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The Situation of Palestinian Refugees from Syria

**Report based on a Fact Finding Mission to
Beirut, Lebanon, from 30 June to 7 July 2019**



Ministry of Immigration
and Integration

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Immigration Service

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Disclaimer

This report is written according to the EASO COI Report Methodology.¹ The report is based on approved minutes from meetings with carefully selected sources in Beirut, Lebanon. Statements from sources are used in the report and all statements are referenced.

This report is not, and does not purport to be a detailed or comprehensive survey of all aspects of the issues addressed in the report and should be weighed against other available country of origin information on the situation of Palestinian refugees from Syria in Lebanon.

The report at hand does not include any policy recommendations or analysis. The information in the report does not necessarily reflect the opinion of the Danish Immigration Service.

Furthermore, this report is not conclusive as to the determination or merit of any particular claim to refugee status or asylum. Terminology used should not be regarded as indicative of a particular legal position.

¹ European Union: European Asylum Support Office (EASO), EASO Country of Origin Information report methodology, June 2019, [url](#)

Introduction and methodology

This report focuses on the situation of Palestinian refugees from Syria (PRS) in Lebanon. The report contains information on entry into and legal status in Lebanon, access to services, housing and the labour market, as well as protection by the authorities of single women against violence in private conflicts, prevalence of harassment or mistreatment of PRS in the Shia-/Hezbollah-dominated areas in the south and finally the prevalence of refoulement or pressure to return to Syria.

The report is the product of a fact finding mission conducted by the Country of Origin Information Division, Danish Immigration Service (DIS) to Beirut, Lebanon, from 30 June to 7 July 2019.

The purpose of the mission was to collect updated information on recurring issues identified in cases pertaining to PRS asylum seekers in Denmark. Taking this into account, the terms of reference (ToR) was written by DIS in consultation with the Danish Refugee Appeals Board as well as an advisory group on COI ('Referencegruppen').² The ToR is included at the end of the report (Appendix 2).

Prior to the mission sources were identified on the basis of the ToR and the expertise, merit and role of each source relevant to the mission.

During the mission the delegation consulted nine interlocutors, comprising Lebanese governmental authorities, international organisations, international NGOs, a humanitarian organisation and a local NGO. One source did not have information relevant to the ToR and therefore the minutes from the meeting have not been included in the report. Another source requested afterwards that the information provided by the source only be used as background information and not in the final report. As this source was the only interlocutor who provided the delegation with information relating to procedures for changing PRS' status (i.e. registration of PRS with the Lebanese and Syrian authorities) this issue could not be addressed in the report.

The sources were briefed about the purpose of the mission and informed that their statements would be included in a publicly available report in accordance with their preferred referencing. The meeting minutes were forwarded to each source for approval with the possibility to amend, comment or correct the statements. Seven sources approved their statements. The minutes from the meeting with Lebanese General Directorate of General Security was not sent for approval as the source did not find it necessary.

The report is a synthesis of the sources' statements and therefore does not include all details and nuances of each statement. In the report, care has been taken to present the views of the sources as accurately and transparently as possible. The statements of all sources are found in their full extent in Appendix 1 of this report.

During the interviews, the sources may have highlighted issues that are not addressed in the ToR. Since these issues could be relevant to refugee status determination, they are included in the meeting minutes in Appendix 1, but they are not addressed in the report.

² The group consists of the Danish Refugee Council, Amnesty International in Denmark, Danish Institute for Human Rights, Dignity, representatives of two Christian organisations ("Europa Missionen" and "Åbne Døre"), the National Commissioner of Police and the Danish Bar and Law Society (representing asylum lawyers).

For the sake of reader-friendliness, transparency and accuracy, paragraphs in the meeting minutes in Appendix 1 have been given consecutive numbers which are used in the report when referring to the statements of the sources in the footnotes.

The Danish Embassy in Beirut provided valuable assistance in the planning and execution phases of the mission.

The research and editing of this report was finalised on 23 August 2019.

The report can be accessed from the website of DIS, www.newtodenmark.dk, and thus is available to all stakeholders in the refugee status determination process as well as to the general public.

Abbreviations

COI	Country of Origin Information
DPAR	General Directorate of Political Affairs and Refugees in Lebanon
GAPAR	General Administration for Palestine Arab Refugees in Syria
GDGS	General Directorate of General Security
DIS	Danish Immigration Service
EASO	European Asylum Support Office
PRL	Palestinian Refugees from Lebanon
PRS	Palestinian Refugees from Syria
UNHCR	United Nations High Commissioner for Refugees
UNRWA	United Nations Relief and Works Agency for Palestine Refugees in the Near East

Executive summary

PRS' possibility to enter and reside in Lebanon is heavily restricted. Being entitled to a residence permit in Lebanon as a child of a Lebanese mother or being a spouse to either a Lebanese or a Palestinian refugee from Lebanon (PRL) husband, does not impact the possibility to obtain an entry permit into Lebanon. A previous residence permit in the country does neither impact the possibility of a new residence permit. A child of a Lebanese mother and a spouse to a Lebanese or a PRL husband cannot apply for residence permit from abroad. They must be present in Lebanon when applying.

General Directorate of General Security (GDGS) will not process cases regarding rejected PRS asylum seekers from third countries, and the directorate will not approve their entry into Lebanon, regardless of whether they are sent by force or on a voluntary basis.

UNRWA Lebanon provides its services to all PRS in Lebanon, including education, health care services and cash assistance, provided that they are registered with UNRWA in Syria.

Affordable housing is difficult to find in Lebanon, and access to housing is a great challenge for many PRS, whose main source of income is the UNRWA cash assistance. 50 per cent of the PRS in Lebanon live in the Palestinian refugee camps.

PRS' access to the labour market is restricted in Lebanon and many PRS work within the informal sector where the wages are low.

Law No. 293 of 2014 provides for protection of women by the authorities against violence in family conflicts. However, the Lebanese authorities do not provide protection to women living in one of the 12 official Palestinian refugee camps, who risk being subjected to violence in private conflicts.

PRS living in Southern Lebanon do have access to services and are not subject to harassment or violence due to their religious and ethnic background.

There have been no reports of PRS currently inside Lebanon who have been deported to Syria by the Lebanese authorities. However, there have been cases of PRS being sent back to Lebanon from a third country through the airport, who have been deported to Syria directly from the airport in Lebanon.

Background

In 2011, unrest broke out in Syria, resulting in a refugee influx into Lebanon.³ As per July 2019, there were 926,717 UNHCR registered refugees from Syria⁴ and around 28.500 PRS registered with UNRWA in Lebanon.⁵ In the first years of the conflict, Lebanon maintained an open-border policy, allowing refugees to enter the country without visa.⁶ However, in May 2014 the Lebanese government imposed entry restrictions for PRS,⁷ and according to UNRWA only 12 per cent of PRS currently present in the country entered after the implementation of the entry restrictions.⁸ In January 2015 visa requirements for all Syrians entering Lebanon were implemented.⁹

³ United States Congressional Research Service, *Lebanon*, 19 June 2018, [url](#)

⁴ UNHCR, Syria Regional Refugee Response, *Operational Portal – Refugee situation*, [url](#)

⁵ UNRWA: 10

⁶ United States Congressional Research Service, *Lebanon*, 19 June 2018, page 18-19, [url](#);

⁷ UNRWA, *2015 Syria Crisis Response Progress Report*, 2015, [url](#)

⁸ UNRWA, Protection brief, *Palestine refugees living in Lebanon*, April 2019, publication

⁹ UNHCR, *Q&A on 'New entry & renewal procedures for Syrians in Lebanon' ENTRY TO LEBANON*”, august 2016, [url](#); United States Congressional Research Service, *Lebanon*, 19 June 2018, page 19, [url](#)

1. Entry and legal status of Palestinian refugees from Syria

1.1. Possibility of entry into Lebanon for Palestinian refugees from Syria

In order to enter Lebanon PRS have to obtain an entry permit issued by the General Directorate of General Security (GDGS).¹⁰ An entry permit is only issued in two cases; if the PRS has a valid appointment with an embassy in Lebanon, or if s/he has a valid ticket to and a visa from a third country where Lebanon is used as transit. Apart from these two cases, PRS are not permitted to enter Lebanon. Humanitarian reasons are not sufficient ground for an entry permit for PRS.¹¹

The requirement for an entry permit applies regardless of whether the PRS is travelling alone or with her/his Lebanese or PRL relatives (e.g. Lebanese mother, PRL or a Lebanese spouse).¹²

The visa to Lebanon for PRS is not renewable, and the individual's stay will become illegal after a couple of days or weeks if s/he does not leave Lebanon after the expiration of the visa.¹³

Possessing a previous residence permit in Lebanon or being entitled to a residence permit in Lebanon does not impact a PRS' possibility to obtain an entry permit or a new residence permit in the country.¹⁴

MFA noted that applications submitted by the authorities from a third country for return of PRL, who are denied residence permit in those countries and who do not have valid travel documents from Lebanon, are being processed case by case; however only humanitarian cases are given priority.¹⁵

According to a memorandum from GDGS, no PRS entering Lebanon after September 2016 can renew his/her visa.¹⁶ NRC noted that the memorandum issued in 2016 stipulates that Lebanon will not allow any entrance of PRS entering from Syria or via the airport.^{17 18}

1.1.1. Rejected asylum seekers

Lebanon does not accept rejected PRS asylum seekers from a third country; the GDGS will not process these cases and they will not be allowed to enter Lebanon regardless of whether they are sent by force or on a voluntary basis. Previous residence in Lebanon, or entitlement to a residence permit in Lebanon, for instance as a child of a Lebanese mother, will not have any impact on the possibility to enter Lebanon in such cases.¹⁹

¹⁰ GDGS: 2; NRC: 82; MFA: 8; NRC: 82; For more information, see: General Directorate of General Security, رعايا الدول التي يحق لها، بتأشيرات دخول الى لبنان، [Nationals of countries entitled to visas to enter Lebanon], [url](#)

¹¹ UNRWA: 11

¹² GDGS: 2; UNRWA: 19

¹³ UNRWA: 14

¹⁴ GDGS: 1, 4

¹⁵ MFA: 9

¹⁶ UNRWA: 14

¹⁷ NRC: 82

¹⁸ "Since October 2015, several memoranda have been issued by the GSO, few of them accessible to the public, allowing for a free-of charge renewal of residency documents, with the exception of those who entered irregularly. Starting in July 2017, it was specified that unlimited free-renewal is available for 6 months for those PRS who entered Lebanon before September 2016, with no penalty charge for delays. However, the July 2017 memorandum excludes persons who entered Lebanon after September 2016, as well as those who entered irregularly and those with an exit order. A considerable number of PRS are therefore still unable to regularize their stay in Lebanon. In addition, PRS children who turned 15 years old in Lebanon, without a passport or national identity card will be granted a temporary residency document by the Lebanese Authorities if they present an individual status record that was issued in the last two years and officially stamped by the Lebanese Embassy in Syria and the Ministries of Foreign Affairs in Syria and Lebanon." UNRWA, *Protection brief – Palestine refugees living in Lebanon, June 2018*, page 2, [url](#)

¹⁹ GDGS: 1; MFA: 7

1.2. Legal status of Palestinian refugees from Syria in Lebanon

Persons entitled to a residence permit are listed on the GDGS's website. Among the persons included in the list are: children of a Lebanese mother as well as children of a Lebanese father, a female and male spouse of a Lebanese, female spouse of a PRL and minor children of a female PRL.²⁰ However, the applicant cannot apply for a residence permit from abroad, and s/he has to be physically present in the country when applying for a residence permit.²¹

Approximately 60 per cent of PRS residing in Lebanon have legal residency. Unlike Syrians, PRS cannot obtain residency via a sponsorship from a Lebanese citizen.²²

Over the years, there have been more separate circulars, separate memos and changes regarding legal residency procedure for PRS compared to Syrians. There have been several changes, and often it is difficult to know which circular applies.²³

1.2.1. Required documents

During the meeting with GDGS, the delegation was referred to GDGS' website for information regarding required documents when applying for residence permit in Lebanon.²⁴

It appears from the website that depending on the type of residency permit applied for, various documents are required. Examples of such documents are: a certificate of civil status or any other official documents that prove that the applicant is of Lebanese origin, a birth certificate or any official document that proves that the applicant has a Lebanese mother, a marriage certificate and an Extract of Family Civil Registry Record.²⁵

Without the required documents, the GDGS will not process the application for residence permit.²⁶

2. Access to services, housing, labour market, financial assistance

UNRWA Lebanon provides its services to all PRS in Lebanon regardless of whether they have entered and are residing legally in Lebanon or not. However, PRS' access to UNRWA services in Lebanon requires that they are registered with UNRWA in Syria.²⁷

According to UNRWA, currently, around 28.500 PRS are residing in Lebanon whereas the number was approximately 45.000 in 2016.²⁸ Close to 50 per cent of PRS living in Lebanon reside in the Palestinian

²⁰ General Directorate of General Security, الإقامة السنوية, [Annual residence], [url](#); General Directorate of General Security, إقامة مجاملة, [courtesy residence], [url](#); General Directorate of General Security, Courtesy residence, [url](#); General Directorate of General Security, Annual residence, [url](#)

²¹ GDGS: 3

²² NRC: 78

²³ NRC: 77, 79, 80

²⁴ GDGS: 5

²⁵ General Directorate of General Security, الإقامة السنوية, [Annual residence], [url](#); General Directorate of General Security, إقامة مجاملة, [courtesy residence], [url](#); General Directorate of General Security, Courtesy residence, [url](#); General Directorate of General Security, Annual residence, [url](#)

²⁶ GDGS: 5

²⁷ UNRWA: 20

²⁸ UNRWA: 10

refugee camps, and this high concentration has put an additional pressure on the resources, the infrastructure and the services in the camps.²⁹ The situation in the Palestinian refugee camps is further affected by the funding situation in UNRWA, as access to health care services and education is fully depending on UNRWA funding.³⁰

Some UNRWA services (education and health) are provided outside the camps; however, there are some camps which are closed off by the Lebanese Security Forces for security reasons, which makes movement in and out of them difficult, particularly for PRS without valid documentation.³¹

PRS registered in Syria start receiving UNRWA services one month after they approach UNRWA in Lebanon, as the agency wants to ensure that the PRS in question intends to stay in the country.³²

2.1. Access to basic services (water, electricity, sanitation)

There is access to water, electricity and sanitation in the 12 official Palestinian refugee camps in Lebanon. However, the access is not regular and stable, and there are shortages in the services.³³ Some Palestinian refugee camps are not connected to the electricity and water supply system of the cities; in this case they have to procure their electricity and water via other channels.³⁴

2.2. Access to housing

Generally in Lebanon, affordable housing is very difficult to find.³⁵ Access to housing is a great challenge for many PRS, whose main source of income is the UNRWA cash assistance.³⁶

PRS living in the Palestinian refugee camps usually rent accommodation from PRL.³⁷

Human Rights Watch (HRW) noted that the Lebanese Higher Defence Council recently has passed an order putting housing restrictions on refugee settlements on agriculture land. The shelter order which was implemented in June 2019 is perceived to pressure the refugees with housing that do not meet the requirements, to return to Syria, according to HRW.³⁸

2.3. Access to education

PRS have access to the UNRWA educational services as PRL,³⁹ and there are generally no obstacles for PRS in this regard.⁴⁰ UNRWA provides education up to the end of secondary education and PRS have access to the UNRWA secondary schools without limitations.⁴¹

PRS are not denied access to the public schools in Lebanon. However, priority is given to Lebanese students. If Lebanese schools have openings, they will register non-Lebanese students on the condition that

²⁹ UNRWA: 22, 26; NRC: 84

³⁰ NRC: 86

³¹ UNRWA: 21; NRC: 83

³² UNRWA: 16

³³ UNRWA: 23; NRC: 83

³⁴ UNRWA: 23

³⁵ NRC: 85

³⁶ UNRWA: 24

³⁷ UNRWA: 25; NRC: 84

³⁸ HRW: 61; HRW referred to the report: Human Rights Watch, *Lebanon: Syrian Refugee Shelters Demolished*, 5 July 2019, [url](#)

³⁹ UNRWA: 28

⁴⁰ NRC: 87

⁴¹ UNRWA: 30

the number of non-Lebanese students does not exceed 50 per cent of the total number of the classroom capacity.⁴²

For public and private universities, Palestinian refugees can generally enrol as long as they pay the fees. Higher education is only found outside the Palestinian refugee camps.⁴³

2.4. Access to health care services

PRS have access to all primary health care services provided by UNRWA in Lebanon. UNRWA also runs mobile health clinics in some areas in the South with a high concentration of Palestinians, which PRS also have access to.⁴⁴ Generally, there are no obstacles for PRS to access UNRWA health care services if they stay in areas where these services are available.⁴⁵

Secondary and tertiary health care services are only found outside the Palestinian refugee camps.⁴⁶ There is a system of partial coverage of expenses related to secondary and tertiary health care services where UNRWA Lebanon pays a certain percentage of these services. UNRWA's partial support for secondary and tertiary treatment applies to UNRWA-contracted public or private hospitals, whereas UNRWA covers 100% of secondary care at hospitals run by the Palestinian Red Crescent.⁴⁷ The UNRWA-contracted hospitals are available all over Lebanon, and are more prevalent in areas where there is a high concentration of Palestinian refugees.⁴⁸

2.5. Access to the labour market

According to the legal framework in Lebanon, PRS are considered foreigners and they can only apply for jobs allowed for foreigners.⁴⁹ PRS do not benefit from any of the exemptions and facilitations accorded to either Syrians or PRL in Lebanon.⁵⁰ PRS are primarily working within cleaning, agriculture and the construction sector in addition to working informally in other sectors restricted to Lebanese.⁵¹ The majority of PRS are working in the informal sector in Lebanon.⁵²

All workers in Lebanon need a work permit and employers are required to seek a work permit for their workers. PRS cannot apply for a work permit for work in sectors that is restricted to Lebanese. However, PRS married to a Lebanese, and sons of Lebanese mothers as well as persons exempted for other reasons by the Ministry of Labour, are allowed to apply for the same jobs as Lebanese.⁵³

PRS are placed at the low end of the wage hierarchy in the Lebanese labour market.⁵⁴ While the salary for unskilled work in the construction sector is usually at least 20 USD a day (minimum wage in Lebanon), in

⁴² UNRWA: 27

⁴³ UNRWA: 21, 32

⁴⁴ UNRWA: 33

⁴⁵ NRC: 88

⁴⁶ UNRWA: 21

⁴⁷ UNRWA: 34

⁴⁸ UNHCR: 96

⁴⁹ UNRWA: 36; ILO: 64

⁵⁰ UNRWA: 36

⁵¹ ILO: 64

⁵² UNRWA: 36; ILO: 76

⁵³ ILO: 65, 68, 70

⁵⁴ UNRWA: 37

other sectors such as the agriculture, it is observed that particularly women are underpaid and their salary can sometimes be 10 USD a day.⁵⁵

Access to the labour market is not regulated by the law in the Palestinian refugee camps. Types of employment in the camps include microenterprise activities, trade and repair. Many Palestinians are also employed by the UNRWA. The majority of Palestinians working have jobs outside the camps; jobs outside the camps are better paid.⁵⁶

2.6. Access to travel documents

It does not appear on the website of GDGS that GDGS issues travel documents to PRS in Lebanon.⁵⁷

PRS are able to renew their travel documents at the Syrian embassy in Lebanon. However, not many PRS want to approach the Syrian embassy as they have fled Syria and the Syrian authorities.⁵⁸

PRL without (valid) travel documents staying abroad can apply for (new) travel documents at the nearest Lebanese embassy. The embassy will forward the application to the Lebanese Ministry of Foreign Affairs, who will study it.⁵⁹

2.7. Access to financial assistance from UNRWA

UNRWA's cash assistance to PRS is aligned with UNHCR criteria, which are 27 USD per person and 100 USD per family/household per month. The assistance is provided by UNRWA and the amount can be withdrawn through ATM, but those without access to ATM can also receive the assistance in cash. In order to benefit from the cash assistance in Lebanon, PRS have to document that they have been living in Syria during the time of the crisis.⁶⁰

2.8. Protection by the authorities of single women against violence in private conflicts

2.8.1. Protection inside the Palestinian refugee camps

The Lebanese authorities, including the police, do not enter the 12 official Palestinian refugee camps in Lebanon and as such do not provide protection to women who risk being subjected to violence in private conflicts. Any intervention by the Lebanese authorities in private conflicts would require coordination with the Palestinian security committees in each of the camps, which is not always possible. Furthermore, the Palestinian popular committees in the Palestinian refugee camps in Lebanon, who are responsible for the security in the camps, do not tend to prioritize protection of women in private conflicts either.⁶¹

2.8.2. Law No. 293

With law No. 293 from 2014 the police is more obliged to interfere in cases regarding family violence and an officer can be fired if s/he does not follow the law.⁶² It is not always clear to the police officers how they should handle cases of family violence; sometimes, they refer a woman asking for protection to the court,

⁵⁵ ILO: 74

⁵⁶ ILO: 76; UNRWA: 21

⁵⁷ General Directorate of General Security, *Functions of the general security*, [url](#)

⁵⁸ UNRWA: 38

⁵⁹ MFA: 9

⁶⁰ UNRWA: 20, 39

⁶¹ UNRWA: 40, 41, 42

⁶² KAFA: 104

and sometimes they do not. The Lebanese NGO, KAFA, has trained a large number of police officers in how they should handle cases of family violence according to the law.⁶³

If a woman needs protection in a family conflict, she can directly, immediately or at any time go to a 'Court for Urgent Matters' (*Adel al-Omur al-mosta'jala*) which will issue a 'protection order' (*qarar hemaya*).⁶⁴

There are shelters run by NGOs in Lebanon.⁶⁵ The number of shelters does not correspond to the women's need for protection. However, even in rural areas a woman can be protected if she has a protection order, and if her family is the perpetrator she can be referred to a shelter.⁶⁶

KAFA noted that there is no difference between refugee women (e.g. Syrians or Palestinian women from Syria) and Lebanese women regarding the possibility of getting protection according to law No. 293.⁶⁷

There is a difference between different areas in Lebanon with regard to the extent to which women trust the authorities concerning their protection. The extent of support given to women by their families is also different in different areas of Lebanon.⁶⁸

3. Harassment or mistreatment of Palestinian refugees from Syria in the south

PRS living in Shiite-dominated South Lebanon are not subjected to harassment or mistreatment by Hezbollah or other Shiite groups due to their Sunnite or Palestinian background and they do not have difficulties accessing services because of that. Most Palestinians live within Palestinian communities or in the camps, and few live among local Lebanese.⁶⁹

4. Prevalence of refoulement or pressure to return to Syria

4.1. Refoulement to Syria

The Lebanese Higher Defence Council has recently issued a directive stipulating that anyone who has entered Lebanon illegally after 24 April 2019 can be deported.⁷⁰ NRC highlighted that theoretically, it means that any Syrian in Lebanon can be arrested and be accused of having entered the country illegally, and then deported. The decision is not publicly available.⁷¹

There have been no reports of PRS currently inside Lebanon who have been deported to Syria by the Lebanese authorities.⁷² However, there have been reports of Syrian nationals being deported directly from

⁶³ KAFA: 104

⁶⁴ KAFA: 103

⁶⁵ KAFA: 100

⁶⁶ KAFA: 110

⁶⁷ KAFA: 108

⁶⁸ KAFA: 106

⁶⁹ NRC: 89, UNRWA: 52

⁷⁰ HRW: 56; NRC: 91

⁷¹ NRC: 91; For a legal analysis by a national NGO, NRC referred to the English version of a position paper on deportations.: The Legal Agenda, *Forced Deportations to Syria: Rights Organizations Call on Lebanon to Respect the Rule of Law*, 24 June 2019, [url](#)

⁷² NRC: 93; UNRWA: 46

the airport to Syria from Lebanon since April 2019.⁷³ The Lebanese authorities have acknowledged that some individuals have been deported.⁷⁴

PRS who are sent (back) to Lebanon from a third country through the airport will risk being immediately deported to Syria. UNRWA was familiar with four or five cases within the last years where PRS are directly deported to Syria from the airport.⁷⁵

4.2. Returns to Syria

Over the past years, the Lebanese government has adopted several measures making it more difficult for Syrians to remain in Lebanon; as examples HRW mentioned the restricted freedom of movement, the shelter order, the arrests, the eviction and the restrictions on work. The general atmosphere of wanting the refugees to return does also apply to PRS.⁷⁶

Since January 2018, the number of PRS in Lebanon returning to their place of habitual residency in Syria has been higher than those newly entering Lebanon. The socio-economic hardship, lack of employment opportunities, lack of access to health care services, education and inadequate housing in Lebanon are some of the reasons behind the returns.⁷⁷

According to UNRWA, most PRS returning to their place of habitual residence in Syria have gone to Damascus or rural Damascus. However, UNRWA does not have information on whether they have moved on from Damascus to other areas in Syria.⁷⁸

Neither UNRWA nor UNHCR are facilitating returns of PRS to their place of habitual residence in Syria. Further, they are not involved in any activity encouraging PRS to return.⁷⁹

⁷³ HRW: 54; NRC: 90

⁷⁴ HRW: 59; NRC: 90

⁷⁵ UNRWA: 44, 45, 46

⁷⁶ HRW: 60, 61, 62, 63

⁷⁷ UNRWA: 47, 48

⁷⁸ UNRWA: 50

⁷⁹ UNRWA: 51

Consulted sources

Oral sources

General Directorate of General Security, GDGS

The Lebanese Ministry of Foreign Affairs, MFA

The United Nations Relief and Works Agency for Palestine Refugees in the Near East, UNRWA

Human Rights Watch, HRW

The International Labour Organization, Regional Office for Arab States, ILO

Norwegian Refugee Council, NRC

The United Nations High Commissioner for Refugees, UNCHR

KAFA (enough) Violence & Exploitation, KAFA

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Access Center for Human Rights, *Syrian refugees deported from Beirut airport to the Masnaa Border gateway*, 26 April 2019, <https://www.achrighs.org/2019/04/26/syrian-refugees-deported-from-beirut-airport-to-the-masnaa-borders-gateway/?fbclid=IwAR0bmGgQCq9gcjsryVbsWREil1CC2npv4UdH6bSs4IM0fSEdJ2Z7zIMqq8>

General Directorate of General Security, لبنان، رعايا الدول التي يحق لها بتأشيرات دخول الى لبنان, [Nationals of countries entitled to visas to enter Lebanon], <http://www.general-security.gov.lb/ar/posts/38>

General Directorate of General Security, الإقامة السنوية, [Annual residence], <http://www.general-security.gov.lb/ar/posts/241>

General Directorate of General Security, إقامة مجاملة, [courtesy residence], <http://www.general-security.gov.lb/ar/posts/6>

General Directorate of General Security, Annual residence, <http://www.general-security.gov.lb/en/posts/241>

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Appendix 1: Meeting minutes

Meeting with General Directorate of General Security, Beirut, 5 July 2019

About the source: General Directorate of General Security, GDGS, is an intelligence agency under the Minister of Interior. Among its tasks, the GDGS is responsible for issuing visas, entry permits and residence permits. Further, it is responsible for issuing passports to Lebanese nationals and travel documents to Palestinian refugees from Lebanon.

Possibility for entry and legal status of rejected PRS asylum seekers who are sent back to Lebanon

1. Lebanon does not accept rejected PRS asylum seekers from a third country; the GDGS will not process these cases and they will not be allowed to enter Lebanon regardless of whether they are sent by force or on a voluntary basis. Previous residence in Lebanon or being entitled to a residence permit in Lebanon, for instance due to be child of a Lebanese mother, will not have any impact on the possibility to enter Lebanon in such cases.
 2. PRS have to obtain an entry permit/visa in order to enter Lebanon.⁸⁰ The requirement of an entry permit applies regardless of whether they are travelling alone or with their Lebanese or PRL relatives (e.g. Lebanese mother, PRL or a Lebanese spouse).
 3. A foreign child, regardless of age, to a Lebanese mother, is entitled to a residence permit. However, s/he cannot apply for a residence permit from abroad, but has to be physically present in the country when applying for a residence permit. The same applies to a spouse to a Lebanese or a PRL husband.
 4. A previous residence permit in Lebanon does not impact a PRS' possibility to obtain an entry permit or a new residence permit in the country.
 5. Persons entitled to a residence permit are listed on the GDGS's website. The requested documents when applying are also listed on the same website.⁸¹ Without the required documents, the GDGS will not process the application for residence permit.
 6. There are approximately 35.000 PRS in Lebanon.
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⁸⁰ For more information, see General Directorate of General Security, [url](#)

⁸¹ General Directorate of General Security, *Courtesy residence*, [url](#); General Directorate of General Security, *Annual residence*, [url](#)

Meeting with the Lebanese Ministry of Foreign Affairs (MFA), Beirut, 5 July 2019

PRS' access to and legal status in Lebanon

7. Lebanon does not accept Palestinian refugees from Syria (PRS), who are denied residence permit in a third country, to enter Lebanon regardless of whether they are sent by force or on a voluntary basis. These refugees should be sent back to their country of origin, i.e. Syria, and not to Lebanon.
 8. The MFA underlines that all decisions regarding entering and residing in Lebanon is taken by the General Security, and the MFA is only liaising between the authorities in other countries and the General Security.
 9. The applications submitted by the authorities in other countries for return of Palestinians from Lebanon (PRL), who are denied residence permit in those countries and who do not have valid travel documents from Lebanon, are being processed case by case; however only humanitarian cases are given priority. This applies both to those PRL who are to be sent to Lebanon voluntarily or those who should be sent by force. The MFA underlines that PRL without (valid) travel documents who are in other countries can apply for (new) travel documents at the Lebanese embassies, the embassies send them to the MFA to be studied.
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Meeting with UNRWA, Beirut, 4 July 2019

PRS' access to and legal status in Lebanon

10. The number of PRS in Lebanon has decreased significantly in recent years. Currently, around 28.500 PRS are residing in Lebanon whereas the number was approximately 45.000 in 2016. The number is regularly checked by UNRWA's registration department and is quite accurate.
11. PRS' access to Lebanon is more restricted compared to Syrian nationals. Syrian nationals can enter Lebanon as for instance tourists, students or for medical reasons. PRS are allowed to enter Lebanon in two cases; if they have a valid appointment with an embassy in Lebanon, or if they have a valid ticket to and a visa from a third country where Lebanon is used as transit. In the event they have an appointment with an embassy in Lebanon, the embassy in question should contact the General Security and confirm the appointment with the person before the visa to Lebanon is issued, and the visa granted in such cases is valid for 48 hours maximum. Apart from these two cases, PRS are not permitted to cross the border and enter Lebanon at all, not even when it comes to humanitarian cases where Syrian nationals may be granted permission to enter.
12. The restrictions on entry have resulted in PRS entering Lebanon irregularly (through mountains or by using smugglers) which apart from the cost of the trip entails the risk of being arrested. There are also PRS who enter Lebanon via appointment with an embassy, but do not go back to Syria after the expiration of their visa.

13. There are cases of PRS coming to Lebanon through sponsorship by Palestinian factions and political parties; however the number of such cases is not high.
14. The visa to Lebanon obtained in relation to an appointment with an embassy or using Lebanon as a transit is not renewable, and the individual's stay will become illegal after a couple of days or weeks. According to a circular from the General Security, no PRS entering Lebanon after September 2016 can renew his/her visa. Those who have entered the country before September 2016 can, according to the circular continue renewing their visas at the GSO offices in Lebanon. The visa renewal is free of charge for those that meet the conditions to apply, and is valid for only 6 months. It is roughly estimated that forty percent of PRS in Lebanon do not have valid legal residency documents.
15. Contrary to Syrian nationals, PRS do not need to go to UNHCR, DPRA or the General Security in order to be recognised as refugees in Lebanon, as they are already registered as refugees in Syria. When PRS fleeing the war in Syria come to Lebanon, they will contact UNRWA, and will have their documents checked. If they are registered as PRS in Syria, UNRWA will start providing its services to them one month after they have approached UNRWA. The Agency waits one month before providing the services to ensure that the PRS in question intends to stay in Lebanon and is not just on a short trip.
16. If a Palestinian from Syria approached UNRWA in Lebanon and is not registered with GAPAR in Syria, UNRWA Lebanon would liaise with UNRWA Syria to check about the possibility of registering the refugee; based on the documents the refugee would have available to show they meet the definition of Palestine refugee. It would not be possible to register the individual as a Palestine refugee with DPRA in Lebanon.
17. PRS returning to their place of habitual residence in Syria can approach UNRWA Syria to apply for services there. On this basis, they will be deactivated from UNRWA services in Lebanon.
18. A Syrian national married to a PRS will be registered with UNHCR while the PRS spouse is recorded with UNRWA Lebanon. UNHCR is quite strict with regard not to register PRS as refugees in Lebanon under their mandate.
19. In UNRWA's experience, previous residence in Lebanon or being accompanied with a Lebanese or PRL relative (e.g. Lebanese or PRL mother etc.) has no impact on a PRS' chance to obtain visa or residence permit in Lebanon. The Lebanese authorities are strict with regard not to let PRS enter Lebanon unless they have an appointment with an embassy or want to travel through Lebanon to a third country.

Access to services, housing and labour market

20. UNRWA Lebanon provides its services (education, health care, legal aid, etc.) to all PRS regardless of whether they have entered and are residing legally in Lebanon or not, provided that they are registered with UNRWA in Syria. However, in order to benefit from the cash assistance, PRS must show evidence that they had been living in Syria during the time of the crisis.

21. Many PRS without valid legal residence permits who live in the refugee camps refrain from moving outside the camp for fear of being caught by the authorities. As a result, they have restricted access to educational and health care services, job opportunities and specialised services outside the Palestine refugee camps. Secondary and tertiary health care services and higher education are only found outside the Palestine refugee camps and jobs outside the camp are also better paid.
22. Close to fifty percent of PRS living in Lebanon reside in the Palestine refugee camps.

Access to basic services (water, electricity, sanitation)

23. There is access to water, electricity and sanitation in the 12 official Palestine refugee camps in Lebanon, but the access is not always regular and stable. Some Palestine refugee camps are not connected to the power and water supply system of the cities and they have to provide their electricity and water via other channels, for instance water tanks etc.

Access to housing

24. Access to housing is a great challenge to many PRS, whose main sources of income is the UNRWA cash assistance (around 200 USD per month per family of four), as it will be very difficult for a family to survive if they have to pay a minimum rent of a couple of hundred dollars per month.
25. PRS tend to rent houses inside and outside the Palestine refugee camps in Lebanon. Inside the Palestine refugee camps they usually rent houses from PRL.
26. PRS are not benefiting from UNRWA's rehabilitation services which PRL can use to renovate their houses. It is up to the owner of the house, who is renting to PRS, to repair things if need be. In light of these conditions, it is not unusual to find families of 13-14 PRS living in apartments with 2-3 bedrooms inside the Palestine refugee camps. The high concentration of PRS and Syrian refugees inside the camps has put the weak infrastructure in the camps further under pressure.

Access to school

27. Palestinians (PRL and PRS) are not denied access to the public schools in Lebanon. However, as Palestinians in general are a low priority in the Lebanese educational system, it is difficult for them to get access to the public schools. The priority is given to Lebanese students. If Lebanese schools have places, they will register non-Lebanese students (including PRL and PRS), on the condition that the number of non-Lebanese students do not exceed 50 percent of the total number of the classroom capacity.
28. PRS have access to the same UNRWA Lebanon educational services and scholastic system as PRL. Except for one UNRWA school which still runs in double-shift, all other PRS children have now been fully integrated into UNRWA schools and classrooms together with PRL. PRS have, over the years, better adapted to the Lebanese curriculum system used inside the UNRWA schools in Lebanon, and the initial problems with regard to the language difference between the Syrian and the Lebanese curriculum (Arabic vs. English or French) are not as prevalent as before.

29. All registered PRS have access to vocational training at an UNRWA training centre.
30. UNRWA provides education up to the end of secondary education (Grade 12). Lebanon is the only country where UNRWA has secondary schools and Palestinians have access to these schools without limitations. The main reason behind this is the difficult access to the Lebanese secondary schools for Palestinians.
31. One of the obstacles with regard to education is that students without official ID documents cannot sit in the final exams. However, UNRWA has helped students in such cases to sit in the final official exams in Lebanon, even if they do not have the required ID documents. So far, the number of such cases has been limited.
32. As far as UNRWA is informed by some sources, PRS do not have problems with regard to access to universities. For public and private universities, Palestine Refugees can generally enrol as long as they pay the fees.

Access to health care services

33. PRS have access to all primary health care services provided by UNRWA inside and outside the Palestine refugee camps. UNRWA also runs mobile health clinics in some of the Palestinian gatherings in the South, which PRS also have access to.
34. There is a system of partial coverage of expenses related to secondary and tertiary health care services where UNRWA Lebanon pays a certain percentage of these services (90 percent for secondary and 60 percent for tertiary). UNRWA's partial support for secondary and tertiary treatment applies to UNRWA-contracted public or private hospitals, whereas UNRWA covers 100% of secondary care at hospitals run by the Palestinian Red Crescent. Moreover, there is a special hardship fund for topping up UNRWA's regular contributions related to treatment of extremely vulnerable persons, and this fund has been used by a number of PRS which are assessed to be in a much more vulnerable situation than PRL.

Access to legal assistance

35. UNRWA Lebanon provides legal assistance to PRS with regard to different issues (legal residency, civil documentation i.e. marriage, birth certificates). It is underlined that UNRWA's legal assistance to PRS with regard to their legal residency is limited to informing them about the law and what options PRS have with respect to the possibility of regularizing their legal status. For PRS with irregular entry, or those who fall outside of the legal parameters of renewal, there is not much else UNRWA can do in this regard.

Access to the labour market

36. The majority of PRS are working in the informal sector in Lebanon. As regards employment in the formal labour market, according to the legal framework in Lebanon, PRS are considered foreigners, and they do not benefit from any of the exemptions and facilitations accorded to either Syrians or PRL in Lebanon.

37. PRS are, together with Syrians, placed at the low end of the wage hierarchy in the Lebanese labour market, which has caused tensions between PRL and PRS/Syrians because PRS and Syrians are in competition with PRL for scarce low-paid jobs, and are willing to work for a lower salary than PRL.

Access to travel documents

38. So far UNRWA has not heard of any PRS approaching the Syrian embassy in Lebanon and not being able to renew his or her travel documents. However, PRS who are living in Lebanon without valid legal residency are restricted in their freedom of movement due to their fear of being apprehended by authorities, detained, and given a departure order. In addition, not many PRS want to approach the Syrian embassy because they have fled Syria and the Syrian authorities.

Access to cash assistance from UNRWA

39. UNRWA's cash assistance to PRS is aligned with UNHCR criteria, which are 27 USD per person and 100 USD per family/household per month. The assistance is provided through ATM, but those without access to ATM can also receive the assistance in cash. This cash assistance to PRS is much higher than the cash assistance received by even the most vulnerable PRL (they get 10 USD per month). UNRWA's cash assistance to PRS is a blanket coverage which means that everybody gets the same assistance regardless of whether the person is vulnerable or not. The reason behind the blanket coverage is a social-economic assessment of PRS conducted by the American University of Beirut, AUB, that showed that 89.1 per cent of PRS are generally poor (35,000 could not meet their basic food and non-food needs); while nine per cent of PRS are extremely poor (3,500 are estimated to be unable to meet essential food requirements).

Possible protection by the authorities of single women against violence in private conflicts

40. The Lebanese authorities, including the police, do not access to the 12 official Palestine refugee camps in Lebanon and do not provide protection to women who risk being subjected to violence in private conflicts.
41. The Palestinian popular committees in the Palestine refugee camps in Lebanon, who are responsible for the security in the camps, do not tend to prioritize protection of women in private conflict either.
42. In general, for residents inside Palestine refugee camps, there is no possibility for Lebanese authorities to intervene to provide protection in private conflicts. Any intervention would require coordination with the Palestinian security committees in each of the camps, which is not always possible.
43. It is not a reliable solution for a PRS woman, who is threatened in a private conflict in a Palestine refugee camp, to move to another camp, as those looking for her would be able to trace her through connections between Palestinian communities in the Palestine refugee camps.

Prevalence of refoulement of PRS to Syria

44. The Lebanese government does not accept PRS entering Lebanon, even if they return to Lebanon from a third country on a voluntary basis. PRS who are sent (back) to Lebanon from a third country through the airport will risk being immediately deported to Syria.

45. There have been only four or five such cases within the last years where PRS are directly deported to Syria from the airport. For instance, there was a PRS who tried to travel to Malaysia via Turkey, but the Turkish authorities sent him back to Lebanon when they found out that his passport was forged. Lebanon sent him back to Turkey, and when he was sent back to Lebanon for the second time, he was deported to Syria by the Lebanese authorities.
46. UNRWA has not heard of cases of PRS who are currently inside Lebanon who have been deported to Syria by the Lebanese authorities. There have been cases of PRS residing illegally in Lebanon who have been arrested and given departure order by the Lebanese authorities for not possessing valid legal residency documents, but these departure orders have not been implemented. In the past, there have been a few cases where PRS were brought to and left in the border area, but now they are merely given departure orders. However, departure orders have had a psychological impact on the PRS community in Lebanon and caused many PRS without valid legal residency documents to restrain their movements for fear of being caught by the Lebanese authorities.

Return to place of habitual residence in Syria

47. In 2016 and 2017, the number of PRS coming to Lebanon from Syria was much higher than those moving in the opposite direction. Since January 2018, the trend has changed and there were more PRS who returned to their place of habitual residency in Syria than those newly entering Lebanon.
48. With regard to the reasons for PRS to return to their place of habitual residency in Syria, the socio-economic hardship in Lebanon was a determining factor, as 43 percent of PRS interviewed by UNRWA said the lack of employment opportunities, the lack of access to health services, education, lack of money and inadequate housing in Lebanon, were prominent considerations. Moreover, the improved security situation in Syria featured more prominently as a factor in the decision to leave: in 2018, it was mentioned by 28 percent of PRS respondents, up from 15 per cent in 2017. A further 23 percent said the desire to join other family members or the loss of a family member featured in their decision to return.
49. While UNRWA has accurate information about the number of PRS moving between Syria and Lebanon due to its presence in these two countries, the organisation is not aware of the number of PRS going to Europe. There have been reports of PRS leaving Lebanon by boats to Turkey and Cyprus in recent years.
50. Most PRS returning to their place of habitual residence in Syria have gone to Damascus or rural Damascus, but UNRWA does not have information on whether they have moved on from Damascus to other areas in Syria. The PRS in Lebanon who have not returned to Syria mentioned concerns with military conscription, the destruction of their areas and houses in Syria (e.g. Yarmouk) and lack of livelihood opportunities in their area of habitual residency as the reasons for not going back to Syria.
51. In line with the official position of UNHCR, UNRWA is not facilitating the return of PRS to their place of habitual residence in Syria and is not involved in any activity encouraging PRS to return there.

However, the organisation provides information on services available from UNRWA in both Syria and Lebanon.

Prevalence of harassment or mistreatment of PRS in the Shia-/Hezbollah-dominated areas in the south

52. UNRWA has not received reports of PRS residing in south Lebanon being harassed or mistreated by Hezbollah or other Shia groups due to their Sunni or Palestinian backgrounds or because of being refugees from Syria.
53. There have been isolated cases of individual PRS or Syrian refugees being in conflict with local political groups or individuals. However, UNRWA underlines that such conflicts tend to be individually or politically motivated rather than a broad religious conflict or tension between Hezbollah or the Shia community on the one hand and the Sunni PRS and Syrian refugee community on the other.

Meeting with Human Rights Watch, Beirut, 5 July 2019

About the source: Human Rights Watch, HRW, investigates and reports on abuses happening in all corners of the world. HRW works to protect the most at risk, from vulnerable minorities and civilians in wartime, to refugees and children in need. HRW has an office in Beirut and has followed the situation of refugees from Syria in Lebanon during the Syrian war.

Prevalence of refoulment or pressure to return to Syria

54. HRW has documented the deportations of 16 Syrians from Lebanon on 26 April 2019 after they arrived at the Beirut airport. Some of the deportees were registered refugees. 13 of the deported Syrians were living in Lebanon, but left the country via Turkey to Cyprus to seek asylum. They were denied entry to Cyprus and were sent back to Lebanon. When they arrived in Lebanon, the General Security officers put them on a bus, along with three Syrian women who had arrived at the airport and took them to the Lebanon-Syria Masnaa border crossing, where they were told they were not allowed to come back to Lebanon.⁸²
55. The policy appears to be that if Syrians arrive with no valid entry permit at the airport, General Security can deport them to Syria.
56. In addition, a directive issued by the Higher Defence Council stipulates that anyone who has entered Lebanon illegally after 24 April 2019 can be deported. There is some lack of clarity on how the order is being implemented, but from what HRW has been told it seems that the refugees need to show they were in Lebanon before April 24 in order not to be deported. HRW is trying to confirm how it works.⁸³

⁸² Human Rights Watch, *Lebanon: Syrians Summarily Deported from Airport*, 24 May 2019, [url](#)

⁸³ Legal Agenda, *Position Paper, On the decision to summarily deport Syrian nationals who entered Lebanon irregularly*, [url](#)

57. Many Syrians in Lebanon have never been registered, and the government would not know whether they entered before 24 April 2019 or after it.
58. General Security has since the passing of deportation directive acknowledged that it had deported some individuals and the Director of General Security, Abbas Ibrahim, did also do media interviews on the deportations.⁸⁴
59. There have been allegations that those individuals, some of whom defectors from the Syrian army, were turned over to the Syrian security intelligence. General security has denied this but has not denied the deportation. HRW has not been able to independently verify who the deported individuals were.
60. Over the past years, the Lebanese government has taken steps to make it more difficult for Syrians to remain in Lebanon. To coerce the Syrian refugees to return to Syria is not merely rhetoric, but also a policy which has been implemented in different fields including the restricted freedom of movement, the shelter order, the arrests, the eviction and the restrictions on work.
61. Most recently the Higher Defence Council passed an order putting housing restrictions on refugee settlements on agriculture land. The shelter order which was implemented in June is perceived to pressure the refugees with housing that do not meet the requirements, to return to Syria. However, these refugees do not see it feasible to return to Syria at this point because of a number of protection concerns.⁸⁵
62. Last year (2018) HRW documented how municipalities had conducted mass evictions of Syrians from their communities which impacted their housing, jobs and schools for those who have children.⁸⁶ In some cases, the eviction has resulted in people returning to Syria.
63. The general atmosphere of wanting the refugees to return certainly does also applies to the Palestinian refugees from Syria.

Meeting with the ILO, Regional Office for Arab States, Beirut, 4 July 2019

About the source: *The International Labour Organization is a specialized agency of the United Nations. It is the only tripartite UN agency – bringing together government, employer and worker representatives to elaborate labour standards and policies and promote decent work in different parts of the world. The ILO Regional Office for Arab States covers Bahrain, Iraq, Jordan, Kuwait, Lebanon, the occupied Palestinian territory, Oman, Qatar, Saudi Arabia, Syria, the UAE and Yemen. Two area offices are located in Kuwait and Jerusalem.*⁸⁷

⁸⁴ Naharnet, Ibrahim: General Security Didn't Hand Dissidents to Syrian Authorities [url](#)

⁸⁵ Human Rights Watch, Lebanon: Syrian Refugee Shelters Demolished, 5 July 2019, [url](#)

⁸⁶ Human Rights Watch, Lebanon: Mass Evictions of Syrian Refugees, 20 April 2018, [url](#)

⁸⁷ International Labour Organisation, Regional Office for Arab States, About US, [url](#)

Access to the labour market

64. Palestinian refugees from Lebanon (PRL) are not subject to the job restrictions for foreign workers. However, Palestinian refugees from Syria (PRS) are considered foreigners like the Syrians. They are able to apply for jobs allowed for foreigners. There is a common understanding among employer organisations that these jobs are limited to cleaning, agriculture and construction, and this is a perception that the Ministry of Labour is trying to promote. Syrians and PRS are primarily working within these three sectors in addition to working informally in other sectors restricted to Lebanese.
65. There is a circular stipulating the professions which are restricted to Lebanese. Syrians and PRS cannot apply for a work permit for work in sectors that is restricted to Lebanese. Those married to a Lebanese, and sons of Lebanese mothers as well as persons exempted for other reasons by the Ministry of Labour are allowed to apply for the same jobs as Lebanese.
66. Examples of jobs that are restricted to Lebanese are administrative work, employee in bank, insurance, teaching, head of HR, account secretary, IT-jobs, sale, supervising work, working in jewellery, tailoring etc.
67. Decision 29/1 from 2018 specifies that there are skilled professions in the construction sector that are restricted to Lebanese. Unskilled works in the agriculture and construction sector are allowed for Syrians.
68. All workers need a work permit. Until 2019, the General Security Office, GSO, was only requesting Lebanese employers to sign a letter of pledge of responsibility, which is known as the sponsorship system. Since 2019, employers have to seek a work permit for their employers through the Ministry of Labour for their workers. The Ministry of Labour do no longer ask for the legal stay for the worker when issuing work permit. A legal stay was required before. So far, only 17,000 work permits has been issued to Syrians in Lebanon.
69. Syrians registered with UNHCR before 2015, are able to renew their legal stay without a sponsor, based on a UNHCR certificate. However, they are only allowed to work as daily worker in the construction and agriculture sectors. PRS cannot benefit from the renewal of legal stay based on UNHCR certificate and they were not allowed to renew their legal stay in general after 2015.
70. A work permit is issued on a request from the employer. An employer seeking a work permit for his/her Syrian and PRS workers has to attach a certificate from the Syrian embassy when applying for a work permit. Further, a work permit fee of 80 dollars is also required to be paid. A formula has to be filled out specifying the type of work, the location of work, the ID of the workers, the number of workers payed by the employer, documents proving the legal entry into Lebanon and for the companies the registration commercial registry.
71. A notarized work contract is required when applying for a work permit. Further, it depends on the sector whether it is difficult or easy to get a work contract. Many companies do not provide a work

contract for unskilled work. For skilled employment, companies usually provide a work contract. Companies who actually provide a work contract are also those who also seek a work permit.

72. Syrians and PRS with no documents proving their identity cannot be employed in the formal sector, as they will need a work permit based on a work contract.
73. Since July 2019, the Ministry of Labour has waived the requirement of a certificate from the Syrian embassy. Previously, the regular work permit process required a certification of the personal documents such as ID from the Syrian Embassy.
74. 20 dollars a day is the legal minimum wage in Lebanon. Usually, what is observed is that unskilled work in the construction sector is paid at least 20 dollars. In other sectors as the agriculture, it is observed that particularly women are underpaid and their salary can sometimes be 10 dollars.
75. ILO has conducted a labour wage survey that indicates that 67 % of the Lebanese consider the minimum wage of 20 dollars as an acceptable amount for the unskilled work versus 71 % of Syrians share this view.
76. Many PRS are residing in the Palestinian camps. Inside these camps access to employment is not regulated by the law, and there is a high unemployment. Types of employment in the camps include micro activities and trade and repair. Many Palestinians are also employed by the UNRWA. The majority of Palestinians working have jobs outside the camps. PRS and PRL are usually informally employed.

Meeting with Norwegian Refugee Council, Beirut, 3 July 2019

About the source: The Norwegian Refugee Council is an independent humanitarian organisation helping people forced to flee. The work of Norwegian Refugee Council in Lebanon focuses both on Syrians, Palestinian refugees from Lebanon as well as on Palestinian refugees from Syria. NRC assists with civil documentation, housing, employment rights and questions regarding legal residency and access to services.

Possibility for entry and legal status of rejected PRS asylum seekers who are sent back to Lebanon

77. PRS residing in Lebanon were never treated in the same way as Syrians, why the question about legal residency for PRS is complicated. Over the years, there have been more separate circulars, separate memos and changes in the procedure for PRS compared to Syrians. There have been several changes, and sometimes it can be opaque which circular does apply.
78. Overall, the percentage of PRS having valid legal residency in Lebanon is higher than Syrians. Approximately 60 % of PRS residing in Lebanon have legal residency, while the percentage is only 27 % for Syrians. In addition PRS obtain their residency permit for free, contrary to the Syrians who have to pay a 200 USD residency fee. Unlike Syrians, PRS cannot obtain residency via a sponsorship from a Lebanese citizen. They can only base their residency on UNRWA registration.

79. Generally, it is very challenging for refugees in Lebanon to get a legal status and to renew their existing residency. Lack of ID documents is one of the main obstacles that people might face. Most PRS have an ID document from Syria; it could be an ID card, a passport or a civil extract etc.
80. PRS, who have a proof of ID (a Syrian passport, ID card or a civil extract) and are entitled to residency permit in Lebanon, will not face any difficulty to obtain legal residency. Only minors between 15 and 18 can use the individual extract which should be issued not more than 2 years before. An adult can submit the individual extract with the ID if the ID card is broken/damaged. The General Security Office does not issue residency permit to PRS without ID documents. Especially young people between 15 and 18 years, who have been in Lebanon for some years, lack their own individual ID documents. An ID card in Syria will be issued when the person turns 14 years. And these young people cannot apply for an ID card via the Syrian embassy in Beirut, because the embassy does not issue first time ID cards.
81. A broken or damaged ID card cannot be used as ID documentation when applying for residency permit.
82. PRS staying in Denmark, who want to enter Lebanon, need an entry permit from the Lebanese authorities. The PRS need special approval from the general director of the Lebanese General Security to enter Lebanon, otherwise no entry is possible. A memo issued in 2016 says that Lebanon will not allow any entrance of PRS entering from Syria or via the airport.

Access to basic services (water, electricity, sanitation etc.)

83. PRS living in the camps have access to basic services like other residents in the camps. Access to electricity and water is not for free. The quality of services in the camps is low, and there are shortages in services. In addition, some camps are closed off by Lebanese security forces for security reasons, which make it difficult to move in and out of these camps.

Access to housing

84. PRS live primarily in South Lebanon, but some of them also live in Beirut, in the Bekaa and in the north. Many PRS in Lebanon are residing in the Palestinian refugee camps, and that puts an additional pressure on the resources, the infrastructure and the assistance services in the camps. Many PRL living in these camps have now become landlords and host PRS.
85. Generally in Lebanon, affordable housing is very difficult to find, especially in urban areas, why many PRS reside in the camps.
86. The situation in the camps is getting worse, which partly has to do with the funding situation in UNRWA. The funding issue definitely affects the access to health care services and education, as they are 100 % depended on UNRWA funding.

Access to schools

87. Generally, there are no obstacles for PRS to access UNRWA schools if they stay in areas where these services are available.

Access to health care services

88. Generally, there are no obstacles for PRS to access UNRWA health care services if they stay in areas where these services are available.

Prevalence of harassment or mistreatment of PRS in the Shia-/Hezbollah-dominated areas in the south

89. PRS living in Shiite-dominated South Lebanon are not subjected to harassment or mistreatment and do not have difficulties accessing services due to their Sunnite background. Most Palestinians live within Palestinian communities or in the camps, and few live among local Lebanese.

Prevalence of refoulment or pressure to return to Syria

90. Within the last couple of weeks (end of June and beginning of July 2019), NRC has received reports of some Syrian refugees being deported to Syria from Lebanon, which according to NRC is a new phenomenon. These deportation cases have also been covered by the media and were never denied by the authorities. So, in that sense, these deportations are rather well documented, even though details might be unclear or controversial. As far as NRC is informed, two boys of 17 years age and two women have been among the deportees.
91. In April/May 2019, the Lebanese authorities made a decision according to which refugees from Syria who have illegally re-entered Lebanon after the 24 April 2019 can be deported to Syria. This decision is not available.⁸⁸ The burden of proof is on the person at risk of deportation, which means that he/she has to prove that he has not entered Lebanon illegally after 24 April 2019. Theoretically, it means that any Syrian in Lebanon can be arrested and be accused of having entered the country illegally, and then deported. According to the new decision, a deportation order from a judge is no longer required in order to deport a person to Syria; the only thing required is to notify the prosecutor, and the deportation can take place within few hours. This administrative circular is in violation of Lebanese law which foresees the requirement of court decision.
92. There were two cases of deportation from January and April 2019 of groups of Syrians trying to leave Lebanon via the airport. These were detained and forced by the General Security to sign a voluntary returning paper and afterwards taken to the border and handed over to the Syrian authorities, who accepted the deportation. The authorities then issued entry bans, which prevent the deported persons from legally re-entering Lebanon.⁸⁹
93. NRC is not aware of any cases of PRS being deported to Syria so far. However, there is no guarantee that the new practice with regard to deportations could affect the PRS in Lebanon in future.

⁸⁸ For a legal analysis by a national NGO see the English version of a position paper on deportations: Legal Agenda, *Forced Deportations to Syria: Rights Organizations Call on Lebanon to Respect the Rule of Law*, 24 June 2019, [url](#)

⁸⁹ For more information about the mentioned cases: Orient News, تفاصيل احتجاز وترحيل الأمن اللبناني سورين كانوا في طريقهم إلى السودان, [Details on the detention and deportation by the General Security of Syrians who were on their way to Sudan], 13 January 2019, [url](#); Access Center for Human Rights, 26 April 2019, [url](#)

94. Over the last few months there have been a small number of PRS returning to Syria on a voluntary basis.

Meeting with Stephanie Laba, Inter-Agency Health Sector Coordinator UNHCR, Beirut, 2 July 2019

About the source: At the Inter-Agency level, *UNCHR and WHO ensure that all activities under the Lebanon Crisis Response Plan⁹⁰ are well-coordinated and in line with the strategic objectives of the Health sector. Furthermore, UNHCR and WHO advocate for the least funded groups and activities based on the emergent sector needs and gaps.*

Access to health care services

95. Palestinian Refugees from Syria (PRS) living in Lebanon are targeted under the Lebanon Crisis Response Plan. Their access to health care services, both primary and hospital care, is ensured mainly by UNRWA with the support of different health partners including international and national NGOs. PRS can access quality primary health care in UNRWA clinics and hospital care in UNRWA contracted hospitals. Subsidized cost for both primary and hospital care is ensured for PRS living in Lebanon which decreases their out of pocket expenditure. Sometimes the patient has to pay a share for his/her treatment; however the majority of the cost is subsidised by UNRWA and other health partners.
96. The UNRWA contracted hospitals are available all over Lebanon, and are more prevalent in areas where there is a high concentration of Palestinian refugees.
97. UNRWA's contracted hospitals have the capacity to manage the health needs of PRS. The main challenge remains related to ensuring the needed funding to cover all the hospital needs for all PRS living in Lebanon.
98. All PRS and PRL living in Lebanon have the same level of access to quality health care.
99. All Health care services provided to PRS under the Lebanon Crisis Response Plan meet international standards in terms of quality. The main challenge remains related to the availability of funds which might implicate a decreased coverage but does not interfere with the quality of service provided.
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⁹⁰ The Lebanon Crisis Response Plan, LCRP, is a joint plan between the Government of Lebanon and its international and national partners that aims to ensure the protection of displaced Syrians, vulnerable Lebanese and Palestinian refugees; provide immediate assistance to vulnerable populations; support service provision through national systems; and reinforce Lebanon's economic, social and environmental stability. Source: The Government of Lebanon and the United Nations, *Lebanon Crisis Response Plan 2017 – 2020*, January 2019, [url](#); *Lebanon Crisis Response Plan (LCRP) 2019 - Full document*. [url](#); *Lebanon Crisis Response Plan (LCRP) 2019 – Health chapter*. [url](#)

Meeting with KAFA, Beirut, 5 July 2019

About the source: KAFA (in Arabic: enough) Violence & Exploitation is a feminist, secular, Lebanese, non-profit, non-governmental civil society organization seeking to create a society that is free of social, economic and legal patriarchal structures that discriminate against women.

KAFA has been aiming to eliminate all forms of gender-based violence and exploitation since its establishment in 2005. It seeks to realize substantive gender equality through advocacy for law reform and introduction of new laws and policies, conducting research and training, empowering women and children victims of violence, and providing them with social, legal, and psychological support. KAFA have two support centres in Beirut and Bekaa.⁹¹

Possible protection of women against violence in private conflicts by the authorities

100. There are a number of organisations and NGOs in Lebanon providing assistance to women who are in need of protection against violence in family conflicts. While some provide legal assistance, others run shelters. There are few organisations such as KAFA who provide multidisciplinary services (shelter, legal aid etc.). International organisations like DRC, UNHCR do not provide direct services to women in such cases, and their assistance is limited to financial support.
101. Since the enforcement of law No. 293 in 2014, many changes have taken place in a positive direction with regard to the authorities' protection of women against violence in family conflicts. There are though a number of gaps and problems in the law which is to be addressed. A new proposal is currently being processed in the parliament where the gaps in the original law 293 are to be addressed.
102. There are 18 religious sects with 15 religious personal status laws/courts in Lebanon, each with their own procedures and understanding of how such cases should be handled.
103. If a woman needs protection in a family conflict, she can directly, immediately or at any time go to a 'Court for Urgent Matters' (*Adel al-Omur al-mosta'jala*) which will issue a 'protection order' (*qarar hemaya*). The police interfere from the beginning, starting with a call on 112 (emergency line) or in a police station. The police are obliged to interfere from the beginning based on the issued MEMO in 2013 and the law 293/2014. The protection order can be issued before or after a complaint. Violating a protection order will allow the victim to issue a report to the Internal Security Forces and they should interfere after coordinating with the general prosecutor, which they always do. The abuser can be detained in the police station for 48 hours during which the victim can present a request to the judge in chamber to issue a protection order (in case of reporting to police and filing a complaint).
104. The protection order can be renewed depending on the case.

⁹¹ KAFA (enough) Violence & Exploitation, [url](#)

105. Before the law 293 was passed, the police also did interfere in cases of family violence based on a memo, but the law 293 makes the police more obliged to interfere, and an officer can be fired if he does not follow the law.
106. KAFA has trained a large number of police officers in how they should handle cases of family violence according to the law and the memo. Now, there are more people in the court system and among the police force who know what to do in such cases.
107. There is a difference between different areas in Lebanon with regard to the extent to which women trust the authorities concerning their protection. The extent of support given to women by their families is also different in different areas of Lebanon.
108. A woman can get protection in other areas than her place of origin. For instance, a woman from Bekaa can get protection in Beirut.
109. There is no difference between refugee women (e.g. Syrians or Palestinian women from Syria) and Lebanese women regarding the possibility of getting protection according to law 293.

Shelters

110. Women, who need protection in cases with family violence, may be referred to shelters or to NGOs like KAFA where services can be provided.
111. The number of shelters in Lebanon does not correspond to the women's need for protection. However, even in rural areas a woman can be protected if she has a protection order, and if her family is the perpetrator she can be referred to a shelter. The quality of shelters differs; for instance, the quality of shelters for women with children is much better than shelters for alone children. Shelters have often secret addresses, and no one – except the involved organisations or the women themselves – knows where they are located.
112. Sometimes, there are emergency cases where there is no shelter to refer a woman to. In such cases, KAFA helps woman to find a solution.

Appendix 2: Terms of Reference

1. Possibility for entry and legal status of rejected PRS asylum seekers who are sent back to Lebanon
 - 1.1. Possibility for entry and legal status of following groups of PRS in Lebanon
 - 1.1.1. Minor/adult child of a Lebanese mother
 - 1.1.2. Minor/adult child of a Palestinian Refugee from Lebanon
 - 1.1.3. Female/male spouse of a Lebanese national
 - 1.1.4. Female/male spouse of a Palestinian Refugee from Lebanon
 - 1.2. Documents necessary to prove one's relationship to a Lebanese mother, a Palestinian Refugee from Lebanon, or a Lebanese spouse
 - 1.3. Impact of travelling together with one of a Lebanese mother, a Palestinian Refugee from Lebanon, or a Lebanese spouse on one's possibility to enter Lebanon
 - 1.4. Impact of previous residence in Lebanon on one's possibility to enter Lebanon
2. Access to services, housing and labour market
 - 2.1. Access to basic services (water, electricity, sanitation)
 - 2.2. Access to housing
 - 2.3. Access to education
 - 2.4. Access to health care services
 - 2.5. Access to the labour market
 - 2.6. Access to travel documents
 - 2.7. Access to financial assistance from UNRWA or other organisations
 - 2.8. Possible protection by the authorities of single women against violence in private conflicts
 - 2.9. Prevalence of harassment or mistreatment of PRS in the Shia-/Hezbollah-dominated areas in the south
3. Procedure for changing PRS' status in DPAR
4. Prevalence of harassment or mistreatment of PRS in the Shia-/Hezbollah-dominated areas in the south
5. Prevalence of refoulement or pressure to return to Syria