

**NGO intervention on support for the application of the comprehensive refugee response framework (CRRF): reception and admission, meeting needs and supporting communities, and solutions**

**Agenda item 2**

Dear Chairpersons, distinguished delegates,

This intervention has been drafted following wide consultations with NGOs.

NGOs commend UNHCR for the CRRF roll-out and its consultative approach, inclusive of NGOs. On this basis, we believe that the Programme of Action could underline learning and guidance on good practices.

Overall, we welcome the move away from encampment, ‘care and maintenance’ and parallel services, towards refugee inclusion, support for host communities and social cohesion. However, this should go along with a stronger focus on rights, standards and protection.

More specifically we would like to highlight that, on Reception and Admission:

- We consider contingency planning and preparedness to be key aspects of refugee responses, requiring further elaboration.
- We note a strong State security perspective lacking a counterbalancing human security approach. For example, the text could use a wealth of good legislation and practice on alternatives to detention to highlight that detention and criminalisation of refugees are not the answer. The goal of ending child immigration detention must also be mentioned.
- Reception, registration and documentation should also aim at identifying stateless people, develop rigorous data protection and child safeguarding standards. Children’s right to acquire a nationality should be recognised – without gender discrimination. The importance of translation and accessible communication materials should be highlighted.
- We also welcome the idea of an asylum capacity support group and await further details. We recommend that this group be child and gender sensitive, guided by human rights imperatives and aim to translate the right to seek asylum into concrete measures.

On Meeting needs and supporting communities:

- International commitments to ensure quality education for refugee children and youth – including girls – must be reaffirmed and connected to national education systems. Protection dimensions of education must be further emphasized and child protection needs must be clearly guided by the Convention on the Rights of the Child.

- Promoting economic opportunities and alternatives to camps should be accompanied with explicit references to freedom of movement and vocational training. Moreover, the right to work must be clearly accompanied by *rights at work*, including protection from abuse and exploitation, fair and ethical recruitment, social protection and access to justice. In addition to ILO guidance<sup>1</sup>, States must comply with international labour standards when dealing with refugees.
- On gender, the Programme of Action must take a broader view, based on an Age, Gender and Diversity analysis, highlighting the specific needs of women, girls, men, boys, and LGBT individuals. We recommend the insertion of a paragraph committing to meet gender-specific needs while reinforcing language on the rights and needs of women and girls throughout the displacement cycle.

Mr. Chairperson, noting a departure from agreed Annex I language, we request that the last section revert to the heading of ‘durable solutions’. This would also reaffirm that all three durable solutions should be pursued with equal vigour. Moreover:

- The binding *non-refoulement* principle should appear under voluntary repatriation. Equally important is to define the meaning of ‘voluntary’, using existing guidance<sup>2</sup> and recognizing that quotas and return packages undermine the very concept of voluntariness. Moreover, the section should aim to ensure the physical safety of returnees, their access to services, livelihood, and employment.
- We appreciate the recommendation for countries of origin to incorporate the Guiding Principles into national policies although the language should be more affirmative and in the body of the text: internal displacement is not a footnote! Premature, involuntary or coerced returns may lead to further movements and endless forced displacement cycles, calling for collecting interoperable data along the entire displacement continuum. Preventing and monitoring internal displacement is vital for preparedness; addressing and mitigating internal displacement can impact refugee flows.
- On resettlement and pathways – fundamental responsibility sharing elements – we recommend firmer commitments and would appreciate more details on the resettlement core group and its relation to the Platform and solidarity conferences. We also stress that other pathways should come in addition to, and not instead of, durable solutions.
- Finally, host states must receive support to integrate refugee populations and the language on durable legal status, permanent residence and naturalization should be strengthened.

A detailed version of this intervention is available on [icvanetwork.org](http://icvanetwork.org). We also encourage you to consult other NGO comments on the zero draft.

Thank you.

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<sup>1</sup> Such as: ILO Recommendation 202 (Employment and Decent Work for Peace and Resilience) and ILO Guiding Principles on Access of Refugees and Forcibly Displaced Persons to the Labour Market.

<sup>2</sup> For more details, see Chapter 2.4 of *UNHCR Handbook on Voluntary Repatriation: International Protection* (1996) and section 6 on Voluntary repatriation in the *NGO Key Messages for the 10th High Commissioner’s Dialogue on Protection Challenges “Towards a Global Compact on Refugees”* (12-13 December 2017).