EVALUATION REPORT

ROHINGYA EMERGENCY RESPONSE

(2017-2020)

CONCERN WORLDWIDE



OCTOBER 2020

List of Acronyms and Abbreviations

ACSM Awareness Communication and Special Mobilization

ADC Assistant District Commissioner

CBDP) Community Based Disaster Preparedness

CiC Camp in Charge

CMAM Community-based management of acute malnutrition

DC District Commissioner
NFI Non Food Items

FGDs Focus Group Discussions
GAM Global Acute Malnutrition
GBV Gender-Based Violence

GiHA WG Gender in Humanitarian Action Working Group

ISCG Inter-Sectoral Coordination Group IGA Income Generation Activities

IMAWG) Information Management and Assessments Working

Group

INGO International Non-Governmental Organization

IP Implementing Partner

IYCF Infant and Young Child Feeding

MEAL Monitoring Evaluation Accountability and Learning

MAM Moderate Acute Malnutrition

MoDMR Ministry of Disaster Management and Relief

MUAC Mid-upper arm circumference

OECD- Organisation for Economic Co-operation and DAC Development – Development Assistance Committee

OTP Out-patient therapeutic program

PEER Preparing for Effective Emergency Response

P4 Program Participant Protection Policy
PLW Pregnant and lactating women
PPE Personal Protective Equipment

PSEA Prevention of Sexual Exploitation and Abuse RCCE Risk Communication and Community Engagement

RUSF Ready to use supplementary food RUTF Ready to use therapeutic food SAM Severe acute malnutrition

SARPV Social Assistance and Rehabilitation for the Physically

Vulnerable

SBCC Social and Behaviour Change Communication

SEG Strategic Executive Group SMP Security Management Plan

TSFP Targeted supplementary feeding program

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Executive Summary

Overall, the Concern Rohingya response programme was found to be highly relevant and fit for purpose. It addresses the wide array of issues that affect the overall health and nutrition of extremely vulnerable populations in refugee camps and host communities in Cox's Bazar. Concern's response in Cox's Bazar is well adapted to the local contexts, priorities and needs. Concern's nutrition programme is widely acknowledged by stakeholders as relevant and appropriate to address the urgent nutrition needs of the targeted refugee community through provision of integrated nutrition curative and preventive, community-based management of acute malnutrition (CMAM), livelihood and income generation interventions. The programme recognizes the integration between nutrition and provision of services to improve food security, livelihood and income generation and community outreach interventions in tackling the issue of malnutrition.

Concern Cox's Bazar strategic operational plan 2019-2021 is developed with the overall goal to provide clarity on Concern's direction and develop a strategic plan that aligns to the Joint Response Plans for Rohingya and Government of Bangladesh's priorities; supporting the gaps to address the needs of the most vulnerable and reflects the emerging issues and changing context of the response in Cox's Bazar. Concern staff communicated that yearly strategic review workshops was organized in July 2020 and progress against targets were reviewed and new targets were planned for next 12 months. The Strategic Plan demonstrates current programming, areas of continuation, growth, expansion and future programming. The Strategic plan can be further strengthened by adding the yearly targets under each objective with estimated funding needs and geographical coverage. Additionally, a monitoring and evaluation framework including process, output, outcome and impact needs to be developed and will help in regular systematic documentation of progress and review of achievements against targets.

Concern is directly implementing all major programme interventions in the Rohingya response with only one project implemented through local partner in early stage of the development. Due to the planned strategic shift in Rohingya response as per changing context, another local partner will be involved in implementing a newly approved project. As the Cox's Bazar response implementation modality is gradually shifting from direct implementation to local partners implementation therefore frequent visits by Head of departments and staff in Dhaka office to Cox's Bazar will be required to support the reorientation of implementation modality. Improved communication, coordination and interactions between Dhaka and Cox's Bazar offices will contribute to one team approach. The localization and implementation through local partners at Cox's Bazar is aligned with Country strategy where all the programmes are implemented through partners. As per Cox's Bazar Strategic Operational Plan, the plan is to add 1-2 new implementing partners to support in implementation of Cox's Bazar response in 2020/2021. The trend for localization might affect future funding for Concern Rohingya response.

IOM DRR and WFP FFA projects implementation was significantly delayed and a no cost extensions were requested for implementation of late activities. There were issues related to beneficiaries' selection as well. IOM and WFP were not happy with Concern performance on these project resulted in Concern not having subsequent DRR and FFA projects from IOM and WFP respectively.

Rohingya response is a complex emergency with a challenging environment to operate and successfully implement programmes. Despite the difficult context, Concern Bangladesh has been able to accomplish a number of achievements. Concern has been able to save lives of malnourished children, alleviate sufferings, and improve livelihood and provided income generation opportunities to most vulnerable Rohingya refugees and vulnerable host communities. The programme also has positive impacts, contributing to behaviour change of the programme participants, building the capacity of local staff, partners and beneficiaries and thereby reducing vulnerability and increasing resilience to future emergencies.

1. Introduction and Objectives of the Evaluation

Concern Worldwide is committed to assessing and improving the quality of its humanitarian programmes. The purpose of the evaluation is to review the overall progress of the humanitarian response programme against the Extended DAC evaluation criteria and Core Humanitarian Standards (CHS) commitments as well as to capture emerging lessons that can feed in to improved practice. This evaluation/review of Concern's humanitarian response look back and assess learning, and will serve as foundation for developing effective, timely, and appropriate interventions in the future.

The evaluation tries to answer a number of questions related to Extended DAC criterial. These questions are related to

- The DAC evaluation criteria and Core Humanitarian Standards (CHS) commitments
- The Concern and DAC cross cutting issues and themes such as equality, protection, partnership, advocacy and Disaster Risk Reduction (DRR)
- The Sphere Standards and the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief

2. Background and Context

The Rohingya people have faced decades of systematic discrimination, statelessness and targeted violence in Rakhine State, Myanmar. Such persecution has forced Rohingya women, girls, boys and men into Bangladesh for many years, with significant spikes following violent attacks in 1978, 1991-1992, and again in 2016. Yet it was August 2017 that triggered by far the largest and fastest refugee influx into Bangladesh. Since then, an estimated 711, 460 Rohingya, have fled into Cox's Bazar. The immediate cause of their flight was described by the UNmandated Independent International Fact-Finding Mission on Myanmar as a "widespread and systematic attack on [civilians]" including "murder, imprisonment, enforced disappearance, torture, rape, sexual slavery and other forms of sexual violence, persecution, and enslavement" with "elements of extermination and deportation" as well as "systematic oppression and discrimination [that] may also amount to the crime of apartheid." As of July 2020, over 900,000 stateless Rohingya refugees reside in Ukhiya and Teknaf Upazilas. The vast majority live in 34 extremely congested camps.

The humanitarian response for the Rohingya refugee crisis is facilitated by the Inter-Sectoral Coordination Group (ISCG) in Cox's Bazar. The Strategic Executive Group (SEG) that is designed to be an inclusive decision-making forum consisting of heads of international humanitarian organizations guides the ISCG Secretariat. On the government side, a National Task Force, was established by the Ministry of Foreign Affairs, leads the coordination of the overall Rohingya crisis. Since the August 2017 influx, the Ministry of Disaster Management and Relief (MoDMR) has been assigned to coordinate the Rohingya response with support from the Bangladesh Army and Border Guard Bangladesh. The Refugee, Relief and Repatriation Commissioner (RRRC) and the Deputy Commissioner of Cox's Bazar district are critical for day-to-day coordination. The sources of relief are multiple from foreign aid (govt. to govt.), national aid (Bangladesh govt.), NGOs, ISCG (mostly UN agencies), personal initiatives and others (different informal/formal organizations apart from NGOs). There are also other Alliance 2015 agencies operational in the response with collaboration and coordination over the years.

Concern Worldwide's Response

Concern Worldwide has been working in Bangladesh since 1972 and has worked in Cox's Bazar intermittently over the years. Since September 2017, Concern Worldwide has scaled up its operation in Cox's Bazar to address the humanitarian needs of the Rohingya people living in refugee camps. As part of the initial response in 2017, Concern focused on responding to the emergency by providing emergency nutrition services to reduce both Severe Acute Malnutrition (SAM) and Moderate Acute Malnutrition (MAM) and Non Food Items (NFIs) to meet immediate needs. Over time the operation also worked on Disaster Risk Reduction (DRR) to reduce the seasonal weather and disaster vulnerability of at risk Rohingya people and the Bangladeshi host communities living in Cox's Bazar.

Host communities, including poor Bangladeshi families living in the area around the refugee camps, have also struggled with this crisis – with rising costs of living and loss of land traditionally used for farming. To ensure that all communities were and continue to be supported, and to alleviate tensions between the two communities, Concern's livelihood interventions have been expanded to include these populations.

Three years on, Concern continues to provide quality life-saving integrated nutrition services, and tailored outreach messaging with a focus on prevention of malnutrition. In 2020, Concern also began responding to the COVID-19 crisis working to improve the resilience of vulnerable households and improve COVID-19 infection prevention and control at health facilities and community level in the Rohingya refugee camps in Cox's Bazar. Concern generally implement projects directly in Cox's Bazar, and in partnership with INGOs on a number of projects. Concern has received funding from UNICEF, WFP, IOM, UNOPS, DEC, KOICA and others. Concern was elected as Chair onto the Steering Committee of the Team Leaders Forum. The Cox's Bazar Team Leader Forum (CB-TLF) exists primarily to act in the interest of the betterment of serving beneficiaries and provides a space for International NGOs to share views and to discuss strategic and operational issues.

3. Evaluation Methodology

The methodology utilised the Organisation for Economic Co-operation and Development–Development Assistance Committee (OECD-DAC) Principles for evaluating humanitarian assistance to provide a structure to the findings, and includes a number of conclusions on the programme and makes recommendations for potential further areas of focus. The selected criteria for evaluating Concern's Rohingya Humanitarian response include Relevance/Appropriateness, Connectedness, Coherence, Coverage, Efficiency, Effectiveness and timelines and Impact.

Prior to evaluation, a desk review was performed. Desk Review Included study of relevant material related to Concern Rohingya (Cox's Bazar) Response from 2017-2020. The key documents reviewed include project proposals, budgets, log frames vs achievements tracking tools, assessment reports, expenditures reports, beneficiaries selection criteria, PDM reports, MEAL monthly reports, case studies/success stories, strategic plans, surge team and other visitors reports, external evaluations and reports. Key informant and individual interviews were organized with implementing partners, donor representatives, government officials and community representatives and beneficiaries and non-beneficiaries (including male, female and other vulnerable groups: people with disabilities and elderly) from host communities and camps benefited from programme intervention. Individual interviews were also performed with Concern Worldwide staff members from country team and ex-staff members and staff from Emergency Directorate (Surge Team) who have visited or been involved and supported the Cox's Bazar response over the three years. The majority of the interviews were conducted via skype and phone. Due to COVID-19 pandemic situation, evidence based direct observation visit to the programme area for direct observation of programme activities was not possible. In addition, strict COVID-19 SOPs did not permit to conduct focus group discussion with beneficiaries. All interview questionnaires were based on Extended OECD-DAC criteria and guidance guestions (Annex I of Terms of Reference) as described in the ToR and were adapted depending on the individual being interviewed. The interviews were semi-structured to allow the interviewees to focus on specific lines of questions depending on their priorities.

In total15 individuals including Concern staff in country and surge team members, donor representative, INGOs, Implementing Partners associated with Rohingya response were interviewed via skype. Additionally, 40 individuals and key informants with different age groups and gender from beneficiaries and non-beneficiaries were interviewed with support from Concern Cox's Bazar MEAL team,

The selected criteria for evaluating Concern's Rohingya humanitarian response such as efrelevance/appropriateness, connectedness, coherence, coverage, efficiency, effectiveness and timelines and impact and cross cutting issues were appraised and fared against following grades/scales as outlined in Concern guidelines "Evaluating Concern's Emergency Responses".

Scale	e Description of Scale/Grade			
4 outstanding performance				
3	Performance in line with what would be expected of a well-functioning organisation			
2	generally acceptable performance but with some clear, and documented, shortcomings			
1	Barely acceptable performance with some major shortcomings and reservations			
0	Totally unacceptable performance or insufficient data to make an assessment			

4. Limitations of the evaluation

Evaluation performed remotely as due to COVID-19 visit to the programme area was not possible. Having no direct field observations and no focus group discussion and interaction with participants especially the beneficiaries has significantly affected the validation of information on an evidence-based manner. Key informants and individual interview with Concern staff, Donor, Government Authorities, and Implementing Partners were mainly conducted remotely through online platforms (mainly Skype), the discussions were usually formal, and the flavour of direct face-to-face interaction was somehow missed. Local MEAL staff facilitated with information collection through KII and II with beneficiaries and community representatives, which introduces biases. The evaluator has therefore drawn conclusions from objectively verifiable information as well as reporting on issues raised by informants during interviews.

5. Evaluation Findings

Brief History of Concern Rohingya response

Concern Worldwide has been an active member of the Cox's Bazar Emergency Response Nutrition Sector since the start of the latest phase of refugee influx in August 2017. Concern was implementing curative and preventive nutrition services in 10 refugee camps. In the last quarter of 2019, following consensus within the Nutrition Sector and UN agencies, Concern was assigned six integrated CMAM sites in three Rohingya Refugee Camps (13, 14 and 15) to implement integrated OTP, TSFP and BSFP services reaching 26,368 households with pregnant women and children 0-59 months, and 9,644 households with adolescent girls. Alongside the integrated OTP, TSFP and BSFP services, are community outreach activities including the following: Active case finding, referral and follow up of CMAM beneficiaries; Community Management of Acute Malnutrition in Infants (CMAMI) for mother and under 6 month infant pairs at risk for malnutrition; Home gardens, with innovative designs for the limited space, and soil types in the camps; Participatory cooking sessions; Micronutrient supplementation of Iron and Folic Acid for adolescent girls and Adolescent nutrition and maternal, infant and young child feeding activities using Care Groups. UNICEF and WFP are the main donors for Concern's integrated nutrition interventions for prevention and treatment of acute malnutrition among vulnerable Rohingya refugees in Cox's Bazar.

In 2018-19, Concern implemented a DRR project in Host communities with IOM funding with the aim to strengthen the Disaster Risk Reduction (DRR) and response capacity of targeted Disaster Management Committees (DMCs), and to enhance local community disaster preparedness and reduce cyclone and flooding risks in Cox's Bazar. The project supported vulnerable host communities and government institutions in Palong Khali and Raja Palong Unions of Ukhiya Upazila and Whykong, Baharchara and Sabrang Unions of Teknaf Upazila to anticipate, reduce the risk of, respond to, and ensure effective early recovery from natural disasters. A Community Based Disaster Preparedness (CBDP) model was in place at District and Upazila level at project outset. Concern established 45 ward-level DMCs in five unions and provided training to five union DCMs. Early warning systems were in place at the project outset. In order to strengthen early warning systems, Concern provided training on Early Warning, First Aid and Search and Rescue to DMC members, across all the five target unions. 750 most vulnerable households (66% Female, 34% Male) benefited from business development plan and training followed by cash grant of 12,000

BDT for livelihood support. Government representatives participated in upazila-level resilient livelihood training and facilitated community level trainings. The targeted beneficiaries received resilient livelihood knowledge on agriculture, fisheries, livestock etc. The project contributed and strengthened the institutional capacity of DMCs to implement the national CBDP model in the context of the current Rohingya humanitarian crisis affecting the area. According to PDM report for cash distribution under this project, 30% of the respondents mentioned that there were some beneficiaries' exclusion errors. About 8% of the beneficiaries indicated that they know that some beneficiaries paid money to the local leadership in order to be registered and another 1% suspected that there was an exchange of cash between some beneficiaries and the local leaders. Additionally, there were few reported cases of favouritism by local leaders during registration process.

Concern is currently working in camps 13, 14 and 15 as nutrition lead and focal points delivering integrated nutrition programme coordinated through the nutrition sector with UNICEF/WFP as main donors with co-funding from Korea International Cooperation Agency (KOICA). In camp 20W and 21, Concern is implementing a food security project funded by WFP. Concern is also implementing a project "Integrated Emergency Humanitarian Response to the Rohingya and Host Community Population in Cox's Bazar" under Strengthening Humanitarian Preparedness and Response (SHPR) programme through DFID/UNOPS funding Christian Aid consortium and is being implemented in camps 13, 14 and 18 delivering nutrition and livelihood interventions. Concern is also linking Care Group members with nutrition sensitive livelihoods interventions through the DFID funded consortium project with Christian Aid. Concern being the Nutrition lead agency is also implementing a small Food Security and Livelihoods component as well. Concern is also implementing a one year WFP funded Self-Reliance project focused on innovative gardens and fresh meals and food processing businesses with a business and household resilience lens in Camp 20 Extension and Camp 21 predominantly, but also having some business ventures scattered in Camps 13, 14 and 15.

A new multi-year multi-sectoral project from BPRM is approved and started in October 2020, implemented through a consortium with International Rescue Committee (IRC) and BBC Media Action. Concern will implement this project in Camps 13, 14, and 15 directly, delivering preventive nutrition services expanding targeting to include households with children under 5 years and older people over 60 years for home gardens, participatory cooking sessions, development of nutritious recipes for age groups, and livelihood options for people over 60 years. Concern's local implementing partner (national NGO), Social Assistance and Rehabilitation for the Physically Vulnerable (SARPV) will implement a similar set of activities in their Nutrition Sector assigned Camps 4, 5, 6, 8W, 10, as well as two unions in the host community (in Ukhiya upazilla/sub-district). Both Concern and SARPV will liaise with IRC to integrate gender-based violence and protection support to mothers in the routine activities, and work with BBC Media Action to strengthen community engagement. Additionally, SARPV have expertise disability inclusion and in identification and treatment of rickets disease.

The partnership with SARPV is the beginning towards Concern's exit strategy from direct implementation in Cox's Bazar programs in the coming years. Concern Cox's Bazar Strategic plan 2019-2021 also aims for localization and a gradual shift from direct implementation to implementation through partners. The Country Management Team understand that the shift from Direct implementation to local implementing partners should be a gradual process and with continued strong oversight from Concern.

Concern Cox's Bazar Strategic operational plan 2019-2021 is developed with the overall goal of providing clarity on Concern's direction and develop strategy plan that aligns to the Government of Bangladesh's priorities; supporting the gaps to address the needs of the most vulnerable and reflects the emerging issues and changing context of the response in Cox's Bazar.

5.1 Relevance & Appropriateness

In the Rohingya response context, the Information Management and Assessments Working Group (IMAWG) is responsible for conducting and coordinating joint multi-Sector needs assessment in the Rohingya refugee and host communities to identify needs and gaps, which support the preparation of Joint Response Plans. The ISCG Secretariat consolidate the multi-Sector needs assessment with more in-depth technical Sector assessments, such

as SMART (Standardised Monitoring and Assessment of Relief and Transitions) nutrition surveys and Food Security assessments, and the context analysis undertaken by UNDP. Concern contributed to a number of Sector led assessments. As a member of the Assessment Working Group within the response, Concern participated in the SMART Survey 2019. The recommendations arising from this study have been incorporated to design the projects addressing the least performing indicators around infant and young child feeding.

Concern Cox's Bazar conducted rapid livelihood and self-reliance assessment. This assessment conducted a series of FGDs and KIIs with various groups within the community with a focus on ascertaining the community needs with respect to livelihood opportunities. Concern also undertook a number of barrier analysis assessments. The most recent barrier analysis assessment was for two behaviours (early initiation of breastfeeding and exclusive breastfeeding) to inform and strengthen the social and behaviour change communication (SBCC) approaches in the response.

Concern Rohingya response also utilizes the assessment performed by Nutrition sector and other actors in Rohingya response and use the key findings and recommendations in designing new projects. An example of one such assessment is IYCF monitoring assessment exercise conducted by Save the Children and UNHCR on behalf of the nutrition sector. This exercise sought to assess the performance of key Infant and Young Child Feeding (IYCF) indicators as well as the barriers to their adoption within the Rohingya community thus enabling implementing partners design SBCC strategy that are suitable to the context. The findings on the performance of key nutrition indicators and the recommendations have been incorporated in the design of Nutrition projects such as the DFID/UNOPS funded project.

Concern Worldwide' Rohingya Refugees response interventions are in line with the needs of Rohingya refugees and vulnerable host communities in Cox's Bazar and is aligned to Government of Bangladesh and Nutrition and food security sector priorities as outlined in the Joint Response plans 2020 for Rohingya Response. Concern Worldwide interventions contribute to the achievement of Strategic objectives of Joint Response Plan (JRP) 2019 and 2020 and directly contribute to Sector objectives for Food Security and livelihood and Nutrition sector.

According to JRP 2020, coverage of nutrition services across the camps has increased. All communities can reach a nutrition facility on foot in less than 30 to 45 minutes. Utilisation of nutrition services by some Severe Acute Malnourished (SAM) and Moderate Acute Malnourished (MAM) children and Pregnant and Lactating Women (PLW), however, access is limited by other reasons related to socio-cultural and behavioural issues, as shown in an IYCF monitoring exercise. Other assessments indicate that relevant nutrition sensitive interventions, such as income generating activities and kitchen gardens that can contribute to the reduction of malnutrition are facing challenges in implementation due to space and other constraints. In one of the impact study for DFID funded project, beneficiaries raised the issue of water shortage for kitchen gardening resulting in failure of crops. The situation needs to be further analysed. The unintended negative consequence could be that beneficiaries compromise on basic hygiene practices by saving water for growing vegetables. Small-scale low cost rainwater harvesting techniques or any other locally practiced water conservation method could be advised to beneficiaries to solve the water shortage issues in dry period.

The large-scale, blanket coverage programming approach ensures that all households in the camps receive a base level of assistance; some households consistently face greater difficulties meeting certain basic needs than others. This is particularly the case for income generating activities, accessing fresh food to supplement assistance, and accessing preferred health care services. All refugees have unmet essential needs, despite the provision of humanitarian assistance. The vast majority rely on negative coping mechanisms to meet these needs. The interviews with key informants and individual from Concern target communities showed their satisfaction with Concern Nutrition curative and preventive interventions and consider that their needs are met sufficiently. The individual beneficiaries also requested for more support for income generation in livelihood interventions.

In terms of targeting, Concern integrated Nutrition programme is having blanket coverage in refugee camps where Concern has presence and having OTPs facilities. Nutrition and IYCF preventions interventions target families with SAM and MAM children, Pregnant and Lactating Women (PLW) and Adolescent girls. For Self-reliance, livelihood

and Income Generation interventions the target groups are Female headed households, elderly (>60 years) and People with disability (PWD).

The target beneficiaries are actively engaged throughout the project cycle through household visits, community meetings, Focus Group Discussions with specific groups such as mother care groups, Key informant and community leaders' interviews and meetings. The feedback obtained from all the interaction with the community is assessed and used to enhance the quality of the programme. Concern's Complaints Response Mechanism (CRM) also helps to collect feedback mechanisms in place to ensure that the community can provide feedback about the project and this can be utilised to enhance programme quality and ensure that interventions are context-specific interventions.

Concern Cox's Bazar team regularly engage with relevant local government authorities, Majhis, faith leaders, Camp governance committees, Protection Watch Groups, Safety Units, DMUs and ensure active participation in sector-relevant camp-level coordination meetings and also at Cox's Bazar Saddar-level ISCG (Inter Sector Coordination Group) meetings to demonstrate best practices, seek guidance and to coordinate programme implementation.

Concern programme staff regularly attend monthly meetings at each camp in which Concern operate with CiCs, Majhis, Camp Management Committees (CMC), and NGOs. Concern ensures timely submission of all relevant project documentation to the CiC for approval of project activities in each camp. There are instances where some Majhi groups have tried to influence project staff to include non-eligible beneficiaries for income generation and livelihood assistance, which were successfully resolved by involving and explaining the selection criteria to CiC and other government stakeholders. At District/ Sub-district levels, Concern is liaising with RRRC to obtain Visa extensions for international staff; obtaining clearance from the District Commissioner (DC) office for distribution items; securing Upazilla Nirbahi Officer (UNO) attendance at project inception meetings all of which is a time consuming process. The NGO Coordination platform is advocating with the Assistant District Commissioner (ADC) at the DC office for a Simplified Track Approval process to avoid delays in securing DC office approval of aid distribution items. At Sector level, Concern is attending Sector meetings and reporting to relevant Sectors on planned, ongoing and completed distributions to avoid duplication of services and cover gaps in services. Concern participate in Rohingya response INGOs meetings and Chair Team leaders Forum at Cox's Bazar level. At National level, Concern's Dhaka based Government Liaison Manager ensures approval of project activities and budget from the NGO Affairs Bureau, Participation in NGO Forum meetings. Concern is also co-chair of SEG.

Extensive engagement of community and beneficiaries in all stages of the project cycle, formation of different care groups in consultation with community and CMAM and outreach interventions all contribute to increased ownership, accountability, and cost effectiveness. Concern has established Majhi groups comprised of 15-20 block level Majhis and the head Majhi of the camp. Regular meetings are held with Majhis groups to discuss project related issues and identify unmet needs. Majhis are very active and speak on behalf of their communities during meetings. These majhis groups support in identification and verification of vulnerable families, coordinate and support in distributions and other activities for vulnerable target refugee families. For host community livelihood support component of the programme, community consultation meetings (CCMs) are held to ensure community is involved at all stages of the project including beneficiary selection and monitoring. As part of Accountability to affected population (AAP) exercise, FGDs are held with beneficiaries, different vulnerable groups and community representatives. These FGDs aim to collect beneficiaries understanding and perception of Concern programme interventions, feedback on improvements and additional needs or gaps in current interventions.

DEC Phase II funding provided an important early opportunity for Concern to contribute towards meeting host community needs by extending livelihood support to host communities in participation with the Food Security Sector, the Livelihoods Working Group and Cash Working Group. This experience has contributed to building Concern's profile in the host community settings and contributed in mitigating the tension between Host community and Rohingya refugees. Later on, Concern secured funding from other donors to provide DRR and livelihood support to additional host community households in Ukhiya and Teknaf.

Concern Food security and livelihood interventions are contributing to Food Security Sector objectives in JRP 2020, which aims to promote portable skills development opportunities for Rohingya and enhance the livelihoods

and resilience of host communities. Beneficiaries' success stories and feedback from beneficiaries and PDM reports confirm that Concern is helping to improve the human capital and confidence of targeted groups through skills development and capacity building, supply chain linkage, support services and access to IGA inputs to create an enabling environment by engaging with the private sector in the host community and the government. The underlying goal is to mitigate tensions and promote positive relations (living side by side) between and within refugee and host communities.

Concern Rohingya response follows the gender analysis reports by Gender in Humanitarian Action Working Group (GiHA WG). The GiHA WG regularly produce reports on Gender analysis and these are shared with actors operating in Rohingya Response to ensure gender is mainstreamed, including through joint gender analysis and consultations with communities, to identify gaps, manage and develop sites in a gender responsive way, and advocate for the effective engagement of women in the community representative system.

Concern Rohingya response have been applying learning from success and failures. Concern staff communicated that Community Kitchens were not very much welcomed by beneficiaries and thus the community kitchen space was utilized for other purposes such as care group meetings. As the number of SAM cases started reducing significantly, Concern placed more effort on the preventive aspect of the program area with a focus on behaviour change and that is why Mother to Mother Support Group approach was changed to Care Group approach. The 2019 Care Group approach piloting by Concern was a success, recognized by both the Nutrition Sector and Rohingya Refugee camp community leaders and mothers and the team is scaling up the approach in 2020 and onward. Other Nutrition actors in Cox's Bazar are also showing interest to adopt to this Care Group approach.

Standard CRM system with complaint box and hotline number was in place since beginning of the response but was not functional. In Rohingya Refugee context, mostly the population is illiterate and prohibited to use mobile phone and the team attributed these as the main factors for non-functionality of the CRM system. Sensitization and awareness of communities on CRM is a key aspect, which needs to be strengthened as well. In 2020, the Cox's Bazar team introduced a CRM helpdesk facility at OTP level. To execute this system, dedicated Helpdesk and CRM Assistants take care of the Complaint or suggestion Box, Complaint register and Hot line number to receive complaints by helping participants and non-participants to deliver their complaint or feedback to the relevant authority. A CRM guide clearly outlines the structure, procedure and timeframe for collecting, investigating and resolving different kind of complaints. Cox's Bazar CRM is receiving on average 20 feedbacks in a month.

5.2 Connectedness

Concern started its Cox's Bazar emergency operations with Food and NFIs distribution and established OTPs to start the Nutrition curative programme. The Concern Nutrition programme gradually expanded and Integrated Nutrition programme including preventive interventions such as diet diversity and IYCF outreach, income generation and livelihood interventions were included to have a comprehensive package for better Nutrition and health outcome. Mother Care Groups and Adolescent care groups and CMAM are relevant approaches for a long-term programme.

The refugee camps are very congested and prone to landslide, flood and cyclones. Concern regularly reinforces integrated nutrition centres to withstand flooding and cyclone risks and provide training to field staff and volunteers on these recurring emergency response preparedness. Field staff and volunteers are provided with follow up trainings to prepare them for recurring floods and cyclone seasons. Lead Mother training on MUAC (Mid-upper arm circumference) enable Concern to continue Nutrition curative interventions in COVID pandemic situation. During COVID, Lead Mothers screened more than 11,000 children for SAM and MAM and referred more than 1800 child with SAM to OTPs for treatment.

Concern Bangladesh Head of Risk Reduction and Response Unit (RRRU) and Systems Director was the lead person from Dhaka office, Nutrition Advisor, HR, finance, admin, logistics staff from Dhaka office supported in setting up response in Cox's Bazar in 2017. Although the Cox's Bazar response was setup by staff from the Dhaka office, but the staff who were deployed in 2018 to Cox's Bazar communicated that there was big disconnect and a coordination and communication gap was very much visible between the Dhaka office and the Cox's Bazar office.

The informants noted that communication channels were quite heavy and over loaded and there was tendency to copy staff at HQ level on operational level emails. RRRU department from Dhaka office, which is responsible for responding and managing emergencies, was no longer involved in Cox's Bazar response in mid-2018. However, Dhaka based staff from MEAL, Gender, HR, Finance, Administration and Systems continued to provide remote and direct support to Cox's Bazar.

The coordination and communication between the Dhaka and the Cox's Bazar offices has significantly improved in last year or so. The country management think that there is scope to further improve coordination and communication between Cox's bazar and Dhaka staff to ensure that the Rohingya response is viewed as part of the Country programme. Country management is planning some changes in the structure and will incorporate the Cox's Bazar Strategic plan 2019-2021 into new Country Strategic Plan (CSP) to align the Cox's Bazar response into the CSP. As the Cox's Bazar response implementation modality gradually shifting from direct implementation to local partners implementation therefore frequent visits by Head of departments and staff in Dhaka office to Cox's Bazar will be required to support in reorientation of the implementation modality. Country team implementation is through partner and thus have very small team mainly technical leads and a small support structure as compared to direct implementation. The majority of the Dhaka staff have very little experience working in direct implementation in Refugees context in such a large and complex scale.

The Humanitarian community is collectively facing a number of challenges in the Rohingya response. Securing FD6 and FD7 approvals from Bangladesh Government is time consuming and is the main challenge resulting in unutilized funding. Funding, which has explicitly been granted by donors as flexible funding, cannot be used flexibly due to FD-6/FD-7 requirements. In some cases, some organizations had to return the funds to donors because of unsuccessful or delayed FD applications and approvals. The long registration process bars some NGOs from accessing funding or from spending funding already committed. The average waiting time to secure an FD6 and 7 is 6-8 weeks for international NGOs. NGOs are being discouraged from applying Rohingya response from FD6s. Government encourages making response for Rohinga by FD-7, which is not more than six months, that making for NGOs to plan operations of more than 6 months length. A number of NGOs with the capacity and funding to support the response is unable to secure registration quickly, as the registration, process takes an estimated 12 months with no process of expediting. International NGO staff are required to secure the NGO visas or N' visa to work on the response in Cox's Bazar. However, such visas are impossible to secure unless the NGO has been issued an FD6 or FD-7 and accordingly approved for the concern positions. To meeting the compliance this is impossible to work NGO staff currently in Cox's Bazar district to have with tourist/VOA or business visas. However, Concern follows the requirements of N' visa and ensures updated FD7 and FD-6 approval for the response. All international staffs are working in Cox's Bazar with N' visa and work-permit as per Government compliance. However. It has been facing more difficulties to ensure their VISA's and work-permit. Recent tightening of security regulations at camp checkpoints may lead to the majority of NGO staff being denied access, which will considerably affect the Rohingva response. Concern is fully compliant with FD7 and visa requirements and therefore Concern Rohingva response is not affected by this access and movements related restrictions.

At the start of Rohingya response in 2017, new Alliance2015 partners (PIN, WHH and ACTED) arrived in Bangladesh for Rohingya response also faced challenges for registration, as other INGOs as a result some Alliance partners had to leave the country, some are non-operational due to pending registration and some had reduced presence. Only two Alliance2015 partners (Concern and Helvetas) are registered in Bangladesh. Alliance2015 partners continuously tried to build relations but same as Concern, Alliance2015 partners were also facing issue of staff turnover, which significantly affected continuity. This situation made it difficult for Alliance 2015 partners to develop a JEPRP (Joint Emergency Preparedness and Response Plan). Alliance 2015 partners meet frequently to support each other across various operational issues. Joint proposals were developed. Through Alliance2015 funds, a joint assessment was also conducted. A joint proposal with WHH, Concern and PIN was submitted for German Government funds, which was successful, WHH implemented the WASH component, PIN was responsible for protection activities and Concern implemented nutrition treatment and preventive interventions. Concern supported the new Alliance2015 partners arriving in country with the Security Management Plan (SMP). accommodated and Alliance2015 partners supported each other in operations. The Alliance2015 collaboration has been satisfactory but due to challenges faced by individual alliance partners, high staff turnover has significantly affected the continuity in relationship building. Concern staff further communicated that JEPRP is in year 2020 plan but not developed yet.

5.3 Coherence:

Concern Rohingya response interventions adhere to equality and protection policies. Cultural gender dynamics exists in the refugee population that might limit female participation. Similarly, for Bangladeshi women in the surrounding host community, an average of half reported not having freedom of movement to specific places. Considering movement restrictions, the programme engage men and boys of the community and particularly spouses to sensitise them on the activities women and girls will engage in, their intended purpose, benefits, and safety of the environment. Home-based income generating activities also provide women and adolescent girls with opportunities to improve their financial status. The staff are sensitised and trained on protection and safeguarding, including referral mechanisms for suspected or detected protection cases. Staff and volunteers are trained on gender and GBV prevention issues, guidelines and checklists to abide by Do No Harm principles. Although nutrition services mainly target children and mothers, special attention is given to married and unmarried adolescent girls as well. In one project (DEC funded), Concern implemented some Protection interventions. Concern's Protection Office was trained on Gender and Protection mainstreaming in the Nutrition interventions and further trained field staff on identifying referral pathways for GBV and Child Protection agencies in each of the camps.

As evident from the Annual reports, regular Country-level Preparing for Effective Emergency Response (PEER) plans were developed and updated however, in discussion with Concern staff, the staff mentioned that program staff in Cox's Bazar, which means that PEER plans are not widely shared or explained to Cox's Bazar team, never see these plans and thus the non-effectiveness of these PEER plan is serious concern. The PEER Plan have a lot of information and contents which informs the processes and execution of an emergency response.

All Concern interventions in Cox's Bazar are implemented in refugee camps and nearby host communities and all interventions are part of Joint Response Plan for Rohingya response and are aligned to Core Humanitarian Standards, Sphere standard and other humanitarian principles and country and context specific standards.

Concern Rohingya response is aligned and respect SPHERE Standards, Infant and Young Child Feeding in Emergencies Guidelines, Core Humanitarian Standard on Quality and Accountability (CHS), Joint Response Plan(JRP-2019), IASC Minimum Operating Standards for Prevention of Sexual Exploitation and Abuse (IASC MOS-PSEA), National Guidelines for Community-based Management of Acute Malnutrition (CMAM) July 2017 and National Guidelines for the Facility-based Management of Children with Severe Acute Malnutrition in Bangladesh July 2017. The Rohingya response largely adhere to Concern's Approach to emergencies core directions and guidelines. The PEER plan was developed but not effectivity used in the response. Security policy is in place to ensure staff security at Cox's Bazar level. Initially the Concern was operating from Cox's Bazar level which is around 2 hour drive from the camps where Concern operate. Due to strict curfew hours as per SMP, there was very little time for actual work in camps. Concern office is now established at Ukhiya with easy access to camps and operational area and a coordination office at Cox's Bazar level.

5.4 Coverage

Pre COVID-19 almost all Rohingya refugees (94%) were identified as highly or moderately vulnerable and in continued need of humanitarian assistance to meet their basic needs. Host community households were found to be better off than refugee households across all dimensions of well-being, with 41% identified as vulnerable (WFP 12/2019). In both populations there is a high level of unmet basic needs leading to poor wellbeing outcomes. Concern target all Rohingya refugees in selected camps with Nutrition curative and preventive and food security interventions and the most vulnerable groups in camps and host communities with livelihood and income generation interventions.

Concern's main programme in Cox's Bazar is Nutrition which mainly benefit malnourished children under age 5, Pregnant, and Lactating Women and adolescent girls. Livelihood and income generation activities target families with SAM and MAM and other vulnerabilities such as disability, women headed HHs, Elderly (>60 years). In addition, portable skills development and other capacity building initiatives target the most vulnerable and individuals at risk of marginalization, including women, the elderly and people with disabilities.

All Rohingya refugees are considered vulnerable and are getting blanket humanitarian assistance. Concern always try to reach those who are least served by the wider response. One example of such efforts was during distribution of Dignity Kits (NFIs) under DEC Phase II project. The difficult geographical terrain combined with the heavy monsoon rains during the project period made it difficult for people with disabilities to access services and they were often among the least informed about available services. Concern's approach of identifying beneficiaries through house-to-house visits in target camps ensured women and girls with disabilities were equitably included in the beneficiary selection process. Project volunteers made house-to-house visits to identify potential beneficiaries in consultation with Majhis (Rohingya community leaders).

5.5 Efficiency

As per review of some of the Financial Reporting Packs, the Cox's Bazar response is believed to be efficient in terms of budget. The staff felt that the activities were budgeted appropriately. The Finance department at Cox's Bazar was under staffed in the first year of response, Dhaka Finance department provided oversight and support and allocated time to ensure financial compliance, and that funds are being spent in the most effective and efficient way as possible. The majority of the achievements are in line with original project documents and in case of any changes in time and cost approval was requested from donors.

Staff communicated that despite direct implementation by Concern, no procurement, logistics department existed at Cox's Bazar level, and Dhaka office staff were providing support until June 2018. A Concern Surge Logistician was deployed in May 2018 to support the establishment of logistics and procurement system. Concern's procurement process experienced considerable delays in terms of both costs and availability of goods, impeding the efficiency in the delivery of program activities in start of emergency response. The Rohingya response now have fully functional logistics and majority of procurement and logistics functions are performed at Cox's Bazar level with some support from Country office. Informants mentioned some issues with procurements such as excessive delays in payments and not being reflected in management accounts months after the activities are completed. Another issue is related to the Supplies Request (SR) tracking sheet, which not updated in a timely manner and a version control issue was also detected.

In the past the funding situation has not been stable for Concern Rohingya response. Most of the time the situation was uncertain about the next years funding. Concern staff communicated that 2019 has been better than other years as there are a couple of projects with multiyear funding although finding sources for co-funding remains a challenge. In 2020, Concern funding portfolio for Cox's Bazar response is around € 5.2 million. Cox's Bazar Staff interviewed believe the current program's management structure to be adequate and responsive but gaps in some key positions such as head of programmes and delays in hiring of staff affecting the overall efficiency of the program. At the Cox's Bazar Ukhya office level, the Emergency Director and Programme technical leads regularly conduct meetings with staff to track activities and financial progress, implementation plans, and addressing challenges. The staff communicated that inception meetings, quarterly or six months review meetings and project closeout meetings are organized and are beneficial in better understanding of plans, course correct, and documenting lessons learnt.

5.6 Effectiveness and Timeliness

Before the current influx of refugees in 2017, there were more than 30,000 registered Rohingya refugees living in two camps who came during 1991 influx. Concern handed over these two to UNHCR in 2004-05. There were also refugees living within in host communities. Concern continued working with undocumented refugees in host communities but due to restrictions from Bangladesh Government and operational challenges Concern closed its refugees programme in 2012-13. Concern was supporting these Rohingya refugees since 1991.

Immediately after the new influx of refugees August 2017, Concern submitted a number of applications to Government to seek permission for refugees' response in Cox's Bazar. According to Concern staff, there was an urgent need to respond but Government was very restrictive. After three weeks struggle and advocacy to Government and NGO Bureau, Concern and two other INGOs were granted permission to intervene in Cox's Bazar. A number of Concern staff informed that funding was a big constraint in setting up the response. Particular

challenge for Concern was that other organizations were submitting applications with big envelopes from their internal funds but Concern was having a small envelope of €150,000. The Concern Country office had to do a lot of advocacy to get approval to intervene with small funds.

In October 2017, Concern received DEC appeal funds (€229,000) and started with Food and NFIs distribution through YPSHA Local partners. Concern approached UNICEF for funding and secured funding (€1.57 million) for Nutrition interventions. Despite significant funding constrain in first couple of months at the start of response, Concern was having €1.95 million secured funding for Rohingya response with 80% funding from UNICEF for Nutrition programme by December 2017. Concern Bangladesh team was looking at more creative ways to use the small funds. In order to have more effective and coordinated response, Concern supplemented the WFP distribution to complement the rations with other food items, which were needed but not included in WFP ration distribution. Concern became an influential actor. Concern influenced and convinced all actors to complement the WFP rations.

Implementation modality was another challenge for Concern Bangladesh. At one point, WFP approached Concern for funding and Concern declined the funding because WFP was only funding organizations for direct implementation. Concern Bangladesh routine development programmes are mainly implemented through local partners. The Cox's Bazar Refugees context was different and the country team was experiencing limited capacity to undertake direct implementation in the Rohingya response. In order to overcome this challenge, the Concern Bangladesh team approached ex-Concern staff who worked earlier in the same refugees settings in the area and had direct implementation experience. These experienced staff immediately setup the OTPs and started the Nutrition programme in Cox's Bazar with UNICEF funding. Full operational structure at Cox's Bazar level for direct implementation was also challenge and significantly affected the programme implementation in the early stages. Surge team and HQ staff supported in setting up the support functions and hiring new staff. Due to the non existence of support structure at Cox's Bazar level the Country office staff were overstretched and procurements were delayed and this resulted in delay in the receipt of supplies and implementation of emergency activities.

A number of SAL and Surge members continued providing technical support through short deployments before staff were hired to take over the responsibilities for the Cox's Bazar response. High staff turnover was a big issue and sometimes the Country team had to release the Systems Director and Head of Risk Reduction and Response Unit (RRRU) to lead the response in Cox's Bazar.

The informants feel that the initial investment to handle such type of rapid onset emergency crisis is crucial. Those organizations, who invested in early stage of response and setup the responses with their internal funds were having broader presence and operations and attracted more funds from institutional donors in the later stage. Informants feel that Concern was left behind because of small presence and camps were saturated and occupied by actors with good initial funding. Concern should have a funding envelope for rapid setup of response and attract more funding in such large scale and complex emergencies. People were expecting a big response from Concern but Concern response was very small as compared to other INGOs. Concern senior staff involved in early stage of response feel that HQ level donor advocacy is key in securing funds for such rapid onset emergencies. A considerable amount of HQ funding from ERFS and CEO funds has been allocated to Rohingya response but was in the later stage of the response in 2018.

Information collected from individual interviews and Key informants interviews from target communities reveals that generally, the target refugees and host communities are satisfied with Concern interventions so far and feel that their needs are met on time. Despite the broader community satisfaction there were some delays in activities involving construction such as Community Kitchen spaces, OTPs etc. due to delay in allocation of land for these facilities by Camp in Charges. Additionally Livelihood, income generation and outreach interventions are on hold due to COVID as they are considered non-essential by the Bangladeshi Government.

The informants communicated that during the first year of the response, no MEAL department existed at Cox's Bazar level and MEAL function was performed by the PSO on an ad-hoc basis. The MEAL Coordinator was hired in November 2018 and later on a MEAL department was established. Currently the MEAL department has all the required resources and is performing its intended functions such as conducting assessments, baseline and endline surveys, monitoring visits, PDMs, FGDs for AAP (Accountability to affected Population) and CRM. MEAL team at

Cox's Bazar communicated that Concern IformBuilder platform is partially used for PDM, Baseline and End-line evaluation and ONA platform is mainly used for digital data collection. The team attribute long time it takes to deploy a new tool on IformBuilder as the main reason for not using Iformbuilder for digital data gathering (DDG).

Data collection and indicators tracking tools exists in Cox's Bazar response. As per MEAL database and indicators progress tracking, indicators and activities progress tracking data exists for all completed and ongoing projects since 2018. There are issues with the database such as the templates used for indicators tracking are not consistent for different projects. In some cases the multiple years data is entered in a single sheet and in some cases the data is split in multiple sheets which is quite confusing and extracting the overall information for yearly project achievements is time consuming and challenging.

According to reports and MEAL database, the output indicators and activities under nutrition, IYCF, self-reliance and DRR interventions have been achieved in past years completed projects. Generally, all the major targets are achieved except construction activities, which were delayed due to approval and allotment of land by CiC. Some indicators are significantly overachieved and justification should be provided against those indicators in the indicators tracking sheet. For ongoing projects in 2020, some of the output and outcomes related to Livelihood, income generation Nutrition and IYCF CMAM interventions progress are not on track since April 2020 due to COVID-19 thus it is highly expected that current year planned outputs and outcomes will be underachieved due to COVID-19.

The Concern multi-layer approach of training community members, community volunteers and setting up local groups such as Mother to Mother Support Groups, Mother Care groups and Adolescent Girl Groups, Lead Mothers groups interventions of programme are steps in the right direction and will contribute to sustainability and an exit strategy. The Concern's staff and volunteers should be offered regular refresher technical trainings and will be effective in strengthening knowledge and in developing the capacity to spread messaging to mothers and adolescent girls benefitting from the program.

The Average Cure Rate for Children treated at Concern OTPs was 80%, which is above the Sphere Minimum Standards in Humanitarian Response rate of 75%, and thus meet the minimum sphere standards. Average Cure Rate for Children benefiting from TSFP were 87.6 %, which is well above the Sphere Minimum Standards in Humanitarian Response rate of 75%. According to the bi-annual SMART surveys conducted by the Nutrition Sector, the rate of Global Acute Malnutrition (GAM) has also reduced; 19.3% in November 2017, 12.0% in May 2018, 11.0% in November 2018 and 10.9% in November 2019. The level of acute malnutrition did not reduce significantly from 2018 to 2019, despite the doubling of coverage of the malnutrition treatment program. At the same time, annual SMART survey findings showed that stunting increased from 26.9% to 32.6% from November 2018 to November 2019 among children under 5 years; anaemia increased from 52.0% to 56.9% in children under 2 years and malnutrition in pregnant and lactating women doubled from 2.8% to 5.0%. With the GAM rate still over 10% and hence classified as 'serious' by WHO classification, with continued aggravating factors for malnutrition in the refugee camps, there is need to continue the curative CMAM services; including OTP, TSFP and BSFP.

Concern staff communicated that routine monitoring and data collection by programme and MEAL staff is mainly used for tracking indicators progress and fulfilling donor reporting requirements with minimal utilization for improving programme quality. One of the Consortium lead representative mentioned the same issue. Capacity of program team and MEAL team needs to be strengthened to regularly monitor and analyse program activities, identify gaps and take corrective measures accordingly. Later submission of financial report is also reported by Consortium lead agency. The communication and coordination between program and finance needs to be strengthened to ensure donor compliance especially in financial procedures.

5.7 Impact

According to beneficiaries and target communities, Concern programme in Cox's Bazar is making significant positive contribution to improve the social, economic, health and nutrition of Rohingya refugees and host communities especially children, pregnant and lactating women, Adolescent girls, elderly and people with disability.

The integrated approach in nutrition programme, livelihood and income generation interventions has had a significant impact on the prevention of malnutrition by improving dietary diversity and providing additional sources of food beyond WFP rations distributions. During individual interviews beneficiaries, there is positive feedback on diet diversity, livelihood and income generation interventions. Beneficiaries reported significant increase in their daily and monthly incomes and enhanced their ability to fulfil their food, health and other needs. According to post distribution monitoring and outcome monitoring reports, the homestead gardens had a good positive impact in terms of availability of diet diversity and nutritious food and have given the opportunity to target families to earn some cash to cover other family needs. According to Annual reports from 2017-2019, Concern Rohingya response all interventions benefited 426,640 individuals including 248,096 Female and Girls and 178,544 Male/Boys,

A significant amount of national staff (94 Male, 77 Female) and volunteers (198 Male and 168 Female) are currently working on Concern Rohingya response. Many of the staff are from nearby host community and a good number of volunteers are Rohingya refugees. Beyond the income they are earning for themselves and their families, they are also gaining valuable knowledge and skills. Concern should continue this practice of investing in the communities, and look for opportunities to enhance capacity building and training.

5.8 Cross Cutting Themes

Equality

Concern's main programme in Cox's Bazar Nutrition programme mainly benefit malnourished children under age 5, Pregnant and Lactating Women and adolescent girls. Livelihood and income generation activities target families with SAM and MAM and other vulnerabilities such as disability, women headed HHs, Elderly (>60 years). In addition, portable skills development, self-reliance and livelihood support and other capacity building initiatives target the most vulnerable and individuals at risk of marginalization, including men, women, female-headed household, (elderly men and women) and people with disabilities.

Protection

Rohingya refugee emergency is a protection crisis. Concern Rohingya response have policies and procedures in place for programme participants' protection, prevention, respond and tackle exploitation, harassment and abuse. These include, Safeguarding, PSEA, Data Protection, Anti-Bribery, Conflict of Interest and Code of Conduct, Programme Participant Protection Policy (P4) that all staff, volunteers, outreach workers and community mobilisers must sign and adhere to diligently to ensure maximum protection of programme participants from exploitation, and to clarify the responsibilities. As of September 2020, Concern Cox's Bazar has 2 international, 171 National staff and 366 volunteers. The HR department informed that all new Concern staff for Rohingya response are provided with list of mandatory trainings and refresher every six months including Inductions, PSEA (Protection from Sexual Exploitation and Abuse), Orientation on GBV according to the pocket guide, Safeguarding, CRM, Core Humanitarian Standards, PDR training, Security training, Fire safety training, technical trainings (organized by sectors and programmes and project specific technical orientation), Logistics and procurement training and Infection Prevention and Control (IPC) for COVID. All volunteers working on Concern Rohingya response are provided with trainings including HR induction, PSEA (Protection from Sexual Exploitation and Abuse), Orientation on GBV according to the pocket guide, Safeguarding, CRM and Infection Prevention and Control (IPC) for COVID-19 and programme. Staff are aware and use the referral mechanisms at the camp level whether for protection or health related issues.

Under DEC Phase II project in 2018, Concern implemented some activities that contributed to protection of adolescent girls and women. Concern distributed Dignity Kits to 10,190 women and adolescent girls in 7 Rohingya refugee camps. The Dignity Kits promoted the protection of women and girls through the inclusion of items such as torchlights, which helps them, feel safer when going to use outside toilets in the evening, as many parts of camps lack of streetlights.

Disaster Risk Reduction

In order to have communities better prepared to withstand future emergencies, Concern implemented an IOM funded DRR project in 2018-19 with aim to strengthen the Disaster Risk Reduction (DRR) and response capacity of targeted Disaster Management Committees (DMCs), and to enhance local community disaster preparedness and reduce cyclone and flooding risks in Cox's Bazar. The project supported vulnerable host communities and government institutions in Palong Khali and Raja Palong Unions of Ukhiya Upazila and Whykong, Baharchara and Sabrang Unions of Teknaf Upazila to anticipate, reduce the risk of, respond to, and ensure effective early recovery from natural disasters. It has been more that this project was implemented and no further DRR related interventions are executed in host communities. As stated above, the IOM funded project was not managed professionally; implementation was significantly delayed; reports were not submitted on time; planned activities were not implemented as per agreed Details Implementation Plans (DIP) and as per quality criteria's resulted in no cost extension request from donor and significantly affected relationship with donor. There were issues related to beneficiaries' selection and CRM as well. Concern staff communicated that, IOM was not happy with Concern performance on this project resulted in Concern not having subsequent DRR projects from IOM.

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In 2019, Disaster Risk Reduction through Food Assistance for Assets (FFA) project, which was funded by WFP, was implemented with the objective to mitigate and reduced disaster risks through cash for work initiatives in the camp environment. The activities implemented were Roads, drainage, Stairs, guide walls, slope protection, Retaining walls, RCC drain slaps and culverts. Concern Dhaka based head of Rapid response Unit communicated that overall performance of this project was not satisfactory. There were issues of delays in implementation; could not secure approvals from CiCs or also could not complete planned construction work resulted in no cost extension approval request from WFP and affected donor relationship. Concern also could not maintain functional communication and coordination with WFP and other actors. Concern staff communicated that Concern occasionally submitted required reports on time to WFP. WFP did not award subsequent similar project to Concern in 2019.

Under Strengthening Humanitarian Preparedness and Response (SHPR) programme, DFID/UNOPS funded project, Concern is building capacity and skills development of care-group members on food preservation, food processing and value addition for culturally common food basket items e.g. rice sweets, chutneys or pickles. Skills development trainings on handicraft, business, financial literacy, quality assurance and marketing to targeted Rohingya women, men and youths through host community master trainers. Organizing trade fairs for promotion of locally produced products. Quality assurance scoping and training with private sector partners, and fair pricing negotiations. Linkage of producers with private sector for finished goods via quality assurance team. All these interventions contribute to preparedness of communities to better withstand future emergencies.

Overall, the Concern Rohingya response performance in implementation of IOM DRR project and WFP FFA project were not satisfactory and significantly affected relationship with donor.

Partnership

Concern has been directly implementing the integrated Nutrition, Livelihood and income generations programme since beginning of Rohingya response. In early stage of Rohinin next gya response in late 2017 and early 2018, Concern worked through YPSHA to implement DEC funded Food and NFIs distribution project. CLOFAT and CLOSAT assessment tools were used to assess the YPSHA. YPSHA has long experience to operate different types of projects in urban, rural in development and humanitarian settings, including leading projects in Chittagong Division and Cox's Bazar district. YPSA was implementing coastal projects in the same area as geographical area. Assessment of YPSHA revealed that YPSHA has relevant policies and strategies in place and have past experience working with Concern Worldwide. Considering the specific nature of the Rohingya humanitarian response, capacity-building sessions were organized by Concern on protection and humanitarian principles as well as mechanisms of communicating with refugee communities. YPSHA local experience helped in successful implementation of food and NFIs distribution activities on time. YPSA fulfilled all the reporting requirements as per agreed terms and condition in partnership agreement between Concern and YPSHA.

.The Rohingya response implementation is gradually shifting from direct implementation to a mix of direct and local partner's implementation modality. In recently approved multi-year multi-sectoral BPRM funded project, which will be implemented in consortium with International Rescue Committee (IRC) and BBC Media Action, Concern is working with a local implementing partner (national NGO), Social Assistance and Rehabilitation for the Physically Vulnerable (SARPV) to implement a portion of project activities. SARPV will implement preventive nutrition services, expanding targeting to include households with children under 5 years and older people over 60 years for home gardens, participatory cooking sessions, development of nutritious recipes for age groups, and livelihood interventions for people over 60 year in their Nutrition Sector assigned Camps (4, 5, 6, 8W, 10) as well as two unions in the host community in Ukhiya upazilla sub-district. SARPV have expertise disability and inclusion and identification and treatment of rickets disease affected people.

As per Cox's Bazar Strategic Operational Plan, the plan is to add 1-2 new implementing partners to support in implementation of Cox's Bazar response in 2020/2021. The trend for localization might affect future funding for Concern Rohingya response.

Impact on Environment

Concern Nutrition and Food Security and Livelihood interventions are contributing to rehabilitation of the environment through vegetable and crops planting activities, sustainable and nutrition sensitive agriculture for the Rohingya refugee and host communities, contributing to water conservation and awareness raising initiatives. The Disaster Risk Reduction (DRR) activities in camps are significantly contributing to environment protection and DRR activities in host communities complement and support the Government of Bangladesh, Ministry of Disaster Management and Relief (MODMR)-led strategies and activities. Activities under Food Assistance for Assets (FFA) project, such as repair of roads, drainage, stairs, guide walls, slope protection, Retaining walls, RCC drain slaps and culverts positively contributed to environment by reducing the soil erosion and safe disposal of rainwater.

5.9 Impact of COVID-19:

There has been a significant reduction of humanitarian presence in the refugee camps since April 2020 due to the measures put in place to mitigate the risk of widespread COVID-19 transmission. Since April 2020, humanitarian actors are allowed to implement only critical activities such as health and nutrition services, WASH activities and services, distributions, information hubs for COVID-19 awareness sessions, food distributions. The activities such Protection and GBV, site management, Shelter/NFI, livelihoods, education/learning, community-based activities and training activities are considered as non-essential and are currently restricted. These restrictions have reduced humanitarian staff in the camps by 80%. Going forward, the risk of losing access and funding for essential activities is high. For sustainability, funding and scaling up of national capacity to deliver lifesaving and life- sustaining activities is essential.

COVID-19 has had a strong socio-economic impact in Cox's Bazar district, affecting both Bangladeshi and Rohingya refugee communities. In camps, movement restrictions, market closures and reduction in humanitarian community supported income generation activities has led to loss of financial security and increased economic vulnerability. Loss of livelihoods exacerbates risk of eviction, forced and/or exploitative labour, health problems, food insecurity and malnutrition. Protection agencies operational in camps are reporting an increase in organised criminal activity and increased insecurity in camps in recent months. There have been reports of increased extortion, kidnapping, physical attacks, threats against refugee volunteers and recruitment of boys/youth into criminal operations by these actors.

In current COVID context, longer-term restrictive operational environment is expected therefore new and innovate ways of working need to be explored to adopt to new normal. Support from Lead mothers in screening SAM children using MUAC method and referring SAM cases to OTP is a success in current COVID situation. Strengthening local partner's capacity and implementation of new projects activities through local partners. Strengthen community capacity by engaging and training of target groups such as mother care groups, Adolescent Girl groups and training Rohingya community volunteers to continue the critical outreach and livelihood activities.

Concern's Rohingya response office is located in Court Bazar Ukhiya town, which is close to the camps where Concern is operational and that was an advantage in terms of movement and access to camps in COVID-19 situation. COVID-19 is significantly affecting hiring of new staff and some of the critical positions remain vacant. Because of the COVID-19 impact on the implementation environment, the BSFP services were delivered for all households, through the WFP General Food Assistance system. The Concern Integrated Nutrition centers and OTPs remain functional with reduced staff working on rotation basis. The community outreach activities, however, took the hardest hit from the COVID-19 pandemic, and will need to be tweaked to the new normal situation. During COVID-19 pandemic period, Lead Mothers took the responsibility for screening of children for SAM and MAM. Lead Mothers screened more than 11,000 Children and referred 273 child with SAM to OTPs for treatment.

The DFID funded consortium project with Christian Aid in which Concern is linking Care Group members with nutrition sensitive livelihoods interventions. The COVID-19 pandemic affected the implementation modalities of this project during its April to June and July to September 2020 phases, with alignment of the nutrition component to critical Nutrition Sector priority activities like Mother Led MUAC, for identification and referral of acute malnutrition. In the October to December 2020 phase, Concern will be looking to revert to strengthening preventive approaches to malnutrition such as IYCF counselling and support, innovative home gardens and linking pregnant and lactating women to livelihoods interventions, using the Mother Care Group approach for optimal coverage of households in the catchment area.

As part of COVID-19 response in Cox's Bazar, Concern secured funding and the activities to be predominantly implemented in Camp 13, 14, 15, 18, 20E and 21. This project provides facemasks, hand sanitizers, and soap to all SAM and MAM beneficiary households and all households with pregnant and lactating women in the five camps, over a six months period. Additionally, 13 health facilities will be provided with WHO and Health Sector endorsed quality PPE (Personal Protective Equipment) until December 2020.

5.10 Advocacy

The Country Director and Emergency Director f is vigilantly engaged in advocacy works both at country level and at International level on a number of issue and concerns related to Rohingya refugees crisis. Most recently, the Concern country management is engaging Bangladesh Government and authorities on following advocacy work at country level;

- For resumption of self-resilience and livelihood interventions, which are on hold due to COVID restrictions.
- For Protection programme, allow agencies to resume works in camps.
- For better living conditions and facilities in the refugee camps and more livelihood and income generation activities.
- Issues on access and freedom of movement of beneficiaries, protection concerns of beneficiaries.
- Having more volunteers hired from refugee communities in camps as compared to host communities and maintaining or increasing payment rates
- Contributing to humanitarian community advocacy to Bangladeshi Government that humanitarian space
 must be maintained. Timely permissions; streamlined and consistent project processes and information
 requests for NGOs; (easing visa restrictions; uninterrupted NGO staff and vehicle access to camps and
 host communities).

For International level advocacy the Country Director and Emergency Director liaise with the HQ Advocacy team and with Regional Director and Desk Officer.

6. Conclusions and Recommendations

Conclusions

At the start of Rohingya refugee crisis, funding constraints and delays in setting up operations for emergency response resulted in most of the camps interventions being saturated and taken over by other organizations. Concern was left with only unserved portions in different camps, and ended up doing partial nutrition interventions instead of integrated nutrition interventions on a small scale. The nutrition programme could have been scaled up and integrated with health and WASH for better nutrition and health outcome. Sector wise Concern was very much relevant as an active partner of Nutrition sector and Concern was well known in health sector as well. Head of Emergency Operations visited in September 2017 and recommended for a follow up visit by Humanitarian advisor after 6 weeks to carry out a real-time review of the response and suggest a way forward but this visit never happened.

At the start of emergency response, Concern's procurement process experienced considerable delays in terms of both costs and availability of goods, impeding the efficiency in the delivery of program activities. Logistics and procurement department is established now and fully functional at Cox's Bazar level. Staff mentioned excessive delays in payments and not being reflected in management accounts months after the activities are completed. Also updating SR tracking sheet and version control are identified as some of the issues. One solution could be to have an online version of SR tracker on SharePoint and regularly updated to avoid version control issue.

Some past projects construction related interventions were overdue and staff mentioned delay in allocation of suitable land by camp management and CiC as the main reason. Availability of suitable land is a big constraint in these overcrowded camps. Concern staff mentioned that some of the sites allocated for construction of facilities were prone to disaster such as landslides and flood and thus not suitable for construction and construction at such site was not cost effective. Concern staff communicated that CiC are frequently changed and the field team and senior staff have to spend a lot of time in building relationships. Construction activities could have been better planned and factoring in time for allocation of land for such facilities by camp management and CiC. In addition, the relationship with CiCs can be further strengthened to expedite the processes. In 2018, Concern was advocating at cluster level and pushing for more integrated Nutrition programming to achieve better outcomes. Later on in 2019, the Nutrition sector consolidation and harmonization exercise provided Concern the opportunity to have integrated Nutrition interventions and consolidate its response.

High staff turnover in early stages of response and significant delay in hiring process resulted in having no overlap between staff and loss of institutional memory and also impacted on consistency and affected the relationship between Concern and different stakeholders. During an interview with a donor representative, the same concern of high staff turnover was raised. Concern staff feel that most of the time our hiring process is taking very long. The HR process need to be made robust and there should be mechanism to prioritize and fast track the hiring for setting up and start of such complex emergencies. One Consortium lead communicated that there is programme level leadership gaps in Concern Rohingya response at field level. The project coordinator position is vacant since long and the responsibility is assigned to assistant project coordinator but still the Consortium lead representative feel that there is still a gap in terms of capacity and needs to be addressed immediately.

Concern staff communicated that at Cox's Bazar level there is no centralized information management and there is huge reliance on individual staff computers for information. This can hinder report writing and access to information in the absence of such individuals and it is difficulty to finding the final versions of grant/project components such as proposal narrative, log frames, updated work plans, detailed implementation plans, procurement plans etc. Even the Grants data shared for desk review was a working folder and having so many version of different documents and it was difficult and time consuming to find the final version of documents.

Concern Cox's Bazar Strategic operational plan 2019-2021 is developed with the overall goal to provide clarity on Concern's direction and develop strategy plan that aligns to the Government of Bangladesh's priorities; supporting the gaps to address the needs of the most vulnerable and reflects the emerging issues and changing context of the response in Cox's Bazar. The Strategic plan demonstrate current programming, areas of continuation, growth,

expansion and future programming. The Strategic plan can be further strengthened by adding the yearly targets under each objective with estimated funding needs and geographical coverage. Additionally, a comprehensive monitoring and evaluation framework including process, output, outcome and impact need to be developed and will help in regular systematic documentation of progress and review of achievements against targets.

Rohingya response is a complex emergency and offer challenging environment to operate and successfully implement programmes. The challenges are restrictions on livelihood, food security and protection activities due to COVID. No mobile and internet available in the camp. Fencing of refugee camps, restriction on cash based interventions. Tension between Rohingya and host community is one of the emerging challenges across the Rohingya response program. Working with government and excessive lead-time for FD7 approval affecting timely completion of interventions. Movement restriction on refugees and challenges in hiring of local staff and volunteers especially Rohingya due to local politics and lack of technical capacity of Rohingya. Hiring of qualified female staff is also a challenge in Rohingya response as female don't prefer to relocate to Ukhiya due to long distance and travel time Cox's Bazar to Ukhiya where most of the schools and child care facilities are located. Funding constrains and other day-to-day operational challenges. Despite the difficult context, the Concern Bangladesh has been able to accomplish a number of achievements. Concern has been able to save lives of malnourished children, alleviate sufferings, and improve livelihood and provided income generation opportunities to most vulnerable Rohingya refugees and vulnerable host communities. The programme also has positive impacts, contributing to behaviour change of the program participants, building the capacity of local staff, partners and beneficiaries and thereby reducing vulnerability and increasing resilience to future emergencies.

Overall, the Concern Rohingya response programme was found to be highly relevant and fit for purpose. It addresses the wide range of issues that affect the overall health and nutrition of extremely vulnerable populations in Refugee camps and host communities in Cox's Bazar. Concern response in Cox's Bazar is well adapted to the local contexts, priorities and needs. Concern Nutrition programme is widely acknowledged by stakeholders as relevant and appropriate to address the urgent nutrition needs of the targeted refugee community through provision of integrated Nutrition curative and preventive, CMAM, livelihood and income generation interventions. The programme recognizes the relationship between nutrition and provision of services improving food security, livelihood and income generation and community outreach interventions in tackling the issue of malnutrition.

Evaluation Grading

During the evaluation exercise, the desk review and interviews with a number of Concern staff and other stakeholders highlighted some issues related to information management; digital data collection and data protection concerns, delays in procurement, in some cases late submission of donor reports but no major shortcomings and reservations were found. Overall performance were found to be satisfactory and in line with what would be expected in a normal Concern programme. The extended DAC criteria and cross cutting themes for this evaluation are graded as follow;

Criteria	Scale	Description of Scale/Grade
Relevance/Appropriateness	3	Performance in line with what would be expected of a well-
		functioning organisation
Connectedness	3	Performance in line with what would be expected of a well-
		functioning organisation
Coherence	3	Performance in line with what would be expected of a well-
		functioning organisation
Coverage	3	Performance in line with what would be expected of a well-
		functioning organisation
Efficiency	3	Performance in line with what would be expected of a well-
		functioning organisation
Effectiveness and timelines	3	Performance in line with what would be expected of a well-
		functioning organisation

Impact	3	Performance in line with what would be expected of a well-functioning organisation
Equality	3	Performance in line with what would be expected of a well-functioning organisation
Protection	3	Performance in line with what would be expected of a well-functioning organisation
Disaster Risk Reduction	2	Generally acceptable performance but with some clear, and documented, shortcomings
Partnership	3	Performance in line with what would be expected of a well-functioning organisation
Environmental Impacts	3	Performance in line with what would be expected of a well-functioning organisation

Recommendations

- In terms of programme scale up, the chances to expand and scale up the programme in Refugee camps is limited. The camps are super saturated. Concern should continue and strengthen its integrated Nutrition programming especially the CMAM and outreach interventions. The team can look into expanding income generation, livelihood, and portable skills interventions to cover more vulnerable people beyond families of SAM and MAM Children. The Host communities are prone to frequent disaster such as floods, landslides and cyclone. The team can attract more funding and expand programme in host communities in DRR, Climate Change, Income Generation and other disaster mitigation infrastructure. Under DRR and Climate Change objective in Cox's Bazar Strategic Plan, Climate smart and conservation agriculture can be introduced especially in host communities.
- For digital data gathering (DDG), Cox's Bazar response is currently, using Kobo toolbox and free version
 of Ona platform therefore, data protection is a big concern. Data collection tools should be standardized
 and deployed on IformBuilder to avoid delays in frequent deployment of new tools to Iformbuilder. It is
 recommended to use Concern IformBuilder platform for all future digital data collection and seek advice
 from GPDR colleagues in Dublin on data protection policy and guidelines.
- In CRM system, recently helpdesks are established with dedicated staff at each OTP site, which is an expensive solution. In order to identify the community preference on suitable channel of communication for registering complaint, barriers analysis and FGDs with communities and community leaders could have been performed. According to CRM guide, CRM is part of ACSM (Awareness Communication and Special Mobilization) and RCCE (Risk Communication and Community Engagement) materials but more robust sensitization and awareness raising on CRM is required. Regular refresher training sessions with programme staff and volunteers for better understanding of CRM mechanism and information dissemination to programme participants is required.
- Process monitoring by Programme and MEAL staff need to be further strengthen and must inform the
 realignment of the programme implementation to improve the quality of programme. Capacity of national
 staff working at management and Coordinator/Assistant Coordinator positions need to be strengthened
 on technical skills, programme quality, technical and financial management of projects. Concern Learn365
 online training platform can be utilized to train staff on a number of topics.
- Lesson learnt and closeout workshops for projects are a good opportunity to document lesson learnt and identify success and failures. Suggest having lesson learnt/closeout workshops for all ongoing and future projects and the findings and action points from the workshop documented and disseminated. Concern Rohingya response is entering into its fourth year now, efforts should be made to strengthen the processes to capture and document outcome level achievements and impact of programme. IOM DRR and WFP FFA project were the least successful projects in Cox's Bazar response, shortcomings and lesson learnt from these projects should be documented and should inform the design and implementation of future DRR projects.

- For programme level and other grants/projects related information management, it is recommended to
 use Concern SharePoint to have centralized grants documents stored and will be useful in case of staff
 turnover and will somehow preserve institutional memory for the response. Similarly, a separate Folder
 should be created for MEAL data with control access to relevant staff.
- The quality of donor narrative and financial reports need to be maintained. In order to meet donor-reporting deadlines, a reporting calendar can be developed and maintained and regular circulated among relevant senior staff. Communication and coordination between program and finance needs to be strengthen to ensure donor compliance in financial procedures. More frequent visits by the CFC to Cox's Bazar are required to support the Finance team at Cox's Bazar in review and validation of finance documents to ensure donor compliance and also provide guidance on Concern and donor compliance requirements.
- PEER plans were not shared or explained to Cox's Bazar level staff. Orientation and information
 dissemination to staff on key plans, policies and strategic document is important. Cox's Bazar based staff
 need to regularly orient on Strategic Plans, PEER plans, and keep them informed of any changes in plans
 and strategies. There is clear disconnect between PEER plan and execution of the Cox's Bazar response.
 PEER plan should be effectively utilized and all planning, processes, execution and decisions related to
 Cox's Bazar response should be aligned to PEER plan.