Delegations are kindly invited to use this template to share their comments on the draft country programme document being presented to the Executive Board during the forthcoming session.

Delegation name: Belgium

Draft country programme document: Syrian Arab Republic

In accordance with Executive Board decision 2014/1, draft country programme documents are considered and approved in one session, on a no-objection basis. All comments received by the Office of the Secretary of the Executive Board before the deadline stated above will be posted on the Executive Board website, and considered by the requesting country, in close consultation with UNICEF.

<table>
<thead>
<tr>
<th>Delegation’s comments</th>
<th>Response(s)</th>
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<tbody>
<tr>
<td><strong>General Comments</strong></td>
<td>UNICEF continues to advocate for the availability of data. Unfortunately, the data is scarce at this point. Also, due to the limitation of the CPD, which is a technical document meant to provide a broad framework of UNICEF’s programmatic priorities with strict word limit, it is difficult to further elaborate. This said, UNICEF conducted a situation analysis of children for the CPD, including risk analysis considering conflict sensitivity and the vulnerability of children. UNICEF adopts a context-sensitive, vulnerability monitoring and community-based and localized approaches to the delivery of its programme to ensure that equitable, inclusive, community-driven priorities and solutions inform UNICEF programming. Also, as part of the One UN, UNICEF contributed to a comprehensive UN socio-economic context analysis.</td>
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<td>• The CPD doesn’t reflect with accuracy the current political situation in Syria. There is no clear mention or reference to the Syrian regime nor its actual role in the conflict. No mention is made of the difficulties that this political regime represents in achieving this program. The CPD fails to acknowledge that Syria’s present crisis is directly caused by and continually exacerbated by armed conflict. The need for an inclusive and Syrian-led political process that creates a sustainable solution to the conflict, in line with resolution 2254, remains essential and must be clearly stated in the document.</td>
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Additionally, UNICEF field-based programme staff regular assessments of the context, trends and vulnerabilities of children’s and their families is critical for the programme planning and implementation.

We are also pleased that UNICEF has received the approval to conduct the Multiple Indicator Cluster Survey (MICS), for the first time since 2006. This is a critical undertaking for further identifying key areas for prioritization in UNICEF and partner programming. We are confident that the narrative will be further grounded with this updated household survey data on key social indicators that are critical for children.

The CPD for the Syrian Arab Republic, as is the case for other CPDs and in line with the QCPR and UNDS reform requirements, is aligned with and derived from the Strategic Framework, as validated by the Resident Coordinator.

Currently, the primary priority for UNICEF through this CPD is to secure conditions to provide principled, on-the-ground assistance to meet the immediate humanitarian needs of children and population in Syria and fulfil their rights and protection, prevent a further escalation of needs, and build the resilience of vulnerable children and their families and communities.

As referenced in Paragraph 23 of the CPD, UNICEF operates fully in line with the document titled, “Parameters and Principles of UN assistance in Syria”, which recognize that reconstruction will only be possible once a credible political solution, consistent with UNSCR 2254 and the Geneva Communiqué, is firmly underway but also that assistance is to be prioritized based on the needs of the population, with a particular focus on the needs of vulnerable children, families
and communities, in a manner that protects human rights and child rights as an outcome, and that such assistance be delivered in a fair, equitable, non-discriminatory and non-politicized manner.

Risk management description has been reviewed to better reflect UNICEF’s risk management system in paragraphs 46-51.

UNICEF in Syria has made significant investment in assessment of violations and vulnerability that children and their communities face and risk management capacities drawn from its robust system. While humanitarian programming relies on the continuous and forward-looking assessment and mitigation of risks, UNICEF collects information from the field to manage risks in a timely manner to ensure its ability to deliver assistance with full respect to humanitarian principles. On this basis, UNICEF continuously reviews and assesses the risks associated with its operations and programming to ensure its ability to deliver assistance in a neutral, impartial, and independent way that upholds a human-rights based and Do No Harm approach. In these efforts, UNICEF’s extensive field presence, evidence based and strong advocacy, close monitoring and continuous, close engagement with communities are critical components.

UNICEF conducts due diligence verifications for implementing partners with whom it works. It also utilizes the Harmonized Approach to Cash Transfers, a risk-based management framework for cash transfers to implementing partners. This ensures partners are assessed for financial management capacity to determine the overall risk rating and assurance activities. UNICEF conducts assurance activities and ensures that recommended actions are taken to strengthen the partner’s capacity and lead to management actions. UNICEF is also an active member of the UN Humanitarian Country Team which discusses and reviews risks and dynamics affecting humanitarian response in Syria as
coordinated also with the Resident Coordinator Risk Management Unit. Also, regional dynamics are informed by UNICEF’s Regional Office.

UNICEF has four complementary and triangulated programme monitoring modalities. First, UNICEF implementing partners conduct their own monitoring and submit progress reports to UNICEF. Second, independent third-party monitors then impartially verify implementation using prescribed checklists. Third, UNICEF staff and third-party technical facilitators conduct programme monitoring visits to assess progress and quality of results, and identify constraints and adaptations required. Feedback mechanisms are the final pillar of monitoring, including a complaint mechanism/service line, suggestion boxes, beneficiary surveys, focus group discussions and post-distribution monitoring surveys.

General comments

- It appears to Belgium that the risk management approach presented does not cover fully the range of threats. Among them, Belgium is particularly concerned by the deterioration of the economic conditions, access limitation, potential diversion of resources, poor financial management, and in general how hostilities and/or deterioration of security conditions can compromise the programme implementation. Therefore, Belgium would like to have more details about:
  1/ Accountability with a strong internal control, but also a monitoring and tracking system;
  2/ Multidimensional risks assessment covering the full spectrum of development, and more specifically human rights issues;
  3/ Analysis of national and regional dynamics, including risks related conflicts and security.

In Paragraph 46, a mention of implementation by relevant national and international partners has been added to reflect the fact that UNICEF partners with a wide range of both international and national NGO partners to implement its programme in Syria. In addition, UNICEF may directly execute its programme when necessary. UNICEF seeks also technical support, where necessary, from national, regional and international consultants and institutions, as well as from its Middle East and North Africa Regional Office and Headquarters.

General comments

- Too few details are provided regarding the partnership with local and/or independent actors such as international organisations.

UNICEF’s programmes in Syria are based on needs. UNICEF’s CPD refers to “coordination with relevant national
NGOs or local associations, communities or directly with households. Collaboration with local government bodies are mentioned. Belgium would like to draw UNICEF’s attention to the need to remain extremely careful in its relationship with public stakeholders or affiliates to the Syrian regime. UNICEF should provide more guarantees that its independency is preserved and no conflicts of interest might occur.

Authors’ which will be conducted at various stages and levels of action in the implementation of the country programme.” Coordination with national and local authorities is critical for the delivery of effective and more lasting early recovery assistance that meets the needs of vulnerable children and their communities.

Supporting early recovery at times requires building the capacities of local service providers

| Comments on specific aspects of the draft country programme document | (Delegations providing comments may wish to include details, such as the page number, paragraph number, or page of the annexed results and resources framework. |