security Law, eliminating the condition of reciprocity. However, the amendment still denies Palestinian refugee workers their right to health benefits and family allowances, especially maternity allowances. Although Palestinian refugee workers in Lebanon who are registered at the NSSF still have to pay the full fees (23.5%) of the salary like Lebanese workers, they can only benefit from end of service indemnity (amounting to 8.5% of the total amount paid). They are forced to use private insurance, adding to the financial burdens of both Palestinian refugee workers and employers. Thus, opportunities for their employment are reduced or they are forced to work in harsh conditions at low wages and outside the protection of the law.”

(Source: Najdeh Association, Development Action Without Borders (Naba’a), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, pp. 7-8)

“The current economic crisis affects the already vulnerable Palestine Refugee community. Employment restrictions have now worsened. Even holding a job within the informal employment sector now requires a permit from the Lebanese authorities. During a 2015 survey, only 6 % of those employed held employment permits. The PRS community in Lebanon are in legal limbo with no formalised legal stay. Having entered the country illegally or being unable to renew their previous permits, many are now trapped inside the UNRWA camps, where entry and exit in most cases is controlled by the Lebanese army. There are extremely limited and poorly paid work opportunities in the camps and the PRS survive on handouts.”

(Source: Danish Immigration Service, “[Palestinian Refugees Access to registration and UNRWA services, documents, and entry to Jordan](#)” June 2020, p. 56)

In the internationally recognised book they published in 2020, legal scholars Dr. Francesca Albanese [currently Special Rapporteur on the situation of human rights in the Palestinian Territory] and Prof Lex Takkenberg wrote:

“Registered Palestine Refugees

In terms of employment, several laws and decisions by the Ministry of Labour have restricted opportunities for Palestine refugees over the years, though more recent ones, in 2005 and 2010, have brought some improvement. As of 2005, Palestine refugees are allowed to work in certain jobs that were previously restricted to Lebanese, except liberal professions that are regulated by internal bylaws that restrict non-Lebanese from practicing them. In practice, Palestinian refugees remain barred from practicing thirty-nine professions, among which are all liberal professions such as medicine, law, and engineering, and are excluded from commercial and administrative professions that do not fall in the list identified by the government. With respect to jobs open to them, despite the deductions made from their wages, Palestinian workers have generally enjoyed no social security entitlements. Two new laws of 2010 pertaining to social security and labour enable Palestine refugees to obtain work permits at no cost and earn social security benefits (such as end-of-service and injury-related indemnity) regardless of the reciprocity condition. In practice, the application of the laws is uneven. According to bylaws in force, some (p. 215) professions are still off limits for Palestine refugees, such as general medicine, dentistry, nursing, midwifery, tourist guide, and some others, and where employment is possible, obtaining a work permit still entails a lengthy process with success dependant on the goodwill of the employer. Even when Palestine refugees are not denied their rights de jure, they must still deal with the complexities of the Lebanese system, and Lebanese bureaucracy often appears to discriminate against Palestinians. As a result, most Palestine refugees in Lebanon reportedly work in menial, low-paying jobs in the informal sector and receive lower salaries than Lebanese nationals.”

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.3, Legal Status and Treatment, p. 276)

The same source further stated that:

“Lebanon is commonly referred to as the country where conditions for Palestinian refugees are the ‘worst off’ among those hosting them since 1948, and a turbulent history has marked the Palestinian presence in the country. Among the five UNRWA ‘fields’ of operation, Lebanon has the highest percentage of Palestine refugees living in abject poverty.(p. 208) This is directly linked to the marginalization Palestinians have experienced in Lebanon in the economic and social spheres. Discrimination against Palestinians in Lebanon is institutional and is entrenched in both the Tai’f Constitution and the legal system.”

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.1, p. 272)

A submission by the United Nations Country Team as part of Lebanon’s third cycle of the Universal Periodic Review, noted that:

“Palestine refugees from Lebanon (PRL) are still prohibited from practicing 39 professions due to the precondition of holding the Lebanese nationality, or having to meet the reciprocity of treatment condition in order to access the profession. PRL are required to obtain an annual permit from the Ministry of Labour to work legally in Lebanon. According to the amended Labour Law 129/2010, PRL employees can obtain this work permit free of charge but it is bound to the will of their employer and requires a cumbersome administrative procedure. Furthermore, PRL workers do not benefit from the National Social Security Fund equally as per their contributions; they cannot access the sickness and maternity fund, nor the family allowances fund. In August 2019 the former Ministry of Labour adopted decision 93/1 to simplify the procedure to obtain a work permit but still the work permit is linked to the work contract.”

(Source: UN Human Rights Council, “[Universal Periodic Review Third Cycle - Lebanon - UN Contributions: UNCT Lebanon, 2020](#)”)

9.2. What is the 2021 Decision by the Minister of Labour, Moustafa Bayram, relating to employment of Palestinians in Lebanon?

On 25 November 2021, the Lebanese Ministry of Labour signed Decree no. 1/96: in relation to professions that should be limited to Lebanese only and signed by the Minister Mustafa Bayram.⁴⁴ As noted in the following article published by Arab news in December 2021, the decision to allow Palestinian refugees to work in additional sectors that were previously closed to them.

“Labor Minister Mustafa Bayram finalized the decision on Wednesday, but it has been met with criticism, particularly from the Christian right, which has launched a campaign against the minister.

The decision allows Palestinian refugees — many of whom are doctors, lawyers and nurses — to work in the managerial, business, tourism, industrial, information, health, education and service sectors.

It includes “Palestinians born in Lebanese territories, born to a Lebanese mother or married to a Lebanese citizen, and non-registered Palestinians who were born in Lebanon,” but forbids them from joining state security services or free profession syndicates.” [...]

A source examining the right of Palestinian refugees to work in Lebanon told Arab News that former labor minister Trad Hamadeh tried to push through a similar decree that was canceled by the next prime minister.

44 Lebanese Ministry of Labour (signed by the Minister Mustafa Bayram), [Decree no. 1/96 in relation to professions that should be limited to Lebanese only](#). 25 November 2021. (Arabic only)

The source said: ‘There is no specific mechanism for the adoption of a ministerial decree.

‘Bayram’s decision does not affect Palestinians whose specializations require membership in powerful syndicates. These syndicates also prevent Lebanese who are not members from practicing their professions.

‘Bayram’s decision does not affect Palestinians whose specializations require membership in powerful syndicates. These syndicates also prevent Lebanese who are not members from practicing their professions.

‘This decision only allows the use of Palestinian labor in professions that do not require advanced degrees. These are modest craft and manual professions that the Lebanese do not want to work in.

‘Simultaneously, this decision prevents a social crisis in the camps as a result of the economic collapse and many unemployed young Palestinians turning to drugs and theft. In other words, it is a decision to defuse the situation.

‘Palestinian refugees contribute to Lebanon’s economy; thousands of them are paid in dollars by the Palestine Liberation Organization or international organizations and they spend their money in Lebanon.’

In a press conference on Friday, Bayram said: ‘What was prohibited by the constitution and laws is still prohibited for the non-Lebanese. Foreign workers in all sectors work under an exception license issued by the labor minister. However, the Lebanese people have the priority in all professions.’

He added: ‘90 percent of people criticizing us have not read the whole decision. The Lebanese worker holds the priority, and the exception is granted to the foreign worker. Some sectors do not appeal to the Lebanese, such as the construction and agriculture sector, where we gave foreign workers priority.

‘The decree gives Palestinians privileges by exempting them from having a work permit and allowing them membership of social security. We are in trouble in the job market and trying to fill the gaps. The Lebanese market needs foreign labor.’

(Source: Arab News, “[Anger in Lebanon as Palestinian refugees granted work rights](#)”, 10 December 2021)

In December 2021, AlAraby, an international Arabic newspaper and website, wrote about an amendment to the Lebanese Labour law, which was signed on 25 November 2021⁴⁵:

“On Wednesday, the Lebanese Minister of Labor, Mustafa Bayram, took a decision to integrate Palestinians into the official economy, by lifting the ban on work in many sectors, including pharmacy, public transport, engineering and any other professions that require union membership. The new decree will allow “Palestinians born on Lebanese soil and officially registered with the Ministry of Interior” to work in professions that have been officially prohibited for them for decades.” [In-house translation. The author is an Arabic native speaker]

ORIGINAL SOURCE:

واتخذ وزير العمل اللبناني مصطفى بريم الأربعة قرارا بدمج الفلسطينيين في الاقتصاد الرسمي، وذلك من خلال رفع الحظر عن العمل في العديد من القطاعات، بينها الصيدلة والنقل العام والهندسة وأي مهن أخرى تتطلب عضوية نقابية. وسيسمح المرسوم الجديد “للفلسطينيين المولودين على الأراضي اللبنانية والمسجلين بشكل رسمي لدى وزارة الداخلية”، بالعمل في المهن التي ظلت محظورة عليهم رسميا على مدى عقود.

(Source: AlArab.co.uk: “[Lebanon eases restrictions on Palestinian refugees’ work in a world of work stalemate](#)”, 10 December 2021)

45 Lebanese Ministry of Labour (signed by the Minister Mustafa Bayram), [Decree no. 1/96 in relation to professions that should be limited to Lebanese only](#). 25 November 2021. (Arabic only)

The Lebanese Newspaper L'Orient Le Jour published similar news two days before:

“The Minister for Labour, Moustapha Bayram has modified the rules in place that concern the professions that are reserved for Lebanese citizens, authorising Palestinians to work in union-regulated professions.

The ministerial decree, as reported by the National Information Agency, will permit to Palestinians born on Lebanese soil and officially registered with the Ministry of Interior to work in professions that require registration with a union, such as medicine, law, engineering or public transport- professions from which they have previously been excluded.

(...) However, not all of these professions will immediately open for Palestinians according to this new decision, as some of them require legal changes, while others require a change in the status of the unions so as to allow non-Lebanese workers to enter their realm.” [In-house translation. The author is a French native speaker]

ORIGINAL SOURCE:

“Le ministre libanais du Travail Moustapha Bayram a modifié mercredi les règles en vigueur concernant les professions réservées aux ressortissants libanais, de manière à autoriser les Palestiniens à travailler dans des professions réglementées par des syndicats.

Le décret ministériel publié, tel que rapporté par l'Agence nationale d'information (Ani, officielle), permettra aux «Palestiniens nés sur le territoire libanais et officiellement enregistrés auprès du ministère de l'Intérieur» de travailler dans des professions nécessitant l'adhésion à un syndicat- comme la médecine, le droit, l'ingénierie ou les transports publics- dont ils étaient auparavant exclus.

[...]Toutefois, toutes ces professions ne seront pas immédiatement ouvertes aux Palestiniens en vertu de la nouvelle décision, car certaines d'entre elles nécessitent soit des modifications juridiques, soit des modifications du statut des syndicats pour que les travailleurs non libanais soient autorisés à travailler dans ces domaines.”

(Source: L'Orient-Le Jour, “[Les Palestiniens peuvent désormais exercer des professions nécessitant l'adhésion à un syndicat](#)”, 8 December 2021)

The National, an English language publication covering news in the Middle East wrote:

“Lebanon on Wednesday removed barriers for Palestinian refugees to access some of the local labour market, but most white-collar jobs remain barred without a Parliament vote.

The decree, published on the Labour Ministry's website, says Palestinians born in Lebanon, as well as non-Lebanese with a Lebanese mother or married to a Lebanese citizen, are now allowed to work in professions managed by Lebanese orders and syndicates.

But it remains to be seen whether orders and syndicates will choose to amend their rules to allow Palestinians to work. “The majority request reciprocity,” said Abdelnasser El Ayi, project manager at the Lebanese-Palestinian Dialogue Committee, an inter-ministerial body headed by the prime minister's office. This remains impossible as long as there is no Palestinian state.

Laws governing jobs organised by order, such as engineering, medicine, pharmacy and law, can only be changed by lawmakers in Parliament, Mr El Ayi told The National.

Syndicated professions, including nursing or physiotherapy, may be governed by a government decree or by a law voted by Parliament.”

(Source: The National, “[Palestinian refugees in Lebanon granted limited access to job market](#)”, 8 December 2021)

9.3. How has Labour Minister Moustapha Bayram's 2021 decision been implemented?

In a series of written responses to questions sent by Asylos for this report, Dr. Jasmin Lilian Diab, Director of the Institute for Migration Studies at the Lebanese American University indicated in October 2022 that the aforementioned decision by Minister for Labour, Moustapha Bayram, to allow Palestinians to work in union-regulated professions, was “never enforced, and reportedly revoked.”

(Source: Dr. Jasmin Lilian Diab, [written communication with Asylos](#), 6 October 2022)

In its series of country reports for 2021, published in March 2022, the US Department of State wrote about Lebanon:

“A law expanding employment rights and removing some restrictions on Palestinian refugees was not fully implemented, and Palestinians remained barred from working in 39 skilled professions, including medicine, law, and engineering that require membership in a professional association, although since July they were permitted to practise nursing when no Lebanese candidate was available.”

(Source: US Department of State (USDOS) “[2021 Country Reports on Human Rights Practices: Lebanon](#)”, Section 2. Respect for Civil Liberties, March 2022, p. 28)

In February 2022, The Jerusalem Post reported that an order issued in December 2021 allowing Palestinians to work in trade-union regulated sectors had been reversed:

“Lebanon’s State Shura Council decided this month to reverse an order issued in December allowing Palestinian refugees to work in trade-union regulated professions, after complaints that the order would encroach on the rights of Lebanese professionals and claims that the order was trying to pave the way for naturalizing Palestinian refugees.

The reversal was made after the council accepted an appeal by the Maronite League, the head of the league, Neamatallah Abi Nasr, announced on Thursday, according to Lebanon’s National News Agency (NNA). [...]

The appeal filed by the Maronite League claimed that the labor minister had overstepped his authority when he issued a decision allowing Palestinians to access previously barred professions. The appeal had claimed that the decision violated the country’s constitution, adding that the league was blocking attempts to «change the modern and historic face of Lebanon and attempting to impose a new demographic status quo,» according to L’Orient Le’Jour.

The Hamas movement in Lebanon condemned the decision to reverse the order on Saturday, saying that it ‘raises fundamental questions related to its background and timing, and harms Lebanese-Palestinian relations.’

The movement stressed that the order which had allowed Palestinians to work in previously barred professions was «commendable» and that it would not lead to Palestinians settling in Lebanon.

Opponents of the Maronite League’s appeal asserted that the labor minister did not change a law by opening up previously barred professions and had simply reversed previous orders issued by former labor ministers.

The National Federation of Employees’ and Workers’ Unions in Lebanon (FENASOL) announced on Saturday that it would not comply with the reversal of the order and would keep allowing Palestinian refugees to work in the affected professions, according to NNA.

‘How can a former president of the Maronite League have the right to appeal the decision regarding the livelihood of the besieged in the camps and suffering from hunger, impoverishment and unemployment?’ questioned FENASOL. The federation called on all the unions and human rights organizations to reject the decision and submit an appeal against it.”

(Source: The Jerusalem Post “[Palestinian professionals banned from work in Lebanon for second time](#)”, 13 February 2022)

In an article published in Arab News in December 2021, opposition to the decree was reported.

“Gebran Bassil, head of the Free Patriotic Movement, said: ‘The decision violates the labor law and the constitution. It is veiled naturalization and it is rejected.’

In a tweet, he called on labor syndicates to reject the decree and urged the Lebanese public to ignore it. ‘This is unacceptable and we will not allow the stealing of jobs from Lebanese in such circumstances,’ he said.

Former labor minister Sejaan Kazzi said that Bayram’s decision ‘contradicts the decision issued in 2015,’ adding: ‘This new resolution will increase the Lebanese people’s unemployment rate by 40 percent and open the door to settlement and naturalization.’”

(Source: Arab News, “[Anger in Lebanon as Palestinian refugees granted work rights](#)”, 10 December 2021)

9.4. What are the obstacles Palestinians face when trying to enter the labour market?

The UN Office for the Coordination of Humanitarian Affairs stated in April 2022 that:

Based on the Multi-Sectoral Needs Assessment (MSNA) conducted by the REACH Initiative in December 2021, OCHA reported in 2022 that:

“Like migrants, Palestine Refugees in Lebanon are also vulnerable, repeatedly marginalized and outside of social protection schemes. Even before the crises, PRL had limited access to livelihoods due to restrictions on their right to work in several professions, and frequent discrimination within the workplace; and despite their long-standing presence in Lebanon, they are unable to own or inherit property. Many are dependent on daily/seasonal labour, but the significant deterioration in their living conditions is affecting their physical and mental wellbeing, contributing to tensions which have sometimes escalated into violence in camps and increasing the protection risks faced by women, children and older persons. Palestinian refugees in Lebanon without official identity documents and residency in Lebanon (“non-ID Palestinians”) are even more restricted in their livelihood options as they are often unable to move around freely and are even more vulnerable to discrimination in the workplace. Palestine refugee camps, which are often over-crowded with poor infrastructure are de facto under the governance of Palestinian authorities, which can lead to limited access to official justice systems, particularly for vulnerable groups.”

(Source: OCHA, “[Increasing Humanitarian Needs in Lebanon, April 2022](#)”, 14 April 2022, p. 11)

According to the same source:

“Lack of employment and reduced income lead to deteriorating food security and nutritional status of PRL [Palestinian Refugees in Lebanon] households. Similar to Lebanese households, daily/intermittent work was reported by PRL households as their main source of income (50 per cent), followed by community support (21 per cent) and savings (17 per cent). On average, most reported earning between 1 million LBP and less than 2.4 million LBP (between US\$49 and US\$96 at average exchange rate in December 2021 of \$1=LBP25,000). Contracted employment was an income source for only 13 per cent of the households assessed compared to 28 per cent among Lebanese and 61 per cent among migrant households. Increased competition for jobs or not enough jobs was reported to be the major obstacle preventing unemployed family members from finding work, followed by lack of qualification, distance to jobs and employers’ preference for other nationalities. Comparably, 63 per cent of PRL households reported challenges in affording basic needs as a result of loss or reduced employment in the 3 months prior to data collection. To cope, almost half of PRL households reported that they have taken on debt to meet basic needs – among these households 18 per cent reported that food was the primary reason for taking on debt.”

(Source: OCHA, “[Increasing Humanitarian Needs in Lebanon, April 2022](#)”, 14 April 2022, p. 26)

In a peer-reviewed article about Palestinians' access to the labour market in Lebanon published in 2022, academics Samih Eloubeidi and Prof. Tina Kempin wrote:

"Despite amendments to the Lebanese Labour Law and Social Security Law in 2010 waiving work permit fees for Palestinian refugees born in Lebanon, the 2016 unemployment rate stands at 23% and only 42% of Palestinian refugees are economically active. Women face higher poverty rates, higher unemployment rates, and only comprise 15% of the Palestinian workforce. Less than 3.3% of Palestinian refugee workers have an official employment contract that allows them to seek a work permit, highlighting that many are unable to access occupations that are open to them. Recent new employment restrictions have affected Palestinian businesses and increased insecurity. The situation is especially dire for young people, which constitute the majority of Palestinian refugees in Lebanon. Youth unemployment and lack of school attendance are one of the biggest issues that face young Palestinians in Lebanon, especially affecting females. Twenty-six per cent of young women cite household work and 15% cite family reasons for their lack of employment or educational activity while only 7% cite being restricted from obtaining work. For economically inactive men, the reasons are more varied; 11% cited illness, 12% cited 'other reasons', 6% cited they were preparing to start a new job, and 6% cited family reasons. Even if Palestinian refugees find work, they are often discriminated against, are exposed to unfair and unsafe work conditions, and are usually paid less than their Lebanese counterparts working the same job. The average monthly income of Palestinian workers is \$356, below Lebanon's official minimum wage of \$447, which most Lebanese workers earn. Further, while the average is \$356, half of the employed Palestinian refugee population earns less than \$330 a month, placing them even further below the minimum wage.

Because of the difficult work situation, many Palestinians have given up finding employment, citing long working hours, low pay, poor working conditions, and educational mismatch. Many refugees continue to be dependent on the United Nations Reliefs and Works Agency for Palestine Refugees in the Near East (UNRWA), established in 1949 to provide relief resulting from the 1948 Arab-Israeli conflict, for basic support. The UNRWA provides primary, secondary, and vocational education, health care, social services, infrastructure improvement, and emergency response."

(Source: Samih Eloubeidi & Tina Kempin Reuter/ The International Journal of Human Rights, "[Restricting access to employment as a human rights violation: a case study of Palestinian refugees in Lebanon](#)", 11 April 2022, pp. 3-4)

Based on a qualitative survey of 15 men between 24 and 75 years old living in the Bourj el-Baraneh Camp on the outskirts of Beirut conducted by researchers Samih Eloubeidi & Prof. Tina Kempin Reuter in 2021, the latter reported that:

"[...]Overall, the occupations that Palestinian refugees in Lebanon carry out on average are not enough to support them and their families or to enable the younger generation access to education and a better future. Employment restrictions in combination with the stateless status and camp confinement of Palestinians have therefore far-reaching and grave consequences, affecting not only the current situation, but perpetuating a cycle of poverty, dependency on outside aid, and limiting the ability for progression and advancement.

[...] Perceptions of restricted access to employment on emotional and mental well-being

[...] The doctor, for example, responded with 'agree'.⁴⁶ When asked about his choice in the interview, he based his response on the fact that he does not have access to resources, knowledge, or practices that he would have if he were allowed to practice and develop his skills outside the camp. He noted, with exasperation: 'I cannot become better than what I am. I am a cardiologist by training, but I haven't done an EKG in a very long time', highlighting the restrictions he faces in his occupation."

(Source: Samih Eloubeidi & Tina Kempin Reuter/ The International Journal of Human Rights, "[Restricting access to employment as a human rights violation: a case study of Palestinian refugees in Lebanon, Perceptions of restricted access to employment on integration](#)", 11 April 2022, pp. 8-9)

46 The doctor was answering question 1: I feel oppressed working this job. [Restricting access to employment as a human rights violation: a case study of Palestinian refugees in Lebanon](#), Samih Eloubeidi & Tina Kempin Reuter. 11 April 2022, p.9

In the internationally recognised book they published in 2020, legal scholars Dr. Francesca Albanese [currently Special Rapporteur on the situation of human rights in the Palestinian Territory] and Prof Lex Takkenberg wrote:

“Registered Palestine Refugees

[...]Two new laws of 2010 pertaining to social security and labour enable Palestine refugees to obtain work permits at no cost and earn social security benefits (such as end-of-service and injury-related indemnity) regardless of the reciprocity condition. In practice, the application of the laws is uneven. According to bylaws in force, some (p. 215) professions are still off limits for Palestine refugees, such as general medicine, dentistry, nursing, midwifery, tourist guide, and some others, and where employment is possible, obtaining a work permit still entails a lengthy process with success dependant on the goodwill of the employer. Even when Palestine refugees are not denied their rights de jure, they must still deal with the complexities of the Lebanese system, and Lebanese bureaucracy often appears to discriminate against Palestinians. As a result, most Palestine refugees in Lebanon reportedly work in menial, low-paying jobs in the informal sector and receive lower salaries than Lebanese nationals.”

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.3, Legal Status and Treatment, p. 276)

9.5. How visible are stateless Palestinians in the workforce? How satisfied are stateless Palestinians with their professional occupation?

Based on a qualitative survey of 15 men between 24 and 75 years old living in the Bourj el-Baraneh Camp on the outskirts of Beirut conducted by researchers Samih Eloubeidi & Prof. Tina Kemplin Reuter in 2021, the latter reported that:

“The perceptions of job satisfaction and impact of employment on standard of living were mostly consistent among study participants. A majority of the participants responded with ‘I disagree’ and ‘I strongly disagree’ for questions asked about contentment with their work situation and impact on quality of life, with some variations across different occupations and work situation inside or outside the camp. People working in lower-paying, menial jobs inside the camp expressed a higher rate of dissatisfaction with their circumstances both with regards to financial security and standard of living. Most of those who expressed that their jobs were not enough to maintain an acceptable standard of living were store owners or self-employed within the confines of the camp, such as carpenters and street vendors. In addition to general shortcomings of menial occupations such as low pay and long work hours, participants cited two main reasons for the inability to attain an adequate standard of living: first, they experience high levels of competition within the camp because many Palestinian refugees are concentrated in these types of occupations. Second and related, most of them only maintain a very limited client base because they are only able to service other Palestinian refugees inside the camp. This impacts not only Palestinians’ current situation and standard of living, but also future prospects. As one participant, a store owner, put it: ‘I sent my daughter to America to finish her studies and to work because there was no future for her here in Lebanon. But my son is still living here with me, and he has dreams he will never be able to accomplish’.

[...]The most interesting discovery are the differences we found in perceptions of people who work inside the camp versus outside the camp. All of those who worked outside the camp affirmed medium to high levels satisfaction with their job, standard of living, and financial security, even if working in menial positions like goods distribution or as crowd controllers and security personnel. In their interviews, they explained that these jobs provide enough for the participants and their families. Unlike their counterparts inside the camp, they expressed relatively high levels of job satisfaction with their jobs.

[...]We attribute this finding to a number of reasons. First, according to participants, Palestinians receive higher pay levels outside the camp, so even though they are not paid well, they earn comparatively more than other Palestinians who work inside the camp. Second, some of refugees’ dissatisfaction with their new jobs in the host country is due to occupational skidding, namely the inability to find jobs that match their skills and qualifications. This is not possible for Palestinian refugees currently living in Lebanon because most of them never had the opportunity to pursue higher-level occupation due to aforementioned employment restrictions or inability to receive the education required to carry out a non-menial profession. Third, the interviews showed that any form of employment is considered positive and seen as a success. This is especially true for Palestinians working outside the camp who enjoy both higher pay and higher status even if they work in low-level positions.

[...]Questions 2 and 3 focused on the desire to have access to more sophisticated jobs and feelings of humiliation being stuck in menial jobs. Despite their overall contentment with their job situation, almost all of the participants responded with 'strongly agree' to the question asking whether they felt demeaned by the fact that they cannot access higher paying and more sophisticated jobs, regardless of whether or not their current occupations allow them to be financially stable. In this regard, the participants confirmed what is stated in the literature, namely that restricted employment access negatively impacts refugees' psychological capital, emotional well-being, and perceived self-worth. Only two participants, the crowd controller and the supermarket worker, answered Question 3 with 'disagree'. Both noted in their interviews that Palestinian refugees are oppressed and treated unfairly in the employment sector and thus, it should follow that they would feel belittled by not being allowed to work in a number of higher-level jobs. However, for them personally, they felt not demeaned by not having access to these higher-level occupations.

Based on these responses, it is apparent again that it is not necessarily menial occupations by themselves that make people feel oppressed or demeaned, but rather conditions pertaining to a particular work situation, such as limited access to resources or discriminatory practices, and restrictions to certain types of higher-level jobs and education. This again illustrates the extent to which the plight of Palestinian refugees in Lebanon is different from the plight of refugees elsewhere. The type of occupation (low level vs. high level) is not a good predictor for emotional and mental well-being, but it is the specific circumstances of Palestinian refugees in Lebanon that determine their outlook on life."

(Source: Samih Eloubeidi & Tina Kempin Reuter/ The International Journal of Human Rights, "[Restricting access to employment as a human rights violation: a case study of Palestinian refugees in Lebanon](#)", 11 April 2022, pp. 7-10)

9.6. Is there disaggregated data on the number of stateless Palestinians in the labour market?

Refugee Net, which, according to its website, is a "Palestinian Refugee News Network in Lebanon", wrote about unemployment among Palestinian refugees in Lebanon in May 2022:

"A member of the political leadership of the Islamic Resistance Movement «Hamas» in Lebanon, Mahmoud Taha, said that «unemployment rates have reached nearly 80 percent among Palestinian refugees, even refugees who work are living a very difficult reality, because the Lebanese pound has lost its value in light of the inflation in the country." [In-house translation. The author is an Arabic native speaker]

ORIGINAL SOURCE:

قال عضو القيادة السياسية لحركة المقاومة الإسلامية "حماس" في لبنان، محمود طه، إن "معدلات البطالة وصلت إلى ما يقارب ٨٠ بالمئة بين اللاجئين الفلسطينيين، حتى اللاجئين الذي يعمل يعيش واقعا صعبا جدا؛ لأن الليرة اللبنانية فقدت قيمتها في ظل الغلاء الحاصل في البلاد".

(Source: Refugee Net: Mahmoud Taha: [Unemployment rates have reached 80% among Palestinian refugees in Lebanon](#), May 4, 2022)

Based on a 2018-2019 survey on Labour Force and Household Living Conditions by the Lebanese Central Administration of Statistics, UN women reported in 2021 that:

"Work in Lebanon is highly informal, particularly amongst low-skilled Lebanese and non Lebanese populations. Overwhelmingly, non-Lebanese populations such as Syrians, Palestinians, and migrants are more likely than Lebanese to work in the informal sector [Informal Employment is defined as: the share of workers not contributing to social security], with no social security coverage, no paid sick leave, and no paid annual leave (91% versus 28% for Lebanese employees overall). Here there is a significant gender difference as well, as 89% of non-Lebanese women work informally compared to 49% of non-Lebanese men.

Prior to the economic crisis, foreign nationals in Lebanon held a larger percentage of jobs than Lebanese citizens, however, Palestinian and Syrian women were economically active at very low rates. The most recently reported labour force participation was 17% for Palestinian refugee women from Lebanon and 14% for Palestine refugee women from Syria (PRS) (UNRWA 2016). The unemployment rate for PRS was double that of Palestine refugees from Lebanon, with female PRS reporting a 68% unemployment rate (UNRWA 2016). Both employed Palestinian men (39%) and women (27%) most commonly work in elementary occupations (daily work), and women are far more commonly found in professional jobs (21% of women compared to 5% of men). For Syrian refugee women, the labour force participation rate stands at 12% (UN Women 2020d). As with the Lebanese population, there is geographic variation, since Palestinian and Syrian women in Beirut and Mount Lebanon had the highest labour force participation rates amongst the governorates.

(Source: UN Women, “[European Union Sector Specific Gender Analysis: An in-depth sectoral examination of feminist and women’s rights issues in Lebanon](#)”, July 2021, pp. 30-31)

9.7. Are steps taken to ensure that stateless Palestinians can enter the labour market? Are these successful?

Researcher Walaa Kayyal, a Palestinian living in Lebanon herself, was not aware of amendments to the work permit rules and indicated that the access to qualified positions have not changed for Palestinians in Lebanon:

“As far as I know, international NGOs or local NGOs (because this is where the educated Palestinians go for work since we cannot work in the public sector) have a quota. So they say that 20% of their employees can be foreigners. Foreigners include Palestinians. They can be Syrians, Iraqis, Americans, whatever... and within this quota, we can be employed. Usually, this quota for foreigners is quite low because they do not want to pay for too many work permits. We have tons of laws which are passed but not enforced in Lebanon. So even if the work permit is free, you still have some administrative fees.”

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

On the contrary, Mr Ziad El Sayegh, Executive Director of the Civic Influence Hub in Beirut and former Policy and Communication Advisor to the Lebanese-Palestinian Dialogue Committee [a Lebanese inter-ministerial government body formed in November 2005 to implement the policies of the Lebanese government towards Palestinian refugees in Lebanon] whom we interviewed for this report responded to our question about the 2010 amendment to the Lebanese Labor Law and Social Security Law of 2010 that:

“They will receive a work permit without paying anything. The [...] problem was in the National Social Security Fund, and we were about solving this. I was that time the team leader of the Minister of Labor. They don’t have to pay anything. The only problem was that the law obliged them to pay for the end-of-service indemnity, and this was in their interest but obliging them to pay for medical fund without benefiting it was an issue. End of service indemnity program within the National Social Security Fund to protect the rights when they finished their work, this was key. The only problem was that there was a debate between the Lebanese government at that time and the Lebanese Parliament also if they are obliged to pay for the medication program of the National Social Security Fund. And after this, there was a discussion between 2011 and 2012 to make sure to put an end for this contribution because they are not benefiting from this contribution and the medication program because UNRWA is taking care of this. Yet this kind of modification was not adopted because of the lack of governance in the country and the Lebanese-Palestinian dialogue committee.

[...] Yes, [it was in] 2010. But between 2016 and 2018, when there was a Lebanese-Palestinian dialogue-- and we succeeded in 2018 to issue a unified vision towards the Palestinian refugees issue in Lebanon, and I’m sure you saw it. It was issued by LPDC, and I was one of the facilitator of these dialogues. It was coordinated with the UNDP. It was led by the Lebanese Palestinian Dialogue Committee[...]. We succeeded within the Lebanese political stakeholders to approve a consensus that these Palestinian refugees should not pay for the medication program because they are not benefiting from it. [...] If you have other fields, they need a specific law adopted by the parliament like being a lawyer or an engineer, or. These are free orders, and they have bylaws approved by the parliament. We need another kind of modification here.[...] the Palestinian engineers and medicines, they are working. They are working on the black market. And this is bad, and they are accepting work in the black market.[...]”

(Source: Ziad El Sayegh, [interview record](#), 31 October 2022)

In response to a question on the repercussions of working without a work permit, Palestinian researcher Walaa Kayyal responded that:

“No organisation will jeopardise their reputation or their relation with the government to employ you without a work permit. So it is either you have a work permit, or the person issue a work permit for themselves to be employed. But sometimes, and I’ve heard this through many research work that I have done that specifically pharmacies employ someone who is stateless without work permits. The Ministry of Public Health comes and conducts inspections and check-ups on all the pharmacies, specifically, the new established pharmacies or the pharmacies in villages. When this inspection occurs, the stateless employees would be smuggled out because they are not allowed to work without a permit. If you were caught, this is definitely a complete termination of your work contract. What exactly happens is up to the person who caught you. They can raise an allegation and it can go to court. Or they can just say, «You’re not allowed to work anymore.» and terminate your contract. But then again, the owner of the pharmacy can tell you, «come tomorrow. It’s fine.» They don’t do regular checkups. It’s very rarely that they go and they catch people. But it happens because I’ve heard specifically from stateless individuals who are educated that when the ministry comes for any checkup or they come to collect taxes, they would hide in the toilet.”

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

Katherine Harbord, a lecturer in human rights whom we interviewed for this report in October 2022 also shared her knowledge on the consequences of working without a work permit for Palestinians and employers:

“This is something that has previously come up about a year, a year and a half ago. And my understanding is that the main consequences of not having a permit-- of course, there are potentially legal consequences, a fine. It’s an offence. My understanding is that it carries kind of a statutory fine in the same way if you’re caught speeding or something, you have whatever the fine is. So there are consequences. But the more important consequences, I think, are actually perhaps the unintended ones. So if somebody doesn’t have a permit, they don’t have the protections inscribed in labour law. They’re open to exploitation, unscrupulous employers, those kinds of ancillary problems rather than justifying itself. It’s my understanding too that employers, if they have an illegal worker, they also are subject to a fine. So the gentleman I spoke to did say it was quite difficult to find a good job without a work permit. Finding work is easy, but employers aren’t generally willing to take the risk for higher-status jobs and roles. Understandably. The man that I was speaking to had involvement-- or had previously had involvement with the trade union movement, for example. So it may be that he was also more aware than the average person of the situation because of his interest in labour laws and labour relations.”

(Source: Katherine Harbord, [interview record](#), 13 October 2022)

Also Katherine Harbord, a lecturer in human rights specialised in the Middle East whom we interviewed for this report in October 2022 said that Palestinians still had to pay for work permits:

“I spoke to a Palestinian in Lebanon towards the end of last year who told me that they do still require a work permit, it’s like an authorisation, it’s not something you have to physically pay for. But in practice, because of the problems of weak state structures, in practice often there is a charge attached or you can’t receive it without paying a fee. No, fee is the wrong word. I was trying to think of a polite way to say bribe, but I mean bribe.”

(Source: Katherine Harbord, [interview record](#), 13 October 2022)

In a series of written responses to questions sent by Asylos for this report, Dr. Jasmin Lilian Diab, Director of the Institute for Migration Studies at the Lebanese American University indicated in October 2022 that the aforementioned decision by Minister for Labour, Moustapha Bayram, to allow Palestinians to work in union-regulated professions, was “never enforced, and reportedly revoked.”

(Source: Dr. Jasmin Lilian Diab, [written communication with Asylos](#), 6 October 2022)

In its 2021 Annual Operational Report, UNRWA reported:

“Courses delivered at the STC [Siblin Training Centre] offered Palestine refugee youth the skills required to successfully compete in a challenging job market, especially important in the context of Lebanon’s economic crisis. UNRWA has, however, observed a decline in enrollment figures for the 2021/22 academic year, with 33 PRS students enrolled and an overall student population of 718 trainees. This may be due to the fact that more young people have been forced into leaving their studies to find unskilled work to support their families. To counter this, UNRWA will continue to reach out / promote vocational training and will also offer short-term courses that better respond to new emerging skills required in the employment market”.

(Source: UNRWA, “[Annual Operational Report 2021](#)” 27 October 2022, pp. 120-121)

UN women noted that changes in Lebanese law improved the rights of Palestinians in Lebanon in principles, however, “significant” gaps remain:

“Changes to Lebanese law in 2005 and 2010 have, in principle, improved the rights of Palestinians in Lebanon (PRLs) to access formal employment and strengthened related social protection mechanisms, giving them partial access to the National Social Security Fund. However, significant gaps remain. ”

(Source: UN Women “[European Union Sector Specific Gender Analysis: An in-depth sectoral examination of feminist and women’s rights issues in Lebanon](#)”, July 2021, p. 28)

9.8. Are there reports/evidence of additional practical challenges to employment for stateless Palestinians more than others? For example, on the basis of their legal status, gender, class, religion or disability?

UN women noted that within a challenging legal context, Palestinian women are less likely [than Palestinian men] to find work:

“Changes to Lebanese law in 2005 and 2010 have, in principle, improved the rights of Palestinians in Lebanon (PRLs) to access formal employment and strengthened related social protection mechanisms, giving them partial access to the National Social Security Fund. However, significant gaps remain. Within this difficult legal context for Palestinian refugees where there are limited prospects for jobs, Palestinian women are even less likely to work.”

(Source: UN Women “[European Union Sector Specific Gender Analysis: An in-depth sectoral examination of feminist and women’s rights issues in Lebanon](#)”, July 2021, p. 28)

The UNRWA socio-economic survey on PRS pointed out the gender disparity in employment:

“One of the most striking characteristics of the PRS labour force (like that of the other populations around the Middle East) pertains to the significant difference between female and male participation. While they represent 54.2 percent of the potential working population aged 15+, women represent only 22.1 per cent of the labour force (despite higher educational levels) compared to 77.9 percent of men, which highlights the ‘economic dependency’ borne by most male breadwinners. In other words, 17.8 percent of women in that age group are economically active as employed persons or job seekers compared to 74.4 percent of men. Women’s lower participation rates are commonly attributed to a combination of factors, including “conservative social norms,” low wages, specializations that do not fit the private sector’s needs and feelings of insecurity. In that respect, being a housewife is the main reason, stated by the PRS respondents of both genders, for not being economically active (44.9 percent) well ahead of disability/illness (13.20 per cent), being retired/too old to work (11.2 per cent), being a student (9.9 per cent) and loss of hope in finding employment (9.4 per cent). Additionally, relatively fewer economically inactive women are said to be ready to work (25.1 percent of them) compared to 66.4 percent of inactive men. [...] two thirds of women are unemployed (66.6 percent) compared to less than half of men (44.1 per cent). Unemployed women also report being less currently available to work (25.1 per cent) than men (66.4 percent). They tend to look for jobs longer than men (27.8 weeks for unemployed females compared to 24.4 weeks for unemployed men).”

(Source: UNRWA, “[Socio-economic Survey on Palestine Refugees from Syria Living in Lebanon](#)”, 28 April 2021, pp. 40 & 41)

The Dutch Ministry of Foreign Affairs reported in 2021 that:

“10.3.3 Women

[...] A source indicates that with the rise of corona measures, the freedom of movement and access to work for women and LGBTI groups has worsened.” In-house translation. The translator is a native Dutch speaker)

ORIGINAL SOURCE

“10.3.3 Vrouwen

[...] Een bron geeft aan dat met de opkomst van coronamaatregelen de bewegingsvrijheid en toegang tot werk voor vrouwen en LHBTI groepen is verergerd”

(Source: Dutch Ministry of Foreign Affairs, “[Thematisch ambtsbericht Palestijnen in Libanon](#)”, January 2021, p. 53)

9.9. How has Covid 19 impacted access to the labour market?

An UNRWA publication noted that:

“Unprecedented levels of poverty, skyrocketing unemployment rates and increasing despair are spreading across the country, severely hitting the Lebanese people and Syrian and Palestine refugees. This comes amid one of the worst economic crises in recent history, compounded by the COVID-19 pandemic, poor governance and an almost total collapse in basic services. Palestine refugees, living in overcrowded camps and marginalized by discriminatory policies, are historically one of the poorest people in the country. They are at the end of their rope.”

(Source: Source: UNRWA, “[Hitting Rock Bottom – Palestine Refugees in Lebanon Risk Their Lives in Search of Dignity](#)”, 21 October 2022)

An UNRWA report on the socio-economic situation of Palestine Refugees in Lebanon highlighted a World Food Programme assessment, which estimated the impact of the economic crisis and Covid-19 on the livelihoods and food security of people in Lebanon, including Palestine Refugees:

“The World Food Programme conducted a rapid assessment between April and May 2020 to estimate the impact of the economic crisis and COVID-19 on the livelihoods and food security of people in Lebanon including Palestine and Syrian refugees. The findings of the assessment showed clearly how Palestine refugees were struggling to cover their basic needs and suffering from the repercussions of the economic crisis as well as the COVID-19 pandemic and its ensuing restrictions. 62 per cent of the interviewed Palestine refugees indicated that their household income was reduced following COVID-19 and the wave of public unrest compared with the previous year (2019) and 11 per cent resorted to alternative sources of income to compensate for their income losses. During the period of the survey, 39 per cent of Palestine refugees reported that they lost their jobs and 21 per cent witnessed a reduction in their salary. A high proportion of the Palestine refugees who were interviewed indicated that they reduced their food consumption in the last 30 days (before and during the period of the survey April/May 2020) with 53 per cent indicating that they ate less expensive food, 15 per cent skipped meals and 8 per cent went for a whole day and night without eating.

(Source: UNRWA, “[Palestinian Refugees in Lebanon: Struggling to Survive](#)”, January 2022, p. 5)

As part of the 2020 annual implementation report on its Gender Equality Strategy, UNRWA wrote about the suspension of microcredits for Palestine refugees:

“In Lebanon, the loans provided to the Palestine refugees by the Microcredit and Community Support Program (MCSP) were suspended due to the degradation of the economic situation and to COVID-19. A review of the programme will be carried out in 2021.”

(Source: UNRWA “[UNRWA Gender Equality Strategy 2016-2021: annual implementation report January-December 2020](#)”, May 2021, p. 10)

An article published by UNRWA highlighted the dire situation of those who reside in camps:

“UNRWA is urgently seeking to help Palestine refugees by providing them with emergency cash assistance in US dollars and a strengthened COVID-19 response to limit the spread of the virus in camps. It is also seeking funds to finish the reconstruction of the Nahr el Bared refugee camp in the north of the country near Tripoli, which was destroyed in 2007 when fighting broke out between the Lebanese Armed Forces and Fatah al-Islam, a militant group. [...] Even before the pandemic and the financial meltdown of Lebanon, Palestine refugees lived in poverty and faced systemic restrictions that limited their employment, property ownership and, at times, movement. Joblessness has been high in Palestine refugee camps for many years, but the collapse of the Lebanese economy in the last few months has left many of them feeling desperate, especially as UNRWA has been struggling with an acute financial crisis itself. COVID-19 has been the latest in a series of recent devastating blows to a community that has suffered marginalization and uncertainty for decades.”

(Source: UNRWA, “[UNRWA Raises Alarm on the Situation of Palestine Refugees in Lebanon](#)”, 1 April 2021)

Based on an assessment by WFP, UNDP Lebanon projected that:

“The expectation is that more Lebanese families will be prepared to take on lower-quality jobs with worse conditions that previously were assumed by refugees, leading to anticipated tensions between Lebanese and non-Lebanese communities as it has been the main driver of tensions in the past.”

(Source: UNDP/UN Lebanon “[Rapid Socio-Economic Impact Assessment Lebanon](#)”, 2 November 2020, p. 11)

The UNRWA Protection brief offers a wider overview of current challenges faced by Palestine refugees living in Lebanon.

“• Palestine refugees in Lebanon face substantial challenges to the full enjoyment of their human rights. PRL are socially marginalized, have very limited civil, social, political and economic rights, including restricted access to the Government of Lebanon’s public health, educational and social services and face significant restrictions on their right to work and right to own property. In 2016, 65 percent of PRL lived under the poverty line, as did 87 percent of PRS in March 2020.

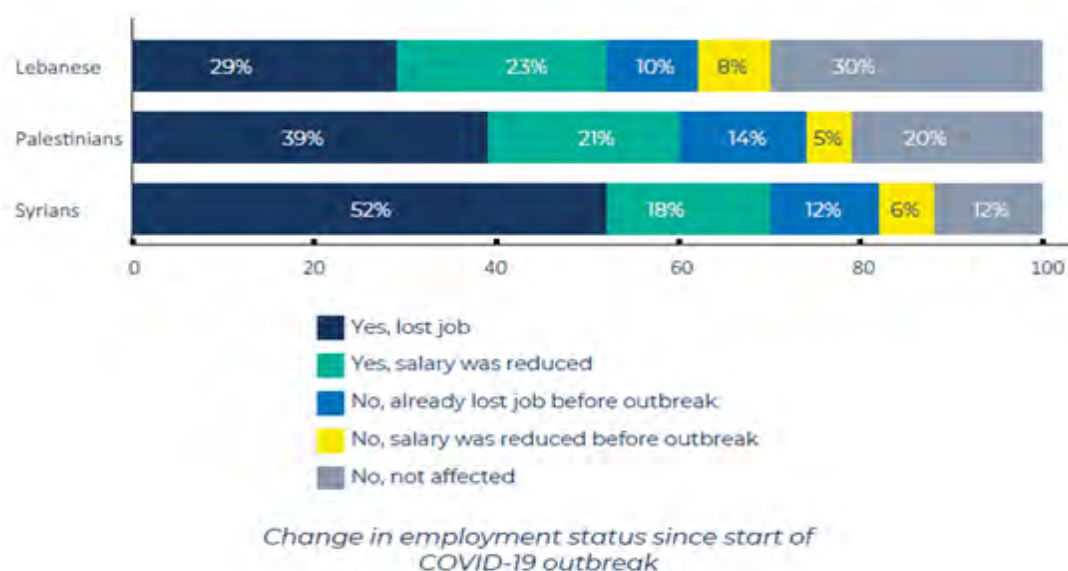
• The conflict in Syria has not only caused additional strain on services within Lebanon, but has also significantly impacted its economy. The fragile financial situation was most recently exacerbated by the depreciation of the Lebanese Lira and the global COVID-19 pandemic. The significant financial challenges facing Lebanon have had deep socio-economic consequences for both Lebanese and non-Lebanese residents. This includes a significant impact on the Palestine refugee population, already vulnerable due to their poor socio-economic situation and precarious legal status in the country.

• COVID-19 hit Lebanon in the midst of an economic crisis, where inflation and their precarious legal status had already made many refugees even more vulnerable to economic shocks. As in many other countries, containment measures including lockdowns further hindered economic activity and resulted in increased unemployment and poverty. In Lebanon’s already fragile financial situation, this has led to an increase in prices of consumer goods and an overall increase in the cost of living, in turn leading to an increased number of refugees who are in urgent need of financial support to be able to purchase essential items such as food and medicine, pay their rent and avoid evictions. [...]

• The social, political and economic situation in Lebanon deteriorated further in 2020, marked by street protests, the COVID-19 outbreak and associated measures such as lockdowns and successive confinements, loss of livelihoods, and disruption of regular life and education. These developments have increased the levels of mental distress and exacerbated the protection risks especially for children and women. An increase of child labour, including begging, rubbish collection and working regularly on the street, , and increased cases of child marriage, child abuse and harassment and violence against girls and women have been observed during the pandemic. In addition, although the Palestinian community was not directly affected by the 4 August 2020 blast in the port of Beirut, the tragic events have impacted all residents in the country, exacerbated mental health and psycho-social support (MHPSS) needs, and are expected to add to the growing tensions and the economic crisis.”

(Source: UNRWA: “[Protection brief: Palestine refugees living in Lebanon](#)”, September 2020)

In the dashboard below, UNHCR reported that “Across Lebanon [...] 80% of Palestinians have either lost their income-generating possibilities or have had their salaries reduced since the start of the COVID-19 outbreak or even before.”:



(Source: UN Inter-Agency Cooperation, Lebanon, “[In Focus: Rise of evictions due to increased economic vulnerability](#)”, July 2020, p. 1)

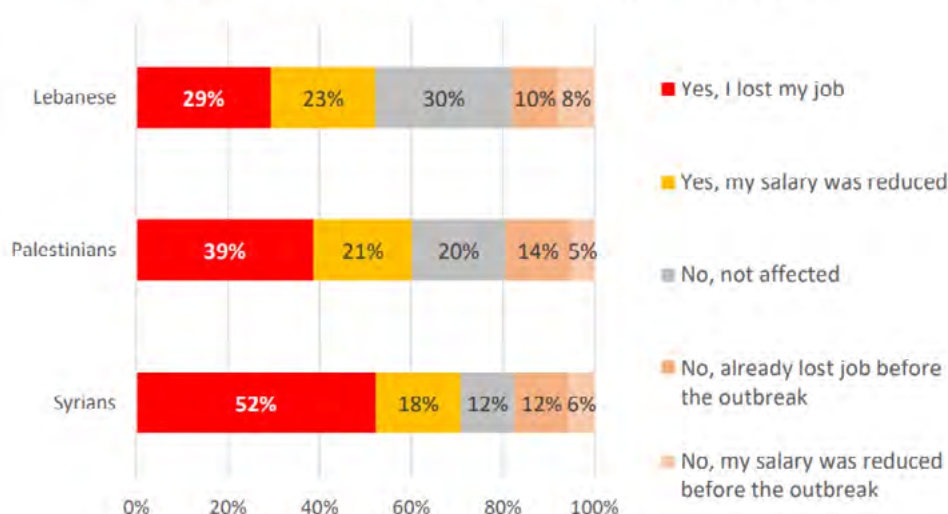
A collective of NGOs working in Lebanon made a joint submission to the Human Rights

Council Universal Periodic Review in 2020 in which they stated that:

“Before Covid-19, Palestinian refugees were enduring a humanitarian and socio-economic crisis impacting their rights, such as the right to access and practice work. The pandemic made things worse. Unemployment among the Palestinian workforce in Lebanon is currently around 80% (based on a 2019 study on the labor market and unemployment by Dr. Najib Issa). The financial crisis and limits imposed by banks and the government led to a slowdown of remittances by Palestinians to their families and relatives, exacerbating the situation of refugees.”

(Source : Najdeh Association, Development Action Without Borders (Naba’a), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, p. 13)

Chart 5: Respondent employment status – change since COVID-19



(Source: WFP “[Assessing the Impact of the Economic and COVID-19 Crises in Lebanon](#)”, June 2020, p. 8)

The World Food Programme reported in June 2020 about the impact of COVID-19 on employment in Lebanon:

“In order to capture the COVID-19 impact on employment status in Lebanon, respondents were asked whether their individual ability to carry out their work activities has been jeopardized as a result of containment measures. [...]

The New Humanitarian (formerly IRIN News) reported in April 2020 about the impacts of COVID-19 on the refugee population in Lebanon:

“Refugees say some of the new hardship is due to limitations on refugee movement imposed by local authorities. Although work in food production is technically allowed during the lockdown, many refugees are afraid to leave the camps to work in the fields as they once did.

“Here in the camp, the municipality has forbidden anyone to go out,” Assaf said. “Currently, no one has money. At the end of the month, most people don’t have bread,” much less medicine, she added.

“There’s no work; it’s absolutely forbidden,” agreed Aisha Ibrahim, who lives in an informal camp in Bar Elias with her husband, mother-in-law, and six children – three of whom have disabilities. Ibrahim said camp residents had been threatened with deportation if they ventured out for anything other than food and medicine.

Even before the financial meltdown and before coronavirus, according to a UN assessment published in December 2019, only one third of refugees in Lebanon had regular work, and the vast majority – 96 percent – were in debt.

According to UNHCR, it was already extremely difficult for many refugees to get by, and now the pandemic is making it worse. “The situation is having a severe impact on refugees’ access to livelihoods, morale, and ability to meet their basic survival needs like rent, food, and medicine,” Abou Khaled said, “[Much] as it [also] is for vulnerable Lebanese communities.”

(Source: The New Humanitarian, “[How COVID-19 is limiting healthcare access for refugees in Lebanon](#)”, 21 April 2020)⁴⁷

Means of subsistence

“During the reporting period, Lebanon continued to suffer from multiple crises that affected daily life on every level. Increased global prices, namely for wheat, oil and fuel, have resulted in runaway inflation rates (the average annual increase in Lebanon’s consumer price index stood at 215.03 per cent during the first half of 2022 when compared to the same period in 2021) [...] Food prices have increased by more than 15 times since October 2019, while people’s purchasing power has significantly decreased and unemployment rates have risen.”

(Source: UNRWA, “[Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022](#)”, 3 November 2022, p. 11)

“According to recent UNRWA data [UNRWA, RSSD, Crisis Monitoring Report – high frequency survey results, March 2022] Lebanon’s multi-layered crises have led to increased poverty with 86 per cent of Palestinian families now living below the poverty line and unable to cover their basic needs. This represents a significant increase from the 73 per cent recorded in July 2021.”

(Source: UNRWA, “[Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022](#)”, 3 November 2022, p. 11)

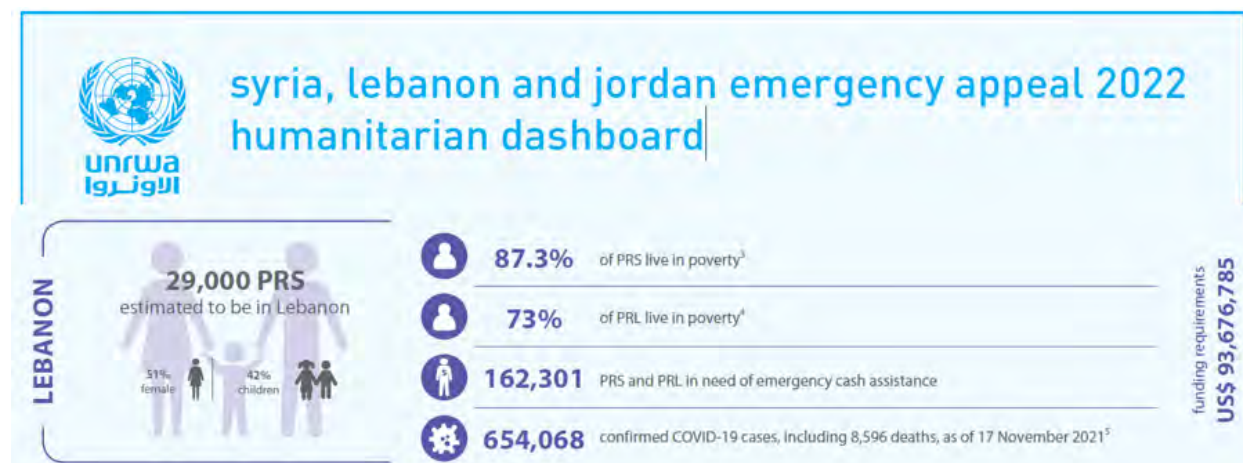
⁴⁷ Publication date is outside of this reports reference period, however this excerpt was as it contained relevant information on the lockdown impacts.

With reference to the means of basic subsistence, UNRWA reported that:

“As Lebanon’s crisis deepens, so do Palestinian refugees’ poverty and frustrations. Poverty among Palestinian refugees is increasing, with an UNRWA survey finding that 86 percent were living below the poverty line in March 2022 compared to 73 percent in July 2021. This is a result of rising prices and an end to government subsidies, with a growing proportion of household expenses being directed towards increasingly expensive fuel and electricity. In March 2022, electricity and fuel accounted for 15 percent of household expenditure, compared to 6 percent in July 2021, while expenditure on food dropped from 45 percent to 39 percent over the same period, suggesting that households have reprioritized resources, cutting down on elements usually considered essential, such as food. With the rise in food prices, nearly 90 percent of those surveyed in March reported purchasing leftovers from the market, while two-thirds reported reducing the number of meals they had eaten in the seven days proceeding the survey.⁵ The price of a survival minimum expenditure food basket in Palestine refugee camps in March 2022 was a 400 percent increase on the October 2019 price.⁶ 52 percent of households reported taking on debt in the three months prior to the survey in March 2022, compared to 47 per cent in July 2021. Some Palestinian households, particularly in Tyre and Central Lebanon Area, reportedly cut their generator subscriptions, leaving them reliant on one or two hours’ electricity a day from the national grid. Lack of electricity also left streets darker in camps, limiting safe movement after dark (reported as a particular issue for women and children), and made it more difficult for children to do homework. In the Beqaa, the particularly harsh winter, coupled with the usual annual jump in unemployment as agricultural work halted until spring, left families struggling to pay for the additional fuel needed for heating. In Beqaa and the North particularly, cold houses, a lack of heating and lack of adequate winter clothes were described as having a significant impact on people’s health, particularly amongst groups such as older persons.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 1 \(Q1\) 2022](#)”, 1 July 2022, p. 2)

“Lebanon: sector-specific interventions : [...] The Lebanon Field Office (LFO) food price monitoring survey – implemented at the end of the reporting period – showed an average 32 per cent increase in the cost of a standard food basket since the beginning of 2022. Some of the most affected areas are the Central Lebanon Area (40 per cent increase) and the Bekaa Valley (36 percent increase). [...]



(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 8)

Additionally, as discussed by UNRWA in their 2022 Emergency Appeal report for Palestinian refugees in Lebanon, Syria and Jordan:

“For Palestine refugees, the crisis is experienced on every level. According to recent UNRWA data, 73 percent of Palestine refugee families are now living below the poverty line and are unable to cover their basic needs in 2021, with 58 percent of refugees reporting having to reduce meal sizes and frequency. Nearly half of all household expenditures is spent on food reflecting a critical food security situation. The situation for PRS is of particular concern. A socio-economic survey conducted by UNRWA in 2020 found that 87.3 percent of PRS live below the absolute poverty line and 11.3 percent exist in a state of abject poverty. Essential commodities are increasingly out of reach for most and PRS are being pushed into ever more negative coping mechanisms to survive, including missing meals, child marriage, child labour, debt and unsustainable borrowing practices. This is also exacerbating the isolation of people with disabilities as families struggle to provide for their additional needs. The stress of this

situation is further driving an increase in violence against children, intimate partner violence, and violence in the community as interpersonal disputes erupt into shootings.”

(Source: UNRWA, “[Syria, Jordan and Lebanon Emergency Appeal 2022](#)”, January 2022, p. 16, last accessed 29 November 2022)

“The protection situation in Lebanon continued to deteriorate during the reporting period. Key concerns identified through quarterly protection monitoring, work with community groups and organizations and information from UNRWA programmes included: (i) difficulties in accessing services due to high transportation costs, particularly in relation to accessing education; (ii) increased evictions or eviction threats as landlords are requesting rent in US dollars; (iii) increasing exposure to substance abuse, particularly amongst children and youth; (iv) high levels of sexual violence, including against children; (v) child labour, including begging and working on the streets; and (vi) parents economically struggling to support children, including in their commitment to keep children in school.”

(Source: UNRWA, “[Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022](#)”, 3 November 2022, p. 11)

“Palestine refugees continued to struggle under the weight of multiple overlapping crises in Lebanon during the reporting period, including a rapidly deteriorating socio-economic and financial situation, exacerbated by the impact of COVID-19 and the repercussions of the 2020 Beirut Port explosion. The cost of basic items soared after government subsidies were gradually lifted on fuel and medicines, leading to extreme fuel shortages and reduced access to medicines. At the same time, the LBP continued to depreciate against the US\$, placing basic goods further out of reach for many people. [...] The condition of PRS in Lebanon remains of particular concern with data from internal UNRWA monitoring mechanisms indicating that an increased number were unable to cover their basic needs during the course of the year. The Food Security Cluster in Lebanon reported that the food component of the survival minimum expenditure basket recorded an 11 percent increase between July and August 2021, representing a staggering 628 per cent increase since October 2019. [See 2021 3rd Quarter Sector Dashboard, Food Security and Agriculture, Inter Agency Cooperation, Lebanon]. According to UNRWA surveys, the poverty rate reached 87 per cent amongst PRS and 73 per cent amongst PRL in 2021”

(Source: UNRWA, “[Annual Operational Report 2021](#)” 27 October 2022, p. 99)

UNRWA reports that more stateless Palestinians do not reach out for UNRWA’s support services due to struggling to survive day-to-day:

“In Lebanon, 1,402 Palestine refugees (1,276 PRL, 126 PRS) benefited from PSS through the Agency’s Protection and Health programming. In addition, the Protection team responded to ongoing requests for legal counselling, particularly from PRS concerned about their residency status in Lebanon and legal assistance was extended to 3,402 refugees. Community-based protection activities involved 1,095 individuals, although it is becoming more difficult to engage Palestine refugees in these activities given their need to focus on day-to-day survival.”

(Source: UNRWA, “[Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022](#)”, 3 November 2022, p. 6)

“The impact of underfunding [...] In Lebanon, only one round of cash assistance could be disbursed to 61,502 vulnerable PRL [...] Environmental health activities and emergency repairs and maintenance of UNRWA installations in Lebanon were also not conducted due to unavailability of funds.”

(Source: UNRWA, “[Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022](#)”, 3 November 2022, p. 7)

“Winter assistance [...] in Lebanon, UNRWA will be able to assist only 718 PRL and 1,771 PRS families (compared with the planned 16,193 PRL and 8,450 PRS) through the distribution of in-kind fuel assistance (to be provided in early 2022).”

(Source: UNRWA, “[Annual Operational Report 2021](#)” 27 October 2022, p. 101)

“Funding constraints affected the provision of extensive cash support to vulnerable PRL. During the reporting period, the UNRWA Lebanon Field Office (LFO) added supplementary vulnerability targeting criteria to prioritize those PRL in most need of assistance, making the most of available funding.”

(Source: UNRWA, “[Annual Operational Report 2021](#)” 27 October 2022, p. 115)

UNRWA struggles to provide assistance to stateless Palestinians in Lebanon, whilst noting that:

“In this challenging context, the humanitarian assistance provided by UNRWA remains a lifeline for the overwhelming majority of Palestine refugees.

[...] Yet, UNRWA continues to struggle in securing the necessary funds to carry out its operations and implement its mandate [...] In Lebanon, UNRWA has not been able to expand the amount of cash assistance to the most vulnerable groups of Palestine refugees, nor was it able to secure further funding to support vulnerable Palestinian refugees from Syria.

(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 6)

“In 2022, UNRWA requires US\$ 365 million to continue to respond to the increased humanitarian needs of Palestine refugees in Syria, Lebanon and Jordan. The funding shortfall faced by UNRWA under all of its funding portals in 2021 jeopardized the continuity of essential services and the provision of emergency assistance. [...] The funding shortfall also limited the provision of cash assistance to PRL”.

(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 11)

“For Palestine refugees in Lebanon, the situation could not be more precarious, given the multiple and compounding crises affecting all aspects of life in the country in 2021. The economy has crumbled, inflation is at a record beating level and, for those people who are already marginalized, the pressure on earnings and livelihoods has reached an unbearable level. In Lebanon in 2020, 87 percent of Palestinian refugees from Syria were living in poverty and this figure is expected to have increased over the last 12 months as the situation in the country continues to deteriorate”

(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 6)

“For Palestine refugees in Lebanon (PRL), the crisis has led to increased poverty with 73 percent of families now living below the poverty line and unable to cover their basic needs, and 58 per cent reported having to reduce meal sizes and frequency, according to UNRWA surveys. The situation for Palestinian refugees from Syria (PRS) is of particular concern with 87.3 percent already living below the absolute poverty line in 2020 and 11.3 percent existing in a state of abject poverty. PRS are being pushed into ever more negative coping mechanisms to survive, including missing meals, child marriages, child labour, debt and unsustainable borrowing practices. Families struggle to provide for the additional needs of the elderly and family members with disabilities.”

(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 9)

“The Protection and Humanitarian Principles team will work closely with other Agency programmes to organize referrals and will continue to implement revised standard operating procedures (SOPs) for emergency protection cash, including for clear links to a protection shock (e.g., GBV, eviction), to ensure narrow targeting and less emphasis on previously applied sustainability criteria whereby cash was only given when its impact would be sustained. This is in recognition of the relatively limited impact such an injection of cash is likely to have in the current context of Lebanon where so many people are struggling to maintain dignified lives and their self-protection capacity.

(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 41)

“Relief and Social Services: UNRWA supports 61,709 Palestine refugees in Lebanon through a social safety net programme with yearly payments of US\$ 130 per individual. As of January 2022 the Agency will also support more than 29,000 refugees from Syria (PRS) with monthly payments of US\$ 25 per person. [...] This level of support is below the actual needs and expectations of the refugees”.

(Source: UNRWA, “[Palestine Refugees in Lebanon: Struggling to Survive](#)” 18 January 2022, p. 12)

Palestinian Refugees from Syria incur debt as a way to secure their basic needs and cope with the rising cost of living:

“A staggering 74 per cent of the PRS families use debt as a strategy to cope with expenses. [...] PRS families across the country are equally affected inside and outside camps, but with variations among areas of residence ranging from 69 and 70 percent in the Saida and the Tyre areas, respectively, to 79.6 and 81.3 percent in the NLA and the Beqaa area, respectively. [...] Three quarters of the PRS families incur debt on food (75.4 percent), with percentages of food-related family debts peaking at 83.7 percent among the severely food insecure. Half of them incur debt on rent (50.3 percent). Other sources of debt include medical expenses (27.9 percent), electricity bills (13 percent), transportation costs (two percent) and other miscellaneous sources (16.3 percent) 46 such as tobacco, drinking water and educational expenses.”

(Source: UNRWA, “[Socio-economic Survey on Palestine Refugees from Syria Living in Lebanon](#)”, 28 April 2021, p. 60)

10. Access to land, housing and shelter

10.1. Do stateless Palestinians have the right to property on an equal basis with Lebanese citizens? What are the obstacles they face to access housing?

Walaa Kayyal, a researcher living as a Palestinian in Lebanon whom we interviewed for this report in October 2022 gave the following explanation regarding Palestinians' access to property:

"All Palestinians who bought houses before 2001, they can register it and it legally belongs to them. But after 2001, Palestinians were forbidden to own any property. However, you have people of other nationalities who own properties but not Palestinians. For example, Syrians can own a house, Yemenis can own a house, Saudis can own a house, Kuwaitis can own a house. But Palestinians cannot own a house. And it is in the Lebanese law, it's written this way: Palestinians are not allowed to. Currently I do not know of any steps taken to improve this situation for Palestinians."

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

Mr Ziad El Sayegh, Executive Director of the Civic Influence Hub in Beirut and former Policy and Communication Advisor to the Lebanese-Palestinian Dialogue Committee [a Lebanese inter-ministerial government body formed in November 2005 to implement the policies of the Lebanese government towards Palestinian refugees in Lebanon] whom we interviewed for this report considered that:

"This is a very complicated story. In 2002, we didn't allow anymore for the Palestinian refugees to buy a house,[...]. And between 2016 and 2018, this was one of the key frameworks we discussed within Lebanese national dialogue towards the Palestinian refugees issue, and we suggested a solution to legalize all the lands and houses bought before 2002 and after to think of scenarios of long-term leasing that can allow the Palestinian refugees to have houses."

(Source: Ziad El Sayegh, [interview record](#), 31 October 2022)

In a statement by Badil Resource Centre, submitted to the UN Human Rights Council, it was noted that:

"Living Conditions for Palestinian Refugees in Lebanon

Palestinian refugees in Lebanon are facing rapidly increasing levels of [...] poor housing conditions, poverty, as well as a lack of access to [...] gas, electricity, and heating. The legal status given to the more than 479,000 Palestinian refugees [figures from UNRWA], where they are still categorized and treated as foreigners rather than refugees, [...] further prohibits Palestinian refugees from owning real estate, generating over-crowdedness in the 12 refugee camps while forcing others to live in 'informal housing.'"

(Source: Badil Resource Center: "[Written statement* submitted by BADIL Resource Center for Palestinian Residency and Refugee Rights, a nongovernmental organization in special consultative status](#)", 23 May 2022, p. 2)

The UN Office for the Coordination of Humanitarian Affairs published a statement by the UN special rapporteur on extreme poverty and human rights on his visit to Lebanon in November 2021:

"Deprived of the right to own any real estate, almost a half of Palestinian refugees (45 per cent) live in one of the 12 official Palestine refugee camps, and the rest reside in the so-called "gatherings" near the camps or informal housing. In all of these settings, Palestinian refugees are often subjected to overcrowded, unsanitary and unsafe conditions, with minimal access to infrastructure and basic services."

(Source: OHCHR, "[Statement by Professor Olivier De Schutter, United Nations Special Rapporteur on extreme poverty and human rights, on his visit to Lebanon, 1 – 12 November 2021](#)", 12 November 2021, p. 1)

UNRWA wrote about the right to adequate housing:

“Around 45 per cent of Palestine refugees reside in the 12 official Palestine refugee camps. The camps are overcrowded and are affected by substandard infrastructure, sanitation and housing conditions. In addition, camp inhabitants have limited opportunities to improve their housing conditions, and the movement of building materials into the camps requires the authorization of the Lebanese authorities. The remaining Palestine refugees reside in gatherings or cities in Lebanon.”

UNRWA noted that:

“Since the adoption of Law 296/2001, Palestine refugees are prevented from legally acquiring and transferring immovable property in Lebanon. This has led to insecurity of tenure as many have been forced into informal rental arrangements and have been deprived of the benefits of property ownership. As a result of the ongoing economic crisis, Palestine refugees are increasingly at risk of evictions. Furthermore, the crowded nature of the Palestine refugee camps, and the often high number of household members inside the home, has made it especially difficult to adhere to COVID-19 related social distancing measures and to isolate, while further exacerbating any family conflict, psychosocial distress and violence in the home.”

(Source: UNRWA: “[Protection brief: Palestine refugees living in Lebanon](#)”, September 2020, p. 2)

A collective of NGOs working in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated that:

“49. As a result of the lack of legal status and records, stateless persons [...] cannot own property and register their homes and cars – if they can afford having any given their lack of economic rights – under the names of relatives or friends who have a nationality, which may result in conflicts ad [sic] dependency. They cannot inherit property.”

(Source: The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukuk Frontiers Rights et al, “[Joint Submission to the Human Rights Council Universal Periodic Review](#)”, July 2020, p. 11)

Another collective of NGOs working with Palestinians in Lebanon made a joint submission to the UPR in 2020 in which they noted amongst other issues that:

“10. Right to Property

Palestinian refugees in Lebanon were excluded from the right to own real estate by law 296/2001, under the pretext that they do not hold a «nationality issued by a recognized state» and the rejection of implantation.

10.1. The expropriation of Palestinian refugees who bought property prior to 2001 but had not completed registration procedures at the relevant departments.

Property purchased and paid for prior to the adoption of Law 296/2001 (which is not retroactive) and whose new owners had not completed registration procedures before that date is not being registered in official real estate departments due to the deliberate wrongful interpretation of the law. Other arbitrary procedures at real estate departments are preventing Palestinian refugees from transferring their registered property through the enforcement of inheritance laws by religious courts, although Law 296/2001 did not prevent this. This forces some injured parties to seek the courts, incurring additional financial burdens. It should also be noted that the Lebanese courts have stopped looking into such cases since 2011.

10.2 Constraints in real estate registration procedures for foreigners married to Palestinian refugees

One of the requirements for registering real estate to a foreigner in Lebanon is obtaining a certificate of «denial of ownership,» a document that includes the household as a unit (husband, wife, and minor children). If one of the spouses is found to be Palestinian, the registration application is denied.”

(Source: Najdeh Association, Development Action Without Borders (Naba’a), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, pp. 5-6)

Quds Net News Agency, which belong to the Quds News Network, associated with Hamas and popular among young Palestinian Internet users, reported in June 2020:

“The situation of Palestinians in Lebanon became known where they are prevented from the right to own property by virtue of Law 296/2001 related to non-Lebanese acquiring real property rights in Lebanon. However, when any foreigner wants to own real estate in Lebanon, the Real Estate Affairs asks him to prove that he does not have a record in the Directorate of Political Affairs and Refugees of the Lebanese Ministry of Interior, which registers Palestinian refugees. If this foreigner is of Palestinian origin and has been granted another nationality, he is not allowed to register the property under his name. Rather, this was not approved except in the past few years.” [In-house translation. The author is an Arabic native speaker]

ORIGINAL SOURCE:

بات من المعلوم حالة الفلسطينيين في لبنان من خلال منعهم من حق التملك بفعل القانون ٢٩٦/٢٠٠١ المتعلق باكتساب غير اللبنانيين الحقوق العينية العقارية في لبنان. ولكن عندما يريد اي اجنبي ان يمتلك عقارا في لبنان، تطلب منه الشؤون العقارية ورقة اثبات ان ليس لديه قيد في مديرية الشؤون السياسية واللاجئين التابعة لوزارة الداخلية اللبنانية والتي تسجل اللاجئين الفلسطينيين. فإذا كان هذا الأجنبي من اصل فلسطيني ومنح جنسية اخرى لا يسمح له بتسجيل العقار باسمه، بل هذا لم يكن معتمدا إلا في السنوات الأخيرة الماضية.

(Source: Quds Net News Agency: “[A Palestinian doesn’t Own in Lebanon, Even if In Possession of Lebanese Nationality](#)”, 24 June 2020)

In the internationally recognised book they published in 2020, legal scholars Dr. Francesca Albanese [currently Special Rapporteur on the situation of human rights in the Palestinian Territory] and Prof. Lex Takkenberg wrote:

“Compared to Palestine refugees in other UNRWA ‘fields’ of operation, Lebanon (together with Gaza) has the largest proportion of camp residents. The living conditions in camps are dire. Those who do not stay in the camps mostly live in rented accommodation, even though rental rates are unaffordable for many. Those who could afford to buy property were stripped of that ability by a 2001 law, which has largely prevented Palestinian refugees from legally acquiring real property, as well as transferring or bequeathing previously owned property to their heirs. Palestinian refugees must therefore rely on informal agreements with Lebanese citizens who buy or keep property bought pre-2001 on their behalf.”

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.3, Legal Status and Treatment, p. 276)

In its submission as part of the Universal Periodic Review Third Cycle, the United Nations Country Team noted that:

“Prior to 2001 Palestine refugees from Lebanon (PRL) were entitled to property ownership but with the adoption of Law 296/2001 Palestine refugees are prevented from legally acquiring, transferring immovable property in Lebanon. No positive legislative changes have taken place during the period under review to give PRL the right to own or transfer and register immovable property in Lebanon”

(Source: OHCHR “[Universal Periodic Review Third Cycle - Lebanon - UN Contributions: UNCT Lebanon, Background Document 1, 2020](#)”, 26 March 2020)

See also [Section 11.1](#) further below on living conditions in camps.

10.2. Are steps taken to improve Palestinians' access to property?

Walaa Kayyal, a researcher living as a Palestinian in Lebanon whom we interviewed for this report in October 2022 gave the following explanation regarding Palestinians' access to property:

"All Palestinians who bought houses before 2001, they can register it and it legally belongs to them. But after 2001, Palestinians were forbidden to own any property. [...] And it is in the Lebanese law, it's written this way: Palestinians are not allowed to. Currently I do not know of any steps taken to improve this situation for Palestinians."

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

In a series of written responses to questions sent by Asylos for this report, Dr. Jasmin Lilian Diab, Director of the Institute for Migration Studies at the Lebanese American University indicated in October 2022 that:

"There are no actions in this regard – nor in the areas of access to bank accounts as well. This is the main issue here associated with property ownership. On a broader level, the "temporary" nature of the Palestinians' stay in Lebanon (as the Lebanese government insists) prevents them from attaining their property rights. The Lebanese government views this possibility as grounds for them staying more "permanently", and for this reason, this right will not be negotiated nor extended to them in the near future."

(Source: Dr. Jasmin Lilian Diab, [written communication with Asylos](#), 6 October 2022)

11. Situation in the camps

Living conditions in camps

11.1. What kind of living conditions do Palestinians have in the camps? Is there a difference between the availability of state protection for camp-based and non-camp-based Palestinians?

In a joint report published in 2022, the Badil Resource Center and the European Network on Statelessness wrote about refugee camps in Lebanon:

“The Lebanese Government does not allow construction of new refugee camps, which has led to serious overcrowding and poor conditions in existing camps.”

(Source: Badil Resource Center and European Network on Statelessness: [“Palestinians and the Search for Protection as Refugees and Stateless Persons”](#), June 2022, p. 10)

In March 2022, UNICEF Lebanon reported on the poor living conditions within camps in Lebanon:

“Despite being recognised as vulnerable communities under the LCRP [Lebanon Crisis Response Plan], Palestinians in Lebanon are impacted less by its strategic interventions. Instead, they come under the jurisdiction of a separate system of governance and service provision (UNRWA), which is vastly underfunded. UNRWA continues to organise communities into camp-style arrangements or informal gatherings characterised by poor living conditions. Many inhabitants continue to face barriers to accessing basic health and social care, education, and employment opportunities. Poor access to essential services and income generating opportunities is a cause of tension among some PRL [Palestinian Refugees in Lebanon] communities who consider Palestinian refugees from Syria to be an additional burden on public goods.”

(Source: UNICEF Lebanon, [“The situation of children and young people in the Lebanese crisis”](#), March 2022, p. 53)

A report by UNRWA on Palestinian refugees in Lebanon from 2022 outlined the issues regarding housing and basic services:

“The situation worsened in summer 2021 with the disruptions in the delivery of basic services such as electricity and water. This crisis is in fact putting the health, safety and education of the whole population at risk. The most vulnerable communities, including refugees, risk further marginalization and deprivation without a comprehensive social protection scheme to compensate for the losses. The hardship is particularly acute in communities that were already underprivileged, such as Palestine refugees, where unemployment and poverty have significantly increased.”

(Source: UNRWA, [“Palestinian Refugees in Lebanon: Struggling to Survive”](#), January 2022, p. 3)

In their “Syria, Lebanon and Jordan Emergency Appeal 2022, and covering 1st and 2nd quarter of 2022, UNRWA wrote:

“In Lebanon, UNRWA recorded the arrival of 409 PRS families from Syria during the first half of 2021, the highest number of arrivals since 2017. During the same period, PRS returns to Syria dropped. [...] in Lebanon. As a result of the economic decline and COVID-19, the protection situation for many Palestine refugees has sharply deteriorated. Over the course of 2021, there has been an increase in interpersonal disputes escalating into violence in the camps as people have become more frustrated and desperate. Violence against women and children has continued to increase, closely linked to people’s mental well-being and their ability to constructively cope. Instances of conduct in breach of the rights of the child and human rights and humanitarian law have reportedly increased, including child labour, drug abuse amongst the youth and related participation of boys and girls in drug-distribution networks, as well as children’s involvement with armed groups.”

(Source: UNRWA, [“Syria, Lebanon and Jordan Emergency Appeal 2022”](#), 18 January 2022, p. 16 citing UNRWA Protection Quarterly Monitoring Reports, Q1 and Q2, 2021)

The report continues to state:

“UNRWA provides daily environmental health services in all 12 Palestine refugee camps in Lebanon. These services include: (i) water supply management; (ii) wastewater and storm water maintenance; (iii) solid waste collection and final disposal; (iv) sweeping and cleaning of roads; and (v) regular vector control campaigns. Population growth in the camps, particularly with the arrival of PRS and Syrian refugees, has increased pressure on the provision of these services. Other challenges in 2021, including increased electricity cut-offs and the national fuel crisis, impacted on the daily operations of water plants in the camps, resulting in reduced water supplies to camp residents. The national solid waste crisis and closure of municipal/private landfill sites has put an additional strain on the solid waste management services provided by UNRWA.”

(Source: UNRWA, [“Syria, Lebanon and Jordan Emergency Appeal 2022”](#), 18 January 2022, p. 42)

The French newspaper Le Monde published an article about a refugee camp in Lebanon and the situation of its inhabitants:

“However, people are just getting by: those who are eligible for UNRWA aid are getting 20 dollars per person every three months. “Without the financial support of relatives from abroad, people would die of hunger. Those who leave want a better economic situation, calm, stability and security. They’ve lost hope that their fate here would improve” - attest the camp manager, who wanted to remain anonymous.”

ORIGINAL SOURCE:

Mais on y vit : les habitants éligibles à l’aide de l’UNRWA, l’agence des Nations unies pour les réfugiés palestiniens, reçoivent 20 dollars par personne tous les trois mois. « Sans le soutien financier de proches à l’étranger, les gens mourraient de faim. Ceux qui partent veulent une meilleure situation économique, de la tranquillité psychologique, de la stabilité, de la sécurité. Ils ont perdu l’espoir que leur sort s’améliore », affirme un responsable du camp, qui souhaite rester anonyme. [Translation by Asyllos.]

(Source: Le Monde, [“Avec des réfugiés palestiniens revenus au Liban après l’enfer en Biélorussie : « On a les mêmes problèmes qu’avant, des dettes en plus »”](#), 26 November 2021)

UNRWA indicated that Palestine refugees in the camps experience a substandard living environment.

“Around 45 per cent of Palestine refugees reside in the 12 official Palestine refugee camps. The camps are overcrowded and are affected by substandard infrastructure, sanitation and housing conditions. In addition, camp inhabitants have limited opportunities to improve their housing conditions, and the movement of building materials into the camps requires the authorization of the Lebanese authorities. The remaining Palestine refugees reside in gatherings or cities in Lebanon.

(Source: Source: UNRWA: [“Protection brief: Palestine refugees living in Lebanon”](#), September 2020, p. 2)

Based on a Whatsapp survey in Palestinian camps and gatherings in Lebanon, the UNDP stated in August 2020 that:

“In both the Wadi Zeineh gathering and Mieh Mieh camp, the need for medical and education facilities was overwhelming, as was the need for employment, infrastructure, and recreational space. In Mieh Mieh camp specifically, security checkpoints have restricted access to goods, services, and employment. In Wadi Zeineh gathering, residents were particularly frustrated by inadequate service provision (e.g., garbage collection by the municipality of Siblinge).”

(Source: UNDP, [“Nothing and Everything to Lose: Results from a Qualitative Whatsapp survey of Palestinian Camps and Gatherings in Lebanon”](#), August 2020, p. 10)

A collective of NGOs working with Palestinians in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated amongst other issues that:

“13.3. Denying Palestinian refugees a healthy environment

Palestinian refugee camps in Lebanon suffer from an inadequate infrastructure, including an overlap between the drinking water and sewage network, high humidity, water seepage, poor ventilation, and lack of sunlight in most houses in Palestinian camps and gatherings. In addition, waste collection sites are located in proximity to homes leading to an unhealthy environment and causing lung, chronic, and critical ailments. Medical and health aid and protection from diseases and epidemics is scarce and not available in a sustainable manner.”

(Source: Najdeh Association, Development Action Without Borders (Naba’a), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, p. 9)

AlAraby, an international Arabic newspaper and website, wrote about the situation in camps:

“[...] more poverty, unemployment and poor environmental conditions within the camps prevented them from bringing in health supplies and building materials. With the increase in the number of family members, the Palestinians were forced to expand vertically within a fixed and unsafe geographical area. The average life expectancy in Shatila Camp is 45⁴⁸ years, and dozens of refugees die annually from electrocution due to random electricity wiring in Burj al-Barajneh Camp.” [In-house translation. The author is a native Arabic speaker]

[...] والنتيجة مزيد من الفقر والبطالة والظروف البيئية السيئة ضمن المخيمات التي منع عنها إدخال الإمدادات الصحية ومواد بناء، كان الفلسطينيون مع ازدياد أفراد عائلاتهم يضطرون للتوسع عمودياً ضمن رقعة جغرافية ثابتة وبشكل غير آمن، وبلغ متوسط عمر الفرد في مخيم شاتيلا ٤٥ عاماً، ومهوت عشرات اللاجئين سنوياً صعقاً بالكهرباء الممددة عشوائياً في مخيم برج البراجنة.

(Source: AlAraby.co.uk, “[What is left of the Palestinian asylum in Lebanon?](#)” 28 November 2021)

UNRWA provided the following information in an emergency appeal progress report for Jordan, Lebanon, and Syria 2022:

“Living conditions, particularly for refugees in the Palestine refugee camps, have continued to deteriorate. The lack of electricity due to the fuel crisis has left camp streets in total darkness at night, limiting safe movement, particularly for women and children.”

(Source: UNRWA, “[Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022](#)”, 3 November 2022, p. 11)

In its Protection Monitoring Report for the 1st quarter of the year 2022, UNRWA reported that:

“As poverty and desperation deepened, Palestinian refugee communities continued to report an increase in crime and drug use and trafficking. Thefts were widely reported, far more than in previous quarters, while reports continued of boys and young men, and, to a lesser extent, girls, being drawn into using drugs, and a smaller number into their sale. Drug use and dealing were reported to have increased significantly in Ein El Hilweh since the beginning of the year, where the issue had until then remained limited. Focal points in Central Lebanon Area and Tyre reported growing feelings of insecurity in the camps and those in Saïda, Central Lebanon Area and the Beqaa reported that some residents did not feel safe outside the camps because of fear of rising crime in surrounding communities. Focal points in Tyre suggested that adolescent girls and young women, unable to afford transport, worried about sexual violence and harassment while walking to access education.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 1 \(Q1\) 2022](#)”, 1 July 2022, p. 3)

⁴⁸ The source refers to the ‘average life expectancy is 45 years’ here.

In a peer-reviewed article about Palestinians' access to the labour market in Lebanon published in 2022, academics Samih Eloubeidi and Prof. Tina Kempin wrote:

"[...] About 63% of Palestinians live in twelve camps scattered across the country. The camps are described as 'urban ghettos comprised of concrete blocks with corrugated roofs, narrow alleys with sewage and water pipes and covered with a maze of makeshift electric wires'. Overcrowding, unemployment, poor housing conditions, and low standard of living are common. About two-thirds of Palestinian refugees in Lebanon live in poverty, with higher poverty rates inside the camps. The camps perpetuate structural violence, limit social and economic integration, and have increased tensions and hostility towards Palestinian refugees in Lebanon. Palestinians are subjected to many human rights violations in their daily lives and do not enjoy the same kind of freedoms and rights as other foreigners living and working in the country. The confinement to camps, restricted freedom of movement, and little access to educational and income-generating opportunities over a span of decades and generations have left the community in destitute condition."

(Source: Samih Eloubeidi & Tina Kempin Reuter/ The International Journal of Human Rights, "[Restricting access to employment as a human rights violation: a case study of Palestinian refugees in Lebanon](#)", 11 April 2022, p. 3)

In its series of country reports for 2021, the US Department of State wrote about Lebanon:

"E. STATUS AND TREATMENT OF INTERNALLY DISPLACED PERSONS

Fighting in 2007 destroyed the Nahr el-Bared Palestinian Refugee Camp, displacing approximately 30,000 residents, of whom an estimated 27,000 were registered Palestinian refugees. Many of the displaced resided in areas adjacent to the camp or in other areas of the country where services of the UN Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) were available. A comprehensive, multiyear plan to rebuild the Nahr el-Bared Camp began in 2008; the project was approximately 70 percent completed at year's end. Remaining reconstruction was not fully funded, with a 60 billion Lebanese pound (\$40 million at the official exchange rate) shortfall remaining. Of the 27,000 Palestinians originally displaced following the camp's destruction, 14,706 had returned to newly reconstructed apartments in the camp as of June, and the temporary settlements that provided housing for them near Nahr el-Bared Camp were being decommissioned. As of September, two of the five plots had been closed and the land handed back to the respective landlords in their original condition, a third plot was almost fully vacated, and the two remaining plots were being dismantled."

(Source: US Department of State (USDOS) "[2021 Country Reports on Human Rights Practices: Lebanon](#)", Section 2. Respect for Civil Liberties, March 2022, p. 22)

The same source further stated that:

"Access to Basic Services: The government did not consider local integration of any refugees a viable solution. The law considers UNRWA-registered Palestinian refugees to be foreigners. UNRWA provided health, education, social services, and emergency assistance to registered Palestinian refugees residing in the country. The amount of land allocated to the 12 official Palestinian refugee camps in the country has changed only marginally since 1948, despite a fourfold increase in the population. Consequently, most Palestinian refugees lived in overpopulated camps, some of which suffered heavy damage in past conflicts (see also section 2.e., Status and Treatment of Internally Displaced Persons). By agreement with the government, Palestinian security committees provided security for refugees in the camps."

(Source: US Department of State (USDOS) "[2021 Country Reports on Human Rights Practices: Lebanon](#)", Section 2. Respect for Civil Liberties, March 2022, p. 28)

The French newspaper Le Monde published an article about a refugee camp in Lebanon and the situation of its inhabitants:

"In Al-Jalil [a UN-recognised refugee camp situated in Lebanon's Beqaa Valley], the misery is not as glaring as in other camps."

ORIGINAL SOURCE:

A Al-Jalil, la misère n'est pas aussi apparente que dans d'autres camps. Le lieu est calme, l'ambiance familiale.
[Translation by Asylos.]

(Source: Le Monde, "[Avec des réfugiés palestiniens revenus au Liban après l'enfer en Biélorussie : « On a les mêmes problèmes qu'avant, des dettes en plus »](#)", 26 November 2021)

UNRWA also released a short video in which residents from different camps shared their living conditions and personal struggles:

"I am a Palestine refugee living in Ein el-Hilweh camp. We can no longer go to a doctor or a hospital. We can no longer afford the fees. We cannot afford medicines. Our children go to school without pocket money. My heart aches. Feel our situation, give us your attention, feel for us, feel for our children."

"My name is Salim Meshlawi from Beddawi camp in northern Lebanon. I am chronically ill and I have four children. Two of my sons are also sick. I am not working. I don't have a job. My house is so humid. It's my right as a human being to live a dignified life."

(Source: UNRWA, "[Hitting Rock Bottom – Palestine Refugees in Lebanon Risk Their Lives in Search of Dignity](#)", 21 October 2022)

A UNRWA survey on the social-economic situation of PRS in Lebanon also pointed out the challenging living conditions and increasing cost of living:

"Around one in ten PRS families (12.8 per cent) do not have heating in their home. It is difficult to balance the high costs incurred by using electricity with the alarming poverty levels within the PRS population. This may indicate access to informal electricity power supplies, more so in the poorer camp PRS population (56 per cent) compared to 43.3 percent of PRS living outside camps. Conversely, more PRS families living outside camps admit using no heating device at 13.9 percent compared to 11.7 percent of PRS camp families. Climatic factors influence choices. Because harsh winters require more heating in the Beqaa, PRS families living in this area predominantly use the cheaper diesel option (91.7 per cent) and only 3.6 per cent use electricity. [...] Only one in ten families report not having access to enough water for washing and toilet purposes (8.9 per cent). PRS outside camps are slightly more affected by either insufficient drinking water (28.5 per cent) or washing/toilet water (9.2 per cent) than camp PRS (25.8 per cent and 8.6 per cent, respectively)."

"Most respondents perceive the PRS housing conditions' quality as more or less low in terms of humidity, water leakage from roofs and walls, ventilation, and darkness/gloominess. The most prevalent defect is humidity/stains on the walls, which is reported by a majority of respondents as totally or significantly affecting the dwelling (58.9 percent of respondents). Around half of the respondents said their home was totally/largely prone to water leaks (48 per cent) or darkness and gloominess (48 per cent). Around one third of the dwellings (38.3 per cent) are claimed to suffer totally or largely from poor ventilation. In all respects, PRS inside camps are more critical of the quality of their dwelling than PRS outside camps, with differential percentage points ranging from +8.18 (humidity/stains on the wall) to +2.85 (water leakages)."

(Source: UNRWA, "[Socio-economic Survey on Palestine Refugees from Syria Living in Lebanon](#)", 28 April 2021, pp. 52-54)

Security in camps

In its Protection Monitoring Report for the second quarter of the year 2022, UNRWA reported that:

"The dire economic situation contributed to an uptick in reported levels of crime in the camp, particularly theft and robbery. These crimes have created an atmosphere of insecurity inside camps that inhibits the movement of some Palestinian refugees especially in central Lebanon and Tyre areas."

(Source: UNRWA, "[UNRWA Protection Monitoring Report – Quarter 2 \(Q2\) 2022](#)", 26 August 2022, p. 3)

The UN office for the Coordination of Humanitarian Affairs wrote in April 2022 that:

“The environment in many camps is characterized by insecurity, with more interpersonal disputes escalating into armed violence in 2021 compared to previous years and occasional clashes between armed groups. There is limited access to the Lebanese justice system for all camp inhabitants, and while Palestinian women subjected to personal violence can obtain a variety of protective orders issued by the Lebanese courts, in practice the limited control exercised by Lebanese authorities within Palestinian refugee camps makes it impossible to ensure that such orders are upheld for women residing within camps.”

(Source: OCHA, “[Increasing Humanitarian Needs in Lebanon, April 2022](#)”, 14 April 2022, p. 27)

In June 2020 the Danish Immigration Service reported that:

“In Lebanon, UNRWA is able to provide services inside Palestinian camps, except when internal fighting takes place between factions. UNRWA’s inability to influence the Lebanese government’s systems hinders its service delivery, according to Albanese. The Lebanese authorities do not exert any authority in the camps. Akram stated that the camps in Lebanon are the most poverty-stricken of the ones UNRWA operates in, except for Gaza.”

(Source : Danish Immigration Service, “[Palestinian Refugees Access to registration and UNRWA services, documents, and entry to Jordan](#)” June 2020, p. 32)

In the internationally recognised book they published in 2020, legal scholars Dr. Francesca Albanese [currently Special Rapporteur on the situation of human rights in the Palestinian Territory] and Prof Lex Takkenberg wrote:

“Of those reportedly in the country, between half and two-thirds reside in twelve official Palestine refugee camps located throughout the country and serviced by UNRWA, as well as in a number of informal ‘gatherings’ scattered around the country. Camps and gatherings are overcrowded, severely underserved, and generally unhealthy. The Lebanese government does not exercise its authority or enforce its laws in the camps. The lack of an official authority responsible for public services and security creates an unsafe and insecure environment, with various types of violence and few avenues for redress. Since 2011, already overcrowded camps and gatherings have also become home to several thousand Palestinians from Syria as well as Syrian refugees.”

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.1, pp. 272-273)

In the internationally recognised book they published in 2020, legal scholars Dr. Francesca Albanese [currently Special Rapporteur on the situation of human rights in the Palestinian Territory] and Prof Lex Takkenberg wrote:

“Palestinians continue to be perceived as a threat to both the sovereignty and national identity of Lebanon. Further, despite the abrogation of the Cairo Agreement, there is still an implicit acceptance that the camps are off limits to Lebanese security forces, a ‘space of exception’ in the words of sociologist Sari Hanafi, a de facto extraterritorial zone effectively outside Lebanese jurisdiction. Common criminals and others have frequently sought refuge in the camps, further aggravating the living conditions of camp residents. The conflict over Nahr el Bared in 2007 was a dramatic illustration of this and the first instance in decades where the Lebanese army forced its way into the camps. Keeping the camps as ‘extraterritorial islands’ outside the scope of the law, has had a crippling effect both on the quality of living of camp dwellers – trapped in perpetual insecurity – and on the image of Palestinians within the Lebanese society. Jaber Suleiman, who has conducted extensive research on the situation of Palestinian refugees in Lebanon, observes that dealing with them as a security and humanitarian question contributes to feeding a discourse of Palestinians representing a continuous threat to Lebanese security, which in turn leads to justify their discrimination and non-integration.

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.2, p. 274)

12. State attitudes, discrimination by state authorities and availability of state protection

Public statements by government officials regarding stateless Palestinians

12.1. Are there public statements by government officials regarding stateless Palestinians?

In its Protection Monitoring Report for the 2nd quarter of the year 2022, UNRWA reported that:

“Q2 [second quarter of the year 2022] saw public statements of anti-refugee sentiment by several prominent Lebanese figures. While these remarks were mainly directed at Syrian refugees, the Maronite Patriarch called for the deportation and resettlement of Palestinian refugees alongside Syrians. Some Palestinian refugees expressed their concern at such rhetoric, but UNRWA interlocutors noted it was tied to long-standing social discrimination against Palestinians in Lebanon, rather than being a new phenomenon.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 2 \(Q2\) 2022](#)”, 26 August 2022, p. 5)

The news agency Aljazeera published an article in April 2020 about the Lebanese state’s reaction towards Palestinians at the beginning of the COVID-19 pandemic:

“At a March 13 news conference, Samir Geagea, the leader of the Lebanese Forces party [one of the parties that hold seats in Parliament], who is known for making racist statements, implied that Palestinian and Syrian refugees would be spreaders of COVID-19 in Lebanon and argued that the refugee communities posed a threat to public health.

[...]It soon became clear that the local authorities shared Geagea’s attitude towards refugees.

On March 15, the government announced general mobilisation across the country and local authorities started coordinating with security forces to stop “unnecessary” movement from camps. Refugee communities have already complained that the curfews they face are longer than those imposed on Lebanese citizens. In some areas, they are allowed to be outside of their houses for just five hours.

Palestinians have faced restrictions for decades by the Lebanese authorities, and so have Syrians more recently. That the Lebanese authorities are resorting to such actions amid the COVID-19 outbreak is rather unsurprising.

(Source: Aljazeera, “[Clamping down on refugees will not save Lebanon from the pandemic](#)”, 11 April 2020)⁴⁹

Arrests and detention by state authorities

12.2. Are stateless Palestinians vulnerable to arbitrary arrest and detention by the Lebanese authorities?

When asked whether stateless Palestinians were still more vulnerable to arbitrary arrest and detention by Lebanese authorities than the rest of the population, Jordanian political economist and long-time commentator on the Israeli-Palestinian dialogue Riad Al Khouri who was interviewed for this report in October 2022 responded:

“They were. I do not think they are anymore. The Palestinian case is no longer a major issue. There is a key point here. Most Palestinians have a connection to an armed militia, an armed Palestinian group. [...] They are still there, and they are powerful inside the refugee camps. And they have influence outside the camps. So, this is a counterbalance to the state and private militias in Lebanon. In other words, the Palestinian will directly or indirectly get protection from his own Palestinian militia, even though he is not a militia member. Somebody in his family will be. And there will be balance, let us say, to counterbalance the effect of a Lebanese militia or even Lebanese army or police.”

(Source: Riad Al Khouri, [interview record](#), 7 October 2022)

⁴⁹ For the purposes of this report, even though this excerpt is not within the research period, it was included since it is pertinent.

In June 2020 the Danish Immigration Service reported that:

“235. Finally, in Lebanon, while UNRWA is able to provide services inside Palestinian camps (for the most part, except when civil war flares between factions), the agency’s inability to leverage on Lebanese government’s systems hinders its service delivery. All the more, Palestinian refugees in Lebanon, because of their status and general conditions, are often exposed to abuse and mistreatment by Lebanese authority without possibility to meaningful/systematic access to legal aid and justice. About 3,500 Palestinian refugees are also undocumented (so called ‘non-IDs’), therefore at continuous risk of arrest and detention because they are considered illegally present in the country. How can UNRWA deliver its mandate effectively to this highly at risk population, when the general environment itself is not conducive?”

(Source: Danish Immigration Service, “[Palestinian Refugees Access to registration and UNRWA services, documents, and entry to Jordan](#)” June 2020, pp. 75-76)

In the internationally recognised book they published in 2020, legal scholars Dr. Francesca Albanese [currently Special Rapporteur on the situation of human rights in the Palestinian Territory] and Prof Lex Takkenberg wrote:

“Access to justice is also reportedly curtailed for Palestinians in Lebanon, especially those living in camps. They are vulnerable to arbitrary arrest and detention by both state security forces and Palestinian factions, the latter of which operate their own justice system and detention facilities in the refugee camps. The situation of Palestinians in Lebanon has further deteriorated in connection with Lebanon’s weakening socio-economic situation and the prolonged Syria crisis. Discriminatory laws and policies prevent addressing the poverty that traps two-thirds of this group.”

(Source: “[Francesca P. Albanese and Lex Takkenberg/Oxford University Press, Palestinian Refugees in International Law](#)”, May 2020, Chapter 3.3.3, Legal Status and Treatment, p. 277)

12.3. Are stateless Palestinians particularly exposed to violence by state actors?

The Lebanese Newspaper L’Orient Le Jour published this article on the Lebanese Army conducting a raid in Nahr al-Bared camp:

“BEIRUT — The Lebanese Army has been conducting a series of raids since dawn in the Palestinian refugee camp of Nahr al-Bared, in northern Lebanon, in search of weapons and suspects, an army spokesman told L’Orient-Le Jour Monday morning, without specifying what the suspects were wanted for. [...]

According to information from our correspondent in the North, residents of the camp burned tires at the southern and eastern entrances as well as inside the camp and blocked roads to protest against the searches carried out by the troops.

Reacting to these developments, Palestinian factions and committees in North Lebanon condemned the army raids and announced in a joint statement a general strike in the camp. They also denounced «the military parade of planes, ships and armored vehicles of the army that frighten women, children and the elderly.»

According to our correspondent, the army flew helicopters over the camp.

In a statement issued in the afternoon, the army said that units supported by the navy and the air force searched the Nahr al-Bared camp and arrested «nine suspects who are the subject of several arrest warrants for drug trafficking, shooting and murder.»

[...]” As has been the practice for decades, especially since the 1969 Cairo agreement, the Lebanese Army does not enter the camps and leaves the Palestinian factions to provide their own security. However, there was an exception to this in 2007, when the army launched its assault in the Nahr al-Bared camp against armed militants.”

(Source: L’Orient Today, “[Army conducts raid in Nahr al-Bared camp, residents demonstrate in response](#)”, 25 October 2022)

12.4. How are stateless Palestinians treated in detention and what are the conditions in detention facilities?

Katherine Harbord, a lecturer in human rights specialised in the Middle East whom we interviewed for this report in October 2022 whilst sharing her knowledge on checkpoints specifically in the North of Lebanon, recalls a non-ID man who reported ill-treatment whilst been detained:

“[...] I’ve heard of one person who was arrested but this is going back about five or six years. He was arrested by the police. He was a non-ID man. He was ostensibly arrested because of his lack of ID and kind of suspicion of illegal status or something like that. He was removed to a detention centre, not exactly prison. He reported ill-treatment. And his family was able to secure his release through payment of a bribe. And again, he felt that his status as a non-ID Palestinian was behind this and that his arrest was an opportunity for a bribe. Certainly anecdotally based on the numbers of persons I talked to on this matter, but Syrian Palestinians perceived that they experience more discrimination than other Palestinian groups and receive more verbal abuse and sort of racist “behaviour.” There’s a lot of prejudice against them. There’s obviously a lot of prejudice against stateless Palestinians, full stop, especially in Lebanon. But this is kind of magnified for the Syrian Palestinians.”

(Source: Katherine Harbord, [interview record](#), 13 October 2022)

13. Access to justice, security and state protection

13.1. Do stateless Palestinians report complaints to the Police? If not, why not?

Walaa Kayyal, a researcher living as a Palestinian in Lebanon whom we interviewed for this report in October 2022 explained stateless Palestinians' relationship to the police as follows:

"Usually, stateless individuals [including Palestinians] are afraid to approach any government facility or to talk to any representative of the army. Any person who is wearing a uniform, they do not approach them. If they see them, they change their way because they are afraid. Because they cannot show any papers and can therefore be arrested and detained. So stateless persons do not approach any government facility or any person wearing a governmental uniform, whether in the army or in the general secretariat or in any security forces branch. In rare cases where they have a very good relation with the mayor in their village, they would address a complaint informally, but not more than this. If I want to go and file a complaint about any person, about my neighbour who for example harassed me or about a teacher who insulted me, etc, the first thing they will ask is my ID. Because you need to fill a form and you need to provide a copy of your ID. And if you don't have it, then they will detain you. So they'd rather, if you want, keep silent instead of ending up detained."

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

Katherine Harbord, a lecturer in human rights specialised in the middle East whom we interviewed for this report in October 2022 also reported on Palestinians' reluctance to reach out to the police:

"I have heard anecdotally that there's sort of, quote-unquote, «no point reporting complaints to the police because nothing will happen or they want--» there is a certain amount of corruption in the system, so justice isn't easy to secure. That things depend on kind of personal patronage networks that you may or may not have. But how valid a perception that is, I'm not able to judge. Anything involving a police complaint would go unreported. So "a policeman detained me illegally and beat me", Probably, that would go unreported, because there would be a perception that there would be no point and it might bring further trouble. I have heard from a Palestinian somewhere down near Tyre in south Lebanon- that there was a reluctance to report problems from within the camps to the police. So if it's one Palestinian having a problem with another Palestinian or if something criminal has occurred, they prefer to kind of resolve it within the camp. Because of police perceptions, because of kind of inter-camp structures and things. But I heard that from one woman only.

[...] So more kind of appeals to the older members of the community to kind of create resolution in cases of-- this particular case we were speaking about was a case of sexual violence. But she was acknowledging it was-- obviously, sexual violence is particularly complicated in this context because of kind of connotations of so called honour and things. It was, anyway, a more complex case. I don't know, necessarily, that a murder, for example, would be dealt with by the same way. But it was certainly this woman's impression that the community preferred as far as possible to police itself, rather than have recourse to the Lebanese police. They felt that it was also more likely to lead to more just resolutions."

(Source: Katherine Harbord, [interview record](#), 13 October 2022)

On the contrary, when asked whether stateless Palestinians reached out to the police, Jordanian political economist and long-time commentator on the Israeli-Palestinian dialogue Riad Al Khouri whom we interviewed for this report in October 2022 answered:

"If we are talking about normal criminal and public security issues, yes. I do not think there is any difference. If somebody's house is subject to robbery and he is a Palestinian, he will report it to the police. If we are talking about things to do with politics about a militia, then no. It becomes more complicated. In other words, to repeat the example, if I am a Palestinian refugee, somebody robbed my home, then I will report it to the police in a normal way. There will be no discrimination or other problems. But if I am a Palestinian involved in a political dispute with another

person, whether it is Syrian, or Palestinian, or Lebanese. And for example, if there is armed conflict, I was subject to armed harassment for political reasons, then, yes, there would be a complication in reporting this to the police and the police acting. I think they would not get involved because, in the first place, the victim would not report the case. If he reported it, the police would at once realize that this is a political issue to do with militias, and they would not get involved. Do not forget that in Lebanon, the police and the army have tended to have weaker powers than in most other Arab countries. Most Arab countries have strong security and military structures. Lebanon is the major exception. So, the police and the army in Lebanon are not as powerful as they are in other developing countries. And therefore, if a security or political issue arises, then the police would not be involved in the same way that they would in another Arab country where this would not be acceptable.”

(Source: Riad Al Khouri, [interview record](#), 7 October 2022)

UNRWA reported in their 2020 “Protection brief Palestine refugees living in Lebanon that:

“Rule of law and access to justice [...] While Palestinian women subject to personal violence can obtain a variety of protective orders issued by the Lebanese courts, in practice the limited control exercised by Lebanese authorities within Palestinian refugee camps makes it impossible to ensure that such orders are upheld for women residing within camps”

“Rule of law and access to justice [...] With limited control exercised by Lebanese authorities within Palestine refugee camps, Palestinian political factions are responsible for camp governance and exercise security functions within the camps. The environment in many camps is characterized by insecurity, with sporadic fighting between armed groups, clashes involving drug dealers and occasional violence over personal disputes [sic]. There is limited access to the Lebanese justice system for all camp inhabitants”

[...] PRS not holding legal residency in Lebanon are unable to seek legal divorce due to the legal residency of one of the two parties being a prerequisite for the court. They are also in general unlikely to approach authorities, including to seek justice, due to fear of detention and deportation, which puts PRS women at heightened risk of continuous abuse”

(Source: UNRWA: “[Protection brief Palestine refugees living in Lebanon Updated in September 2020](#)”, September 2020”, p. 2)

A collective of NGOs working in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated among others that:

“Stateless persons have no national or local institutions or offices they can refer to for counselling, information on procedures to end statelessness or to access rights. They fear to approach the authorities to complain in case they were the victim of abuse, attack, theft or any violation.”

(Source: The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukuk Frontiers Rights et al, “[Joint Submission to the Human Rights Council Universal Periodic Review](#)”, July 2020, p. 11)

13.2. Is there a difference between the availability of state protection for camp-based and non-camp-based Palestinians?

In the brief “Palestine refugees living in Lebanon” updated in September 2020, UNRWA cited as a major protection concern amongst others the rule of law and access to justice.

“With limited control exercised by Lebanese authorities within Palestine refugee camps, Palestinian political factions are responsible for camp governance and exercise security functions within the camps. The environment in many camps is characterised by insecurity, with sporadic fighting between armed groups, clashes involving drug dealers and occasional violence over personal disputes. There is limited access to the Lebanese justice system for all camp inhabitants, including Syrian refugees and other populations such as migrants and Lebanese citizens. While Palestinian women subject to personal violence can obtain a variety of protective orders issued by the Lebanese courts, in practice the limited control exercised by Lebanese authorities within Palestinian refugee camps makes it impossible to ensure that such orders are upheld for women residing within camps.

According to the same source:

“PRS not holding legal residency in Lebanon are unable to seek legal divorce due to the legal residency of one of the two parties being a prerequisite for the court. They are also in general unlikely to approach authorities, including to seek justice, due to fear of detention and deportation, which puts PRS women at heightened risk of continuous abuse.”

(Source: UNRWA: “[Protection brief: Palestine refugees living in Lebanon](#)”, September 2020)

13.3. Do State authorities register complaints of discrimination, human rights violations, violence etc made by or on behalf of stateless Palestinians? Is support provided when complaints are made? Does the police take these cases further after registration?

The Dutch Ministry of Foreign Affairs published a report on Palestinians in Lebanon in January 2021 which stated that:

“10.4 Access to the legal process

Legally, Palestinians are punished just as severely and using the same legal process as Lebanese citizens. In practice, Palestinians are discriminated against in the judicial process and Palestinians living in the refugee camps have poor access to the Lebanese justice system. Lebanon ranks 96 on the World Rule of Law Index, which measures the rule of law in 128 countries annually. [Based on surveys with local experts]. The USDoS states that the judicial process in Lebanon, through its constitution and law, entitles Lebanese citizens to a fair and public trial. The Danish Immigration Service (DIS) indicates that Palestinians who do not live in the Palestinian refugee camps receive the same protection as Lebanese. However, in practice, PRLs are less protected by the authorities compared to Lebanese. As an example, the Lebanese legal system requires minors under the age of eighteen to require a guardian when arrested or under investigation, while minor Palestinians do not. PRL often cannot afford attorney fees due to their poor economic position. In addition, the DIS indicates that Palestinians are discriminated against in the legal process; there are known cases where Palestinians have been wrongly suspected of crimes. The process can be heavily influenced by Lebanese political parties and the ambiguity of the legal status of Palestinians, who have no civil status in Lebanon, affects the judicial process. There are cases of Palestinians who are imprisoned for long periods in Lebanon without conviction or because the bail, sometimes even a small amount, cannot be paid.” (In-house translation. The translator is a native Dutch speaker)

ORIGINAL SOURCE

“10.4 Toegang tot het rechtsproces

Wettelijk gezien worden Palestijnen even zwaar bestraft en met gebruik van dezelfde rechtsgang als Libanese staatsburgers. In de praktijk worden Palestijnen gediscrimineerd in de rechtsgang en Palestijnen die in de vluchtelingenkampen wonen hebben slechte toegang tot het Libanese rechtssysteem. Libanon staat op nummer 96 op de World Rule of Law Index, die de positie van de rechtsstaat in 128 landen jaarlijks meet.³⁵⁶ Het USDoS geeft aan dat de rechtsgang in Libanon via de constitutie en wet recht geeft tot een eerlijk en openbaar proces aan Libanese staatsburgers.³⁵⁷ De Deense Immigratie Dienst (DIS) geeft aan dat Palestijnen die niet in de Palestijnse vluchtelingenkampen wonen dezelfde bescherming als Libanezen krijgen. Echter, in de praktijk worden PRL minder beschermd door de autoriteiten in vergelijking met Libanezen. Als voorbeeld wordt genoemd dat het Libanese rechtssysteem vereist dat minderjarigen onder de leeftijd van achttien een voogd nodig hebben wanneer ze gearresteerd worden of onder onderzoek staan terwijl dit bij minderjarige Palestijnen niet het geval is. PRL kunnen vaak de kosten voor een advocaat niet betalen vanwege hun slechte economische positie. Daarnaast geeft de DIS aan dat Palestijnen in het rechtsproces gediscrimineerd worden; er zijn gevallen bekend waarin Palestijnen ten onrechte verdacht zijn geweest van misdaden. Het proces kan sterk beïnvloed worden door Libanese politieke partijen en de ambiguïteit van de legale status van Palestijnen, die geen civiele status hebben in Libanon, heeft invloed op het rechtsproces. Er zijn gevallen van Palestijnen die langdurig gevangen zitten in Libanon zonder veroordeling of omdat de borgsom, soms zelfs een klein bedrag, niet betaald kan worden. (P. 54)”

(Source : Dutch Ministry of Foreign Affairs, “[Thematisch ambtsbericht Palestijnen in Libanon](#)”, January 2021, p. 54)

13.4. Have there been prosecutions and convictions of state representatives or individuals for discriminatory, humiliating, violent actions towards Palestinian stateless persons?

“Rule of law and access to justice [...] While Palestinian women subject to personal violence can obtain a variety of protective orders issued by the Lebanese courts, in practice the limited control exercised by Lebanese authorities within Palestinian refugee camps makes it impossible to ensure that such orders are upheld for women residing within camps”

(Source: UNRWA: “[Protection brief Palestine refugees living in Lebanon Updated in September 2020](#)”, September 2020, p. 2)

“Rule of law and access to justice [...] With limited control exercised by Lebanese authorities within Palestine refugee camps, Palestinian political factions are responsible for camp governance and exercise security functions within the camps. The environment in many camps is characterized by insecurity, with sporadic fighting between armed groups, clashes involving drug dealers and occasional violence over personal disputes [sic]. There is limited access to the Lebanese justice system for all camp inhabitants”

(Source: UNRWA: “[Protection brief Palestine refugees living in Lebanon Updated in September 2020](#)”, September 2020, p. 2)

14. Treatment by society (including families, communities and other non-state actors)

Societal discrimination

14.1. How do the media portray stateless Palestinians? How are stateless Palestinians treated by Lebanese nationals?

“[...] Violence continues to be a regular occurrence throughout the refugee community with a widespread availability of weapons being reported and a propensity to resort to violence in the face of desperate conditions. PRS, particularly those who have arrived in Lebanon since 2016, continue to be largely unable to obtain Lebanese residency, making them vulnerable to receiving departure orders and forcing them to limit their movements and livelihood opportunities. With increased hostility towards Syrian refugees in the media and in some communities, PRS, in particular, report being worried about discrimination and potential deportation.⁵⁰

(Source: UNRWA, “[Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022](#)”, 3 November 2022, p. 11)

“Palestinian refugees from Syria (PRS), particularly those who have arrived in Lebanon since 2016, continue to be largely unable to obtain Lebanese residency, making them vulnerable to receiving departure orders, forcing them to limit their movements and limit their pursuit of livelihood opportunities. With increased hostility towards Syrian refugees in the media and in some communities, PRS in particular report being worried about discrimination and potential deportation. (footnoted- Observation based on discussions with PRS during protection monitoring, meetings and legal aid counselling.) This has contributed to a large body of mental health needs amongst PRS and Palestine refugees in Lebanon (PRL).”

(Source: UNRWA, “[Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022](#)”, 3 November 2022, p. 5)

The Jordanian political economist and long-time commentator on the Israeli-Palestinian dialogue Riad Al Khouri who was interviewed for this report in October 2022 provided the following points of context to understand the current public portrayal of Palestinians in Lebanon:

“Back in the ‘70s and ‘80s, there was a specifically anti-Palestinian portrayal, public portrayal, public statements by either officials or by politicians and other public figures who were not necessarily officials but had a high profile. There was a powerful anti-Palestinian mood in the country in those days. This is no longer the case. Having said that, in the old days, the mood was also against the Syrians. And of course, as always in Lebanon, if you happen to be rich or well-connected, then this issue did not come up. Therefore, the Palestinian who is poor, the Syrian who is poor, is the one subject to criticism and discrimination today. The anti-Palestinian mood in specific is less than it was in the past. It is still there, but it is no longer a major issue compared, for example, to the anti-Syrian mood [...]”

(Source: Riad Al Khouri, [interview record](#), 7 October 2022)

The UN Office for the Coordination of Humanitarian Affairs reported in April 2022 that:

“Unlike Lebanese but comparable to migrants, PRL [Palestinian Refugees in Lebanon] households experience exclusion and discrimination. For example, among all three population groups, PRL households will more often report that one of the obstacles to find work is the fact that employers prefer hiring other nationals.”

(Source: OCHA, “[Increasing Humanitarian Needs in Lebanon, April 2022](#)”, 14 April 2022, p. 26)

⁵⁰ Observation based on discussions with PRS during protection monitoring, meetings and legal aid counselling.

Based on a qualitative survey of 15 men between 24 and 75 years old living in the Bourj el-Baraneh Camp on the outskirts of Beirut conducted by researchers Samih Eloubeidi & Tina Kemplin Reuter in 2021, the latter reported that:

“When asked about their perceptions of integration in Lebanese society irrespective of their occupations, the majority of the participants responded with ‘disagree’ or ‘strongly disagree’. This validates the general sentiment that Palestinians in general do not feel welcome in Lebanon. Integration in the host country society is largely contingent on the receptivity of the host country’s government, and more specifically, the rhetoric propagated by the government and media. In addition to restrictions and human rights violations against Palestinian refugees noted in the beginning of the paper, Lebanon has a history of propagating hateful narratives and negative portrayals. The perception that the Lebanese government does not care about Palestinian refugees was clearly supported by the participants in our study, who unanimously responded with strong agreement to Question 3 (‘The Lebanese government does not care about Palestinian refugees’). Similarly, there was strong disagreement to Question 4 (‘I feel like I fit into Lebanese society’), showing that Palestinian refugees do not feel accepted in the host country. When asked about participants’ experiences in the interviews, almost all of the participants noted that discrimination, hatred, and anti-Muslim or anti-Sunni bias affect the way in which the Lebanese government deals with Palestinian refugees. Feelings of prejudice and discrimination are especially prominent, with many participants noting that there is an obvious rhetoric of hate directed towards Palestinian refugees in Lebanon. One participant noted that Syrian refugees, who have been arriving in Lebanon since the start of the Syrian Civil War, have the right to work in Lebanon without restrictions. He stated

Of course, [our lack of access to employment] is discrimination. Syrian refugees do not have the same restrictions for jobs, but this is because Syrians have a country to go back to when the war is over. We do not have a country to go back to.

Most interviewees also connected the employment restrictions and inability to find jobs outside the camp with these overarching narratives of inferiority and prejudice towards Palestinians. One participant succinctly stated that ‘this is all part of the rhetoric of hate towards Palestinians’. Another participant noted that ‘the government has placed these restrictions on us to ensure that all Palestinians leave, because this hinders our ability to become more educated and sophisticated, which is something important to us’. Similarly, a third participant expressed: ‘the government wants us to leave, and already so many have left’. This seems to support the idea that the strongest reason for restricting access to employment is to ensure that Palestinians do not remain in Lebanon. Thus, restricting access to employment is a strategy that is employed to prevent refugees’ integration into society. For Palestinian refugees this means continued barriers to social and economic integration into Lebanese society, despite being in the country for over 70 years.”

(Source: Samih Eloubeidi & Tina Kempin Reuter/ The International Journal of Human Rights, “[Restricting access to employment as a human rights violation: a case study of Palestinian refugees in Lebanon](#)”, Perceptions of restricted access to employment on integration, 11 April 2022, pp. 7-8)

The Dutch Ministry of Foreign Affairs published a report on Palestinians in Lebanon in January 2021 which stated that:

“10.2 Discrimination on the part of the Lebanese people

The Lebanese people have a negative image of Palestinians. This negative image applies less to Christian Palestinians, who are more accepted in Lebanese society [Jerusalem Institute 2019]. Palestinians in Lebanon are seen as a separate group and are often blamed for the outbreak of the Lebanese civil war. For example, Palestinians are discriminated against in the labor market because of social stigmas and legislation (see also 10.3). Palestinians are associated with radical groups and are denounced in the media as criminals [DIS 2014; Home Office 2018]. Provocative opinions about Palestinians are widespread in Lebanon, according to a source, and are hardly censored or criticized by the government.” (In-house translation. The translator is a native Dutch speaker)

ORIGINAL SOURCE

“10.2 Discriminatie van de zijde van de Libanese bevolking

De Libanese bevolking heeft een negatief beeld van Palestijnen. Dit negatieve beeld geldt minder voor christelijke Palestijnen die meer geaccepteerd zijn in de Libanese maatschappij.³¹³ Palestijnen worden in Libanon gezien als een aparte groep en krijgen vaak de schuld voor het uitbreken van de Libanese burgeroorlog. ³¹⁴ Zo worden Palestijnen gediscrimineerd op de arbeidsmarkt vanwege sociale stigma's en wetgeving (zie ook 10.3). Palestijnen worden in relatie gebracht met radicale groeperingen en worden in de media afgedaan als criminelen.³¹⁵ Provocatieve meningen over Palestijnen zijn volgens een bron wijdverspreid in Libanon en worden nauwelijks door de overheid gecensureerd of bekritiseerd.”

(Source: Dutch Ministry of Foreign Affairs, “[Thematisch ambtsbericht Palestijnen in Libanon](#)”, January 2021, p. 49)

“Sectarian” tensions between different groups among Palestinians

14.2. Is there evidence of discrimination and/or tensions among stateless Palestinians?

In a peer-reviewed article about Palestinians’ access to the labour market in Lebanon published in 2022, academics Samih Eloubeidi and Prof. Tina Kempin wrote:

“Almost all of the participants spoke of the sectarian conflict and its impact on their integration, arguing that the primary reason for rejection and discrimination of Palestinian refugees in Lebanon is the pre-existing sectarianism in the country. Participants were aware of the fact that their integration into Lebanese society would upset the balance, making Maronite and Shia Muslims further outnumbered. Many of the participants specifically focused on the Christian and Muslim divide. As one participant put it: ‘Christians in Lebanon do not want Palestinians to have access to jobs because they think if we have access to jobs, we will stay in Lebanon and throw off the balance of division’. He not only considered sectarianism as the main reason for Palestinian lack of integration and hateful rhetoric and discriminatory practices against them, but also noted the connection to employment restrictions. The Christian–Muslim divide plays a role not only in Lebanese society, but also within the Palestinian population. One participant mentioned that ‘Palestinian Christians, or most of them, are doing much better than we are’. As discussed above, Christian Palestinian refugees who arrived in the country were not only given citizenship, but were also highly encouraged to integrate into Lebanese society, again mostly to favour the Christian majorities in the political balance of power. Sectarianism has indeed contributed to the plight of the Palestinian refugees, creating inner-Palestinian divisions and directly affecting employment access and ability to integrate for Muslims.”

(Source: Samih Eloubeidi & Tina Kempin Reuter/ The International Journal of Human Rights, “[Restricting access to employment as a human rights violation: a case study of Palestinian refugees in Lebanon](#)”, Perceptions of restricted access to employment on integration, 11 April 2022, p. 15)

The liberal Arabic media network based in Beirut Raseef22 published an English translation of an article which quotes the internationally recognised researcher Jaber Suleiman:

In one of its articles “Jaber Suleiman, a Palestinian independent researcher in refugee studies, points out that “tens of thousands of Lebanese people who had been working in Palestine at the time were displaced along with the Palestinians, so the burden was a heavy one.”

Suleiman tells Raseef22 of the Lebanese government’s decision to set up refugee camps on the outskirts of cities and not in the countryside, in order to benefit from the skilled Palestinian labor, especially since a large number of refugees had skills that Lebanon needed, and some of them were well-off and had brought their money and gold with them.

Many sectors in Lebanon flourished with the arrival of the Palestinians, “especially banking, industry, agriculture, and the flow of trade.”

But then began marginalization. Suleiman believes that “placing the refugees in camps that are cut off from the Lebanese environment and are more like ghettos, was the beginning of the intended marginalization of the Palestinians.”

The Lebanese authorities granted citizenship to thousands of Christian Palestinians, according to Suleiman, in “clear sectarian discrimination”, while “special presidential decrees granted citizenship to wealthy and affluent refugees, regardless of their sect.”

(Source: Raseef22, [“A fourth generation of Palestinians living in Lebanon “on the fringes of the law”](#), 6 December 2021)

Exploitation and other types of harm

14.3. Are stateless Palestinians disproportionately affected by exploitation and other types of harm such as physical violence, sexual abuse etc? Are stateless Palestinians disproportionately affected by human trafficking?

In their “Syria, Lebanon and Jordan Emergency Appeal 2022”, UNRWA wrote:

“Violence continues to be a regular occurrence throughout the Palestine refugee community in Lebanon, along with a reported widespread availability of weapons.” (Information on the situation in the refugee community is based on UNRWA protection staff observations and from discussions with community leaders, women’s committees and people from the community.”

(Source: UNRWA, [“Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022”](#), 3 November 2022, p. 5)

In its 2021 Annual Operations report, UNRWA reported that:

“During the reporting period, the protection context deteriorated in Lebanon with the worsening economic situation; a fuel crisis and electricity cuts during a summer heat wave contributed to increased tensions between neighbours and within families with shootings, stabbings and armed clashes significantly increasing between July and September (33 incidents, up from 21 during the first six months of the year), reducing to 16 incidents during the last quarter (citing International Labour Organization, “Assessing Informality and Vulnerability among Disadvantaged Groups in Lebanon: A Survey of Lebanese, and Syrian and Palestinian Refugees.”) During the third quarter, 17 Palestine refugees were reported injured and seven were killed, compared to 38 injured and 17 dead throughout the whole of the reporting period. In addition, PRL and PRS reported significant increase in child protection GBV violations during the third quarter, with slight improvements in the last three months of the year. Mental health needs remained high throughout the year, although several people advised that they lacked the time and/or money to PSS access services.”

(Source: UNRWA, [“Annual Operational Report 2021”](#) 27 October 2022, p. 122)

A collective of NGOs working in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated among others that:

“Stateless children are at risk of being trafficked, since they have no legal documents and no protection. This risk becomes greater for institutionalised stateless children, due to the lack of control on the institutions and their compliance with the obligation to register the children. There is no facilitated access to the records of these institutions. They do not disclose any information to researchers and even sometimes to the administrative and judicial authorities in charge. The dossiers of these children at institutions – accessible only if the institution wishes so and is asking for assistance to register the child and rarely by judicial order- are almost empty: containing no protection orders, police reports, or regular monitoring reports by UPEL (the Union for the Protection of Children in Lebanon) as required by law.”

(Source: The Collective for Research & Training on Development- Action, The Nationality Campaign, Ruwad alHoukuk Frontiers Rights et al, [“Joint Submission to the Human Rights Council Universal Periodic Review”](#), July 2020, p. 11)

15. Particular hardships faced by specific profiles of stateless Palestinians

Women

15.1. Are there any reported instances of violence against stateless Palestinian women?

In its Protection Monitoring Report for the first quarter of the year 2022, UNRWA reported that:

“Women and girls were said to be suffering from ongoing high levels of violence in the home as the socio-economic crisis continued to heighten tensions within families while also forcing them to spend more time together in often crowded homes, with little hope for an improved situation. While focal points reported that the majority of violence against women and girls took place in domestic settings, harassment in the street and online also continued, particularly emphasised in Central Lebanon Area. According to focal points, reporting of sexual violence or exploitation against children continues to be rare due to children not knowing how to report it, fear of retaliation, taboos around mentioning it, and a lack of trust in the system.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 1 \(Q1\) 2022](#)”, 1 July 2022, p. 4)

The UN office for the Coordination of Humanitarian Affairs reported in April 2022 about GBV risks for women and girls resulting directly from their refugee status and associated living conditions:

“Protection risks and harmful coping strategies

PRL [Palestinian refugees in Lebanon] households face protection risks resulting directly from their refugee status and associated living conditions, with women and girls likely to be more exposed to safety and security incidents. Sexual harassment was reported as a main safety and security concern by 8 per cent of the PRL households with the presence of at least one woman, while physical harassment or violence was reported by 5 per cent. This increases to 13 per cent and 8 per cent respectively in PRL households with the presence of girls. Physical violence was also highlighted as a key concern for children with disabilities. Similar to Lebanese households, protection concerns were highest in Akkar and North in comparison to other governorates. Limited access to services for women who experienced gender-based violence is a major challenge, with more than half of PRL households reporting no access to specialized services for women in their community.

(Source: OCHA, [Increasing Humanitarian Needs in Lebanon, April 2022](#), 14 April 2022, p. 28)

The same report further stated, based on the Multi-Sectoral Needs Assessment (MSNA) conducted by the REACH Initiative in December 2021, that:

“The needs of PRL and migrants are exacerbated by their marginalization, which is often related to their legal status, and the associated challenges in accessing specialized prevention and response services. An estimated 50,000 PRL (of whom 89 per cent are women and girls, with boys also at risk in some areas) are considered in need of GBV services, with a large number residing in Akkar and South governorates. An additional 46,000 migrants (80 per cent women, 16 percent girls, 3 percent men and 1 percent boys) are estimated to be in need of GBV services. The region with the highest number of migrants in need is Beirut and Mount Lebanon.

Because of gender inequality and a deficient legal system, women, girls and marginalized groups including gender minorities (such as trans gender women and men, and gender non-binary individuals) are the most in need of GBV services in Lebanon.

[...] “ANALYSIS OF HUMANITARIAN NEEDS

Around a quarter of Lebanese households reported having safety and security concerns for women in their community (including as being exposed to sexual violence and harassment, kidnapping, and sexual exploitation), and the percentage is even higher, if girls are considered (34 per cent). Moreover, nearly half (45 per cent) of Lebanese households have reported psychological distress of at least one adult member negatively impacted by the crisis.”

(Source: OCHA, “[Increasing Humanitarian Needs in Lebanon, April 2022](#)”, 14 April 2022, p. 33)

CEDAW calls upon the State party to ensure the rights of women by adopting, as a matter of priority, legal provisions protecting women’s rights:

“47. The Committee commends the State party for maintaining its long-standing open border and reception policy for Palestinian refugees and those from the Syrian Arab Republic, and for hosting more than 2 million refugees. The Committee remains concerned, however, that the 1962 law regulating the entry into, stay in and exit from Lebanon does not distinguish between asylum seekers, refugees and migrants. The Committee is also concerned about the high number of reported cases of child and/or forced marriage among Palestinian and Syrian refugee girls and women.

48. In line with its general recommendation No. 32 (2014) on the gender-related dimensions of refugee status, asylum, nationality and statelessness of women, the Committee recommends that the State party:

- (a) Strengthen its procedures for identifying asylum seekers and determining asylum status, which should be gender-sensitive, age-sensitive and culturally sensitive, in order to ensure the systematic and early identification of women and girls who are victims or at risk of gender-based violence, and provide appropriate assistance to such women and girls;
- (b) Review the 1962 law regulating the entry into, stay in and exit from Lebanon, to distinguish between the protection needs of asylum-seeking and refugee women on the one hand and those of migrant women on the other;
- (c) Prevent and eradicate child and/or forced marriage through coordinated action, in collaboration with non-governmental organizations and community leaders, in particular by raising awareness of the criminal nature and harmful impact of child and/or forced marriages on girls and women and by ensuring that all such cases are investigated and that those responsible are prosecuted and adequately punished, and systematically collecting data on the number of cases reported, investigations, prosecutions and convictions, as well as on the penalties imposed in cases of forced marriage.

(Source: Convention on the Elimination of All Forms of Discrimination against Women, “[Concluding observations on the sixth periodic report of Lebanon](#)”, 01 March 2022, p. 13)

Based on UNRWA reports from 2015 and 2016, UN Women reported in July 2021 that:

“Recent data suggests that 65% of Palestinians live in poverty, and that Palestinian women experience high rates of GBV, likely closely associated with economic vulnerability (Chaaban et al. 2016; UNRWA 2015).” (p.18)

(Source: UN Women “[European Union Sector Specific Gender Analysis: An in-depth sectoral examination of feminist and women’s rights issues in Lebanon](#)”, July 2021, pp 18)

As part of the 2020 annual implementation report on its Gender Equality Strategy, UNRWA wrote about the suspension of microcredits for Palestine refugees:

“During 2020, an assessment for GBV [Gender-based violence] services was conducted at UNRWA health centres to explore the perceptions of 805 health staff members and 1,326 community members towards GBV during the COVID-19 pandemic. Results indicated a perceived increase in the number of domestic violence cases, specifically

towards women and children. Health staff perceived a particular increase in psychological and physical violence, as well as denial of resources. The community indicated they would be most likely to seek GBV help and assistance from UNRWA health staff or from NGOs in general.

In Gaza, the Health Department identified a total of 1,432 cases of GBV. 252 cases of GBV were identified through the hotlines established during the lockdown. 1,092 cases of GBV (psychological and physical violence, forced marriage, sexual abuse, rape) were identified and taken on by RSS legal counsellors. Support sessions were organised for women, aimed at awareness-raising and at encouraging possible GBV survivors to seek psychological assistance, and a GBV Manual was created and shared with women by health counsellors. Finally, Facebook and WhatsApp groups were created as support forums for women to connect with each other during the pandemic.

[...] In Lebanon, a total of only 53 GBV survivors were assisted in 2020. The limited number of cases can be attributed to the general underreporting of GBV, amongst other factors. In fact, women and girls in FGDs reported that violence within the home is being normalized, and that they would be unlikely to report violence out of fear of retaliation, losing their children, economic restrictions, or the stigma attached to divorce. However, women did report an increase in domestic violence amidst the pandemic, with negative effects on children at home. In FGDs, women told UNRWA that male family members were expressing their helplessness, frustration, and inability to fulfil their responsibilities through violence. They also reported an increase in inter-sibling violence and an increase in control by their fathers and brothers, resulting in limited movements and surveillance.

Although the level of access to services varies between areas in Lebanon, there is a general lack of knowledge on UNRWA services amongst the refugee population and a lack of trust regarding the confidentiality of services provided inside the camps. Awareness-raising sessions on GBV and COVID-19 were conducted through WhatsApp for 1,344 women to strengthen resilience and increase knowledge on UNRWA services. In addition, remote awareness-raising sessions were organised for 399 men to discuss healthy and positive stress-management and prevent GBV.”

(Source: UNRWA, “[UNRWA Gender Equality Strategy 2016-2021: annual implementation report January-December 2020](#)”, May 2021, p. 8-9)

With reference to gender-based violence, UNRWA reported:

“Risk factors including difficult socio-economic conditions, including overcrowded living conditions, lack of privacy and high levels of poverty, the limited control exercised by Lebanese authorities within Palestinian refugee camps and an environment characterized by insecurity and violence, contribute to a high prevalence of violence against women and children amongst the Palestine refugee community. Fear of retaliation or escalation of violence, as well as shame and stigma experienced by survivors, lack of confidentiality and limited availability of protective services within the camps, result in high levels of underreporting of gender-based violence (GBV), especially for domestic violence and sexual exploitation. Furthermore, the lack of formal legal authority within the camps has resulted in limited access to safety and justice for survivors of GBV and children at risk of violence. Based on GBV case management undertaken by UNRWA in Lebanon, between 2013 and 2018, the following statistics and key trends among reported GBV incidents have been identified:

- 38 per cent of reported cases concern incidents of physical assault; 22 per cent of reported cases concern incidents of emotional and psychological abuse; 23 per cent of reported cases concern incidents of sexual violence, of which 7 per cent of cases concern rape.
- 65 per cent of reported sexual violence incidents were perpetrated against minors; 89 per cent of forced marriage incidents were perpetrated against minors and 43 per cent of all identified survivors were minors.
- Domestic violence, sexual violence (rape and sexual assault) and exploitation, as well as child marriage, were the most commonly reported incidents connected to the reported cases of emotional and physical abuse.

In addition, GBV risk within the home has been exacerbated by COVID-19 related measures across refugee communities in Lebanon. 54 percent of women and girls interviewed for an inter-agency assessment reported observing an increased risk of GBV incidents in their households, such as emotional abuse, violence and denial of resources. Furthermore, UNRWA’s legal aid unit registered a significant increase in the number of family law cases related to domestic violence and child protection received during the lockdown period.”

(Source: UNRWA: “[Protection brief: Palestine refugees living in Lebanon](#)”, September 2020, p. 3)

15.2. What Impact did Covid-19 and anti-covid19 measures have on Gender-based violence [GBV]?

“The COVID-19 pandemic and economic crisis has exposed vulnerable Palestine refugees, in particular women and children, to heightened protection-related risks, including Gender-Based Violence (GBV) and abuse, violence against children, and the isolation of the elderly and people with disabilities. The Agency will continue to work with refugee community members and women’s committee in Lebanon to prevent abuse and raise awareness on GBV and child protection and aim to address the links between mental health and violence in the community.”

(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 11)

“mainstreaming gender in the COVID-19 response

This year, The Agency’s activities have been disrupted by the outbreak of the COVID-19 pandemic. Indeed, work became largely remote; training sessions, community-based activities and many services for Palestine refugees were taken online; and health centres and education facilities were closed down for a long period of time, following movement restrictions established by authorities in UNRWA fields of operation. In addition to the significant health risks the pandemic has imposed on everyone, COVID-19 has had a profound impact on women and girls in the region, including Palestine refugees. Rapid socio-economic assessments undertaken by UNRWA showed that the pandemic has led to increased pressure, duties and responsibilities for women within the household, and increased rates of unemployment have led to increased tensions within the home.”

(Source: UNRWA, “[UNRWA Gender Equality Strategy 2016-2021: annual implementation report January-December 2020](#)”, May 2021, p. 4)

The UN Office for the Coordination of Humanitarian Affairs indicated in its Emergency appeal of July 2020 about women and girls:

“Protection needs have increased for women and girls, refugees and migrants (including domestic workers), people with disabilities, older people and other vulnerable groups. Psycho-social support needs have alarmingly increased for children, youth, women and men due to anxiety over the situation, limited livelihoods opportunities and overall desperation. There is significant documentation from the UN and the Government on the impact of COVID-19 on increasing gender-based violence, unpaid care work for all – with a disproportionate impact on women and girls and on women’s engagement in the labour market – with women leaving the labour market at higher rates than men. Further, according to the Inter-Agency SGBV Task Force assessment, 54 per cent of interviewed individuals reported observing an increase of harassment, violence or abuse against women and girls in the households and community [Impact of COVID-19 on the SGBV Situation in Lebanon. Inter-Agency SGBV Task Force Lebanon, May 2020]. The risk of Sexual Exploitation and Abuse (SEA) may also be exacerbated, as evidenced in other contexts. Overall, there are increased risks in times of crisis, particularly for the most vulnerable. Meeting our commitments to Accountability to Affected Populations (AAP) and Protection from Sexual Exploitation and Abuse (PSEA) is therefore especially important

(Source: OCHA, “[Lebanon COVID-19 Emergency Appeal \(17 July 2020\)](#)”, July 2020, p. 5)

In their “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, UNRWA wrote:

“The stress of this situation is further driving an increase in violence against children, intimate partner violence, and violence in the community as interpersonal disputes erupt into shootings.”

(Source: UNRWA, “[Syria, Lebanon and Jordan Emergency Appeal 2022](#)”, 18 January 2022, p. 16)

15.3. What is the situation of stateless unmarried/single Palestinian women without male support?

In its Protection Monitoring Report for the 2nd quarter of the year 2022, UNRWA reported that:

“Focal points continued to emphasise women and children’s feelings of unsafety, which have remained high. Their vulnerability to exploitation and abuse has been exacerbated by the economic situation, which in some cases was said to have led female family members to stay at home and children to spend more time on the street and/or at places of work. This is particularly critical for female-headed households, in a context where single, divorced or widowed women are particularly vulnerable to all forms of gender-based violence.”

(Source: UNRWA, “[UNRWA Protection Monitoring Report – Quarter 2 \(Q2\) 2022](#)”, 26 August 2022, p. 5)

Refugee Net, which, according to its website, is a “Palestinian Refugee News Network in Lebanon”, published a testimonies by Palestinian refugee women who live unmarried in Lebanon:

“Today, Zahra lives in her sister’s house in Burj al-Barajneh Camp in Beirut, and she does not have any pension or anyone who takes care of her after a long course of struggle, and she has no breadwinner. She says: «I do not regret what I have done in my life, knowing that I did not marry and did not build a family, the country is greater than everything, and for it I did what I did, but it hurts me very much to get here after a long struggle, and I still don’t know why I’m being ignored along with many Palestinian women fighters. We have become like a garment whose owner has outgrown it after a period of time has passed, so it is thrown aside and no one cares about it.»

ORIGINAL SOURCE:

تعيش اليوم زهرة في بيت أختها في مخيم برج البراجنة في بيروت، وليس لديها أي راتب تقاعدي أو من يهتم لأمورها الحياتية بعد مسيرة طويلة من النضال، ولا معيل لها. تقول: «أنا لست نادمة على ما قدّمته في حياتي، علماً أنني لم أتزوج ولم أبنِ عائلة، والوطن أكبر من كل شيء، وأنا من أجله قمت بما قمت به، لكن يؤلمني جداً أن أصل إلى هنا بعد مسيرة نضال طويلة، وما زلت أجهل سبب تجاهلي والعديد من النساء الفلسطينيات المناضلات. لقد صرنا كالثوب الذي يضيق على صاحبه بعد مرور زمن عليه، فُيرمى جانباً ولا يعود أحد يكتثر له.»

(Source: Refugee Net: “[I live alone with my chickens](#)”... Forgotten Palestinian women activists in the camps of Lebanon, July 1, 2022)

Persons with Disabilities (PwD), including but not limited to mental, physical, psychosocial, and intellectual

15.4. Are there statistics recorded on the incidence of stateless Palestinians with disabilities and the form of disability?

In its Emergency Appeal Progress Report, UNRWA published statistics for the number of refugee children identified as living with special educational needs or disabilities during the reporting period (1 January to 30 June 2022).

“Lebanon: sector-specific interventions: [...] During the reporting period, 1,744 refugee children (876 girls, 868 boys) identified with SEN [Special Educational Needs] and disabilities – out of 2,655 children (1,313 girls, 1,342 boys) or 65.69 per cent of the total identified – were referred through the UNRWA Health Programme to complementary (non-education) services provided by external partners to support their learning development. Of this number, 474 (230 girls, 244 boys) were children presenting at least one disability, representing 27 per cent of the overall supported population. This result underachieves against the set target as the resources available, both under this EA and project funding, were not sufficient to cover all identified needs (including psychomotor or psychological therapy and assistive devices, such as batteries for hearing aids) for children with learning difficulties and speech and hearing impairments.”

(Source: UNRWA, “[Syria, Lebanon and Jordan, 2022 Emergency Appeal Progress Report for the reporting period 1 January – 30 June 2022](#)”, 3 November 2022, p. 29)

Independent researcher and consultant in social sciences, Emilie Combaz reported the following statistics in a 2018⁵¹ report based on nineteen days of desk-based research and prepared for the UK Government's Department for International Development (DFID) and its partners in support of pro-poor programmes:

"[...]. The rate of prevalence is estimated at about 10% among refugees who have fled from Palestine to Lebanon from 1947, at about 8% among Palestinian refugees from Syria, and at 10-22.8% among refugees who have fled Syria since 2011."

(Source: "[Situation of Persons with Disabilities in Lebanon](#)." K4D Helpdesk Report. Brighton, UK: Institute of Development Studies. Emilie Combaz, 2018, p. 2)

15.5. Are there reported instances of stigma, discrimination, harassment and/or violence towards stateless Palestinians with disabilities by Lebanese state actors or the local community?

UNICEF, relying among other sources on a Knowledge, Attitudes and Practices (KAP) Survey published in 2018 by UNICEF Lebanon and Malmö University, reported in 2022 that:

"The available data indicates that children with disabilities are marginalised in Lebanon. For example, according to a KAP study from 2017, 30 percent of Lebanese respondents believe that children with physical disabilities should not be integrated in society. The percentage is much higher among Syrian respondents (44 percent of Syrians registered with UNHCR and 62 per cent of those in informal settlements) and Palestinian refugees in camps (54 per cent)." (p. 37)

(Source: UNICEF Lebanon, "[The situation of children and young people in the Lebanese crisis](#)", March 2022, p. 37)

Based on a focus group conducted by UNRWA in late 2021, the agency reported in June 2021 that:

"UNRWA is aware of the particular disadvantages faced by disabled Palestinian refugees in Lebanon. Palestine refugees with disabilities report facing regular exclusion and discrimination from the community, including when seeking employment even when qualified (for adults), and difficulty in accessing adapted living environments, medical aids and specialist medical treatment (for adults and children). Disability, especially when it intersects with other vulnerability factors such as gender, age, and/or legal status and lack of civil documentation, leaves this group of Palestine refugees even more vulnerable, more marginalized and requiring additional support which is not readily available within the community setting.

Living conditions in the Southern refugee camps in Lebanon also place disabled persons at a disadvantage. Entry to the camps is restricted by Lebanese Armed Forces. This often causes delays in movement. The entry of building materials is also heavily restricted by the Lebanese authorities. Conditions inside the camps are often poor, with over-crowding and overall poor housing. As a result, camps are often not physically accessible for persons with physical impairments with uneven narrow roads, no pavements and often loose electricity cables. This means that persons with physical impairments are usually unable to move independently outside the home, and often physically unsafe. UNRWA funding does not extend to assisting with significant adaptations to private shelters to the needs of persons with disabilities. As mentioned above, the Agency does not administer or manage the Palestine refugee camps in Lebanon, this is the responsibility of the host authority."

(Source: UNRWA, "[Letter from UNRWA to UNHCR in the case of NB and AB v. SSHD before the Court of Justice of the European Union \(Case C-349/20\)](#).", 21 June 2021, p. 4-5)

51 Even though this information is not within the research period, it was included since it is pertinent to the prevalence of disabled Palestinians in Lebanon.

A collective of NGOs working with Palestinians in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated among others that:

“13.2. Denying Palestinian refugees with Disabilities from PwD rights

“Palestinian refugees are denied from the rights accorded to Lebanese PwDs, although Law 220/2000 does not exclude Palestinian refugees from its provisions, which mentions ‘persons with disabilities’ and not ‘Lebanese persons with disabilities’.”

(Source : Najdeh Association, Development Action Without Borders (Nabaʿa), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, p. 9)

15.6. What measures are taken to ensure that Palestinians with disabilities can access basic services?

In a public letter to the UNHCR published by UNRWA in June 2021, the relief agency stated that:

“UNRWA seeks funding in appeals and project proposals to support Palestine refugee children’s access to specialized educational institutions tailored to children with severe disabilities. However, as the costs for enrolment in these external institutions are high and this effort is dependent on short-term project funding, which is unstable, the availability of funding and places is not guaranteed. In addition, even if these institutions could accommodate children with severe disabilities, the scope of such external institutions in Lebanon is limited with significant waiting lists.”

(Source: UNRWA, “[Letter from UNRWA to UNHCR in the case of NB and AB v. SSHD before the Court of Justice of the European Union \(Case C-349/20\)](#).”, 21 June 2021, p. 5)

On their website, Medical Aid for Palestinians (MAP), a non-profit organisation that works in Palestinian refugee camps and provides frontline care, summarises the difficulties that people with disabilities face and the services that they offer to support them:

“People with disabilities face many challenges to their rights and wellbeing in the occupied Palestinian territory and in the Palestinian refugee camps in Lebanon. Lack of opportunities and access to health, education, livelihood and social services compound the cycle of disability as both a cause and consequence of poverty.

Stigma, discrimination and human rights violations, particularly concerning women with disabilities, frequently go unchecked. Social isolation and marginalisation are particularly prevalent in refugee camps where many adaptations and accessible public infrastructure are not available. There are few specialised rehabilitation services available to children and adults and a general lack of awareness of the rights of children and adults with disabilities. People with disabilities became particularly marginalised during COVID-19 lockdowns and are among the most overlooked groups in emergency responses.

MAP takes a social and rights-based approach to disability. We focus on removing the barriers to participation in society by people with disabilities, which complements medical care. We provide rehabilitation support, and empower people with disabilities to challenge public perceptions of disability and break down the barriers in their communities.

Our Projects:

Support to physiotherapy centre and early intervention unit, Lebanon: In Lebanon, Palestinians with disabilities cannot access government disability services and 29% of Palestinian children with disabilities are not enrolled in education. MAP supports the Palestinian Women’s Health Organisation and Sour Community Disability Programme’s physiotherapy centre and early intervention units to provide physical rehabilitation and educational support to children with physical and mental disabilities living in refugee camps. The physiotherapy centre also provides therapy to young people, adults and elderly people with physical disabilities, and works to empower those with disabilities and their families to promote a cultural shift in community attitudes towards people with disabilities.”

(Source: Medical Aid for Palestinians (MAP), “[Disability](#)”)

15.7. Are there reported instances of stigma, discrimination, harassment and/or violence towards LGBTQI+ stateless Palestinians by Lebanese state actors or the local community?

The independent digital media platform in Arabic Daraj published an interview with the Palestinian-Syrian journalist and activist Joud Hassan:

Joud Hasan: “For me Syria is the country where I grew up. I also feel like I am Syrian. But it is related to where you lived, how you feel towards each country, how people view your nationality and how the law views your nationality. So I am in all these battles of which country I can stay in, and being a constant refugee from one place to another, so I am lost.”

Interviewer: “At the same time, these countries where we are born and that we love have become too narrow for us. At the beginning of the Syrian revolution, you were an activist, you were arrested for a couple of days. You left Syria, you came to Lebanon. Lebanon was not easy. You were obliged to go to Germany. Tell me about these paths. Countries have transformed into tight places, you were obliged to seek asylum in Germany. How narrow do you think this place is for you?”

Joud Hasan: “I honestly do not feel like it is narrow here [Lebanon]. Aside from the legal part. The time I spent in Lebanon is the time during which I was the freest. And I could be who I wanted to be in this country. But it was legally hard. Until now there is hardship. And it is a bit harder now until I get my papers in Germany. But as a country and its people, it was where I felt the safest. Socially speaking, but on the legal and political level it was very difficult.”

Interviewer: “What do you mean by difficult?”

Joud Hasan: “Getting my legal papers was hard. Because of course they do not like Palestinians.”

Interviewer: “You are both Palestinian and Syrian. Which is the whole Lebanese phobia?”

Joud Hasan: “I carry all these characters. Palestinian, Syrian and transgender. So it is now more difficult. There is always this struggle. As a Palestinian-Syrian, I always need to renew my residence permit and as a Palestinian there are no laws to protect me. For Syrians there is the kafala system. Whenever I needed to renew my papers they would tell me that there are no laws to be applied in this case. And when I asked about what I can do, they would say they do not know. And this is where it ends for me. “I do not know” is the answer to the question of “how do I remain here?”

(Source: Daraj Media: «[I’m trans in gender...and politics](#)» | An interview with the Palestinian-Syrian journalist and activist Joud Hassan | Noun Podcast #11” (04:14- 06:12) July 15, 2022)

Refugee Net, which, according to its website, is a “[Palestinian Refugee News Network in Lebanon](#)”, wrote in July 2022 that:

“The sheikhs of the Nahr al-Bared and Beddawi Camps issued a statement calling for the cessation of activities that contradict religious values and the authenticity of the Palestinian people, praising the position of the Mufti of the Lebanese Republic rejecting all attempts or legalization of homosexuality and non-religious (civil) marriage, and appreciating the position of the Palestinian factions which supports religious values and authenticity of the Palestinian people. The statement adds, “while our people are fighting a battle to defend the land, sanctities and dignity, we are seen by institutions that conduct activities that contradict our religion, values, culture and authenticity of our people. That is why it is important for the honorable sheikhs to emphasize our refusal to promote ideas that contradict Islamic law such as: gender equality, homosexuality, CEDAW, freedom of adultery, and others.. which encourages rebellion against Islamic law, and against parents and husbands.” [In-house translation. The author is an Arabic native speaker]

ORIGINAL SOURCE:

أصدر مشايخ مخيمي نهر البارد والبدوي بياناً دعت فيه لوقف الأنشطة التي تتعارض مع القيم الدينية وأصالة الشعب الفلسطيني، مثنين على موقف مفتي الجمهورية اللبنانية الراض لكل محاولات تمهيد أو تشريع الشذوذ الجنسي والزواج اللاديني (المدني) ومثمنين موقف الفصائل الفلسطينية واللجنة الشعبية المدافع ع القيم الدينية وأصالة شعبنا. وقال البيان في الوقت الذي يخوض شعبنا معركة الدفاع عن الأرض والمقدسات والكرامة، تطل علينا مؤسسات تقيم أنشطة تتعارض مع ديننا وقيم وثقافة وأصالة شعبنا، لذا يهم أصحاب الفضيلة المشايخ التأكيد على رفضنا للترويج للأفكار المخالفة للشريعة الإسلامية مثل: (المساواة بين الجنسين)، (الشذوذ الجنسي)، (المثلية)، (سيداو)، (حرية الزنا)، وغيرها.. ما يشجع على التمرد على الشرع الإسلامي، وعلى الأهل والزواج.

(Source: Refugee Net: “[I live alone with my chickens](#)”... [Forgotten Palestinian women activists in the camps of Lebanon](#)”, July 1, 2022)

The Yalla Care Coalition conducted a study on the needs of the LGBTIQ+ community in Beirut and published the results in December 2021. It does not explicitly refer to stateless Palestinians but mentions that the study included “undocumented residents in Lebanon”:

“The disintegration of the quality of life in Lebanon has disproportionately hit marginalized communities and has harshly affected all aspects of their living conditions. These marginalized communities include the LGBTIQ+ community, women and girls, migrant domestic workers, refugees and undocumented residents in Lebanon, people with disabilities, among others. The living conditions before the economic collapse and political deadlock were in abysmal conditions only to be acutely worsened by the systemic oppression and failure of the state institutions.”

(Source: Yalla Care Coalition, “[Study on the needs of the LGBTIQ+ community in Beirut, 2021](#)”, December 2021, p. 12)

Without mentioning LGBTIQ+ stateless Palestinians as an explicit group in their study, Oxfam collected information on the specific struggles of queer refugees in Lebanon, among others the impact of “checkpoints on the mobility of trans people whose gender identity does not match their identification documents and queer refugees who do not have legal permits.”

“Specifically, queer individuals who are non-Lebanese such as refugees and migrant workers were more likely to experience challenges that affect their access to shelter, such as lower opportunities to generate income and meet rent payments, higher risk of eviction, and higher risk of discrimination by landlords based on their nationality. This is concerning because many non-Lebanese queer individuals were placed in difficult situations and were “in limbo” as a result of the crises, by not being able to work, receive support, go out of their houses, afford rent, feel safe in public spaces, or even go back to their country due to travel restrictions.

[...] However, it is important to note that the impact of the crisis was not linear across different members of the community. According to the interviews with queer individuals, CSOs and informal aids groups, trans individuals, gender queer individuals, and queer refugees seem to be the most affected by the series of crises. “We are stifled from all angles. We cannot go out, we cannot work, we cannot receive proper support, we do not have safe spaces to exist” said one of the interview participants about their experience as a queer refugee in Lebanon.

Trans individuals who face systemic and longstanding barriers to formal education and employment are often forced to work in low-income jobs in the informal sector, and many of them resort to sex work to make ends meet. During the pandemic, many informal businesses struggled to survive, and demand for sex work services sharply decreased due to significant decrease in expendable income, making an already dire situation even more devastating. Similarly, queer refugees, who had been struggling for years with legal restrictions that bar them from the formal job market and limit their mobility, found in this crisis another burden that made meeting their most basic needs even more difficult.”

(Source: Oxfam, “[Queer Community in Crisis: Trauma, Inequality & Vulnerability](#)”, July 2021, p. 15)

Based on a confidential source, the Dutch Ministry of Foreign Affairs reported in 2021 that:

“5.1.2 LGBTI

One source indicates that Palestinian LGBTI people who openly admit their sexuality experience discrimination in the refugee camps and are often turned away. The only places where Palestinian LGBTI people can live relatively safely outside the camps are in the non-conservative neighborhoods of Lebanon, for example in the capital Beirut. However, these neighborhoods are often Christian neighborhoods whose residents have a negative image of Palestinians. By living outside the camps, Palestinians also lose their social network that can provide protection. This also applies to LGBTI people who end up in a precarious situation and can no longer rely on their families or other contacts. Human Rights Watch (HRW) also reports the use of violence, abuse and unlawful pre-trial detention against transgender women at checkpoints.” (In-house translation. The translator is a native Dutch speaker)

ORIGINAL SOURCE

“5.1.2 LHBTI

Een bron geeft aan dat Palestijnse LHBTI'ers die openlijk uitkomen voor hun geaardheid discriminatie ervaren in de vluchtelingenkampen en vaak worden weggestuurd. De enige plekken waar Palestijnse LHBTI'ers relatief veilig kunnen wonen buiten de kampen zijn in de niet conservatieve wijken van Libanon, bijvoorbeeld in de hoofdstad Beirut. Echter, deze wijken zijn vaak christelijke wijken waarvan de inwoners een negatief beeld van Palestijnen hebben. Door buiten de kampen te wonen verliezen Palestijnen ook hun sociaal netwerk dat voor bescherming kan zorgen. Dit geldt ook voor LHBTI'ers die hierdoor in een precare situatie terechtkomen en niet langer kunnen terugvallen op hun families of andere contacten.¹⁵⁹ Human Rights Watch (HRW) meldt ook het gebruik van geweld, misbruik en onrechtmatig voorarrest tegen transgender vrouwen bij controleposten.”

(Source: Dutch Ministry of Foreign Affairs, “[Thematisch ambtsbericht Palestijnen in Libanon](#)”, January 2021, p. 28)

People with criminal convictions

15.8. Is there any additional penalty eg. deportation for stateless Palestinians who committed offences, in Lebanon or outside of Lebanon?

COI for this question was not found, but information gaps related to statelessness should not be regarded as the lack of a protection issue. As noted in a COI research guide produced by ARC Foundation and Asylos, ‘plenty of things happen but do not make it into the world of information that is accessible to you’.⁵² As stateless people do not have legal status, they lack visibility in societies, because they are often excluded from formal registration and documentation processes and from access to institutions and public services. This means their lives are not counted and recorded in the same ways, or to the same extent, as citizens of a country. Furthermore, the marginalisation that stateless groups often experience within societies may mean that there is a lack of information about them, or certain aspects of their experience.

⁵² ARC Foundation & Asylos, [Country of Origin Information \(COI\): Evidencing asylum claims in the UK](#), 2020

16. Political participation and protests

16.1. Are stateless Palestinians formally allowed to gather, protest, and join political parties in Lebanon? Are they practically permitted to do so? Do you know stateless Palestinians who ever managed to become public political figures?

Walaa Kayyal, a researcher living as a Palestinian in Lebanon whom we interviewed for this report in October 2022 categorically denied that Palestinians might access political offices. She described Palestinians' avenues for protest as follows:

"Protests rarely happen. The only one I recall was due to the labour law [the previous labour minister tried to regulate foreign labour in the country but without excluding Palestinians from this regulation. Palestinians protested and the regulation was dropped]. But I can imagine that all of them would be detained if they hold a protest to defend their rights and usually Palestinians don't do protests as a result of fear. Palestinian have offices inside the camps only."

(Source: Walaa Kayyal, [interview record](#), 31 October 2022)

Mr Ziad El Sayegh, Executive Director of the Civic Influence Hub in Beirut and former Policy and Communication Advisor to the Lebanese-Palestinian Dialogue Committee [a Lebanese inter-ministerial government body formed in November 2005 to implement the policies of the Lebanese government towards Palestinian refugees in Lebanon] whom we interviewed for this report offered an alternative understanding of avenues to protest used by Palestinians in Lebanon:

"We have camps in the country, and you are asking me if they are allowed to do political work. In the law, they cannot vote, only, within the Lebanese election, but they are everywhere, and they are doing political work. You can see a responsible from each faction visiting a Lebanese political figure and gathering and doing manifestation within the camps, of course. And after, if we receive, for example, Khaled Mashal, or Ismail Haniyeh, in the country, the Hamas leaders, you can see their manifestations. And this is what? This is political work. [...] They have political offices. [...] They have militias within the camps too. And you have many NGOs where you can see Lebanese and Palestinians themselves creating this NGO, and they are working together, [...]. If you are asking me the law is allowing them to do political gathering, I'm telling you no. But this is not the situation on the ground. They are doing everything. It's not about the law. It is about a de facto. When we received Ismail Haniyeh, the Hamas leader, six months ago, there were political / Military manifestation in the camps. And he was received by the president of republic, the prime minister, the speaker in Lebanon.. [...] This is a political visit."

(Source: Ziad El Sayegh, [interview record](#), 31 October 2022)

The Jordanian political economist and long-time commentator on the Israeli-Palestinian dialogue Riad Al Khouri who was interviewed for this report in October 2022 provided following points of context to explain that Palestinians from wealthy families might have more opportunities to access spheres of influence than Palestinians from a lower class:

"The quick answer is no. However, before 1948 I know from my own personal experience with family and friends, among others, the line between Palestinian and Lebanese was not serious. There were intermarriages, business partnerships, and other relations, so that today you have people in Lebanon who are politicians or in office who are originally Palestinian. However, these are people-- A, they are bourgeois; they are not poor people. And B, they were Lebanese citizens before 1948, but they are originally Palestinian. [...] A Lebanese will say he is originally from Palestine, even though he was born and brought up in Lebanon with Lebanese nationality. They will still regard him as originally Palestinian. Having said that, they can be in positions of responsibility or power like Lebanese who made money, which is the key thing in Lebanon. If you are rich, then all these other issues become secondary. [...] The poor Palestinian refugees, I do not know of cases where they have become part of the Lebanese society, political system, and so forth. They may have power or a high profile within the Palestinian camps and in the Palestinian community, but not outside."

[...] This depends more on the sects.[...] The most powerful sect in Lebanon is the Maronite Christian sect which is under the Vatican. Somehow, under the Vatican. They are the sect of the commander of the army and the president of the republic. The other sects, including the Muslim ones, have, informally or formally, access to certain positions in the state- certain power. The Palestinians tend to be of the Sunni Muslim sect and as such there may be intermarriage or business partnerships with Lebanese Sunni Muslim. And as I mentioned[...], people from these groups before 1948, who became Lebanese, married Lebanese, or had a strong business presence in Lebanon, may today have power as individuals or families. But for the Lebanese refugee today from a poor background, to become part of the Lebanese political structure is almost impossible.”

(Source: Riad Al Khouri, [interview record](#), 7 October 2022)

The Dutch Ministry of Foreign Affairs published a report on Palestinians in Lebanon in January 2021 which stated that:

“10.1.4 Political and social engagement

Foreigners can join political parties in Lebanon, according to the International Institute for Democracy and Electoral Assistance (IDEA), provided the party has a Lebanese founder and director. In practice, it is difficult for Lebanese political parties to have foreign members. According to a source, Palestinians and Lebanese from different sectarian backgrounds came together during the October Revolution protests in late 2019 that led to the resignation of Prime Minister Saad Hariri. Another source indicates that Palestinians in Lebanon stay as neutral as possible in Lebanese political issues and protests for fear that suspicions can arise about Palestinians and their involvement in Lebanese internal affairs.” (In-house translation. The translator is a native Dutch speaker)

ORIGINAL SOURCE

“10.1.4 Politieke en sociale betrokkenheid

Buitenlanders kunnen volgens het International Institute for Democracy and Electoral Assistance (IDEA) lid worden van politieke partijen in Libanon, mits de partij een Libanese oprichter en directeur heeft. In de praktijk is het moeilijk voor Libanese politieke partijen om buitenlandse leden te hebben. Volgens een bron kwamen Palestijnen en Libanezen van verschillende sektarische achtergronden samen tijdens de Oktober Revolutie protesten eind 2019 die tot het aftreden van premier Saad Hariri leidden.³⁰⁸ Een andere bron geeft aan dat Palestijnen in Libanon zich zoveel mogelijk afzijdig houden van Libanese politieke kwesties en protesten uit angst dat er argwaan kan ontstaan richting Palestijnen en hun betrokkenheid in Libanese interne zaken.”

(Source: Nederlandse Ministerie van Buitenlandse Zaken, “[Thematisch ambtsbericht Palestijnen in Libanon](#)”, January 2021, pp. 48-49)

A collective of NGOs working in Lebanon made a joint submission to the Human Rights Council Universal Periodic Review in 2020 in which they stated among others that:

“11.1. Restricting the right to expressing opinion through demonstrations to Lebanese citizens and denying it to Palestinian refugees

Decision 352 issued on 20/2/2006 by the Ministry of Interior and Municipalities restricted the right to expression through organizing demonstrations to Lebanese citizens, thus depriving Palestinians the right to demonstrate. Paragraph 3 of Article 1 of the Decision clearly indicated that «organizers of the demonstration must be Lebanese.» It should be noted that the practical application of Decision 352 allows Palestinians the right to demonstrate and express opinions.

11.2. Denying Palestinian refugees the right to issue publications

Palestinian refugees in Lebanon are officially denied the right to issue media publications, in accordance with Article 4 of the Lebanese Publications Law of 1948, which stipulated that ‘the owner of the periodical must be (1) Lebanese. If they are a foreigner, the license must be approved by the Ministers of Interior and Exterior, based on reciprocal treatment between Lebanon and their country.’”

(Source: Najdeh Association, Development Action Without Borders (Naba'a), Palestinian Human Rights Organization (PHRO) et al, "[UPR 2020: Palestinian Refugee Rights in Lebanon](#)", July 2020, pp. 5-6)

16.2. Do stateless Palestinians experience any forms of reprisals as a result of gathering/protesting/gaining a public profile for speaking on a political issue?

COI for this question was not found, but information gaps related to statelessness should not be regarded as the lack of a protection issue. As noted in a COI research guide produced by ARC Foundation and Asylos, 'plenty of things happen but do not make it into the world of information that is accessible to you'.⁵³ As stateless people do not have legal status, they lack visibility in societies, because they are often excluded from formal registration and documentation processes and from access to institutions and public services. This means their lives are not counted and recorded in the same ways, or to the same extent, as citizens of a country. Furthermore, the marginalisation that stateless groups often experience within societies may mean that there is a lack of information about them, or certain aspects of their experience.

53 ARC Foundation & Asylos, [Country of Origin Information \(COI\): Evidencing asylum claims in the UK](#), 2020

17. Appendices

A. Methodology

Step 1: Scoping for research topics

The scoping phase will identify what the most pressing COI gaps are for UK asylum applicants and therefore which topics of Strategic COI reports have the potential to benefit both a large number of applicants and those most vulnerable to poor decision making.

To identify the most pressing topics for our research reports, Asylos will:

- Regularly consult their networks of legal representatives and refugee community organisations that support asylum seekers in the RSD procedure (asking partners to specify why exactly the topic is so important, asking them to point to Home Office country specific asylum policy known as Country Policy and Information Notes (CPINs) and Reasons for Refusal Letters (RFRs) where appropriate)
- Launch an open call for topic suggestions and disseminate it to its respective lists of subscribers.

In addition, Asylos will:

- Monitor such forums as the Statelessness Forum and Refugee Legal Group and the Refugee on an ongoing basis
- Monitor the requests it receives for research assistance on individual cases
- Record the statistics for common themes in the reports it produces for individual cases
- Invite suggestions from partners who have requested our services as part of the ongoing feedback collection.

Asylos will assess which topics to select on the basis of greatest potential impact, with reference to analysis of:

- The number of asylum seekers generated by nationality (UK asylum statistics are not published on convention ground/profile)
- Appeal success rates by nationality
- any existing upcoming Country Guidance (CG) cases that the Tribunal is to hear [to avoid duplication]
- A need for an evidence base to challenge existing CPINs [e.g. where it relies on outdated or uncorroborated COI].

Throughout the scoping exercise, we will approach actors that represent groups particularly vulnerable to information gaps and thus poor-quality decision-making, such as women, children and young people.

In addition, Asylos will set up a Steering Committee who will assist in the selection and prioritisation of strategic research report topics, as well as manage any risks arising from the project. Members of the committee will be approached at least once during the early project phase in order to review and comment on the planned methods and execution. The Steering Committee consists of the following members: Walaa Kayyal (MEAL Specialist, Danish Refugee Council), Judith Carter (Solicitor and Lecturer at Liverpool Law Center), Shahd Qannam (Research Student at City, University of London), Thomas McGee (PhD researcher at the Peter McMullin Centre on Statelessness) and Elizabeth Ruddick (Senior Protection Associate, UNHCR).

Step 2: Identifying preliminary Terms of Reference (ToR)

Once a research topic has been chosen, the following steps will be taken in order to identify the preliminary research headings (i.e. draft ToR):

- Read relevant Country Guidance (CG) cases from tribunal (identifying which evidence is outdated)
- Read relevant Home Office Country Policy and Information Notes (CPINs)
- Reference other COI guidance/policy publications from international organisations such as EUAA, UNHCR as well as sources from media, human rights organisations and academic research
- Include input from other stakeholders (project partners).

The draft ToR will be drawn up by Asylos Programme Manager(s), providing input from their topic scoping activities.

Step 3: Training session for Asylos volunteers

Asylos will source from its volunteer network a group of volunteer researchers for each report to conduct the COI desk research and to assist with interviewing stakeholders.

Volunteer researchers will be fully briefed on the project purpose, design and research methodology. They will then be required to attend a zoom training session facilitated by Asylos Programme Manager(s) which will cover the following:

- Advanced COI research techniques
- Conducting stakeholder interviews
- The nature and scope of the research gap that the report aims to address
- Any Home Office guidance and policy related to the topic
- How experts are instructed in the UK, including how to ensure experts are aware of guidelines for expert testimony in a UK court

Step 4: COI Desk Research

For each report, we will undertake a review of the publicly available COI. This desk research will be coordinated by Asylos's UK Programme Manager(s), working with a team of volunteers.

Before the research begins, Asylos will devise and commit to consulting an agreed list of sources from an agreed period of time. This list will be divided among the volunteers to consult and to submit any relevant findings which will be included in the final report. When any additional sources are identified in the desk research volunteers will record them alongside the initial list, and submit any relevant information.

Once this list has been exhausted, each volunteer will also be designated several of the ToR and asked to do some final research on those topics to ensure that any further sources are identified and included.

Research will be conducted in line with Asylos's internal COI research training and handbook and adhering to accepted COI research standards, including elements of the [EASO country of origin information report methodology \(EASO, 2012\)](#), the [ACCORD COI training manual \(ACCORD, 2013\)](#) and the [Common EU Guidelines for Processing COI \(European Union, 2008\)](#). Researchers should consult these documents throughout the research process and training sessions with volunteers will reflect these standards.

To support the collection of research data, researchers will submit their sources using a live Google doc.

Step 5: Finalising ToR and drafting interview questions

Once the researchers have submitted all of their sources, Asylos's UK Programme Manager(s) will generate a report using Microsoft Word. Whilst editing the report, the Programme Manager(s) will finalise the ToR and arrange the findings according to the headings that were identified. Whilst doing so, the Programme Manager(s) should assess which topics do not seem to be adequately covered in existing COI and consider where expert evidence would be particularly helpful in order to fill these gaps, for example where there is a total absence of COI, a lack of corroborative COI or where there is contradictory COI.

Once the gaps have been identified, Asylos's Programme Manager(s) will draft a list of interview questions for stakeholders to send alongside the ToR for review. The interview questions will address the gaps identified and will be carefully phrased to generate the most accurate and useful answers. These will be approved by the project steering committee.

Step 6: Identifying interviewees / stakeholders

The aim is to identify stakeholders that have extensive professional experience or recently published credible research on the topic and those that have recently been in the country of research.

The [EU Common Guidelines on \(Joint\) Fact Finding missions](#) suggest that:

- Possible sources may include academics, research institutes and think tanks, NGOs, INGOs, UN agencies, experienced news reporters and journalists, community leaders or other representatives, religious authorities, or political parties, government representatives
- It is important that a variety of sources are identified and interviewed so that information can be cross checked
- The guidelines state “try to avoid sources with too similar agendas, standpoints, backgrounds and interests, which can be a challenge – especially when using the ‘Snowballing’. It is generally useful to consult at least three different sources that are independent of each other on each main topic of the ToR”
- It also suggests that interviewing mid-level staff, rather than those in more senior roles, may be more helpful as they are likely to have more experience working on the ground / in the field.

Asylos will source relevant stakeholders by reference to those cited in UK case law, those having published academic material on the issue in question (e.g. JSTOR search), those recommended by the Statelessness Forum and Refugee Legal Group, the European Network on Statelessness (ENS), the Institute on Statelessness and Inclusion (ISI) Electronic Immigration Network (EIN), and the Refugee Rights in Exile Programme. Other project partners with relevant specialist knowledge may also be consulted.

Relevant organisations will be sourced and relevant representatives from these identified by reference to human rights material or media sources, for example published on COI databases such as the Austrian Centre for Country of Origin and Asylum Research and Documentation’s (ACCORD) [ecoi.net](#), UNHCR’s [Refworld](#) or [Reliefweb](#).

Asylos will also seek recommendations from their respective boards of trustees and networks of legal representatives.

All individuals and organisations contacted will be asked to recommend other potential stakeholders for interview.

We will include in the final report a list of all places in which we looked for stakeholders. All researchers will be required to keep a record of any websites, organisations or other sources consulted when identifying stakeholders.

In order to assess the validity of individuals and organisations as a potential source, the following questions will be considered:

- Who is the source and do they have specific knowledge / experience which makes them have expertise on the topic?
- What context do they work in and to what extent might this context influence them or create any bias?
- How does the source formulate any information they present? Is it presented in an objective, neutral and transparent way?

It is anticipated that all stakeholders with the relevant knowledge/experience in question may be contacted for an interview unless there are compelling reasons not to do so. It is our aim to conduct at least 5 interviews per report, from a range of different disciplines. Given that not all stakeholders will respond, a maximum of 15 will be initially contacted by email requesting an interview. Asylos will aim at ensuring that represented in this 15 is a balance between those who are academics, professionals on the ground and government representatives.

Step 7: Instructing interviewees

Once a list of potential interviewees to contact has been agreed, Asylos Programme Manager(s) will send an initial email introducing the project and asking if they would consider contributing their expertise. They may ask project partners for support in making first contact with potential interviewees where their connections may increase the chance of a positive response. Where the Programme Manager(s) do not receive a response from potential interviewees, she will follow up with them by email and/or phone.

If a stakeholder provisionally agrees to take part, the coordinator sends a follow-up email attaching the following documents:

- An edited version of the '[Asylos information sheet for interviewees](#)' [which explains how responses will be used and how the preferred level of anonymity and confidentiality will be guaranteed]
- A copy of the ToR and the interview questions.

The coordinator will also ensure that they are aware that the following can be made available to them on request:

- The COI desk research report
- The Strategic COI Report Methodology.

Once a stakeholder has had sight of this further information and confirms their willingness to take part, arrangements will be made for how they will submit their answers. The information sheet asks the stakeholder to indicate if they would prefer to submit their contribution in written form or through an oral interview. If possible, the coordinator will encourage each participant to agree to an interview (unless interviewees are very experienced in providing written expert testimony for RSD procedures) as we have found that interviews are more likely to wield usable information. Once these arrangements have been made, each participant is asked to provide a short bio, or link to their CV, which will be published alongside the final report.

Step 8: Interviewing stakeholders

Interviews will be conducted by Asylos's Programme Manager(s) with assistance from Asylos volunteers where appropriate. Each interview should be recorded, unless interviewees have indicated that they do not wish for this to happen. In this case interviewers should take notes while conducting the interview. Volunteers conducting the interviews are asked to stick to the following guidelines:

At the beginning of each interview, the interviewer should start by introducing themselves, thanking the interviewee for taking part, and asking for permission to record the interview. Once this has been agreed they should check that the interviewees have received, and have reference to, the report containing our findings from the desk research and have read and understood '[Asylos information sheet for interviewees](#)' (contained in appendix 2) which sets out our recommendations for supplying their evidence. All interviewees have received these guidelines but should be reminded of following key points during the introduction:

- Interviewees should not attempt to answer any questions which fall outside of their expertise or about which they have insufficient information
- Interviewees should make clear if the information they are providing is based on direct experience or other evidence throughout the interview
- If interviewees have obtained the information from other sources they should make sure they confirm where they obtained that information
- Interviewees should not withhold any information on the basis it may detract from their view, rather if interviewees are aware of information conflicting with their views, they should be asked to acknowledge it and explain why their opinion departs from this information.

Before launching into the questions, the interviewer should double check how the source wants to be referenced in the final report and whether or not they would prefer to be anonymous. The interviewee will have already indicated this in their Confidentiality and Anonymity agreement, so this serves to ensure that interviewees are still in agreement with what they initially indicated.

Once the introduction is over the interviewer may commence asking questions, working through the questions in a structured and methodical way. Whilst doing so, volunteers are asked to pay attention to the following points on interview techniques:

- Ensure that your manner remains impartial at all times. Do not use ‘leading questions’
- Be mindful that certain topics might be sensitive to ask
- Do not be afraid to interrupt! This may mean asking for clarification or politely suggesting to move on to the next question if the interviewee goes off topic or it becomes apparent they do have the appropriate expertise or sufficient information to speak authoritatively on the topic
- If it is unclear what information the interviewee is basing their statements on, seek clarification

The EU common guidelines states -

“Additionally, it may also be useful to ask a respondent to clarify or give more factual background to support a statement. This will often be the case where a declaratory statement or Policy position has been given on a particular topic. Requesting additional factual information to backup a statement or position will help give a clearer perspective or a rationale to what has been said, and may also remind the respondent why they have a particular viewpoint. In some instances it may challenge their own assumptions or bring out any potential bias or advocacy on the part of the respondent in a neutral, non-confrontational way.” (Pp. 20-21)

In the interest of source validation, ask the interviewees to identify where any information they rely on can be found by our researchers after the interview.

Step 9: Citing the interviews and writing up the full report

After each interview, the interviewer will transcribe the recording in full and verbatim, with only very minor adaptations being made to enhance comprehensibility. Interview transcripts will be saved under a unique reference number, rather than using interviewees’ names if requested. The document which links interviewees’ names to each unique reference number will be password protected and only accessible to project staff. This transcript will then be returned to the interlocutor, giving them 14 days to sign it off. This transcript should then be sent to the Programme Manager which will be appended in full in the report. If the interviewee wishes certain excerpts to be made anonymous, they will be cited as such in the body of the report and not included in the appended full transcripts.

The report drafters will select relevant excerpts from the interviews and present these under the corresponding research headings in the report alongside the findings from the desk review. The coordinator should use this opportunity to add any additional COI that was mentioned in interviews and then make any further edits to the report, ensuring that the following points have been addressed:

- General formatting should be in line with Asylos’s ‘research handbook’
- Each source should be introduced separately with a concise summary identifying any patterns in convergence or disagreement in the sources consulted, rather than summarising the content of the sources
- Ensure the list of sources consulted is complete, with access links and information about when the sources were accessed (this is crucial for the user of the report to trace back the original source)
- To further aid transparency, it is crucial to provide page numbers for each excerpts to facilitate access to the original source
- The final report should include a note on who instructed the interviewees and when (month and year), and a list of the documents the interviewees were provided with
- A full transcript of each interview should be included as an appendix at the end of the report, excluding any excerpts that the interviewee wished to keep anonymous
- Fully anonymous interviews are included as an appendix without any further identifying information

Following final edits, the report will be sent to the Steering Committee for review. The committee will use this opportunity to revise and update the findings from the desk based research. Once the committee have made their edits, the full report will be sent to each stakeholder detailing how they have been cited, with a copy of their interview transcript / written submissions, to sign off. Stakeholders should be given a 14 day deadline for this, after which we will assume that they are satisfied.

Once the report is published, interviewees can no longer withdraw but we will be able to make additions by issuing addendums, should they wish to provide more up to date sources or information which was not previously available to them.

Step 10: Dissemination

Once the report has been signed off, the Programme Manager(s) will be responsible for publishing it on Asylos's website, ecoi.net, Refworld and EIN (Electronic Immigration Network). Efforts should also be made to promote the report through sharing the report via the Statelessness Forum and RLG mailing list. The coordinator may also consider promoting it through written blogs on websites such as Free Movement and EIN.

Step 11: Evaluation of impact

This information will be made publicly available to all, so that it can be reviewed and used by asylum seekers, Home Office case workers, legal representatives and appeal court immigration judges alike. The reports will be accessible internationally, meaning they will also be used by and influence institutions like the UNHCR and the European Union Agency for Asylum, as well as decision makers in other countries' asylum determination systems.

Asylos will track progress and impact throughout the project cycle by:

- Recording the number of downloads from its website and asking ACCORD for data from ecoi.net
- Collecting feedback from Asylos' networks of legal representatives to review how well the report met the information needed we identified, as well as how the report has been used.
- Tracking how the reports have been used by decision makers (e.g. in Home Office policy documents, UK case law, EUAA reports).

Learning will be fed back into the project on an ongoing basis and an evaluation of its overall impact will be shared with interested stakeholders on its completion.

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C. Interviewee Biographies and transcripts

(in alphabetical order)

Disclaimer: Please note that all interviewees have provided their own biography details. These have not been authored by Asylos and, as a result, they do not follow a standard format.

Mr Riad Al Khouri

An expert on West Asia & North Africa, Riad has for five decades trained, advised, lectured, and researched on a wide variety of topics in or on the region and its periphery, including migration, culture, politics, refugees, and human rights publishing on them and others, as well as making media appearances. He has also appeared as court witness or made expert submissions on cases involving various of the region's countries on a range of topics such as asylum-seeking.

Riad holds a High School Diploma from l'Ecole internationale de Genève; BA from the American University of Beirut (AUB), School of Arts & Sciences; and MLitt from the University of Oxford, Faculty of Social Studies. He was visiting scholar at the Carnegie Middle East Center, Beirut; strategic advisor to the William Davidson Institute at the University of Michigan, Ann Arbor; dean, trustee, and council member at the Lebanese French University, Erbil; Professor at the Prince Hussein School of Politics and International Relations, the University of Jordan. Amman; and Lecturer at AUB, and at Beirut University College (now the Lebanese American University) Beirut.

Among other current activities and positions, Riad is Member of the Board of Directors of the Global Challenges Forum Foundation, Geneva; Country of Origin Information expert for the Fahamu Refugee Program, Oxford; Board Associate at SUNSGLOW Global Training in the Rule of Law, New York City; and international advisor to the president of Questscope (a UK-registered NGO dealing with refugees) Amman; as well as member of the Council for British Research in the Levant, among other bodies and organizations.

He has undertaken assignments as principal or subcontractor for the Jordan Center for Human Rights; the Lebanese Center for Policy Studies; the International Organization for Migration (IOM); the governments of Ras al Khaimah and of Sharjah, United Arab Emirates; the UK Foreign & Commonwealth Office, and Department for International Development; the United States Agency for International Development; as well as many other private, public, and civil organizations including law offices in the UK, US, and elsewhere. Riad has conducted workshops, lectured, or appeared in panels on-site at the Carnegie Foundation, Brussels, and Washington DC; Case Western University, Cleveland; the European University Institute, Florence; Temple University, Philadelphia; Stanford University, Palo Alto; and the Middle East Institute, Washington DC; as well as off-site for the Los Angeles World Affairs Council; Columbia University; the University of Chicago; and the University of California, Los Angeles, among many others.

His mother tongue is Arabic, and he is also natively fluent in English, with a strong working knowledge of French. Married, with two children, Riad lives in Amman.

Dr. Jasmin Lilian Diab

Dr. Jasmin Lilian Diab (she/هي) is a Canadian-Lebanese Scholar and Expert in Migration, Gender and Conflict Studies. Dr. Diab is the Director of the Institute for Migration Studies at the Lebanese American University, where she also serves as an Assistant Professor and Coordinator of Migration Studies at the Department of Social and Education Sciences. In 2022, she became the United Nations University Centre for Policy Research's first ever Global Fellow on Migration and Inequality.

She has served as a Visiting Professor at the United Nations-mandated University for Peace at their Department of Peace and Conflict Studies, an Adjunct Faculty Member of International Migration and Refugee Law at the Global Institute of Law, as well as a Guest Lecturer at McGill University, Leiden University, and the George C. Marshall European Center for Security Studies. Dr. Diab is a Research Affiliate at the Centre for Refugee Studies at York University, a Global Fellow at Brown

University's Center for Human Rights and Humanitarian Studies, as well as a Visiting Fellow at University of Cambridge and the Centre for Lebanese Studies' British Academy Bilateral Research Chair on Education in Conflict.

In addition to serving on the boards of organisations working in the migration and development space, and the editorial boards of several leading journals, Dr. Diab has consulted for UN Agencies, international humanitarian organisations and governments, and has assisted in evaluating humanitarian programming, leading research in conflict settings, leading gender analyses, and developing strategies for organisations targeting hard to reach areas across the MENA region.

She holds a PhD in International Relations and Diplomacy with an emphasis on Asylum, Refugees and Security from the Center for Diplomatic and Strategic Studies of the School of Advanced International and Political Studies at INSEEC Grande Ecole in Paris, and holds graduate degrees in International Law, Human Rights and Feminist Writings.

Mrs Katherine Harbord

Ms Harbord is a lecturer in Human Rights at Liverpool John Moores University. For a number of years, she has worked pro bono for a variety of organisations and charities, conducting fieldwork and writing reports on subjects ranging from gendered education to religious identity. Her main focus is on Israel, the West Bank and Gaza. Ms Harbord has particular expertise in the areas of ethnicity, sexuality, religious discrimination and human rights. She has also conducted research amongst the incarcerated and "collaborators" and has an in-depth knowledge of the situation on the ground in the region, both in respect of state and society. She speaks Arabic and Hebrew, as well as English.

Mrs Walaa Kayyal

Walaa Kayyal pursued a Master's degree in Public Health concentrating in Health Management and Policy with a certificate in Public Health in Conflict and Protracted Crises from the American University of Beirut. Involved during the last 6 years in Research and monitoring and evaluation of humanitarian projects with Syrian refugees, Palestinian refugees, vulnerable Lebanese, and Stateless individuals in Lebanon with multiple universities, UN Agencies, and international Non-Governmental Organizations.

Relevant to this project Walaa was a Country Researcher at the University of Melbourne and consulted on the Statelessness in Lebanon Project: Advising on the research design and methodology for the country case study, facilitating the fieldwork in Lebanon, conducting data collection, analyzing field data, and writing the country case study report. She now works as a MEAL specialist and advisor for several organizations in Lebanon.

Mr Ziad El Sayegh

Mr Ziad El Sayegh is an expert on Public Policies and Refugees – Civic Influence Hub Executive Director. A researcher on the Palestinian Refugees in Lebanon and Peace Negotiations in the Middle East, on Syria Refugees, on Labor Policies and Social Protection. Steering Committee Member of the Lebanese – American Coordinating Committee (LACC). Expert – Member of the Political National Committee working on Palestinian Refugees' issue at the Presidency of the Council of Ministers (October 2016 – March 2022). He was a Senior Policy Fellow at the Issam Fares Institute – IFI/AUB (December 2019 - December 2020). Member of ACT Alliance Peace and Human Security Reference Group-Geneva (November 2019 – December 2020). Policy Advisor in Adyan Foundation (2017-2019). Senior National Policy and Communication Advisor to the Ministry of State for Displaced Affairs (February 2017 - January 2019). Coordinator of «Better Lebanon Initiative» (December 2016 - December 2020). Policies and Communication Advisor to the Middle East Council of Churches – MECC (Sept 2018 - Dec 2020). Member of the Strategic Committee at the Maronite Center for Documentation and Research - MCDR (Sept 2018 – Sept 2021). Policy and Communication Advisor for the President of the Lebanese – Palestinian Dialogue Committee in the Lebanese Presidency of the Council of Ministers (2006 - 2009). He then was the Policy Advisor and Team Leader of the Lebanese Minister of Labor (January 2010 - June 2011), and the National Policy Advisor to the International Labor Organization – (ILO) (September 2011 - June 2013). He was also a Strategies' Communication Advisor for the Middle East Council of Churches, the Syndicate of teachers in Lebanon and the Health Establishment of the Druze Community. He has specialized studies in the Palestinian Refugees issue in Lebanon, Middle East Peace negotiations, Labor and social Protection issues, and Syria Displaced. He published in Public Policies, refugees and migrants.Co-author of "We Choose Abundant Life: Christians in the Middle East: Towards Renewed Theological, Social, and Political Choices".

Interview transcripts (in chronological order)

Written answers sent by Dr. Jasmin Lilian Diab, Director of the Institute for Migration Studies at the Lebanese American University, on October 6, 2022

Asylos: Do you know whether after acquiring a third nationality, i.e. not Palestinian or Lebanese, Palestine Refugees in Lebanon are still entitled to the travel documents issued by the Lebanese authorities or not?

Dr. Jasmin Lilian Diab: They are not entitled to these documents, as these documents are only issued as a temporary measure before obtaining citizenship – whether this be Palestinian (based on the right to return) or other. Once a third nationality is obtained visa requirements based on what that third nationality is.

Asylos: How do checkpoints affect stateless Palestinians' free movement?

Dr. Jasmin Lilian Diab: Stateless Palestinians remain at risk of detention or arrest if they reach a checkpoint and do not have documentation. This is why a significant number of them opt out of moving from region to region entirely. Many stateless Palestinians avoid checkpoints entirely, and remain in the camps/informal tented settlements where they are located. Presently, though they are detained/arrested for not having documentation, the Internal Security Forces (ISF) has been known to release them after paying a fine. There are several main checkpoints across the country that do not move, such as those located in the North and South of the country, and ones before and after specific areas around the Beirut airport. These checkpoints are permanent (largely) and are on the radar of refugees, stateless persons and other people who wish to avoid them. The issue is with ad hoc checkpoints that are set up following political tension/a political event, or in the case where there is a perceived security threat, or the army/police is looking for a specific profile of people. In many cases, this is where the arrests happen (i.e. when the checkpoint is not routinely located there).

Asylos: According to you, how does residence status affect the possibility of returning to Lebanon? I.e., which right to return does each group of stateless Palestinian have?

Dr. Jasmin Lilian Diab: Palestinians that leave the country are always at risk of not being permitted to re-enter. This is less likely if they have the Lebanese government issued PRL document; however, there have been many cases where they have not been permitted to enter. For those who leave the country through irregular means, or following a rejected asylum application in a third country, they are typically not permitted to re-enter Lebanon.

Asylos: We found information relating to the obstacles to the protection of Stateless Palestinian children (risk of child marriage on the rise, children reported working to support the household...) but no information on the infrastructures that might be in place (on the state level or UNRWA level) to protect children from these types of harms. A single source mentioned:

“12.2. Palestinian refugee children, especially those living the camps, do not benefit from the Juvenile Protection Law or the Law on Domestic Violence

Article 1 (Paragraph 1) of Law 422/2002 on the protection of minors in contact with the law or those at risk deprives refugee children from its legal protection and jurisdiction to intervene for their protection due to the absence of due process inside the camps, where children are subjected to several forms of violations.”

(Source: Najdeh Association, Development Action Without Borders (Naba'a), Palestinian Human Rights Organization (PHRO) et al, “[UPR 2020: Palestinian Refugee Rights in Lebanon](#)”, July 2020, p. 7, last accessed: 1 September 2022)

→ Do you know the law this source refers to and can you explain the “absence of due process inside the camps” that it mentions?

Dr. Jasmin Lilian Diab: This law, though intended to cover the rights of all children from all nationalities, unfortunately does not extend to refugees as much as it outlines. This has been the case with Syrian and Palestinian children who largely fall outside the scope of the law in many cases. For children residing in camps, their largely “autonomous” nature, coupled with the inability of the Lebanese government to be actively present/engaged with them, renders it increasingly difficult for policies and legal frameworks to extend to stateless, migrant and refugee children. On a broader level, the overall culture of impunity in Lebanon, at all levels, renders it close to impossible to enforce the law, and has pushed many families to resort to negative coping mechanisms that the government strategically does not interfere with. i.e. sending children to work for instance, etc.

Asylos: Sources reported that the Minister for Labour, Moustapha Bayram modified in December 2021⁵⁴ the rules in place, authorising Palestinians to work in union-regulated professions.

Dr. Jasmin Lilian Diab: This was never enforced, and reportedly revoked.

Asylos: We found several sources relating to the exclusion of Palestinian refugees from the right to own real estate by law 296/2001. Are any steps currently being taken to improve Palestinians’ access to property?

Dr. Jasmin Lilian Diab: There are no actions in this regard – nor in the areas of access to bank accounts as well. This is the main issue here associated with property ownership. On a broader level, the “temporary” nature of the Palestinians stay in Lebanon (as the Lebanese government insists) prevents them from attaining their property rights. The Lebanese government views this possibility as grounds for them staying more “permanently”, and for this reason, this right will not be negotiated nor extended to them in the near future.

54 Correction on date: the decree in reference was published on 25 November 2021.

Interview with Mr Riad Al Khouri on October 7, 2022

Asylos: The first aspect where we are missing information on concerns the rights to a nationality, for children of refugees. We found a UNICEF report saying that birth registration procedures are complicated and costly. Would you be able to give us a more detailed description of the different steps it requires and the costs it implies?

Riad Al Khouri: I am familiar with this issue from the point of view of the nationality. The procedure in most Arab countries, including Lebanon, is for the children to inherit the nationality of their father, including in my country, Jordan. And this is the case with the refugees in Lebanon. If a Palestinian refugee woman marries a Lebanese man, then her children become Lebanese nationals. But if a Palestinian refugee man marries a Lebanese woman, then the children do not get Lebanese nationality, and this causes problems. Now about the birth certificate, I have no direct information, except to note that the cost of these procedures and the time they take in Lebanon is respectively high and complicated, including for birth certificates, but also covering other issues. Go ahead, please.

Asylos: Concerning freedom of movement, we found information concerning travel documents, notably reports by the Dutch government showing that Palestinian refugees in Lebanon can apply for a travel document from the General Security of Lebanon and that it requires an ID card and UNRWA registration cards. Does it mean that these travel documents are only available to Palestine refugees if they need to register with UNRWA, or is it also open to other types of status?

Riad Al Khouri: Now, our conversation is strictly about Palestinians, is that correct? We are not talking about Syrian or other refugees.

Asylos: We are not talking about Syrian refugees, but we are interested in Palestinian refugees from Syria who moved to Lebanon after the war.

Riad Al Khouri: Okay. In both cases, the procedures for these people, whether they are Palestinian refugees in Lebanon or Palestinian refugees from Syria who came to Lebanon at various times over the past few years, the procedure is difficult and complicated. And in any case, once you have this travel document, there is not much you can do with it in terms of travelling without a visa or obtaining a visa to travel.

Asylos: Okay, so your information relates to after the moment where you obtain this document, you are saying that it is not well-enforced.

Riad Al Khouri: Exactly. Before you obtain the document, there is a procedure to go through which can be time-consuming, and otherwise, it is not easy. After you obtain the document, there is not much you can do with it either to travel to other countries without a visa or to obtain a visa to travel to other countries. It is not a useful document.

Asylos: We have a section of the report concerning checkpoints and the way they affect stateless Palestinians' free movement within Lebanon. We were wondering if you have more information on where the checkpoints are and what happens on arrest and which groups suffer discrimination, on which grounds.

Riad Al Khouri: I think that this may have been a problem in the past. It is no longer a major problem. Now, to clarify, we are talking about two distinct kinds of checkpoints here. One would be an official checkpoint of the Lebanese army or the Lebanese police. And there are few problems or restrictions in this regard, including arbitrary arrest. I do not think this is a real problem. The other checkpoints are informal. Lebanon is full of militias. These are not government bodies, they are private. They may, in a certain area, be representative of people. In other words, they are not just criminal gangs, they are somehow politically or socially based, and they may from time to time have checkpoints. But again, talking about the present, this is not a major problem. It was a major problem in the past going back to the 1970s in '80s, it would be possible to hold people or even imprison or even kill at these checkpoints, including Palestinian refugees. But this was 40 years ago. We are talking about the present. This is no longer a major problem.

Asylos: All right. Did I understand you correctly that you are saying that also the second type of checkpoints potentially held by militia and private armed persons are no longer a problem?

Riad Al Khouri: The quick answer is yes. First, there are fewer of them. They used to be extremely common. Now, there are very few of them. Second, they tend to be more relaxed today, more lenient, unlike in the 1970s and '80s, for example.

Asylos: Still concerning freedom of movement, are Palestinians free to leave Lebanon on a temporary or a permanent basis?

Riad Al Khouri: I do not have detailed information on this. It is correct to say that it is almost impossible for people who do not have the proper documentation to leave and then try to come back. Beyond that, the overall situation about residence, about travel, and about travel documents is still difficult. It has always been difficult. It was difficult in 1948 when these refugees first arrived.

Asylos: It is still difficult today?

Riad Al Khouri: It has not really changed.

Asylos: Moving on to our section on health. We have, of course, a very dense section on COVID-19 and how it affected the situation of stateless Palestinians in Lebanon. Are you aware of other communicable diseases affecting stateless Palestinians specifically?

Riad Al Khouri: Yes. There is now a major problem with an outbreak of cholera in Syria. This happened over the last few weeks. The reason for this outbreak is due to polluted water. The water is not clean. This is partly because of the fighting in Syria and the situation of violence and militias and foreign armies and so forth, partly because of the gradual breakdown of public services that has been going on now for decades, even before the fighting started. It is quite likely that this is going to spread to Lebanon if it has not' spread already. And it will be from Syrians, including Palestinian refugees coming from Syria into Lebanon. Last month, the head of one of the Lebanese churches, the main Christian sect in Lebanon, the Maronite Catholic Church, called for the Syrian refugees to leave Lebanon. And included in that would be the Palestinians, refugees who came from Syria to Lebanon over the past few years. I believe one of the reasons is now the spread of disease, including cholera. And this is a very new issue. You will have to look in new sources. There will not be any research on it. It suddenly came up over the past few weeks.

Asylos: Now, moving onto the section on child protection and access to education for children, we found information relating to the obstacles to the protection of stateless Palestinian children, such as risk of child marriage, which is on the rise, children reported working to support the household, but no information on the infrastructure that might be in place to protect children from these types of harm. Do you know of any such infrastructures or protecting bodies?

Riad Al Khouri: First, it is important to note that this problem cuts across the Lebanese population. It is not just Palestinian refugees living in Lebanon, it is other poor people living there, particularly Muslims. Lebanon is divided into two major groups, Christians and Muslims. The Christians tend to be better off economically. They have a higher standard of living, including higher standards of public health in their communities, and community care about issues such as child labor, child marriage, et cetera. The Muslims - and most Palestinian refugees are Muslim - tend to have lower standards, more common child marriages, more common child labor, and others. And this problem has been getting worse over the past few years for economic reasons. Child labor is an obvious example. But child marriage is also an economic issue, whereby you sometimes get rich people, particularly from the Arab Gulf, coming to Lebanon and offering families substantial amounts of money for a young bride who may be below the legal age of marriage. And this is becoming more common now. I am Jordanian, as you know, and I have noticed this problem in the Syrian refugee community in Jordan, something that is increasing and is also becoming more common now in Lebanon. There are structures, institutions, and others, for their protection. I happen to have a friend in London who is the head of an NGO dealing with child brides. You're welcome to talk to her. I think you can find her contacts on the web. Her name is Lakshmi. She is originally from India, but she was born and bought up in Switzerland, and now she lives and works in England. Her first name is Lakshmi, L-A-K-S-H-M-I, and the last name is Sundaram, S-U-N-D-A-R-A-M. Her organization is Girls Not Brides. It is a big, well-established, well-funded NGO based in London, and they may have more information on this. But as I said, this is becoming more common among the refugees in the region, including Syrian refugees in Jordan, and Syrian refugees coming to Lebanon, Palestinian refugees from Syria in Lebanon, and Palestinian refugees who have always been in Lebanon, and the explanation is economic. When you get extreme poverty, this kind of thing increases.

Asylos: Since the spread of COVID-19, NGOs based in Lebanon saw a rise in child marriage.

Riad Al Khouri: I do not know about that. I have heard no direct connection between COVID-19 and child marriage. If you found information on the web, that is fine.

Asylos: Thank you very much. Now, moving on to the section on access to the labor market, we found sources relating to legal restrictions on Palestinians' rights to work in Lebanon, especially due to the ban on certain high wage liberal professions outside the camps. We also found information according to which amendments came to the Lebanese Labor Law and Social Security Law in 2010, which waived work permit fees for Palestinian refugees born in Lebanon. Does it mean that Palestinians still need to obtain a work permit to work, but do not have to pay for this government paperwork any longer? This would be a first question, and the second question, do you know what is motivating the passing of such amendments, if you are aware of them, and whether they had a positive impact on Palestinian refugees' access to the labor market?

Riad Al Khouri: I am not familiar with the details of this issue. However, I can tell you that in manual labor, about low-skilled labor, there is absolutely no problem with Palestinians doing low-skilled labor completely informally for low pay. However, once you get into the more formal, official let us say, work, whether it is clerical or professional, then there is a problem, but I am not familiar with the details of the work documentation and so forth. I do know there have been campaigns in Lebanon over the last few years in the direction of liberalizing the work permit regime, but as I said, I am not familiar with the details. Back in the '70s and '80s, there was a specifically anti-Palestinian portrayal, public portrayal, public statements by either officials or by politicians and other public figures who were not necessarily officials but had a high profile. There was a powerful anti-Palestinian mood in the country in those days. This is no longer the case. Having said that, in the old days, the mood was also against the Syrians. And of course, as always in Lebanon, if you happen to be rich or well-connected, then this issue did not come up. Therefore, the Palestinian who is poor, the Syrian who is poor, is the one subject to criticism and discrimination today. The anti-Palestinian mood in specific is less than it was in the past. It is still there, but it is no longer a major issue compared, for example, to the anti-Syrian mood. And as I mentioned a minute ago, the Maronite Patriarch the Maronite Patriarch is a member of the Vatican College of Cardinals. He votes in the election of the Pope of the Roman Catholic Church. So, this is not a junior figure. This is a high-profile figure with an international presence - he made a statement telling the Syrian refugees to leave Lebanon. And this is the feeling among people. No such statement exists now about the Palestinians.

Asylos: Would you say that stateless Palestinians are still more vulnerable to arbitrary arrest and detention by Lebanese authorities than the rest of the population?

Riad Al Khouri: They were. I do not think they are anymore. The Syrian refugees are more liable, more vulnerable. But the Palestinian case is no longer major issue. There is a key point here. Most Palestinians have a connection to an armed militia, an armed Palestinian group. They were practically running the country in the late 70s, early 80s. They are still there, and they are powerful inside the refugee camps. And they have influence outside the camps. So, this is a counterbalance to the state and private militias in Lebanon. In other words, the Palestinian will directly or indirectly get protection from his own Palestinian militia, even though he is not a militia member. Somebody in his family will be. And there will be balance, let us say, to counterbalance the effect of a Lebanese militia or even Lebanese army or police.

Asylos: Would you say that this is the case only for Palestinians living in camps or also outside the camps?

Riad Al Khouri: Every Palestinian somehow has a connection, the ones in the camps more so because the militias are openly active inside the camps, according to agreement with the Lebanese government. Outside the camps, it is more subtle. It is more indirect, but it is still there.

Asylos: Do you have any information on harmful detention or the types of conditions in detention for Palestinians?

Riad Al Khouri: I do not think there is any major difference today in Lebanon between conditions of detention. You are now talking about government prisons and government detention, yes ? I do not think there is any difference between how a Palestinian is in jail and how a Lebanese or a Syrian refugee or anybody else is.

Asylos: Moving on to the section on access to justice and state protection, do stateless Palestinians reach out to the police in case they have a reason to do so? And if not, why won't they?

Riad Al Khouri: If we are talking about normal criminal and public security issues, yes. I do not think there is any difference. If somebody's house is subject to robbery and he is a Palestinian, he will report it to the police. If we are talking about things to do with politics about a militia, then no. It becomes more complicated. In other words, to repeat the example, if I am a Palestinian refugee, somebody robbed my home, then I will report it to the police in a normal way. There will be no discrimination or other problem. But if I am a Palestinian involved in a political dispute with another person, whether it is Syrian, or Palestinian, or Lebanese. And for example, there is armed conflict, I was subject to armed harassment for political reasons, then, yes, there would be a complication in reporting this to the police and the police acting. I think they would not get involved because, in the first place, the victim would not report the case. If he reported it, the police would at once realize that this is a political issue to do with militias, and they would not get involved. Do not forget that in Lebanon, the police and the army have tended to have weaker powers than in most other Arab countries. Most Arab countries have strong security and military structures. Lebanon is the major exception. So, the police and the army in Lebanon are not as powerful as they are in other developing countries. And therefore, if a security or political issue arises, then the police would not be involved in the same way that they would in another Arab country where this would not be acceptable.

Asylos: Have you known of prosecutions and potential convictions of individuals who might have humiliated, or discriminated, or taken violent actions towards Palestinian stateless persons?

Riad Al Khouri: The quick answer is no; I personally do not know of them. But you must understand something. I am not a refugee, and I belong to a certain socioeconomic class such that I do not interact very much with poor people in general or with refugees. I am familiar, partly because of my work, partly because of my background, but I personally do not know of examples of discrimination or other problems facing Palestinian refugees in Lebanon with the authorities, with the police, and security. I suspect that they exist. But again, this is not as severe as it was in the 1970s and 1980s.

Asylos: Thank you for your transparency. The question was hinting at media coverage, for example, of such a case that might have come to your attention. But I understand from your answer that this is not the case.

Riad Al Khouri: The media in Lebanon is no longer really interested in these issues. The media is now more interested in the Syrian refugees.

Asylos: Do you know whether human trafficking disproportionately affected stateless Palestinians?

Riad Al Khouri: You must understand something. Among poor people and among Muslims, child marriage is not such a drastic issue. It is normal. If a rich man comes to you and wants your 12-year-old daughter, who is nevertheless biologically a woman. If she is no longer biologically a child, she is biologically a woman, then there is no severe problem in having her married, particularly if the husband is rich and he offers the family a good sum of money. And quite often these marriages end up being happy.

Asylos: A question on hardships faced by specific profiles of stateless Palestinians. So, we are trying in the report to uncover the situations of specific groups such as persons with disabilities, LGBTQ persons, Palestinians, as well as people with criminal convictions, for example. And we could not find any statistics recorded on the incidents of stateless Palestinians with disabilities and the form of disability. Are you aware of whether this type of statistics is coming from the Lebanese state or by other organizations?

Riad Al Khouri: There has been a tendency in Lebanon over the past years to pay more attention to the problems of the Palestinian refugees. Paying more attention is the first step. Doing something is the next step. And that has not really happened yet. But at least there is more awareness among the Lebanese and inside the Lebanese state, the Lebanese government, Lebanese officials. Now a critical point to note here, because of UNRWA and because of international NGOs and for other reasons, Palestinians tend to be slightly better off in this respect than the Lebanese themselves. The Lebanese until recently had a much higher standard of living than most other Arabs comparable to Europe. Now the economy has completely crashed and the average Lebanese can no longer afford proper medical attention and so forth. The Palestinians are a little bit insulated from this, partly through their organizations, through UNRWA and through international NGOs.

Asylos: But if I understood correctly, not all Palestinians receive help from access to UNRWA services.

Riad Al Khouri: Yes. UNRWA has for years been suffering from financial and other problems. However, there is no comparable organization for the Lebanese people. The Lebanese people have Lebanese government services, whether they are health or other services. But these have suffered tremendously over the past few years because of the weakness of the Lebanese state and for economic reasons also.

Asylos: Do you have any idea how stateless LGBTQ Palestinians are living in Lebanon?

Riad Al Khouri: I do not know much about this topic. Lebanon has a better record than most Arab countries about such people. But there is still discrimination. And the discrimination cuts across nationalities. Whether you are Lebanese, Palestinian refugee, Syrian refugee or other, there is discrimination, particularly among the Muslims. And most Palestinian refugees are Muslim. There are Christian Palestinian refugees, but their situation is much better than that of the Muslims, including assimilation, getting Lebanese nationality, and other matters.

Asylos: Are you aware of any added penalty, for example, deportation for stateless Palestinians who committed offenses in Lebanon or outside of Lebanon?

Riad Al Khouri: I do not think it is legally possible to deport a Lebanese-based Palestinian refugee. They are refugees. They fled Palestine and came to Lebanon. Lebanon does not deport such people.

Asylos: We reached the last section on political participation and protests. Can Palestinians gather to protest, or hold a political office in Lebanon? Do you know stateless Palestinians who ever managed to become public political figures?

Riad Al Khouri: The quick answer is no. However, before 1948 I know from my own personal experience with family and friends, among others, the line between Palestinian and Lebanese was not serious. There were intermarriages, business partnerships, and other relations, so that today you have people in Lebanon who are politicians or in office who are originally Palestinian. However, these are people-- A, they are bourgeois; they are not poor people. And B, they were Lebanese citizens before 1948, but they are originally Palestinian. And this point appears. A Lebanese will say so and so is originally from Palestine, even though he was born and brought up in Lebanon with Lebanese nationality. They will still regard him as originally Palestinian. Having said that, they can be in positions of responsibility or power like Lebanese who made money, which is the key thing in Lebanon. If you are rich, then all these other issues become secondary. Now, about the poor Palestinian refugees, I do not know of cases where they have become part of the Lebanese society, political system, and so forth. They may have power or a high profile within the Palestinian camps and in the Palestinian community, but not outside.

Asylos: considering the first group you are talking about, people of Palestinian descent who climb the ladder within those Lebanese political institutions, would you say that they entered the majority political institution, or do they remain in the opposition?

Riad Al Khouri: This depends more on the sects. I mentioned minutes ago. The most powerful sect in Lebanon is the Maronite Christian sect which is under the Vatican. Somehow, under the Vatican. They are the sect of the commander of the army and the president of the republic. The other sects, including the Muslim ones, have, informally or formally, access to certain positions in the state - certain power. The Palestinians tend to be of the Sunni Muslim sect and as such there may be intermarriage or business partnerships with Lebanese Sunni Muslim. And as I mentioned a minute ago, people from these groups before 1948, who became Lebanese, married Lebanese, or had a strong business presence in Lebanon, may today have power as individuals or families. But for the Lebanese refugee today from a poor background, to become part of the Lebanese political structure is almost impossible.

Asylos: According to you, do stateless Palestinians experience any form of reprisals because of gathering, protesting, or gaining a public profile for speaking on a political issue. Do you remember any gathering specifically around the identity of Palestinians? Palestinians who would gather publicly to make their cause visible. And in this case, were they arrested, detained, harassed in any form?

Riad Al Khouri: This was the case in the 1970s and 80s. It is no longer the case. Palestinians might undertake demonstrations inside the camps. And you must remember, the camps are officially or otherwise, a state within a state. The Lebanese government, Lebanese security, Lebanese public services do not work in the camps. The camps can be quite big. We are talking about tens of thousands of people in one camp. And there are camps around Lebanon. Outside the camps, almost nothing.

Interview with Mrs Katherine Harbord on October 13, 2022

Asylos: My first question relates to the legal and policy framework and its implementation in Lebanon. We found information on rights to nationality for children of stateless Palestinian parents. We have notably an excerpt from a UNICEF Lebanon report on the situation of children and young people in the Lebanese crisis from 2022, referring to complicated and costly birth registration procedures. Can you give us a more detailed description of the different steps it requires and the cost it might imply?

Katherine Harbord: So I don't know what the cost is. But the reason I think that it's described as complicated particularly is because it's a very bureaucratic process, or at least to European eyes, it's a very bureaucratic process that requires lots of forms and authorisation and you need to get this form stamped, and then you need to go away and that form entitles you to another form and the back and forth. And because of the problems of the state structure in Lebanon, particularly at the moment, because of the financial crisis and other things that are going on, I think this just compounds the problems. So I don't know how many steps there are. It's been a little while since I last talked with someone about this, but my understanding was you needed to register the birth sort of locally and then obtain a form, take that to the district office and register it there as well. And then after that it kind of goes to be dealt with at a higher level. But I don't know the exact steps of it. It's quite a prolonged process. It sort of takes months rather than weeks is my understanding. But that also may be not because of inherent the process itself, but more because of the other problems involved in interacting with state structures in Lebanon. And it doesn't confer registration of birth. You need to do it like it's a requirement to do it, but it doesn't necessarily convert any benefits or status on the child. If you're a stateless Palestinian refugee yourself and you register your child, they don't receive, for example, Lebanese nationality or something like that just by virtue of being born in Lebanon. And once you have the wrong in inverted commas status on your registration card or your ID documents that causes problems for everything else whether it's accessing hospitals or employment or education.

Asylos: The next question relates to freedom of movements. We found reports by the Dutch Ministry of Foreign Affairs that builds on confidential sources and informs us that Palestinian refugees in Lebanon can apply for travel document from the general security, but that requires an ID card and an UNRWA registration card. On the other hand, if this person acquires a certain nationality other than not Palestinian or Lebanese, the person is no longer entitled to the travel documents issued by the Lebanese authorities. Can you elaborate on this?

Katherine Harbord: Sure. I last spoke about this perhaps two years ago with somebody that I knew who worked at the Ministry of Internal Affairs, who worked in a fairly low level but processing these kind of queries, who wanted to remain anonymous. Without pointing me to a legal paragraph, what they said confirmed that applying for travel documents requires an ID card and an UNRWA registration card. The problem is of course that not all stateless Palestinians are necessarily eligible to be registered with UNRWA. So if you are UNRWA-registered and you have a Lebanese ID, then you are eligible to apply for a travel document. If you already have a travel document from somewhere else, for example, an Egyptian travel document, of course, you aren't eligible for a Lebanese travel document. You must travel on your Egyptian equivalent or your Jordanian equivalent or whatever. So it's a solution purely for Lebanese registered, UNRWA-registered stateless Palestinians with no other nationality or any kind of travel documents. It also isn't automatic. So just presenting your ID card and your UNRWA registration card doesn't entitle you to receive these documents, but it entitles you to be considered to receive these documents. So it's possible and assuming there are no security issues for this individual, it's my understanding that these are granted, but it's certainly not automatic. And if you hold any other travel documents or indeed another nationality, then you aren't entitled to be considered for these. So it's a very small subset of 1948 refugees and their descendants only. If you're a 1967 refugee, it's technically possible, but my understanding from this contact was that ordinarily, these people aren't able to move freely out of Lebanon because of it's very difficult for them to register with UNRWA. Difficult to impossible. My contact was speaking about how it works in practice. I don't know what they would consider as a "security issue", but I made the assumption this was a case that also the individual involved was suspected of belonging to militant, banned groups. So I assume he meant in that context. But of course, there is a difference also between somebody who is considered to be a security issue and that actually is a security issue. And I think I don't suspect the bar is as high as that. So although this was in connection with, like I say, somebody suspected of being part of a banned group, I suspect the bar in practice would be lower than that, not necessarily anyone who has come to the authority's attention, but I would imagine it could be expanded out to include kind of criminal concerns as well. But that is supposition.

Asylos: Do you know the proportion of Palestinian refugees in Lebanon who do not have registration with UNRWA and were still able to access travel documents?

Katherine Harbord: I mean, I would assume it is vanishingly small, but no, I don't even know who would have those figures.

Asylos: Moving on to the subject of checkpoints. Do you have any information on where checkpoints might be located, who tends to be arrested and what happens on occasions of arrests?

Katherine Harbord: So I have a very little bit of information, but this relates to checkpoints in the north, near to the camps near Tripoli. What I have been told by stateless Palestinian asylum seekers from Lebanon is that Lebanese armed forces checkpoints or Lebanese police checkpoints are not much of a problem any more, problems rather come from militia, Hezbollah and others. It was certainly my interlocutors' understanding that they felt that Palestinians, those with Lebanese registration or Palestinians from Syria, were disproportionately being detained at checkpoints and sometimes stripped of their freedom of movement, sometimes detained. Generally speaking, my understanding is that they will be arrested or detained the first time and usually either given a warning, sort of, "We don't want your sort here, or you can't pass through here." And if they persist, then they might be sort of roughed up a little bit, slapped or beaten. This was corroborated by three individuals that I've spoken to separately about this in the last few years. As I say, they were all connected with the Tripoli region. But I heard similar stories from each of them, which led me to kind of conclude that there probably is some consistency. In one case, the man that was detained was being beaten. He was actually beaten quite badly, and this was because he was a Sunni man who was married to a Shia woman and it was a Shia militia that detained him. So the problem, in that case, was not his Palestinian identity if you like, but rather a sectarian question. All of them felt they were being discriminated against because they were Palestinians, but there may also be other elements to it. It may not be quite as straightforward as that. I've heard of one person who was arrested but this is going back about five or six years. He was arrested by the police. He was a non-ID man. He was ostensibly arrested because of his lack of ID and kind of suspicion of illegal status or something like that. He was removed to a detention centre, not exactly prison. He reported ill-treatment. And his family was able to secure his release through payment of a bribe. And again, he felt that his status as a non-ID Palestinian was behind this and that his arrest was an opportunity for a bribe. Certainly anecdotally based on the numbers of persons I talked to on this matter, but Syrian Palestinians perceived that they experience more discrimination than other Palestinian groups and receive more verbal abuse and sort of racist "behaviour." There's a lot of prejudice against them. There's obviously a lot of prejudice against stateless Palestinians, full stop, especially in Lebanon. But this is kind of magnified for the Syrian Palestinians.

Asylos: The detention that you mentioned, where would they take place if not in prison?

Katherine Harbord: So my understanding with the militias was that they detain people either at the checkpoint or at a quasi-military base. With the police, the man who was detained was taken first to a local police station and later to a detention centre in Beirut.

Asylos: Continuing on the question of freedom of movement, we talked about travel documents. Let's say a stateless Palestinian managed to get out of the country, how would it be possible for them to return to Lebanon? To what extent would their specific status influence this possibility of them to come back at all?

Katherine Harbord: This is information I've heard from one person plus one person who has experienced this. This individual told me that if you have received permission to live outside of a camp rather than at your registered address which would be in one of the camps, then it is possible for you to go and return. But his opinion was that outside this specific case it would not be possible. Or if you don't have residence at all, you won't be able to return. And he claimed that it's more difficult for those who are residents of camps than those who are permitted to reside outside.

Asylos: Moving on to the health section, we found a report mentioning increase of viral hepatitis A, beside, of course, the COVID-19 pandemic. Are you aware of such an increase or of other communicable diseases affecting the person specifically?

Katherine Harbord: I would be really interested to know this answer also.

Asylos: Okay. We found, of course, information on the mental health issues that affect person refugees in Lebanon, especially after COVID-19 pandemic and the economic crisis. Would you want to point us to any type of source that might have more specifics on this?

Katherine Harbord: I would be really interested to know this answer also.

Asylos: Moving on to child protection and access to education for children. Of course we found much information on the obstacles to the protection of stateless Palestinian's children. However, we're wondering if we might include information on the infrastructures that exist to potentially protect these children from being disproportionately affected by these types of risks, and--

Katherine Harbord: Sorry, again, it's a really interesting question. It's something I know nothing about. Okay, no it's good that you interrupt me before I go into detail.

Asylos: Then I will move on to the issue of access to the labour market. We found information on a ban to 39 high wage liberal professions. We found information according to which amendments were made to this Lebanese labour law in 2010. But then we found other reports implying that the ban is still in place. Any information you could give on this point would be very interesting.

Katherine Harbord: I spoke to a Palestinian in Lebanon towards the end of last year who told me that they do still require a work permit, it's like an authorisation, it's not something you have to physically pay for. But in practice, because of the problems of weak state structures, in practice often there is a charge attached or you can't receive it without paying a fee. No, fee is the wrong word. I was trying to think of a polite way to say bribe, but I mean bribe.

Asylos: Has your contact talked about what would happen if someone is caught working without a permit?

Katherine Harbord: This is something that has previously come up about a year, a year and a half ago. And my understanding is that the main consequences of not having a permit-- of course, there are potentially legal consequences, a fine. It's an offense. My understanding is that it carries kind of a statutory fine in the same way if you're caught speeding or something, you have whatever the fine is. So there are consequences. But the more important consequences, I think, are actually perhaps the unintended ones. So if somebody doesn't have a permit, they don't have the protections inscribed in labour law. They're open to exploitation, unscrupulous employers, those kind of ancillary problems rather than justifying itself. It's my understanding too that employers, if they have an illegal worker, they also are subject to a fine. So the gentleman I spoke to did say it was quite difficult to find sort of a good job without a work permit. Finding work is easy, but employers aren't generally willing to take the risk for higher-status jobs and roles. Understandably. The man that I was speaking to had involvement-- or had previously had involvement with the trade union movement, for example. So it may be that he was also more aware than the average person of the situation because of his interest in labour laws and labour relations.

Asylos: On the subject of access to land, housing and shelter for stateless Palestinians, we found many sources relating to the exclusion of Palestinians from the right to own real estate. Some sources point to the fact that people who were able to access real estate before the passing of this law would manage to register their house or their through relatives who are allowed to own land. Do you have any impression of how much this is practised and how it works?

Katherine Harbord: I have heard the same stories. I don't have any independent verification of this, but I have heard from people that they have registered property. It's their property, but it's registered in the name of their Lebanese business partner or an in laws because it either isn't possible to or it's perceived to be not possible, which can also be a barrier. Or there are concerns about perhaps the state confiscating a property even if it is possible to legitimately register it. So it's a bit hard to kind of untangle what is going on. But certainly, this is something I've heard repeatedly. But I'm not aware of whether there's any efforts to resolve this.

Asylos: This confiscation stories, do you know of anyone for whom it did happen?

Katherine Harbord: No. I don't know. When you hear one of these stories, it always happens to a friend of a friend of a friend or my cousin's husband. I wonder if perhaps it's kind of rumors you are more inclined to believe or to be more wary about things even if they aren't a statistical threat just because you have been living in a state of vulnerability. It seems likely that it could be a threat, so therefore you take evasive action. I mean, I'm not saying it never happens, but I've certainly not been able to track down and verify such a case. All it takes is one rogue police officer or local mayor or a dispute about whose goats ate whose apples or something to escalate. Words get heated, things escalate. And because you have kind of not only your own precarity but this collective memory of precarity, of course, you are fearing that your house/land might be confiscated.

Asylos: Moving on to access to justice, security and state protection, do you know whether stateless Palestinians go to the police in cases they were victims of abuse/crime?

Katherine Harbord: I have heard anecdotally that there's sort of, quote-unquote, "no point reporting complaints to the police because nothing will happen or they want--" there is a certain amount of corruption in the system, so justice isn't easy to secure. That things depend on kind of personal patronage networks that you may or may not have. But how valid a perception that is, I'm not able to judge. Anything involving a police complaint would go unreported. So "a policeman detained me illegally and beat me", Probably, that would go unreported, because there would be a perception that there would be no point and it might bring further trouble. I have heard from a Palestinian somewhere down near Tyre in south Lebanon - that there was a reluctance to report problems from within the camps to the police. So if it's one Palestinian having a problem with another Palestinian or if something criminal has occurred, they prefer to kind of resolve it within the camp. Because of police perceptions, because of kind of inter-camp structures and things. But I heard that from one woman only.

Asylos: Do you have an idea what she referred to when she spoke of existing structures to resolve conflicts within camps? Katherine Harbord: So more kind of appeals to the older members of the community to kind of create resolution in cases of-- this particular case we were speaking about was a case of sexual violence. But she was acknowledging it was-- obviously, sexual violence is particularly complicated in this context because of kind of connotations of so called honour and things. It was, anyway, a more complex case. I don't know, necessarily, that a murder, for example, would be dealt with by the same way. But it was certainly this woman's impression that the community preferred as far as possible to police itself, rather than have recourse to the Lebanese police. They felt that it was also more likely to lead to more just resolutions.

Asylos: Our last point concerns political participation and protests. Are stateless Palestinians permitted to gather, to protest, or to hold a political office in Lebanon? Are there, for example, some public political figures who have--?

Katherine Harbord: So the one Palestinian I interviewed who claimed asylum in Europe based on the fact that he felt he was being targeted in Lebanon because of his political interests and political organisations and seeking to secure rights and representation for Palestinian people. He felt that he was arrested as a retaliation for kind of highlighting injustices faced by stateless Palestinians in Lebanon. He also claimed that he had been detained by police and that he had been subject to kind of harassment by local officials. The Home Office disputed his evidence and the judge did not find his account credible. And I think part of that was that we struggled to "prove" that this had happened..

Asylos: Is there anything you would like to add or share that was not being covered? Please feel free to do so.

Katherine Harbord: No. I do think it's important to stress the wider situation that Lebanon has experienced. Not only with the civil war and the kind of the dysfunction of governments for a number of years now. All of these things have made it much harder to kind of disaggregate the issue of stateless Palestinians here and made the question of finding evidence much harder because there are bigger problems. So the situations of Palestinians is flying a bit under the radar in the last couple of years. I think the fact that we do see discriminations against stateless Palestinians in Lebanon in the '90s early 2000s probably indicates there is some level still continuing of this. It's just that these statistics and things aren't being recorded now, whereas they were before. So the absence of recent evidence shouldn't be evidence of absence.

Interview with Mr. Ziad El Sayegh on October 31, 2022

Asylos: I will start with the first question which relates to the section on legal and policy frameworks in the implementation. We found information by UNICEF, which related to the very, I quote, "complicated and costly birth registration procedures," that children of stateless Palestinians have to go through. Could you tell us more about these birth registration procedures?

Ziad El Sayegh: There is no complication across the procedure at all. We have a department of Palestinian refugees within the Ministry of Interior and Municipalities in Lebanon, and you have also another registration at UNRWA. There is a I guess collaboration between UNRWA and this department within the Ministry of Interior and Municipalities. And it should go smoothly like this. It's very simple. Once they register through the UNRWA, they should go also to have a kind of an official paper from a responsible within the region they are living. After, it can be approved by the Embassy of Palestine of Lebanon and registered directly to the department of Palestinian refugees within the Ministry of Interior and Municipalities in Lebanon. If there is some costs for some members, for example, or a paper coming from the responsible, which is Al Mokhtar in Lebanon, who is responsible in a region. It is nothing, and the Lebanese people are paying for this when someone is born. They are paying the same. This is why I think this kind of information are irrelevant. Why? Because if a Lebanese citizen is obliged to pay for this responsible in the region - and it's an official rate - to give him an official paper and after, go to the Ministry of Interior and Municipality to submit a request. Also, you have a small cost that a Lebanese citizen should pay for it. It's nothing. They are the same. And here, if we are talking about equalities, we cannot ask the Lebanese citizens to pay for this and the Palestinian refugees will not pay. And for me, the solution is very simple. The UNRWA should have a special budget to cover this cost if any Palestinian refugees cannot pay for it. They should cover this cost. And here I'm going to the solution directly. Instead of saying there is a cost, let's try together to finalize a solution between the UNRWA and the department of Palestinian refugees within the Ministry of Interior and Municipalities in Lebanon. And we can solve this problem if the problem is the cost. For me, there is another problem. I'm not sure that all the Palestinian refugees are registering their newborns when they come. And this is another problem. And here we should investigate, and I advise you to add this to your work here, to your questionnaire to see why some Palestinian refugees are not registering their newborn. Why? Or where if they are not registering it within the Lebanese state and the Palestinian embassy only at UNRWA only. There is a lack here of collaboration between the Lebanese Ministry of Interior and Municipality and UNRWA and the Embassy of Palestine. This is the main problem, not the cost is the problem. The problem is there is a lack of a coordination mechanism to make sure that all the newborn are registered officially in Lebanon to make sure that they are not stateless in the future.

Asylos: We have a section on freedom of movements. The Dutch Ministry of Foreign Affairs stated that the Lebanese General Security can deliver travel documents to Palestinian refugees in Lebanon who have an ID card and who have a UNRWA registration card. Based on your knowledge, does it mean that these travel documents are only available to Palestine refugees?

Ziad El Sayegh: Of course. They are only to Palestine refugees. Yes. But each specific case, stateless are taken into consideration within the Directorate of General Security in Lebanon. And here we should go back to a mechanism that we created in 2008 within the Lebanese Dialogue Committee that time to give these non-IDs or these stateless a kind of official paper (Identification Paper). It is not as a Palestinian refugee paper. It is a kind of an official paper saying that this man, this woman, these children are Palestinian refugees, but they have a problem in their papers. And this was supposed to be a transitional period where we should discuss with the UNRWA because the main stateless people were coming from Gaza and West Bank. Gaza that time was under Egypt governance, and West Bank was under Jordanian governance, and these people lost their official papers from Gaza and from West Bank and from Egypt and from Jordan. This is why in 2008- and it took us six months to finalize such a mechanism, and we succeed in making this happening, but unfortunately, after sometime the Minister of interior put an end for this. And I know why. It's for political reason. I know why, but it was not acceptable to put an end for this. And from that time this kind of official papers were paralyzed, but I know that the DGS, the Directorate of General Security are now taking into consideration these difficulties for these people, and they are following and trying to find a solution for each specific case based on a specific measure. And we should recognize this. This is not to say that the problem is solved. No. But there is a serious essay within the DSG, Directorate of General Security to try to find a transitional solution until-- and this is the role of the Lebanese Palestinian Dialogue Committee. I don't know if they are following this now. It seems for me this is not the case because if you don't put, on the table, a clear mechanism, we will continue having a specific solution for a specific case which is not sustainable for me, and it should not continue like this. And of course, this is paralyzing the freedom of movement for the travel only. But within the country, it is not paralyzing anything. They can move within the country. They can move within the country, and there is a constructive

collaboration between the Palestinian authorities, stakeholders in the country, and also the Lebanese government, and also the Lebanese military and security forces.

Asylos: Do you know the proportion of Palestinian refugees in Lebanon who do not have a registration with DPAR, nor with UNRWA, but whose father is registered with the DGS?

Ziad El Sayegh: No, I don't know how many, but I knew that some of these people succeed in terms of an official request to the Directorate of the General Security in the country. They succeed to get a travel document, a travel doc, but I don't know how many there are. No, I don't know.

Asylos: Do you know whether after acquiring a third nationality (not Palestinian nor Lebanese) Palestinian refugees in Lebanon are still entitled to the travel documents issued by the Lebanese authorities?

Ziad El Sayegh: I don't think there is a close relation between these two equations. The problem is very simple. You have many Palestinian refugees that they receive a passport from the Palestinian Authority of the Palestinian State), and this kind of passport is recognized by the Lebanese Authority. And this is another solution that was led by the Palestinian Authority to make sure that they can help these stateless people. And there is another solution that I mentioned earlier that the DSG, Directorate of General Security of the country, tried also with the Palestinian Embassy in the country and the Ministry of Interior and Municipalities and UNRWA to make sure that these stateless are allowed to move within the country and from the country without paralyzing such a movement outside or inside the country because of they don't have any nationality. Have two kinds of solutions: Palestinian authority passport and Lebanese travel document. And they are complementary now, and each specific case are analyzed in a very specific methodology and based on facts. And since 2006, there is a new era between Palestinian and the Lebanese, and here I was not an observer. I was one of the member founder of Lebanese Palestinian Dialogue Committee. And we worked on this, and we paved the way for a new collaboration. That said, as much as we still have lack of laws to facilitate the Palestinian refugee's life in Lebanon, but we still have also other problems when we are talking about the arms inside and outside the camps. This is another story that can also a little bit put obstacles within this freedom of movement in the country. We should take--

Asylos: That is indeed very relevant to the next point we're interested in. How do checkpoints affect stateless Palestinians freedom of movement?

Ziad El Sayegh: They don't affect. If you go to all the camps, you can see in the north and in the south inside and equally, and the camps are mainly connected now to the Lebanese areas and the Lebanese villages and the Lebanese-- they are connected. They are working together. They are living together. They are sharing together. The checkpoints are still there to supervise the situation of the Palestinian arms inside and outside the camps. And this is another story. This is not to do with the Palestinian refugees themselves. Now it is due to the Hezbollah intervention and not allowing the Lebanese state to put an end for these arms. And this is a very simple story. This is a policy story. This is a political story, policy-oriented, very well policy-oriented by Hezbollah in the country. And don't undermine please this structure. The Lebanese Army is surrounding the Palestinian refugees camp, and this is where I am. I'm always discussing this with my Palestinian friend. Stop presenting yourselves always as victims. Please stop. And I'm telling also my Lebanese compatriot that it's time that the state put an end for the illegal arms inside and outside the camps. And it's time to go more to a civil approach in the country to restore the Lebanese Palestinian memory. Here there's a story of checkpoints is becoming a traditional story where you have a polarized approach from the Lebanese side, but also from Palestinian side, and it's time to put an end for this negative polarization from both sides.

Asylos: May I ask what you mean by a polarized story?

Ziad El Sayegh: The Lebanese are saying these camps are out of law, and we should control these camps. And some Palestinian Factions that are not aligned with PLO are saying we should keep our arms to protect ourselves because the Lebanese state is coming to kill us. And The PLO declared clearly that no need for arms inside and outside the campus, and the Lebanese sovereignty should be respected. Both narratives are not true if you see the Lebanese and Palestinian now living. They are living together. This kind of polarization is political. The Lebanese ruling regime is trying to play a dirty game on the Palestinian refugees portfolio in terms of, say, raise fears, radicalize people, polarize votes, and it's political game. The Palestinian Factions (not PLO) on other hand are playing the same game. This is my equation. Polarization is everywhere. And from the Palestinian side also, you have another narrative coming from the Palestinian factions, mainly now coming

from Hamas and some former PLO factions close to Syria regime saying we should keep our arms to protect ourselves, as if there is still a war between Lebanese and Palestinian, and this is not true. There is a close collaboration today between the Lebanese people and the Palestinian Refugees. And there is a close collaboration, if I may say, between the Lebanese army and the Palestinian political factions. They are in close collaboration. This is where this kind of checkpoints narrative should change on both sides.

Asylos: And would you say that it also includes checkpoints which are not run by Lebanese army, the checkpoints which are rather run by....

Ziad El Sayegh: By the Palestinian themselves within the camps.

Asylos: If I understood correctly, you're saying that checkpoints led by the authorities are not so much of an issue for the freedom of movement. But then we heard also of other types of checkpoints which are run by different militia.

Ziad El Sayegh: Absolutely. This is what I'm trying to say. And it's time to emphasize on this balance and to stop this victimization of the Palestinian refugees and also putting the Lebanese people, the Lebanese army as if they are, against, the Palestinian Refugees. And this is not true. This is not true on both sides.

Asylos: And which types of militia would run these checkpoints?

Ziad El Sayegh: Hezbollah. It's very simple. Even if it is informal sometimes. When I say Hezbollah militia, if I may say, it is not directly only Hezbollah. Sometimes you have Palestinian groups controlled by Hezbollah, who are Palestinian militia but close to Hezbollah. This is how Hezbollah is dealing. who are close to the Syrian regime, close to Hezbollah. This is how Hezbollah is treating the militias inside and around the camps.

It's very complicated. It's not as easy as you can imagine. And it's time to adjust this situation this is why I told you when we started: it's time to put an end for a traditional approaches. Let's go to understand the complexity of this creation.

Asylos: The next question, still related to freedom of movement, is now rather about the possibility to leave Lebanon on a temporary or permanent basis for stateless Palestinians. We found information on the difficulty for stateless Palestinians who have left Lebanon without an official document to reenter Lebanon if they want to.

Ziad El Sayegh: No, they can reenter Lebanon. There was a decision in 2007 to not allow them to be back in Lebanon, and in 2008, The Lebanese Government put it an end for this because we relied on a convention that Lebanon signed and approved, and it was an Arabic League, okay? If they go, they can go back, and if they have another nationality, they can keep for them also, the Palestinian refugees document. This was solved in 2008 based on that Lebanon should respect the United Nations resolutions and conventions and the Arabic resolution and conventions. If you tell me everybody is coming back without any difficulty, I cannot assure you. Maybe when they arrive to the airport, they will be subject to some difficulties, but legally speaking, it is solved. It is clear. Legally speaking, it is clear, but in Lebanon, as everywhere sometimes, not only Lebanon, you have the law, and you have some administrative measures based on some facts and information. Maybe they can modify such an implementation of the law, but the law is very clear.

Asylos: I would move to the next section on health. We found a report mentioning an increase of hepatitis A among the population of stateless Palestinians since 2020. Are you aware of such an increase?

Ziad El Sayegh: Yes, of course. Not only on the Palestinian Refugees side. It is on the Syrian Refugees, so the Syria refugee side, but also on the Lebanese community now. We are facing this problem--

Asylos: And are you aware of other communicable diseases which are now on the rise?

Ziad El Sayegh: No, no. It was COVID, hepatitis, and the UNICEF, the UNRWA, and other UN agencies, and the INGOs, and the NGOs, but also some faith-based organization are taking care of this within the camps and outside the camps. And there is a close collaboration between the Ministry of Public Health and the United Nations agencies and program and also the NGOs to make sure to try to contain these health problems. But it is affecting not only the Palestine refugees. It's affecting even the Lebanese community.

Asylos: Moving to the next section on child protection and access to education for children. We found information relating to the obstacles to the protection of stateless Palestinian children, for example, on risk of child marriage or child labor, but we found no information on the infrastructures in place to protect children from these types of harms.

Ziad El Sayegh: If you allow me to ask, are the Lebanese children protected from such a harm? This is my question. This is not connected to the law. This is connected to the informal labor sector of the country, the black market. And now, after mainly the economic social crisis in Lebanon, the Lebanese people, Lebanese children, are subject to such a harm. Let's be here very frank. These kind of questions-- I will be frank with you, and I am responsible for what I will say, I don't think that these questions are constructive now to analyze the Palestinian refugee children situation in the country without taking into consideration that the Lebanese children situation is coming more and more worse, and they are facing the same problems because of the economic and social crisis. It's time to create a paradigm shift or a new paradigm. Saying that these children are equal now, Palestinian Refugees or Syrian Refugees or Lebanese, and it's not due to any lack of law. It is due to three things. First of all, it is due to an ethical problem. Within the Palestinian refugees community itself, first. Second, an ethical problem within the Lebanese community in itself. And thirdly, it is not a lack of resources. It is a lack of government. And here we should ask the UNRWA what are their educational policy. They have schools all around the country. What are the educational policy? The educational policy is only about registering the children that are coming to be involved in the school, or the role as UNRWA is to go to the Palestinian children and to call them to come to the school. This is another story. Because of this I was the only one who wrote in 2007 in Lebanon the policy paper talking around the need for a paradigm shift within the UNRWA policy, not only in Lebanon, all around the world. And to move from a relief approach to a developmental approach. And yet the UNRWA is still continuing the relief approach. And Lebanon's a special case because we've had a war between Lebanese and Palestinian refugees. We've had a war. We have a bad collective memory. As much as we succeed in analyzing together the root causes of this conflict, but the UNRWA didn't change at all yet. To answer your question, it is not about the law. It is about the mindset, the ethics, and the behaviors, and you can add to this now. The economic and social crisis are working. They are working for nothing. For 20,000 or 30,000 lira which is one dollar per day. It's nothing. It's unacceptable. And this is our crisis too. We are facing the same crisis, and we are not children. We are 46, 45, 50, 65. We have the same problem now. And here I think I will request to change a little bit the narrative. You cannot continue on the same narrative. It's not about the law. It's not about the law. It's not about the access for education. It is about an ethical behavior governance crisis. It's not about the law. Now the Lebanese children are moving from the private sector to the public sector in the schools, and it seems in many areas, there is no more places for the Lebanese children in these public schools. The Lebanese don't have any more places. This is why we should ask the UNRWA to enlarge their investment in the educational sector to put an end for such a crisis. And they have the capacity because they have money coming from the international donors, and if they don't invest in education, they will have a big problem in the future, these children.

Asylos: Not all Palestinian refugees' children are registered with UNRWA however, so not all Palestinian refugee children can go to UNRWA school, right?

Ziad El Sayegh: This is another question. If you are Palestinian refugees, why are you not registered with an UNRWA if the UNRWA can provide you, first of all, a living health and education assistance. They can give you some subsidies in terms of home, and they can give you educational assistance and health assistance. Can you tell me why a Palestinian refugee or an official Palestinian refugee is not registered with an UNRWA? Why? He should be registered, and he can request officially the cover of UNRWA and the educational and the health sector. It's not smart at all if any Palestinian refugees in the country refuse to be registered with UNRWA because his will be losing many of his rights because UNRWA assist them-- for example, for the Palestinian refugees coming from Syria, they created a special framework to solve this problem for them. No, the UNRWA is flexible, and I'm sure, I'm confident, and I followed many cases of them that they treated them as if they are coming in 1948. And here, we should ask the UNRWA to enlarge their legal framework on this and to cover all the needs of these Palestinian refugees, whether they were coming in 1948 or in 1967 or in 1973 or after the war in Syria in 2011. They should cover that.

Asylos: I will move to the next session on the access to the labor market. We found many resources related to legal restrictions on Palestinians' rights to work, especially due to the ban on 39 high-wage liberal professionals outside the camps. But we also found information according to which there were amendments that were made to the Lebanese Labor Law and Social Security Law in 2010, which apparently waived work permit fees for Palestinian refugees born in Lebanon. Does it mean that Palestinians still need to obtain a work permit in order to work but do not have to pay for this work permit any longer?

Ziad El Sayegh: No, no, no, no, no. The law was very clear. They will receive a work permit without paying anything. The only problem was in the National Social Security Fund, and we were about solving this. I was that time the team leader of the Minister of Labor. They don't have to pay anything. The only problem was that the law obliged them to pay for the end-of-service indemnity, and this was in their interest but obliging them to pay for medical fund without benefiting it was an issue. End of service indemnity program within the National Social Security Fund to protect the rights when they finished their work, this was key. The only problem was that there was a debate between the Lebanese government at that time and the Lebanese Parliament also if they are obliged to pay for the medication program of the National Social Security Fund. And after this, there was a discussion between 2011 and 2012 to make sure to put an end for this contribution because they are not benefiting from this contribution and the medication program because UNRWA is taking care of this. Yet this kind of modification was not adopted because of the lack of governance in the country and the Lebanese-Palestinian dialogue committee.

Asylos: And this was in 2010?

Ziad El Sayegh: Yes, 2010. But between 2016 and 2018, when there was a Lebanese-Palestinian dialogue-- and we succeeded in 2018 to issue a unified vision towards the Palestinian refugees issue in Lebanon, and I'm sure you saw it. It was issued by LPDC, and I was one of the facilitator of these dialogues. It was coordinated with the UNDP. It was led by the Lebanese Palestinian Dialogue Committee, and I was one of the facilitators at that time. We succeeded within the Lebanese political stakeholders to approve a consensus that these Palestinian refugees should not pay for the medication program because they are not benefiting from it. But to tell you the truth, the work permit was to protect these Palestinian refugees workers from the black market, and this was not well received from the Palestinian refugees because they wanted to stay within the black market. And you have two contradictory narrative coming from the Palestinian refugees: one narrative saying, "We are subject in black market--" and they are attacking this black market. And when you ask them to come and to issue a work permit, they are saying, "No. Why we need a work permit when we are residing in the country since 1948, and we are as Lebanese?". "No, you are not as Lebanese. Sorry. You are a Palestinian refugee, and we are trying to protect you from the black market. What we are asking you is very simple: please come and take this paper and be official. And you will not pay anything for this paper. And you will have a benefit from the end-of-service indemnity. And here, who you are working with should pay for this end-of-service indemnity an amount approved legally." There is a contradictory approach. This is another narrative of victimization, "We are always victim. We're always victim". "You are not victims. We have Lebanese law. As Lebanese, myself, I am working. I am supposed to submit every year to the Ministry of Finance what I'm doing, what I'm receiving as salary, and I should pay a tax. But you are as Palestinians, you don't want to do this. You don't want to do anything. You are a Palestinian refugee resident in this country. There is a law in this country. You should respect the law. Allah. We need to make consensus on this law. I agree. We should maybe modify many things to facilitate your work. I agree. But don't tell me, 'I will not accept any work permit.' Why you are not accepting?" Philosophy speaking as myself a Lebanese citizen, as if I don't want to submit any official paper for the Ministry of Labor and the Ministry of Finance that I'm working in Lebanon, this is crazy. It's time to change this mindset. We are all under the rule of law. If we want to facilitate within the law some measures, we will negotiate this together in a constructive approach. But it's not allowed to anyone in this country, even a Lebanese citizens like me to say, "I will not. I don't want. I'm out of law. I will do anything out of law." "No, no. You should not. Sorry, sorry." What is missing in this country is the rule of law, and it's time to make sure to bring back to this country a state of law taking into consideration the human dignity and the specific status of these refugees and trying to facilitate for them all kinds of measures that can allow them to work in the majority of the fields. If you have other fields, they need a specific law adopted by the parliament like being a lawyer or an engineer, or. These are free orders, and they have a bylaws approved by the parliament. We need another kind of modification here. Here's another story. This is very complicated. But if I may say, the Palestinian engineers and medicines, they are working. They are working on the black market. And this is bad, and they are accepting work in the black market. They are accepting this. The problem is not only within the Lebanese side, the problem is also within the Palestinian side. And this is why we are saying all the time, it's time to restore the Lebanese-Palestinian collective memory and authors, otherwise the contradictory narrative will continue and will destroy the peaceful new era between Palestinian and Lebanese.

Asylos: Assuming that someone would be willing to apply for this work permit, what are the different steps to acquire the work permit?

Ziad El Sayegh: He should go to the Ministry of Labor and submit, and after 1 week or 10 days, you will receive the work permit.

Asylos: which identity papers do they have to show?

Ziad El Sayegh: Of course, there's official paper. There's official document saying who he is. He is working with whom, for whom, in which field, and he should have an official paper from his employer. It's simple. Maybe it's because of the shortage of people within the Ministry of Labor. It will need some more time due to COVID and to the economic crisis in the country, but all of us are facing such problem with the public administration. Anyway, the Lebanese public administration is destroyed since 20, 30 years by the corruption.

Asylos: Our next question concerns Palestinians' access to land, housing, and shelter...

Ziad El Sayegh: This is a very complicated story. In 2002, we didn't allowed anymore for the Palestinian refugees to buy a house, but also, we discovered that before 2002, many Palestinian refugees were buying lands houses without registering it to avoid paying the taxes. And this is another story. And between 2016 and 2018, this was one of the key framework we discussed within Lebanese national dialogue towards the Palestinian refugees issue, and we suggested a solution to legalize all the lands and houses bought before 2002 and after to think scenarios of long-term leasing that they can allow the Palestinian refugees to have houses. This is a very complicated story, but it can be solved surely if we have a goodwill not only from the Lebanese side but also from the Palestinian side themselves.

Asylos: On access to justice, security, and state protection, do you know whether stateless Palestinians report complaints to the police? Does it happen that some of the complaints are also followed by police investigations, or do they tend not to go to the police?

Ziad El Sayegh: Really, I don't have the information, but I'm sure I followed some case, but I don't have specific information. Where they are subject were follow up by the security force, but they have the capacity directly to have a lawyer. The INGOs mainly and NGOs in Lebanon are taking care of them if they have any problem with the justice platform in the country. While I also should acknowledge that the justice in Lebanon is killed by the politicians and the Lebanese citizens are themselves subject to an organized crime which is not allowing any types of justice to be implemented. And for me here also, it's time to adjust the narrative. It's not only about the Palestinian refugees and justice. It is about all the Lebanese citizens and all the residents and the country justice.

Asylos: Our last point concerns political participation and protests. Are stateless Palestinians permitted to gather, to protest, or to hold a political office in Lebanon? Are there, for example, some public political figures who have--?

Ziad El Sayegh: We have camps in the country, and you are asking me if they are allowed to do a political work. In the law, they cannot vote, only, within the Lebanese election, but they are everywhere, and they are doing political work. You can see a responsible from each faction visiting a Lebanese political figure and doing gathering and doing manifestation within the camps, of course. And after, if we receive, for example, Khaled Mashal, or Ismail Haniyeh, in the country, the Hamas leaders, you can see their manifestations. And this is what? This is a political work. Please, it's time that these people will stop saying "We are not allowed for a political work" and you know they are my friends. I'm not an active. They know me very well, and I know them very well. And what I'm telling you, I told them this many times, and I'm still telling them the same thing. It's time to stop being victims. You are here everywhere, and you are doing political work, of course. They have political offices. Please, can you ask Al-Jabha Al-Shabiya General Commander or Hamas or Fatah They have political offices within the camps and outside the camps. They have militias within the camps too. And you have many NGOs where you can see Lebanese and Palestinians themselves creating this NGO, and they are working together, of course. If you are asking me the law is allowing them to do political gathering, I'm telling you no. But this is not the situation on the ground. They are doing everything. It's not about the law. It is about a de facto. When we received Ismail Haniyeh, the Hamas leader, six months ago, there were political / Military manifestation in the camps. And he was received by the president of republic, the prime minister, the speaker in Lebanon. He was received by the president of republic in Lebanon. This is what? This is an NGO visit? This is a political visit.

Asylos: Is there anything thing you would like to add that--?

Ziad El Sayegh: No. I want to thank you for your trust, and I want to encourage you to move forward, and to try to modify, a little bit, the traditional framework. This is my advice.

Interview with Mrs Walaa Kayyal on October 31, 2022

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Asylos: We identified gaps in the public domain relating to legal and policy frameworks and their implementation. One section we would like your input on concerns the rights to a nationality that children of stateless Palestinian parents have. Specifically, one source, UNICEF Lebanon, indicated that the birth registration procedures are "Complicated and costly." Could you give us a more detailed description of the different steps required and the costs that are implied and do you agree with UNICEF's statement?

Walaa Kayyal: Yes, definitely. Registering the birth in the Lebanese system is very complicated and often people-- not all people, they know all the steps if you want to legalize the birth of their children, even if they are Lebanese. So you got to see many Lebanese parents. Both the wife and husband are Lebanese, but their children are stateless because they have missed one of the steps in birth registration. The procedure is very complicated and it doesn't make sense at all. However, this is how the Lebanese system works for birth registration. When a child is born, the doctor at the hospital where the child is born should be giving a birth notification to the parents, where this birth notification should be carried and stamped by the mayor, or we call it an Arabic, the Mukhtar of the area. And he would copy the information in the birth notification from the hospital that has the name of the child, the parents' name, the date, and the time when this child is born into another template, which is the birth certificate. When the mayor fills in this information the parents have to go to the Nofous [Arabic for civil status directory]. We call it [foreign], or the civil status directory where they should go and they should approve that this child has been born on this date, on this time. And definitely before they get to approve the birth registration, the mayor should sign and stamp in order to legalize this. So, as you can see, there are 3 steps in the Lebanese system to notify that a child has been born. First, a birth notification from the hospital. Second, the birth certificate from the mayor, initiated by the mayor, signed and stamped and then signed and stamped from the Nofous. And why? This is because, in the Nofous, they give the birth certificate or the child the record. And the record is inherited through the Lebanese family. So you see, the father has the record on their ID 465. It is in his all children records, male and females. And then the males will give it to all their children, the female when she gets married. Her record changes to her husband. So this is in more detail why this system is a bit complicated to the birth certificate. Now we have something, which is one of the major causes of statelessness in Lebanon, is the one-year duration, which is something that not all Lebanese know about. And what do I mean by this duration? So if I got a birth notification, and then I went to the mayor and got the birth certificate, but I didn't do the third step, which is going to the Nufus and, again, signing and stamping, acknowledging that this child is born. If they didn't do this step within the first year, after birth, this child is considered as stateless. They cannot inherit the record number of his or her father and they become stateless. In order to retain the nationality again, this cannot, at this stage, go through the administrative procedures. They should go through the courts where they raise an appeal, say that we missed this one year, and they have to appoint an attorney for sure, and then, again, retain the nationality of the child. So between the birth notification and the birth certificate, it's not very clear, but it's well-known that within 30 days you should be doing this. And then you have the one-year duration, which is very critical to make sure that your child is born with a nationality. It's a one year. If you miss it, the child becomes stateless, and you have to retain nationality again through court. From where I know this information. So about the process, this is well known in Lebanon that we have to do this step only for Lebanese, also for Palestinians and whoever is born here. But more specifically for Lebanese and Palestinians. Because the Palestinians here in Lebanon, they have a separate Nofous or a separate civil status office for them. So also they have to get a birth notification, birth certificate, and then go to the Nofous, which is the Palestinian office where civil documents are issued. Or they call it Shououn [شوؤن] in Arabic for Palestinians specifically in order to approve the birth. Well, this is well known first. And second, I know these details because I was part of the research done by University of Melbourne about statelessness in Lebanon. So this is why I have that much of details.

Asylos: Thank you very much. So have I understood correctly that the specific administrative office for Palestinians to register births exist at every communal level, or is there only one office in all Lebanon where they are allowed to get the approval of their birth certificate?

Walaa Kayyal: Unfortunately, we have only one office in Lebanon which is located in Beirut. And all Palestinians living in any place in Lebanon, if they want to issue a new ID, if they want to issue a new birth certificate or a divorce certificate or a marriage certificate or a death certificate, they have to come to this one office that is located in Beirut.

Asylos: Thank you for clarifying. The fact that Palestinians specifically have a different type of mayor to whom they need to go to get the approval of the child certificate, is that the only way in which they are specifically affected by this complicated birth registration procedure? Or do you think of other aspects of the child registration procedure which affects Palestinians specifically?

Walaa Kayyal: So when I think about Palestinians, I think of two types of Palestinians: the 1948 Palestinians, who were forcibly kicked off Palestine in 1948, and they came and they sought refuge in Lebanon. These are the individuals who are registered by UNRWA. So they have an UNRWA registration. They have an UNRWA registration card and UNRWA registration number. And through this, they can access all UNRWA services. And also through it, they can-- if you want the Lebanese authorities, they testify that these are refugees and that they have sought refuge in Lebanon during 1948. And you have the Palestinians and those Palestinians who migrated to Lebanon in 1967 as a result of the second revolution that happened in Palestine. The second batch of Palestinians and those who migrated in 1967, the Lebanese government does not consider them as refugees. They consider them maybe as illegally passing-by population. They just pass the borders illegally, and they end up at Lebanon. And these are not registered by UNRWA. And the Lebanese government does not consider them as refugees. And they do not have any papers at all. So they cannot approve their marriage. If they have children, the government does not consider them as they exist from the early beginning. So if they are born, if they die, if they get married, if they have children, the government does not consider them to exist on the Lebanese territory. And hence, they cannot do any legal paper. So they don't exist. So for the 1967 [Palestinians], these are stateless. These are considered stateless because they don't have any kind of identification document from the Lebanese government. For the Palestinians of 1948, the main statelessness reason can be traced to, again, the Lebanese complicated birth registration processes. It can also be because the parents don't want to register their child simply. So if they don't want to register their child-- and we have several cases in Lebanon where parents are just very ignorant to an extent that they do not want to register their child on purpose, or they choose not to register them. And then when they grow up and want to go to school, the schools cannot register them. And then the parents wake up that they needed to register their children and get them legal papers in order to facilitate their education, movement, access to healthcare, etc.

Asylos: Do you know some reasons why these people would not want to register their newborns or are reluctant to do so in the case of the 1948 Palestine Refugees?

Walaa Kayyal: It can be traced to several things. Again, I'm trying to remember some of the interviews that I used to conduct with Palestinians in several projects. So this can be because they simply don't want to register them or because the parents are already stateless, so they cannot pass on their nationality. So anyway, if they want to register them or don't want to register them, it doesn't matter. Second, it can be because-- the Palestinians here in Lebanon, specifically Palestinians who are in Lebanon, they suffer a lot. So we cannot join the workforce in the formal sector. We often work in the informal sector. And if we want to work, definitely we cannot apply for public positions, those that are governmental positions. We can work in informal sector or in the NGO sectors. For example - I speak of myself - I work in an international NGO where they apply for me for a work permit, and they renew it every year. But I cannot work in the public sector. So we cannot work in-- also, even doctors, they cannot register in the syndicate of doctors or engineers, etc. They are deprived of many professions. Even if they go to medical school and they are doctors and they're one of the best doctors, they cannot legally be doctors unless they are doctors in UNRWA clinics.

Asylos: Yes we have a whole section on this ban. We will definitely go back to these aspects. I think it's a bit further down in the list of questions, specifically on the labor market, would you want us to go chronologically through the other questions?

Walaa Kayyal: Yes, no worries. So one thing to add is that the word is Nofous. And if you want the English translation for it, it's the registration offices where Lebanese people; they have one at each area and they cannot register their births or divorce or marriage in the other registration office. For those who are in the south, they go to the specific one in the south. Those who are in the north; they go to the specific one in the north. But for Palestinians, it is only one. And they don't call it Nofous, they call it Shououn [شؤون]. So it's like the Palestinian Affairs Office.

Asylos: We found a document by the Dutch Ministry of Foreign Affairs that stated that the Lebanese General Security can deliver travel documents to Palestinian refugees in Lebanon if they have an ID card and UNRWA registration card. Does it mean that these travel documents are only available to Palestine refugees? Can you share your knowledge on travel documentation with us?

Walaa Kayyal: Yes. So Palestinians in Lebanon; they don't have a passport. If you want, the only legal document that is not issued by the Palestinian Registration Affairs Office is the travel document. They issue everything that has to do with legal papers. The ones I listed before, except for the passport. The passport is issued by the GSO, the General Security Office and there are definitely requirements to apply for the travel document because we don't have a passport. Again, it's a travel document. You should apply with your ID, which is a blue ID as they call it, and the UNRWA card. So why UNRWA card? Because historically, when the Palestinians came to Lebanon in 1948, they were registered directly by UNRWA and based on UNRWA registration, the Lebanese government again considered them as refugees and made this office for them to get all their paper and to be legally present in the country. However, one important thing to mention here is even the GSO office for the Lebanese is different from the Palestinians. The Palestinians, they have a separate office even for issuing the travel documents. We do not interact with the Lebanese. So for example, my mother is Lebanese, so she goes and applies for her passport in a different building, and me as a Palestinian, I go and I apply in a different building. They're very close to each other but they are separate. And definitely, the papers required are different for the Lebanese and the Palestinians. Also, the duration of when you have to renew your passport is different. For example, a Lebanese person can renew his or her passport for 10 years. For Palestinian it's up to 5 years. It's either 1 year, 3 years, or 5 years. For Lebanese, it's 1 year, 3 years, 5 years, or 10 years. Also we did not use to have biometric passport. I think since three, four years ago we started to have biometric passports, the Palestinian travel documents are also biometric. The Palestinian travel document has the migrant sign on it, two oblique lines. We have this on our travel document just to identify us as migrants and not citizens. Before the passport was biometric, the Lebanese used to have a navy blue color for their passport and it's smaller in size, while the Palestinians used to have a larger size of the passport and it was brown. After they became biometric, it became the same size but the Lebanese passport is navy blue and the Palestinian passport is blue, but a lighter blue color. This is something one has to know about Lebanon: They have to discriminate in any way. You can see these discriminatory actions without words, they have to differentiate Lebanese from Palestinians in any way possible.

Asylos: Do you happen to know the proportion of people without registration, neither with DPAR nor with UNRWA, who managed to obtain travel documents?

Walaa Kayyal: Up to my knowledge, no one can issue a travel passport if they don't have an ID and a registration with a UNRWA registration card because this is a requirement. If you do not submit all your complete papers, they simply reject your order. Because they review the papers in front of you and say 'if you don't complete your file, we are not going at the first place to apply for you to issue a travel document'. So up to my knowledge, you cannot issue it unless all the papers are submitted.

Asylos: After acquiring a certain nationality which is not Palestinian or Lebanese, Palestinian refugees in Lebanon are still entitled to the travel documents that you just talked about, or does it prevent from applying for travel documents?

Walaa Kayyal: Before I answer your question, I would like to mention a very deeply rooted phenomenon. The Lebanese state is afraid to disrupt the sectorial balance in the country. Therefore they do not count how many Lebanese inhabitant there are. Because if they count how many Lebanese are in the country, they have to count how many are Sunni, how many are Shiaa', how many are Christian Maronites, how many are Christian Orthodox Etc. And they don't want this because they don't want to say that, for example the Sunnah is the largest group? This is why the last census that Lebanon made was in 1932, and this goes back to the French Mandate. When people was under the French Mandate, the French conducted a census for the Lebanese in order to know how many Lebanese they were, and this was before it was a free country. So you don't have census. And this is done on purpose, as I explained. And this also applies to the Palestinians, so Lebanon does not count how many Palestinians live in Lebanon. Therefore you can find several numbers of how many Palestinians are in Lebanon. The most used number for the number of Palestinians in Lebanon is 300 000-something. Why is this number exaggerated? Because Palestinians tend to leave the country? For example, I can leave now to UK, and I seek asylum, and I become a UK citizen. But my registration in Lebanon is still ongoing and I continue to be counted as a Palestinian in Lebanon. So, again let's say I give birth to four children. I will come to Lebanon, register them, although they are UK citizens? I register them in UNRWA and they get refugee cards. Most Palestinians tend to do this in order to keep their records in Lebanon? Also in the hope to retain their right to territorial Palestine. Because the Lebanese state does not follow up on this, they don't know maybe if I got a UK citizen or US citizenship, etc. And thus, I can still be entitled to the

refugee status in Lebanon, and I can even come and show a refugee paper for my children without them knowing that I actually have another citizenship. Therefore, the number of Palestinians on record is exaggerated. In reality there are less, since the majority of Palestinians have traveled.

Asylos: If someone obtained another nationality they could just not show their identity paper from this newly-acquired citizenship and just enter the country with their refugee papers?

Walaa Kayyal: Let me clarify this. Let's say I become an American citizen? I can enter Lebanon with my American passport and live here with my American passport, no worries. The Lebanese state does not trace anything? But then let's say that my Palestinian passport expires because I've been in the US for ten consecutive years. So I come to Lebanon to visit my family and I say "Oh, let me just renew my passport." I can go normally and renew my passport. They cannot trace if I have other nationalities, they cannot trace if I am in the country or not. They cannot trace anything. This does not happen if someone went and reported that they have a US citizenship. So now the government has the right to withdraw your refugee status because you are no longer a refugee. You're a citizen of another country now. In the case the Lebanese state withdrew all your refugee documents, when you want to visit Lebanon, you visit as a foreigner. You have to pay for residency permit or maybe, according to the nationality you acquired, you have up to three to six months in the country without a residency. Then you are treated as an American, a UK, I don't know, a Swiss person. But that never happens, I can guarantee you like no one goes and reports their other nationalities to the Lebanese authorities.

Asylos: In the case of people who exit the country without a travel document, what are the chances for them to be able to return?

Walaa Kayyal: How will they exit the country without a travel document in the first place? So, look, even on the borderlines we have checkpoints. Let me give you an example. So if I am a person with no papers and I want to go to Syria, which is very close to Lebanon. I went to Syria. There is a whole GSO office there to stamp my passport that I have left Lebanon on this date. And then I went next to it for the Syria, for the government of Syria where they stamped that I entered Syria on this date, and on my way back, the Syrian stamp on my passport that I have left Syria on this date. And again I stamped in the Lebanon GSO that I have entered to Lebanon on this date. So there is no way to cross borders if we're talking by car or walking, whatever. So not by an airplane. There is no way to cross borders unless you are smuggled or illegally passed. And the chances for you to come back to the country will be very minimal because maybe the first time you were lucky to cross borders without anyone, I don't know, observing you-- or noticing you crossing, but it is more risky if you want to come back to Lebanon because they will ask you for any identification document, for your passport, etc. And one more thing that I wanted to add is that it becomes harder when you cross borders illegally and then you are put-- for anything in the country that you travel to, where they're going to ask, "Where is your ID?" or, "Where is your passport?" And you say, "I don't have--" so they may arrest you. You might stay in their prison forever without anyone knowing anything about you because there's no identification. There's no document that would identify that this is your name, this is your birth date, you're married, you're not married, this is your father, this is your mother, etc.

Asylos: I think the only information we found so far on the possibility to reenter after having left the country without residence permit related to Palestine refugees from Syria who apparently could enter the country because the transit was not formalized. And then we found another source mentioning that, since the Lebanese elections in May 2018, it became much more difficult to cross borders.

Walaa Kayyal: It has also become much harder, not only for Palestinians who came from Syria but for Syrians themselves. This dual movement became very hard because, at the moment, the Lebanese government wants to send Syrians back to Syria because they don't consider them as refugees. So the Lebanese government, they consider the Palestinians of 1948 as refugees, and they have established 12 legal camps in addition to Palestinian gatherings. However, the Lebanese government, they do not consent that Syrians are refugees but rather call them "displaced", this is why they don't have legal camps. They just settle in random camps and settlements. This is what we call it. It's not camp. So they don't even have the right to seek asylum or refuge in Lebanon.

Asylos: We found information in public domain referring to arbitrary arrests at checkpoints which, according to this source, particularly affected Syrian refugees, Palestinian refugees from Syria, and non-IDs living in camps in the south of the country. We wonder whether you would corroborate this information and if you have more information on what happens when people are arrested at checkpoints, when and how they are arrested, who might be particularly targeted.

Walaa Kayyal: Usually, the people who are arrested at checkpoints, are those who don't have IDs. They are arrested and they are placed in a police office until someone comes and testify that this person's name is that, they know his mother, his father, this is the name of his mother, this is the name of his father, and this is his birth date. For the stateless individuals, it is very hard because they don't even have an identification document. They have what they call an identification card and this card is literally written by hand by the mayor of the village where the stateless person is residing. Usually, also Syrians, Palestinians from Syria, and Palestinians from Lebanon, they are stopped at checkpoints, and the army, first, they ask for ID. If you are a Syrian ID, a Palestinian from Syria or a Palestinian from Lebanon, it will show right away since the ID of Palestinians in Lebanon is very well known and visible since it is big and has a different blue color. As I also explained to you, in Lebanon, there is a lot of discrimination, so if you show the Lebanese card, they let you pass, and if you show the Palestinian identification document, they stop you. They ask you questions such as "where do you live?" If you tell them you live in Beirut: "why are you going to the north?" "Do you have relatives there?" "What are you going to do?" "Are you going to have fun?" "Who are you going to visit?" "So they open such mini investigation, and if they want to arrest you, they can arrest you. There's no barrier. So they can arrest you. They can just put you under arrest, move you to a police station, have you do some investigation, let you spend some time in the room, in the police office just doing nothing, and then at night, they tell you, we have crossed your information through our systems and there is nothing, so now you can leave to your house, simply. So the army, they have a system where they check your name. They just, for example, type your name and they see all your basic information and they see if you have any criminal record, and based on what comes out, they deal with you. If they see something in your record they will interpret it as related to your current travel and say "Oh, so you're going there to steal", they can decide to keep you longer or even to transfer you to a closer police station. And all of this, if I may say, depend on the mood of the army staff or those who are at checkpoint. If they are in a good mood, and they love Palestinians (because in a lot of Lebanese families they are Palestinians), if their mother is Palestinian or- I don't know - their brother-in-law is, if they have this Lebanese-Palestinian relationship, this might be a very good excuse to let you go at checkpoints. So this process is very much subjective.

Asylos: How common are these checkpoints nowadays? We found information stating that the number of Lebanese army checkpoints decreased over the past few years.

Walaa Kayyal: I wouldn't actually agree because unfortunately, in Lebanon the army is centralized in all Lebanon. So you do not have a separation between the army and the civilians. You can find checkpoints anywhere and you also have mobile checkpoints. So for example, they would call army officers and say, "Go open a checkpoint in this area" and this can be for different reasons. Their number did not decrease. They close one and open another one. They usually do this very, very abruptly. So it's not based on a decision or based on a systematic matter. Let me give you an example. Many people here in Lebanon, they don't register their motorcycle, or they might not have a driving license because it costs money, and they are already poor. So let's say someone saved to get a motorcycle as a transportation mean because now transportation prices are skyrocketing. But this person does not register their motorcycle to have a license plate. Now on a Sunday the military decides to put a checkpoint in the middle of Beirut and start stopping all the motorcycles that are driving by, collecting the motorcycles that are not properly registered, and the government cashes the money.

Asylos: Can you indicate where the checkpoints are usually located?

Walaa Kayyal: I am not aware of all of them, but I can tell you that you have a checkpoint before you enter Sidon [a city in Lebanon], you have a checkpoint before you enter Tyre [a city in Lebanon], before you enter Tripoli then you have a checkpoint before you enter South of Lebanon, so you have a checkpoint actually before you enter any district where they just stop you, you show them your ID, and they say go or they ask you some questions before. Also gradually through the years, the Palestinian camps which did not have any army checkpoints, they started to add checkpoints. So now if you want to enter any camp (we have 12 Palestinian camps in Lebanon), there is an army checkpoint before you enter. They usually ask you why you're entering. If they find you strange, they check you, they check your car, they check your documents and ask why you are entering, if you're distributing anything, if you are carrying anything with you. Usually when we go to camps with my work, we have a permission from the Lebanese government to distribute food parcels or to distribute laptops, tablets, etc.

Asylos: Would you want to add anything about checkpoints that are run by militia, apart from the checkpoints run by the army?

Walaa Kayyal: I wouldn't call them checkpoints, I would call them offices. Because every party in Lebanon has some offices, they can be hidden offices. For example it can be a shop, a very small shop, but it's an office for party X. So it's not really a checkpoint. Checkpoints are only for army, as far as I know. When you enter any village and you are a stranger, there are offices for the specific party who is ruling over this area. They will approach you and ask why you are entering "Do you have anyone inside? Show us your ID." And if they don't like you or suspect that you are, I don't know, coming to do something that is against their interest, they will tell you to leave.

Asylos: I would now move on to the section of their reports which relates to health. We covered the COVID-19 in length in the report but we also found mentions of an increase in cases of viral hepatitis A within the population of stateless Palestinians since 2020. Are you aware of such an increase and/or of other communicable diseases?

Walaa Kayyal: Definitely. So I would not say it is specific to Palestinians or to Syrians or to Lebanese. Hepatitis A is a communicable disease spread through water. The more polluted the environment you reside in, higher the risk you will get hepatitis A. For Lebanese, they live in bigger houses with better infrastructures but are still getting hepatitis A because their water comes from the same source. Let me give you an example, last month we went to my mother, who is Lebanese and lives in a village, my brother got hepatitis A from there. My uncle, who is rich and lives in a mini villa, he also got hepatitis A, because the water is polluted. But from a public health perspective, when you are more vulnerable, it means you are living in a harsher situation, in a harsher environment where access to services is minimal. When the services are available, they are of a bad quality. So person who is living in a luxurious place getting hepatitis A and a person who is living in a camp or an informal settlement can both get hepatitis A but the risk of the second and the third are higher than for the first.

Asylos: In case you have any figures on this, maybe through your work or any other sources you might think of, that would be very helpful. Are there any other communicable diseases you know of that have been particularly affecting Palestinians in Lebanon other than COVID-19 and hepatitis A?

Walaa Kayyal: We have cholera now in Lebanon. However the Lebanese government is not openly saying how many cases there are and where they are concentrated. As usual, they are blaming the Syrians for transmitting cholera to the country. They say that all the cholera cases are concentrated among Syrians. So you will never know unless you contract it. When COVID-19 hit the country, the Lebanese government also said that it was among Syrians, that they brought it to the country, etc. Then the number of COVID-19 infections started rising and rising and they started to collect data on the nationality, place of residence and age of those infected. So now we have cholera, but I cannot tell you how bad the epidemic is. Until now I heard of 300-something cholera cases and maybe up to 13 deaths from cholera. But I cannot tell you where this is actually concentrated because the Lebanese government does not communicate.

Asylos: We have a section on mental health and psychosocial-related disorders amongst Palestinians. Likewise, if you have any more precise figures to send us, that would be very helpful.

Walaa Kayyal: There are several studies done by Dr. Rima Afifi, she's an American-Palestinian and professor at the American University of Beirut when I was a student. She now in a US American university. There are many studies she co-authored, specifically about mental health inside Palestinian camps. In general, on this subject you might not find many journal articles but a lot of grey literature. This grey literature might build on figures from local organizations or international non-governmental organizations working on mental health among Palestine refugees. According to the samples they have identified you might get different numbers and different figures, also according to the camps where they selected the beneficiaries etc.

Asylos: I would move on to the section on child protection and access to education for children. We wondered if child protection or social services are available to stateless Palestinians and if it is the case, to your knowledge, who would they be provided by?

Walaa Kayyal: UNRWA has been working very recently on mental health, so usually the UNRWA clinics, when they started they were focusing on chronic diseases, communicable diseases, providing awareness, providing dental services, et cetera. Because mental health was and still is a taboo in Lebanon, you cannot say "I'm seeing a psychologist to help me do one, two, three." People would answer "Oh what, are you crazy?" et cetera. But then many Lebanese organizations started saying, "No, people should talk, mental health is not a taboo," et cetera. So within all of this time when the awareness on the importance of mental health started to rise, UNRWA started to include mental health services inside their clinics,

where there is a psychologist who comes maybe two days per week in order to see patients, et cetera. But I don't have solid information about this. This is what I know from a project that I worked on with UNRWA but I wouldn't say that there is a clear structure in place. Also, the Lebanese Ministry of Public Health has a mental health department, they say that their services are open for all nationalities, not only for Lebanese. A lot of the NGOs, they have a hotline where you can call, but then you should be calling from your [phone] credits. And most importantly, if you are talking specifically about child protection services, most of these services are covered by international or local NGOs. So again, they're not structured. For example, now I work at an international NGO that provides child protection case management, and they provide for the case management. They provide emergency cash assistance and these projects are based on funds. So, for example if UNHCR stopped giving us, we will cut the service. We will not give any more child protection services. In brief, no, we don't have a structure. There are scattered services through the nongovernmental organization scope, but these are based on funds. So, if the fund is cut, the services are cut. We have some initiatives by UNRWA and the Ministry of Public Health, but these are more broadly into mental health rather than child protection.

Asylos: Do you have any information on the situation of child labor and child marriage?

Walaa Kayyal: Since the economic crisis, child labor increased because we have a devaluation of the Lebanese Lira, and the father of the family cannot afford to support the whole family. So Lebanese generally, their social status has dropped because of the devaluation of the currency. However, the poorer became the most poorer, and the majority of people now are under the poverty line. So without being able to quote any figure or any study, I can say that child labor has increased in Lebanon in general. This is because people have to eat, parents cannot afford anything anymore, so they send their children to work. Before the economic crisis we saw child labor in Lebanon but it increased. Inside the camps, UNRWA schools are free of charge. So children can enter and just pay something very negligible in order to enter the UNRWA school. But then some families still decide not to send their children to school so that they come and help them with their own work. So sometimes the father is a painter, and instead of getting another person to help him, he takes his child out of school to help him. Mostly, boys are involved in child labor. You see this inside the camp more than you see it outside the camp also because inside the camp it's a closed community, they don't have much interaction with the surrounding around them. They have everything in the camp. They have a hospital inside the camp. They have clinics inside the camp. They have pharmacies. They have supermarkets. They have everything inside the camp. So there's no need for them to get outside the camp, although what they have is low quality, they have it inside. In this closed community it is very acceptable for a child, even if they are in school, to help their dad with the work during summer, even if he's 10 years old or 12 years old. The belief is also that the boys helping their fathers during summer will become more masculine. So, this concept of child labor is very acceptable, and it's encouraged if the child is working with their father and/or mother.

Asylos: One question relates to UNRWA assistance regarding education, is UNRWA differentiating between children's legal statuses and does it have an impact on children's access to education?

Walaa Kayyal: UNRWA welcomes all Palestinians to get an education, I would say, regardless of their legal status. However, they need to see an identification paper and UNRWA registration card in order to register people before giving them assistance. Sometimes the UNRWA allows children without papers to come to learn how to write and read. In Lebanon during the 9th grade all students in Lebanon - whether Syrian, Lebanese, Palestinians, etc. – take an official exam planned by the Lebanese government in all disciplines. If they pass, they go to the secondary level, high school. Those who don't pass have to repeat their class. This is what we call the “brevet” similar to the baccalaureate that students do during the 12th grade. So, if the principal of the school is very welcoming, they would allow stateless children to come to learn how to write and read, without doing all the homework, but attending the English and Arabic sessions for example, just enough to become literate. But then when they reach the 9th grade, they cannot apply to take the official “brevet” exam because they need to have an ID for that, they need to have something to tell who they are and in order to identify them, where a card from the government is issued based on their ID in order to access the exams.

Asylos: I would move on to the next section on access to the labor market. We found many sources relating to legal restrictions that prevent stateless Palestinians to work in Lebanon, especially due to the ban on syndicated professions that you also evoked in your answer to a question earlier. We also found information according to which there were amendments made to the Lebanese Labor Law and Social Security Law in 2010, which waived work permits fees for Palestinian refugees in Lebanon. Does it mean that Palestinians still need to obtain a permit in order to work, but that this is now free of charge?

Walaa Kayyal: Palestinians can work in the informal sector. So for example, I can open a bakery without telling the government so that I don't pay taxes. They can work as painters, plumbers, butchers, they can work in a grocery store, they can work in a market. However, when they want to work in a formal sector, they should apply for a work permit. Usually it is the organization you would like to work for which should apply for work permits. For example I work in an international NGO here which applies every year for a work permit for me. Some organizations say "We don't apply for you. You should go to the Ministry of Labor and apply for it yourself." Then you apply for a work permit and you pay for it. And even if the organization applies on your behalf, they pay for you. It's not for free, but you pay a negligible administrative fee.

Asylos: According to sources we consulted, the 2010 amendment of the law meant to change the restrictions so that work permits are still required but are actually free of charge.

Walaa Kayyal: As far as I know, international NGOs or local NGOs (because this is where the educated Palestinians go for work since we cannot work in the public sector) have a quota. So they say that 20% of their employees can be foreigners. Foreigners include Palestinians. They can be Syrians, Iraqis, Americans, whatever... and within this quota, we can be employed. Usually, this quota for foreigners is quite low because they do not want to pay for too many work permits. You see, we as Palestinians are born here and we spend all our life and even die in Lebanon. But they still consider us as foreigners and treat us like foreigners. We are treated like any other foreigner coming to the country. We have tons of laws which are passed but not enforced in Lebanon. So even if the work permit is free, you still have some administrative fees.

Asylos: What would be the consequences if you were caught working without a permit?

Walaa Kayyal: No organization will jeopardize their reputation or their relation with the government to employ you without a work permit. So it is either you have a work permit, or they can issue a work permit for you, or they don't employ you. But sometimes, and I've heard this through many research work that I have done that sometimes specifically pharmacies employ someone who is stateless without work permits. The Ministry of Public Health comes and conducts inspections and check-ups on all the pharmacies, specifically, the newly established pharmacies or the pharmacies in villages. When this inspection occurs, the stateless employees would be smuggled out because they are not allowed to work without a permit. If you were caught, this is definitely a complete termination of your work contract. What exactly happens is up to the person who caught you. They can raise an allegation and it can go to court. Or they can just say, "You're not allowed to work anymore." and terminate your contract. But then again, the owner of the pharmacy can tell you, "come tomorrow. It's fine." They don't do regular checkups. It's very rare that they go and they catch people. But it happens because I've heard specifically from stateless individuals who are educated that when the ministry comes for any checkup or they come to collect taxes, they would hide in the toilet.

Asylos: In a scholarly article from 2022 we found references to recent new employment restrictions affecting Palestinian businesses and increased insecurity. Do you know what they refer to?

Walaa Kayyal: It was a law to be issued by the previous labor minister. He wanted to deny Palestinians from work (by regulating foreign labor, but without excluding Palestinians from this regulation). There was a very big protest by all Palestinian in camps. I think they did not proceed with the regulation in the end. I think it was in 2019.

Asylos: Can you think of any additional practical challenges faced by stateless Palestinian because of other particularities like their legal status, because of their gender, their class, religion, or disability?

Walaa Kayyal: If you're a Muslim and you want to apply for work in a Christian place, they do not accept you because you are a Muslim. If you're a veiled woman neither. If you are a woman without a veil and you are going to a Muslim community, they won't accept you. If you're a person with a disability, they definitely don't accept it because they don't think that you can get the job done. Sometimes men are not accepted in certain branches. Other women are not accepted. Everything in Lebanon is very discriminatory. When you want to apply you have to be compatible with the place you are going to work with. With the exception of international organizations and NGOs. They have a code of conduct and all the regulations that welcome everyone to join, even people with disabilities. But the majority of local organizations, shops, and private organisations, they restrict. On paper they say "We are an equal-opportunity employer," but they do take into consideration all of the mentioned above. Also, here in Lebanon, you should have a wasta [knowing someone in a position of power to help you]. So it's like a recommendation. If you belong to party X and the chief of this party said, "Can you please employ my nephew?" Others can apply for this job and be perfect candidates, but won't get the job because someone has recommended his nephew to take the job. So, this is very central to employment in Lebanon.

Asylos: We found several sources relating to the exclusion of Palestinian refugees from the right to own real estate by law 296/2001. Are any steps currently being taken to improve Palestinians' access to property?

Walaa Kayyal: All Palestinians who bought houses before 2001, they can register it and it legally belongs to them. But after 2001, Palestinians were forbidden to own any property. You have people of other nationalities who own properties but not Palestinians. For example, Syrians can own a house, Yemenis can own a house, Saudis can own a house, Kuwaitis can own a house. But Palestinians cannot own a house. And it is in the Lebanese law, it's written this way: Palestinians are not allowed to. Currently I do not know of any step taken to improve this situation for Palestinians.

Asylos: Next point relates to state attitudes, discrimination by state authorities, and availability of state protection. We found two sources reporting negative public statements regarding, specifically, stateless Palestinians that were made by government officials in 2022 and 2020. We were wondering if you could give us other occurrences that would be illustrative of the way stateless Palestinians are portrayed by government officials? If you think of any.

Walaa Kayyal: I think they never specifically refer to "stateless" Palestinians. However you can find a lot on the web concerning what government officials say about Palestinians, saying that the Lebanese are "bearing the burden of our Palestinian brothers and sisters on the land." I remember that before the protests following announcements on work restrictions, the minister of labour spoke publicly on TV insisting on calling Palestinians foreigners.

Asylos: Another point refers to arrest and detention by state authorities. We did not find much information on these aspects in the public domain.

Walaa Kayyal: You will not. I do not know of any research specifically targeting this issue. You will hear many accounts relating to state violence but not much in literature. It also echoes with what we were discussing about checkpoints. The majority of Palestinians victims of state violence are detained at checkpoints or following a demonstration. Then, inside the detention centers, Palestinians are subjected to verbal, emotional, mental, and physical abuse. Many leave the detention centers with loss of hearing or sight, bruises all over their bodies, cracked bones, and sometimes they die during interrogation. Publications on these topics are minimal as they entail the action of the government or are known only within the government body. So, seeking information from them is hard and no studies as far as I know have interviewed Palestinians detained. However, maybe you can find grey literature on some interviews done by people detained or inside jails and how they are being treated. You can also find some information regarding the jails in Lebanon, which might give you a larger idea about the situation.

Asylos: Concerning access to justice, security, and state protection, do you have information on stateless Palestinians' practices of reporting complaints to the police?

Walaa Kayyal: Usually, stateless individuals, whether they are Palestinians or Lebanese of lower status, are afraid to approach any government facility or to talk to any representative of the army. Any person who is wearing a uniform, they do not approach them. If they see them, they change their way because they are afraid. Because they cannot show any papers and can therefore be arrested and detained. So stateless persons do not approach any government facility or any person wearing a governmental uniform, whether in the army or in the general secretariat or in any security forces branch. In rare cases where they have a very good relation with the mayor in their village, they would address a complaint informally, but not more than this. If I want to go and file a complaint about any person, about my neighbour who is, I don't know, harassed me or about a teacher who insulted me, etc, the first thing they will ask is my ID. Because you need to fill another form and you need to provide a copy of your ID. And if you don't have it, then they will detain you. So they'd rather, if you want, keep silent instead of ending up detained.

Asylos: Do you know of state authorities registering complaints of discrimination that targets specifically status Palestinians? Would you know of any such case that has been followed up on?

Walaa Kayyal: No.

Asylos: Can you think of specific media coverage illustrative of the ways stateless Palestinians are portrayed?

Walaa Kayyal: The media circulate the Lebanese government's narrative that is concentrated around two points of pressure, asking UN agencies for more money to help Lebanon as well as pressuring the World Bank : "give us money, otherwise we will let the Syrian go" They always mention on TV that "Lebanon is dealing with the burden of the Palestinians". They always mention it. This is something that is normal. And every time when they want to pressure the UN agencies to give more money to Lebanon, they say, we have the burden of Palestinians and we have the burden of Syrians. If you don't give us money, we will have to deport the Syrians.

Asylos: Are stateless Palestinians disproportionately affected by exploitation and other types of harm such as physical violence, sexual abuse etc? Are stateless Palestinians disproportionately affected by human trafficking?

Walaa Kayyal: I think the search should be specific as PRLs are not considered illegal, while Palestinians who came in 1967 and their children don't exist from the government's perspective. The same applies to newborns of Palestinians who came from Syria as their legal documents should be issued by the Syrian government, however, UNHCR deals with their cases.

Asylos: Is there any additional penalty eg. deportation for stateless Palestinians who committed offences, in Lebanon or outside of Lebanon?

Walaa Kayyal: The sentence is set by Lebanese law and the judge gives the final number. On the other hand, the juridical system in Lebanon is corrupted like any other system. So, if the judge likes Palestinians he would give the minimum years of sentence, if not s/he gives the maximum. As a community, we feel there is a difference in treatment even in prison but nothing is evident.

Asylos: Are stateless Palestinians permitted to gather, protest, hold a political office in Lebanon?

Walaa Kayyal: No political office. Protests rarely happen, the only one I recall was due to the labor law. But I can imagine that all of them would be detained if they hold a protest to defend their rights and usually Palestinians don't do protests as a result of fear. Palestinian have offices inside the camps only.

Asylos: Do stateless Palestinians experience any forms of reprisals as a result of gathering/protesting/gaining a public profile for speaking on a political issue?

Walaa Kayyal: They would definitely be detained, but this also applies to Lebanese when they do a protest.

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