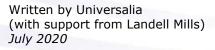


Evaluation of the European Union's humanitarian assistance in Ukraine, 2014-2018

Final Report









EUROPEAN COMMISSION

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Evaluation of the European Union's humanitarian assistance in Ukraine, 2014-2018

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Acronyms

AAP Accountability to Affected Populations

COHAFA Council working party on Humanitarian Aid and Food Aid

DG ECHO Directorate-General for European Civil Protection and Humanitarian Aid

Operations

DG NEAR-SGUA Directorate-General for Neighbourhood and Enlargement Negotiations - Support

Group for Ukraine

DRC Danish Refugee Council
EC European Commission

EEAS European External Action Service

EECP Entry and Exit Crossing Point
EIB European Investment Bank
EiE Education in Emergencies

ENI European Neighbourhood Instrument

EQ Evaluation Question
EU European Union

EUD European Union Delegation
FGD Focus Group Discussion
FLAC Free Legal Aid Centre

FPI Commission Service for Foreign Policy Instruments

FTS Financial Tracking Service
GBV Gender-Based Violence

GCA Government-Controlled Area

HAI HelpAge International

HCT Humanitarian Country Team HDG Humanitarian Donor Group

HI Humanity and Inclusion (formerly Handicap International)

HIP Humanitarian Implementation Plan
HNO Humanitarian Needs Overview
HRP Humanitarian Response Plan
IAF Integrated Analysis Framework

IASC Inter-Agency Standing Committee

ICRC International Committee of the Red Cross
IcSP Instrument contributing to Stability and Peace

IDP Internally displaced person

IHL International Humanitarian Law

INEE Inter-Agency Network on Education in Emergencies

INSO International NGO Safety Organisation
IOM International Organization for Migration

IP Implementing Partner

JHDF Joint Humanitarian-Development Framework

KII Key Informant Interview

MdM Médecins du Monde (Médicos del Mundo)
MHPSS Mental Health and Psycho-Social Support

MinTOT Ministry of Temporarily Occupied Territories and IDPs (since March 2020,

renamed Ministry for Reintegration of Temporarily Occupied Territories of

Ukraine)

MPCT Multi-Purpose Cash Transfers

MS Member State
NFI Non-Food items

NGCA Non-Government-Controlled Area NGO Non-Governmental Organisation

NRC Norwegian Refugee Council

OHCHR Office of the High Commissioner for Human Rights
OSCE Organisation for Security and Cooperation in Europe

PIN People in Need

PUI Première Urgence Internationale

RPBA Recovery and Peace-building Assessment

SC Save the Children

SMM Special Monitoring Mission

TOR Terms of Reference

UHF Ukraine Humanitarian Fund

UNDP United Nations Development Programme

UNHCR United Nations Refugee Agency
UNICEF United Nations Children's Fund

UNOCHA United Nations Office for the Coordination of Humanitarian Affairs

USA United States of America

WASH Water, Sanitation and Hygiene

Abstract

This evaluation covers DG ECHO's programming in Ukraine 2014-2018 (EUR 118.4 million). DG ECHO's 65 actions were delivered by 21 Implementing Partners and covered Protection, Health, Basic Needs including Food Security, Water, Sanitation and Hygiene, and Education in Emergencies. The evaluation was conducted between August 2019 and May 2020, with fieldwork in Ukraine in December 2019.

The evaluation found that DG ECHO was rapid and effective, and overall performed very well. DG ECHO demonstrated system-wide leadership in strategic thinking and coordination. Member states regarded highly the field team's strength and its access to the Non-Government-Controlled Areas (NGCAs). In Ukraine, DG ECHO supported several innovations: notably system-wide joint and impartial needs assessment, advancing an explicit Joint Humanitarian-Development Framework with the other European Union services, and supporting the creation of the Ukraine Humanitarian Fund. All donors, including DG ECHO, were somewhat slow to adapt their programming to the unusually high proportion of vulnerable elderly persons in the affected population. Government, development and humanitarian actors were also slow to connect and work together in the most-affected Government-Controlled Areas. Although access is difficult, needs in the NGCAs remain high, and should continue to be the focus of advocacy and programming in 2020 and beyond.

Executive summary

Objectives and scope

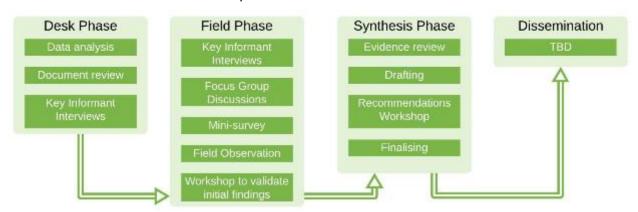
This is an independent retrospective evaluation of the Directorate-General for European Civil Protection and Humanitarian Aid Operations' (DG ECHO's) interventions in Ukraine (2014-2018). The evaluation has three objectives:

- Accountability: it assesses the performance of European Union (EU) interventions compared to initial expectations, engages stakeholders and encourages feedback, and offers an independent and objective judgement based on available evidence
- Learning: it supports organisational learning by identifying areas for improvement and encouraging the sharing of (good and bad) practices and achievements
- Strategy: it aims to make information available in time to support planning for 2021

The geographic scope is the entire region covered by DG ECHO's Ukraine Humanitarian Implementation Plans (HIPs), which include Government-Controlled Areas (GCAs) and Non-Government-Controlled Areas (NGCAs) as well as contributions for displaced Ukrainians in the Russian Federation and Belarus.

Methodology

The work was divided between three phases:



Some features of the evaluation methodology are: (a) the inclusion of four case studies: self-contained portraits of how the selected issues looked across the whole evaluation, (b) utilisation-focus: substantial and continuous engagement with DG ECHO, including a mini-workshop at inception to confirm the intervention logic, an end-of-mission validation workshop, and another in-country workshop to validate findings and to develop recommendations, (c) data capture and analysis tool: the team developed a tool that allowed data from documents, interviews, focus groups and the survey to be integrated and analysed by 20 Key Questions linked to the 12 Evaluation Questions, and (d) the piloting of streamlined (condensed, more graphic) desk and field reports.

Fieldwork took place from 25 November to 6 December 2019, and involved visits to GCAs of Luhansk and Donetsk, as well as Kyiv. A team member located in the NGCA of Donetsk conducted interviews in the NGCAs.

Context and EU interventions

Millions of people have suffered the direct humanitarian consequences of the armed conflict in eastern Ukraine: damaged property, loss of life, displacement, lost livelihoods, reduced services, and isolation. However, beyond the fighting itself, the population now suffers the more complex humanitarian consequences of the *de facto* separation of eastern Ukraine into two regions, one controlled by the government and the other by separatist entities, divided by a narrow zone known as the contact line. After almost six years, the humanitarian needs in eastern Ukraine are still significant, with 3.5 million men, women and children dependent to some extent on humanitarian assistance and protection services. A defining characteristic of the crisis is that approximately 30% of the population in need (and 38% of the population along the GCA contact line) is aged over 60, with high rates of disability, immobility, neglect, malnutrition, and economic insecurity. The needs in the NGCAs are even greater than in the GCAs, but accessing the NGCA population remains a central challenge.

DG ECHO has provided a total of EUR 118.4 million over the five-year period under evaluation, through 65 actions with 21 implementing partners (IPs). DG ECHO's funding represents 16.5% of the total humanitarian funding received over the period, second after the USA, and equivalent to Germany. DG ECHO's humanitarian funding is complemented by substantial funding from the EU's Instrument contributing to Stability and Peace (IcSP) (EUR 81 million) and the European Neighbourhood Instrument (ENI) (EUR 75 million), that have since 2017 coordinated with DG ECHO through a Joint Humanitarian-Development Framework (JHDF).

DG ECHO's programme has evolved over the five-year period, achieving greater sectoral focus, and moving from a broad approach to one that targeted the most vulnerable population close to the contact line and in the NGCAs. Since the start, DG ECHO has been a key coordination actor in Ukraine (initially facilitating the coordination of all the humanitarian response, and subsequently chairing the Humanitarian Donor Group (HDG)), as well as an advocate for humanitarian objectives. In this unusual humanitarian context of a middle-income country on Europe's eastern border, strong coordination and humanitarian advocacy have been almost as important as humanitarian programming.

Key findings and conclusions

Overall, DG ECHO has provided a rapid and effective response to the humanitarian crisis in Ukraine, and the DG ECHO programme has performed very well. Furthermore, DG ECHO has demonstrated system-wide leadership in strategic thinking and coordination, and has supported several innovations: notably advancing an explicit JHDF with the other EU services, and supporting the creation of the Ukraine Humanitarian Fund (UHF).

Relevance

DG ECHO's Ukraine HIPs were clear and context-adapted. The geographic focus, first on Donetsk and Luhansk oblasts and then on the contact line and the NGCAs, was appropriate and evolved according to the changing needs. By 2019, the humanitarian needs in the GCAs were either stable or gradually reducing in some sectors (especially in urban areas). DG ECHO's sectoral emphasis was also well-matched to the needs, and its small financial allocations to education were appropriate in the circumstances.

DG ECHO's partners consulted beneficiaries in the design of their initiatives, although DG ECHO's partners overall fell short of the full expectations of Accountability to Affected Populations (AAP) in respect to beneficiary participation in initiative design and performance assessment. By 2018, DG ECHO's programme accounted well for the needs of vulnerable groups. Although DG ECHO and its partners were aware from the start of the high numbers of vulnerable elderly within the affected population, they were slow to adapt their approaches to this underlying structural factor. DG ECHO and its partners could have made greater efforts early in the response to reach out to include beneficiaries who were bedridden or socially isolated. As a result, the elderly received "normal" support, but not the particular kinds of support that they might need because of their special needs as elderly beneficiaries.

By 2019, needs assessment was comprehensive, vulnerability targeting was much improved, most of the pressing humanitarian needs in the GCAs were being met, and the remaining area of significant under-addressed needs was in the NGCAs, where access remains difficult.

Coherence

DG ECHO contributed substantially to creating a system of joint and impartial needs assessments through their partnership with REACH. DG ECHO made conscious and visible efforts to maintain humanitarian principles, and its actions in Ukraine were aligned with DG ECHO's relevant thematic/sector policies, although there was room for improvement regarding the elderly.

DG ECHO has been a strong coordination actor in its own right, as well as a strong supporter of other humanitarian coordination actors in Ukraine. DG ECHO's coordination work was vitally important in the initial stages of the response, when few humanitarian agencies were present. EU member states (MS) and other donors valued DG ECHO's leadership and information sharing, enabled by the fact that DG ECHO has more specialised humanitarian staff in-country, and unique access to the NGCAs.

In Ukraine, system-level coordination between the humanitarian and development communities is not as advanced as internal nexus coordination within each donor government. Within the EU, DG ECHO has made substantial efforts to encourage EU humanitarian-development coordination, and the evaluation team assessed the drafting and implementation of the JHDF as a qualified success. The perceived weaknesses of the JHDF are not so much weaknesses with the strategy itself, as with the different mandates of the EU's Directorate-General for Neighbourhood and Enlargement Negotiations - Support Group for Ukraine (DG NEAR-SGUA) and DG ECHO, underpinned by different planning and programming systems.

EU value-added

The broad humanitarian community felt that DG ECHO added value to programme delivery, as well as at the policy and system levels, particularly in speed, scale, agility and coordination. EU MS further agreed that DG ECHO added considerable value above and beyond the efforts of individual donor governments, in particular through its convening of information sessions for MS, access to NGCAs, and advocacy. The foundation for this added value was the strong and stable country team, backed up by regional technical expertise, with funding at scale, and access to the NGCAs.

Effectiveness

Although there is less data on the NGCA side, the target number of 400,000 vulnerable people each year have reduced protection risks and are able to meet most of their basic needs. If we consider counterfactuals, there were certainly no protection crises or acute gaps in basic needs reported during the evaluation period, and as time went on it was clear that DG ECHO and its partners were reaching more into the "forgotten corners" of the response: the hardest-to-reach people, and the most isolated settlements. DG ECHO provided an appropriate mix of cash and in-kind assistance. Furthermore, DG ECHO's support for coordination and for quality needs assessment, through the humanitarian organisation REACH, benefited the whole humanitarian community. Through its leadership and advocacy DG ECHO had an important impact on the overall quality and direction of the humanitarian response, but there is still need for continuous advocacy on access to the NGCAs, and on the humanitarian-development nexus.

DG ECHO's programme increased in effectiveness as humanitarian organisations became better established and better coordinated. By the end of 2018, it was becoming increasingly clear that the critical "life-saving" humanitarian needs were largely being met. By 2019, some DG ECHO-funded activities were working in the space that should be covered by government services, especially in health and education, although some humanitarian aid was still warranted. The remaining frontier, where humanitarian needs remained high and where effectiveness was less certain, was the NGCAs.

Efficiency

The overall response of all agencies was less efficient in the first 18 months as the humanitarian system was being built up. DG ECHO's proposal application and review process (the eSingleform and annual HIP cycle) was a source of frustration for partners. Regarding some of the key components of the Grand Bargain, DG ECHO partners did not gain the benefits of multi-year funding, but efficiency was advanced through localisation. DG ECHO partners valued the field monitoring undertaken by DG ECHO staff, but felt that similar monitoring by several donors could have been better coordinated.

Regarding the overall level of funding relative to needs, stakeholders felt strongly that DG ECHO's response was not commensurate with the needs. However, DG ECHO funding for Ukraine was proportionally higher than it is globally. The evaluation team found that it could not assess whether DG ECHO funding to Ukraine was sufficient: it is clear how much DG ECHO provided, but it is not clear if this was <u>enough</u> because there is no objective measure of the monetary value of the humanitarian needs. What is more certain is that DG ECHO's funding to the NGCAs is not yet sufficient.

In 2020, the humanitarian needs in the GCAs and humanitarian funding are reducing, and the challenge of humanitarian efficiency is to maintain a sufficient humanitarian response in a context of reducing funding. To do this requires that donors and implementing agencies make significant changes to the way they work but, so far, the observed changes have been piecemeal and incremental. Some measures taken by the humanitarian community including DG ECHO have helped improve efficiency, notably shaving back on the costs of cluster coordination, localising staff positions, encouraging the creation of the ACCESS consortium, some pooling of resources for shared services such as REACH's needs assessments, and the UHF. However, these measures are not yet going far enough to gain step changes in efficiency. In the view of the evaluation team, a relatively "quick win" to increase efficiency is to move from annual to multi-year planning and programming.

Sustainability and connectedness

In the GCAs, the crisis is taking place in a middle-income context, where government services function and the Government accepts its responsibility to assist its own population. Given this conducive environment for sustainability, DG ECHO did well strategically, for example rapidly phasing out of areas and sectors where the Government was able and willing to step in, facilitating the access by affected persons to their social benefits, moving its centre of effort to the most affected zone along the contact line and later to the NGCAs, and encouraging development donors to step in. In this "big picture" perspective, DG ECHO has taken major steps to increase sustainability and connectedness by linking affected populations to government systems.

However, the evaluation team also concludes that DG ECHO could have made more progress on sustainability in the GCAs. First of all, DG ECHO overestimated the willingness and agility of development donors to bring longer-term development-oriented support to the most affected regions of the GCAs: despite DG ECHO advocacy, this has been slow to materialise. Secondly, DG ECHO paid less attention to recovery and sustainability at the sector and action levels. In some areas such as health, mental health, elder care and winterisation, DG ECHO supported partners that were effective but insufficiently linked to government systems: they either developed parallel service delivery structures, or developed models of support to government that are beyond what government systems can sustain in the long run. In these areas, there is a risk that government will not step in, either because they might not want to create a precedent for a higher level of service than they can sustain, and/or because there is little incentive to step in - for as long as humanitarian actors are willing to continue. Concretely, although DG ECHO has had exit in mind since early in the response, there was little sign that DG ECHO's partners considered exit strategies until they were pressed to do so by declining funding.

Importantly, the depth of humanitarian needs and gaps in services in the NGCAs are such that there is no prospect of sustainability there for the foreseeable future, and neither are development donors able to work there.

Recommendations

Meeting the special needs of the elderly

DG ECHO should encourage better implementation of its existing policies on gender, protection and disability, which all call for consideration of age alongside gender, and continue efforts to strengthen implementation of its Gender-Age Marker. Ultimately, in situations where the affected population contains a high proportion of elderly and disabled, partners should be required to demonstrate that they have considered and addressed their special needs in both design and implementation. Furthermore, when the opportunity arises, DG ECHO should broaden its disability guidance note to draw attention to the likelihood that a target population with a high proportion of elderly will require a response that goes beyond age and disability mainstreaming and inclusion, and also contains substantial age and disability-focused interventions.

Increasing access and programming in the NGCAs

Even though negotiating access with the *de facto* NGCA authorities is difficult, and there is a risk that access might shrink rather than grow, DG ECHO should nevertheless continue its policy dialogue with all key stakeholders in order to increase humanitarian access to the NGCAs and to broaden the range of organisations that can work there. Furthermore, DG ECHO should continue to advocate for policy and regulatory changes in Ukraine that would eventually permit increased use of cash and voucher assistance in the NGCAs. Finally, DG ECHO should determine distinct priorities for the NGCAs in the 2021 HIP, and continue to increase funding to the NGCAs (while maintaining sufficient funding in the GCAs to address remaining critical humanitarian needs and to be able to respond to a new crisis).

Advancing the humanitarian-development nexus

DG ECHO should continue the good practice of joint missions by senior DG NEAR-SGUA and DG ECHO officials to Ukraine, and provide a foundational training on humanitarian protection in Ukraine to relevant EU Delegation staff. Furthermore, DG ECHO should collaborate with DG NEAR-SGUA and the European External Action Service (EEAS) on an explicit advocacy campaign with three objectives. First, that the Government agree to provide services up to the contact line. Second, that the Government follow through on its planned reforms that relate to Donetsk and Luhansk oblasts and to the affected population. Third, that the Government make available sufficient funding and sufficient incentives for services along the contact line to reach national standards.

Improving efficiency through multi-year programming and localisation

In Ukraine, DG ECHO should encourage selected partners to submit two-year proposals for the 2021-2022 HIPs, reduce earmarking as much as possible, continue current localisation initiatives, and seek ways to improve the coordination of donor field monitoring visits where there is mutual benefit.

More deliberate preparation for humanitarian exit from the GCAs

In Ukraine, DG ECHO should seek agreement that all humanitarian donors would start requiring their partner agencies to develop gradual GCA exit strategies by the beginning of 2021. Furthermore, DG ECHO should advocate through the Humanitarian Country Team (HCT) and the cluster leads for greater involvement of government ministries and local authorities in coordination for the GCAs, for humanitarian agencies in Ukraine to align their activities to government systems and standards whenever and wherever possible, and to narrow the focus of GCA programming from 2021 onwards on those activities that cannot be provided by government.

Résumé exécutif

1.1. Objectifs et champ de l'évaluation

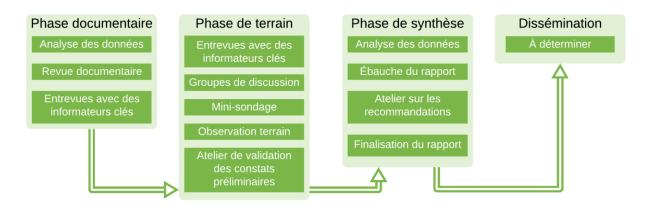
Il s'agit d'une évaluation rétrospective indépendante de la Direction générale pour la protection civile et les opérations d'aide humanitaire européennes (DG-ECHO) en Ukraine (2014-2018). L'évaluation oursuit trois objectifs :

- Redevabilité : elle évalue la performance des interventions de l'Union européenne (UE) au regard des attentes initiales, fait participer les parties prenantes, encourage l'échange d'information et rend un jugement indépendant et objectif fondé sur les données recueillies.
- Apprentissage : elle promeut l'apprentissage organisationnel en identifiant les axes d'amélioration et en encourageant le partage des (bonnes et mauvaises) pratiques et réalisations.
- Stratégie : elle vise à offrir de l'information, en temps opportun, pour soutenir la planification de 2021.

L'évaluation couvre l'ensemble de la région déterminée dans les Plans de mise en œuvre humanitaire (HIP), soit les zones contrôlées par le gouvernement (ZCG), les zones non contrôlées par le gouvernement (ZNCG), de même que des contributions pour les Ukrainiens déplacés dans la Fédération russe et en Biélorussie.

1.2. Méthodologie

Le travail comporte trois volets :



La méthodologie d'évaluation comprend les caractéristiques principales suivantes : a) l'inclusion de quatre études de cas sous la forme de portraits indépendants illustrant la manière dont les thématiques sélectionnées ont été examinées dans l'ensemble de l'évaluation, b) une approche axée sur l'utilisation favorisant une collaboration étroite et soutenue avec la DG ECHO, y compris un mini-atelier de démarrage pour confirmer la logique d'intervention, un atelier de validation en fin de mission et un autre atelier dans le pays pour valider les constats et formuler des recommandations, c) un outil de saisie et d'analyse des données que l'équipe a mis au point pour intégrer et analyser les données provenant des documents, des entretiens, des groupes de discussion et du sondage, au moyen de 20 questions clés liées aux 12 questions d'évaluation, et (d) l'élaboration innovante de rapports synthétiques et visuels basés sur la recherche documentaire et la mission de terrain.

Des visites de terrain ont été effectuées du 25 novembre au 6 décembre 2019 dans les ZCG de Louhansk et Donetsk de même qu'à Kiev. Un membre de l'équipe, basé à Donetsk, a réalisé des entretiens dans les ZNCG.

1.3. Contexte et interventions de l'UE

Des millions de personnes ont subi les conséquences humanitaires directes du conflit armé dans l'est de l'Ukraine : dommages matériels, pertes de vies humaines, déplacements, perte de moyens de subsistance, réduction des services et isolement. Cependant, au-delà des combats eux-mêmes, la population souffre maintenant des répercussions humanitaires plus complexes de la séparation *de facto* de l'Ukraine orientale en deux régions, l'une contrôlée par le gouvernement et l'autre par des entités séparatistes, divisées par une zone étroite connue sous le nom de ligne de contact. Après presque six ans, les besoins humanitaires de l'est de l'Ukraine sont toujours importants, avec 3,5 millions d'hommes, de femmes et d'enfants qui dépendent dans une certaine mesure de l'aide humanitaire et des services de protection. Cette crise se caractérise par une population âgée qui est dans le besoin, puisqu'environ 30 % des personnes touchées (et 38 % de la population le long de la ligne de contact de la ZCG) ont plus de 60 ans et connaissent des taux élevés d'invalidité, d'immobilité, de négligence, de malnutrition et d'insécurité économique. Les besoins dans les ZNCG sont encore plus criants que dans les ZCG, mais l'accès aux populations des ZNCG demeure un problème crucial.

La DG ECHO a versé un total de 118,4 millions d'euros au cours de la période évaluée, dans le cadre de 65 initiatives et avec la collaboration de 21 partenaires de mise en œuvre (PMO). Le financement de la DG ECHO représente 16,5 % du financement humanitaire total reçu au cours de la période, dépassé seulement par celui des États-Unis et équivalent à celui de l'Allemagne. Le financement humanitaire de la DG ECHO est complété par un financement considérable émanant de l'instrument de l'UE contribuant à la stabilité et à la paix (IcSP) (81 millions d'euros) et de l'instrument européen de voisinage (IEV) (75 millions d'euros), coordonnés depuis 2017 avec la DG ECHO par un cadre commun d'aide humanitaire et de développement (*Joint Humanitarian-Development Framework - JHDF*).

Les opérations de la DG ECHO ont évolué au cours des cinq ans : se concentrant davantage sur les secteurs, elles sont passées d'une approche globale à une approche qui cible les populations les plus vulnérables à proximité de la ligne de contact et dans les ZNCG. Depuis le début, la DG ECHO a été un acteur clé de la coordination en Ukraine (en facilitant d'abord la coordination de toute la réponse humanitaire, puis en présidant le Groupe des donateurs humanitaires), ainsi qu'un défenseur des objectifs humanitaires. Dans ce contexte humanitaire inhabituel d'un pays à revenu intermédiaire à la frontière orientale de l'Europe, une coordination solide et un plaidoyer humanitaire ont été presque aussi importants que la programmation humanitaire elle-même.

1.4. Principales constatations et conclusions

Dans l'ensemble, la DG ECHO a réagi rapidement et avec efficacité à la crise humanitaire en Ukraine, et son programme a donné de très bons résultats. La DG ECHO a, en outre, fait preuve de réflexion stratégique et de coordination, et a soutenu plusieurs innovations, notamment la mise en place d'un cadre commun d'aide humanitaire et de développement explicite (JHDF) avec les autres services de l'UE et le soutien à la création du Fonds humanitaire pour l'Ukraine (FHU).

Pertinence

Les Plans de mise en œuvre humanitaire en Ukraine de la DG ECHO étaient clairs et bien adaptés au contexte. La cible géographique, d'abord concentrée sur les oblasts de Donetsk et Louhansk, puis sur la ligne de contact et les ZNCG, était appropriée et a évolué en fonction des besoins. En 2019, les besoins humanitaires dans les ZCG étaient stables ou en graduelle régression dans certains secteurs (particulièrement en zone urbaine). L'accent sectoriel de la DG ECHO était également bien adapté aux besoins, et dans ces circonstances, ses allocations financières à l'éducation étaient appropriées.

Les partenaires de DG ECHO ont consulté les bénéficiaires lors de la conception de leurs initiatives, même si, dans l'ensemble, ils n'ont pas répondu à toutes les attentes du programme Redevabilité envers les populations touchées (AAP) en ce qui concerne la participation des bénéficiaires à la conception des initiatives et à l'évaluation de la performance. En 2018, le programme de la DG ECHO a bien pris en compte les besoins des groupes vulnérables. Bien que la DG ECHO et ses partenaires aient été conscients dès le départ du nombre élevé de personnes âgées vulnérables au sein de la population touchée, ils ont été lents à adapter leurs approches à ce facteur structurel sous-jacent. La DG ECHO et ses partenaires auraient pu faire davantage d'efforts dès le début de leur intervention

pour atteindre les bénéficiaires alités ou socialement isolés. Par conséquent, les personnes âgées ont reçu un soutien « normal », mais pas le type d'aide particulier dont elles auraient eu besoin en raison de leurs besoins spécifiques au titre de bénéficiaires âgés.

En 2019, l'évaluation des besoins était complète, le ciblage de la vulnérabilité était bien meilleur, la plupart des besoins humanitaires urgents dans les ZCG étaient satisfaits, alors que ceux dans les ZNCG, où l'accès reste difficile, n'étaient toujours pas couverts.

Cohérence

Dans le cadre de son partenariat avec REACH, la DG ECHO a fortement contribué à la création d'un système d'évaluation conjointe et impartiale des besoins. Elle a fait des efforts conscients et visibles pour maintenir les principes humanitaires, et bien que, en ce qui concerne les personnes âgées, des améliorations puissent encore être apportées, ses actions en Ukraine étaient en phase avec ses politiques thématiques et sectorielles.

La DG ECHO a joué elle-même un rôle de coordination important tout en soutenant activement d'autres acteurs de la coordination de l'aide humanitaire en Ukraine. Son travail de coordination s'est révélé vital lors des premières phases de la réponse, alors que peu d'organisations étaient présentes sur le terrain. Les États membres de l'UE et d'autres donateurs ont apprécié le leadership de la DG ECHO et l'échange d'information, rendu possible grâce au personnel humanitaire plus spécialisé dont la DG ECHO dispose dans le pays et à son accès unique aux ZNCG.

En Ukraine, la coordination au niveau du système entre les milieux de l'humanitaire et du développement n'est pas aussi étroite que celle au sein de chaque donateur gouvernemental. Au sein de l'UE, la DG ECHO a déployé des efforts considérables pour encourager la coordination entre l'aide humanitaire et le développement, et l'équipe d'évaluation a estimé que la rédaction et la mise en œuvre du JHDF étaient un succès. Les faiblesses perçues du JHDF ne concernent pas tant la stratégie ellemême que les différents mandats du Groupe de soutien à l'Ukraine de la Direction générale de l'UE pour les négociations de voisinage et d'élargissement (DG NEAR-SGUA) et de la DG ECHO, qui s'appuient sur des systèmes de planification et de programmation différents.

Valeur ajoutée de l'UE

L'ensemble de la communauté humanitaire estime que la DG ECHO apporte une valeur ajoutée à la mise en œuvre des programmes, aux politiques et aux systèmes, surtout en ce qui a trait à la rapidité, l'envergure, la réactivité et la coordination. Les États membres de l'UE ont également convenu que la DG ECHO, au-delà des efforts consentis par les donateurs gouvernementaux individuels, apportait une valeur ajoutée considérable, notamment par l'organisation de sessions d'information à l'intention des États membres, l'accès aux ZNCG et des activités de plaidoyer. Cette valeur ajoutée repose sur une équipe nationale solide et stable, soutenue par une expertise technique régionale, un financement adapté et un accès aux ZNCG.

Efficacité

Bien que l'on dispose de moins de données pour les ZNCG, le nombre cible de 400 000 personnes vulnérables chaque année a réduit les risques de protection et ceux-ci sont en mesure de répondre à la plupart de leurs besoins fondamentaux. Si l'on considère les données contrefactuelles, il n'y a certainement pas eu de crises de protection ou de lacunes aiguës signalées dans les besoins de base au cours de la période d'évaluation, et au fil du temps, il est apparu clairement que la DG ECHO et ses partenaires touchaient davantage les « aspects oubliés » de la réponse : les personnes les plus difficiles à atteindre et les campements les plus isolés. La DG ECHO a offert une combinaison appropriée d'aide en espèces et en nature. En outre, le soutien de la DG ECHO à la coordination et à l'évaluation qualitative des besoins, par l'intermédiaire de l'organisation humanitaire REACH, a bénéficié à l'ensemble de la communauté humanitaire. Par son leadership et ses actions de plaidoyer, la DG ECHO a eu un impact important sur la qualité et l'orientation générales de la réponse humanitaire, mais il est toujours nécessaire de plaider en permanence pour l'accès aux ZNCG et en faveur du nexus humanitaire-développement.

L'efficacité du programme de la DG ECHO a augmenté à mesure que les organisations humanitaires se sont mieux établies et mieux coordonnées. À la fin de 2018, il était de plus en plus clair que les besoins humanitaires essentiels « vitaux » étaient largement satisfaits. En 2019, certaines des activités financées par la DG ECHO se trouvaient dans l'espace que les services gouvernementaux auraient dû

couvrir, notamment dans les domaines de la santé et de l'éducation, même si une certaine aide humanitaire était encore justifiée. La dernière ligne de front sur laquelle les besoins humanitaires restent élevés et où l'efficacité est moins certaine, est celle des ZNCG..

Efficience

La réponse globale de toutes les agences a été moins efficace au cours des 18 premiers mois, alors que le système humanitaire se mettait en place. Le processus de demande et d'examen des propositions de la DG ECHO (le eSingleform et le cycle annuel du plan de mise en œuvre humanitaire) a été une source de frustration pour les partenaires. En ce qui concerne certains des éléments clés de la Grande Négociation (*Grand Bargain*), les partenaires de la DG ECHO n'ont pas bénéficié des avantages d'un financement pluriannuel, mais la localisation a permis de gagner en efficience. Les partenaires de la DG ECHO ont apprécié le suivi sur le terrain effectué par le personnel de la DG ECHO, mais ont estimé qu'un suivi similaire par plusieurs donateurs aurait pu être mieux coordonné.

En ce qui concerne le niveau général de financement par rapport aux besoins, les parties prenantes ont estimé que la réponse de la DG ECHO n'était pas à la hauteur des besoins. Cependant, le financement de la DG ECHO pour l'Ukraine a été proportionnellement plus élevé qu'il ne l'est globalement. L'équipe d'évaluation a constaté qu'elle ne pouvait pas déterminer si le financement de la DG ECHO en faveur de l'Ukraine était suffisant : si on connaît bien les montants que la DG ECHO a versé, on ne sait pas s'ils ont <u>suffi</u>, car il n'existe pas de mesure objective de la valeur monétaire des besoins humanitaires. Ce qui est plus certain, c'est que le financement de la DG ECHO aux ZNCG n'est pas encore adéquat.

En 2020, les besoins humanitaires dans les ZCG et le financement de l'aide humanitaire diminuent, et le défi de l'efficience humanitaire est de maintenir une réponse humanitaire suffisante dans un contexte de réduction du financement. Pour ce faire, il faut que les donateurs et les organisations de mise en œuvre apportent des changements significatifs à leur façon de travailler, mais, jusqu'à présent, les changements observés ont été fragmentaires et ponctuels. Certaines mesures prises par la communauté humanitaire, y compris la DG ECHO, ont contribué à améliorer l'efficience, notamment en réduisant les coûts de la coordination des clusters, en localisant les postes du personnel, en encourageant la création du consortium ACCESS, en mettant en commun les ressources pour des services partagés tels que les évaluations des besoins de REACH et le FHU. Toutefois, ces mesures ne vont pas encore assez loin pour améliorer l'efficience. De l'avis de l'équipe d'évaluation, passer d'une planification et d'une programmation annuelles à une planification et une programmation pluriannuelles permettrait assez rapidement de gagner en efficience.

Durabilité et interdépendance

Dans les ZCG, la crise se déroule dans un contexte de revenu intermédiaire, où les services gouvernementaux fonctionnent et où le gouvernement accepte sa responsabilité, celle d'aider sa propre population. Compte tenu de cet environnement favorisant la durabilité, la DG ECHO a obtenu de bons résultats stratégiques, par exemple en se désengageant rapidement des zones et des secteurs où le gouvernement était en mesure d'intervenir et désireux de le faire, en facilitant l'accès des personnes touchées à leurs prestations sociales, en déplaçant son centre d'effort vers la zone la plus touchée le long de la ligne de contact et plus tard vers les ZNCG, et en encourageant les donateurs d'aide au développement à intervenir. Dans cette perspective globale, la DG ECHO a pris des mesures importantes pour accroître la durabilité et l'interdépendance en reliant les populations touchées aux systèmes gouvernementaux.

Cependant, l'équipe d'évaluation conclut également, en ce qui a trait à la durabilité, que la DG ECHO aurait pu réaliser plus de progrès dans les ZCG. Tout d'abord, la DG ECHO a surestimé la volonté et la réactivité des donateurs d'aide au développement à apporter un soutien à plus long terme, axé sur le développement, aux régions les plus touchées des ZCG : malgré le plaidoyer de la DG ECHO, ce soutien a été lent à se concrétiser. Deuxièmement, la DG ECHO a accordé moins d'attention au relèvement et à la durabilité au niveau des secteurs et des actions. Dans certains domaines tels que la santé, la santé mentale, les soins aux personnes âgées et l'hivérisation, la DG ECHO a soutenu des partenaires efficaces, mais insuffisamment liés aux systèmes gouvernementaux : ils ont soit développé des structures parallèles de prestation de services, soit élaboré des modèles de soutien au gouvernement qui vont au-delà de ce que les systèmes gouvernementaux peuvent soutenir à long terme. Il est possible que les gouvernements n'interviennent pas dans ces domaines, soit parce qu'ils ne veulent pas créer un précédent en offrant un niveau de service supérieur à celui qu'ils peuvent maintenir et/ou parce qu'il y a peu d'incitation à intervenir tant que les acteurs humanitaires sont prêts à

poursuivre leur action. Concrètement, bien que la DG ECHO ait envisagé de se retirer depuis le début de la réponse, peu d'éléments indiquent que les partenaires de la DG ECHO aient envisagé des stratégies de retrait, jusqu'à ce qu'ils aient été poussés à le faire en raison d'une diminution du financement.

Il est important de noter que l'ampleur des besoins humanitaires et les carences dans les services des ZNCG sont telles que, dans un avenir prévisible, la durabilité n'est guère envisageable et les donateurs d'aide au développement ne sont pas non plus en mesure de travailler dans ces zones.

1.5. Recommandations

Répondre aux besoins particuliers des personnes âgées

La DG ECHO devrait encourager une meilleure mise en œuvre de ses politiques existantes relatives au genre, à la protection et au handicap, qui toutes appellent à prendre en compte l'âge en plus du genre, et poursuivre ses efforts pour renforcer la mise en œuvre de son marqueur de genre et d'âge. En définitive, dans les situations où la population touchée comprend une forte proportion de personnes âgées et handicapées, les partenaires devraient être tenus de démontrer qu'ils ont pris en compte leurs besoins spécifiques et y ont répondu, tant au niveau de la conception que de la mise en œuvre de leurs interventions. En outre, lorsque l'occasion se présente, la DG ECHO devrait élargir sa note d'orientation sur le handicap de manière à attirer l'attention sur la probabilité qu'une population cible, comptant une forte proportion de personnes âgées, nécessitera une réponse qui en plus de tenir compte de l'intégration et de l'inclusion de l'âge et du handicap, devra également proposer des interventions importantes axées sur l'âge et le handicap.

Accroître l'accès et la programmation dans les ZNCG

Même s'il est difficile de négocier l'accès avec les autorités des ZNCG et que cet accès risque de se réduire au lieu de s'élargir, la DG ECHO devrait néanmoins poursuivre son dialogue politique avec toutes les principales parties prenantes afin d'accroître l'accès humanitaire aux ZNCG et diversifier l'éventail des organisations qui peuvent y travailler. En outre, la DG ECHO devrait continuer à plaider en faveur de changements politiques et réglementaires en Ukraine qui permettraient à terme un recours accru à l'aide en espèces et aux bons d'achat dans les ZNCG. Enfin, la DG ECHO devrait, dans le cadre du plan de mise en œuvre humanitaire de 2021, déterminer des priorités distinctes pour les ZNCG et continuer à augmenter les fonds alloués aux ZNCG (tout en maintenant un financement suffisant dans les ZCG pour répondre aux besoins humanitaires critiques qui subsistent et être en mesure de répondre à une nouvelle crise).

Faire avancer le nexus humanitaire-développement

La DG ECHO devrait poursuivre la bonne pratique des missions conjointes des hauts fonctionnaires de la DG NEAR-SGUA et de la DG ECHO en Ukraine, et offrir une formation de base sur la protection humanitaire en Ukraine au personnel concerné des délégations de l'UE. En outre, la DG ECHO devrait collaborer avec la DG NEAR-SGUA et le Service européen pour l'action extérieure (SEAE) dans le cadre d'une campagne de sensibilisation spécifique dont les trois objectifs sont les suivants : premièrement, que le gouvernement accepte de fournir des services jusqu'à la ligne de contact; deuxièmement, que le gouvernement donne suite aux réformes prévues qui concernent les oblasts de Donetsk et de Louhansk et la population touchée; troisièmement, que le gouvernement fournisse un financement convenable et des incitations suffisantes pour que les services le long de la ligne de contact atteignent les normes nationales.

Améliorer l'efficience grâce à une programmation pluriannuelle et à la localisation

En Ukraine, la DG ECHO devrait encourager les partenaires sélectionnés à soumettre des propositions sur deux ans pour les Plans de mise en œuvre 2021-2022, réduire le plus possible les pré-affectations de fonds, poursuivre les initiatives de localisation actuelles et chercher des moyens d'améliorer la coordination des visites de suivi des donateurs sur le terrain lorsque cela peut être mutuellement avantageux.

Préparation plus réfléchie du retrait de l'aide humanitaire des ZCG

En Ukraine, la DG ECHO devrait chercher à obtenir un accord pour que tous les donateurs humanitaires commencent à exiger de leurs organisations partenaires qu'elles prévoient des stratégies de sortie graduelle de la ZCG d'ici le début de 2021. Par ailleurs, la DG ECHO devrait plaider, par l'intermédiaire de l'équipe humanitaire pays (*Humanitarian Country Team*) et des leaders de cluster, pour une plus grande participation des ministères et des autorités locales à la coordination des ZCG, afin que les activités des organisations humanitaires en Ukraine s'alignent sur les systèmes et normes du gouvernement chaque fois que cela est possible, et que la programmation des ZCG se concentre, à partir de 2021, sur les activités qui ne peuvent être assurées par le gouvernement.

1. Introduction

1.1. Evaluation purpose, objectives and scope

The primary purpose of this evaluation is to "provide a retrospective assessment of DG ECHO's interventions in Ukraine (2014-2018), which should help shaping the EU's future humanitarian approach in the country" (Terms of Reference (TOR)). The EU's humanitarian interventions in Ukraine include EU humanitarian allocations; DG ECHO operational strategies (HIPs); DG ECHO-funded humanitarian actions; coordination activities; and advocacy (both public as well as behind closed doors). The timeframe covered is 2014-2018, and the geographic scope is the entire region covered by DG ECHO's Ukraine HIPs, which includes contributions for displaced Ukrainians in the Russian Federation and Belarus.

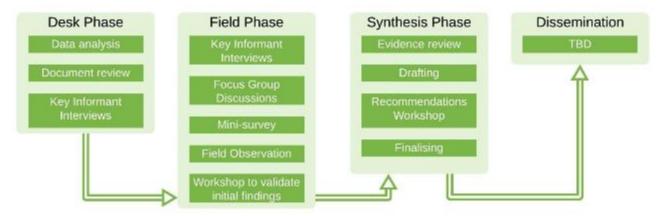
The evaluation has three objectives:

- Accountability: it will assess the performance of EU interventions compared to initial
 expectations, engage stakeholders and encourage feedback, and offer an independent and
 objective judgement based on available evidence
- Learning: it will support organisational learning by identifying areas for improvement and encouraging the sharing of (good and bad) practices and achievements
- Strategy: it will aim to make information available in time to support HIP preparations for 2021

The main users of the evaluation report include DG ECHO staff at headquarters (HQ), regional and country levels, other EU actors, coordination stakeholders such as the HCT and the United Nations Office for the Coordination of Humanitarian Affairs (UNOCHA), implementing partners, and other humanitarian and development donors including EU MS and agencies.

1.2. Evaluation process

The work was divided between three main phases, and involved a substantial degree of engagement with DG ECHO, including a mini-workshop at inception to confirm the intervention logic (Theory of Change) and to elicit priority lines of enquiry, periodic meetings of the inter-service steering group, an end-of mission validation workshop, and another in-country workshop to validate findings and to develop recommendations.



Fieldwork took place from 25 November to 6 December 2019, and involved visits to GCAs of Luhansk and Donetsk, as well as Kyiv. A team member located in the NGCA of Donetsk conducted interviews in the NGCAs.

1.3. Evaluation overview

This report includes a review of methodology (chapter 3), context (chapter 4), findings (chapter 5), conclusions (chapter 6), and recommendations (chapter 7). Annexes provide supporting data, the approved evaluation matrix, a bibliography, and a list of people met.

2. Methodology

2.1. Methodological approaches

Multisite evaluation

Since the most important distinguishing parameter of the Ukraine response is where the action is taking place, the evaluation was designed around a multisite evaluation methodology, where the work was geographically rather than sectorally organised. In each location, the evaluation team considered all the relevant (field-specific) evaluation questions, and assessed how the whole DG ECHO programme is experienced by the beneficiaries in that context (rather than just a single partner-beneficiary view).

Case study approach

Within the overall scope of the evaluation, the team "dug deeper" into four specific aspects of the humanitarian response, aspects that are characteristic of Ukraine and whose analysis complemented the geographic perspective. These case studies are placed at the relevant points in the report, and consist of self-contained portraits of how the case study issues looked across the whole evaluation, including a short analysis, and then the findings and recommendations linked to each issue.

Mixed methods approach

The mixed methods approach triangulated sources of information and perspectives drawing on quantitative and qualitative techniques, to ensure a comprehensive, robust, and evidence-based understanding of the programme. To this end, the evaluation team utilised a range of quantitative and qualitative data collection and data analysis tools and methods (see section 3.2 below).

Theory-based evaluation

Noting the importance given in the TOR to the reconstruction of the intervention logic of DG ECHO's response in Ukraine, the evaluation team developed a programme intervention logic together with DG ECHO in Kyiv. This put into perspective the mechanisms of change, as well as the assumptions, risks and context that supported or hindered the achievement of results. However, since DG ECHO itself does not use an intervention logic to guide its work, the team has only used this as one of several frameworks to assess DG ECHO's performance.

Utilisation-focused and participatory approaches

Evaluations must be useful if they are to deliver value to the client. To this end, and following recommended practice, during the Inception Mission the evaluation team engaged actively with DG ECHO management in HQs and in the field, in order to determine what their specific needs were: what questions they wanted answered in order to make which business decisions in the future, and how they wanted that information presented. This discussion led to some modification to the Evaluation Questions (EQ), and to adjustments to the methodology and case studies. In addition, the evaluation process engaged interactively with the DG ECHO country team at several key points in the evaluation process, including an end-of-mission workshop to validate initial findings, and a separate workshop to review consolidated findings and to co-develop recommendations.

Streamlined reporting

Finally, instead of a more traditional and heavy document production process, the evaluation team piloted a more compact approach to the preparation of the desk report and field reports. With the agreement of the DG ECHO evaluation division and the Ukraine country team, these reports were relatively short and user-friendly, and condensed the essential information on each component of the report into a one-page text slide, resulting in desk and field reports of approximately 24 pages and in a more graphic form.

2.2. Data collection methodology

The evaluation used six main lines of evidence (see box, right). Data was collected in Kyiv, Donetsk and Luhansk GCAs, Donetsk NGAs, and remotely in the Luhansk NGCAs.

The sampling strategy for in-depth project analysis and for the field observations was agreed with DG ECHO at inception and covered two-thirds of the value of the DG ECHO portfolio, including all the current interventions.

To analyse the data from several sources, the evaluation team developed a bespoke data capture tool. Rather than seeking data on each of the indicators in the evaluation matrix, the team rephrased the 12 EQs as 20 plainlanguage "Key Questions", and then used these Key Questions as the common thread across all the data

Quantitative analysis	DG ECHO / FTS
Document review (38 projects)	N = 190 incl. 76 project docs
Key informant interviews	N = 98
Focus Group Discussions Individual discussions	N = 65 N = 5
Field observations	10 full-day visits with 9 partners
Mini-survey/scorecard	N = 72

collection tools (interview guides, document review, survey etc.), thereby allowing the comparison and triangulation of data from very different sources.

2.3. Limitations of the data

The evaluation team considers that the review of documents, interviews conducted, mini-survey and site observations provided sufficient data for the evaluation results to be valid. The evaluation team concluded that DG ECHO's programme was effective, and discusses in section 5.4.1 that this conclusion comes from several threads of analysis, but not from clear quantitative data on outcomelevel changes in the humanitarian needs in Ukraine. In the GCAs, the Ukraine crisis is a data-rich environment. There is a mature system for needs assessment, and no apparent restrictions on gathering and sharing data. DG ECHO was particularly open in sharing staff mission reports and internal assessments.

The team had excellent access to the GCAs in Donetsk and Luhansk oblasts, and was able to travel to several locations along the contact line with the support of DG ECHO partners. Security considerations in Donetsk and Luhansk oblasts meant that the field teams spent a disproportionate amount of time traveling daily from secure accommodation to the field sites along the contact line, from which they also had to leave early due to early sunset in winter. As a result, the field teams had less time in field sites and engaging directly with beneficiaries than they would have preferred.

There is much less data available on the NGCAs, because of limitations on access and on acceptable programming imposed by the *de facto* authorities. As agreed with DG ECHO during inception, and in order to Do No Harm to beneficiaries or to DG ECHO's fragile access to the NGCAs, the international members of the evaluation team did not undertake site visits or Focus Group Discussions (FGDs) in the NGCAs. The local evaluation team member based in the NGCAs was however able to conduct 12 key informant interviews (KIIs) in the NGCAs.

The timing and trajectory of the field mission inevitably created a bias towards the very end of the evaluation period (2018). Indeed, most of the activities visited, as well as the performance and strategic discussions, centred more on 2019-2020. The team aimed to compensate for this bias by making substantial efforts to track down and interview in more depth a few key leaders involved in the early years of the response, including the former DG ECHO Head of Office, the former Humanitarian Coordinator, and the former Head of the International Committee of the Red Cross (ICRC) delegation. In addition, the team sought out for remote interview the Non-Governmental Organisation (NGO) implementing partners of first-generation projects that are no longer in Ukraine, although some attempts to contact these former staff were unsuccessful.

To summarise the availability of data: the evaluation team has excellent data from the 55% of the DG ECHO programme which is in the GCAs (2018 estimate), but limited data on the 45% of the programme which is in the NGCAs (this is a system-wide problem not unique to DG ECHO or to this evaluation).

Regarding the proposed methodology, the evaluation had originally intended to analyse data from four very different types of locations: Kyiv (coordination environment), GCAs far from the contact line, GCAs near the contact line, and NGCAs. However, it became apparent during inception that there were few activities or partners in the regions far from the contact line (the regions that were covered by DG ECHO only in 2014 and the early part of 2015), so the strategy was adapted to divide the GCA teams between Luhansk and Donetsk oblasts. While this facilitated logistics, the differentiation between Donetsk and Luhansk GCAs is so little that the multisite methodology really only looked at three "sites": Kyiv, GCAs and NGCAs, instead of the originally-planned four "sites."

During inception, the team had intended to apply a gender-responsive approach when looking at the criteria of relevance and effectiveness. The extent to which gender analysis was conducted and incorporated into the design of DG ECHO-funded actions was indeed assessed during the desk review, which looked closely at programme compliance with all of DG ECHO's thematic policies (see also section 5.2.2). However, during the desk review it became evident that not only did vulnerability due to old age overlap considerably with vulnerabilities due to gender and disability, but also that the age dimension was the most important factor of vulnerability (see section 5.1.1 and Figure 11). As a result, from the desk phase onwards, the evaluation team looked more closely at old age, which included gender and disability vulnerabilities.

3. Country and programme context

3.1. The crisis in Ukraine and its humanitarian implications

3.1.1. The evolution of the conflict

Large-scale demonstrations in Kyiv in late 2013 were sparked by the Ukrainian Government's decision to delay the signature of the proposed Association Agreement with the European Union. Following several months of protests and clashes (known as *Euromaidan*), there was a change in government in February 2014, Presidential elections were held in May 2014, and parliamentary elections in October 2014. However, in the spring of 2014, the Russian Federation annexed the Crimea and the city of Sevastopol, and a new conflict erupted in Donetsk and Luhansk oblasts of eastern Ukraine. For six months, different military, paramilitary and civilian factions took control of cities, territory and public institutions. This period of fluid military and administrative action ended with a ceasefire on 5 September 2014, which established a line of contact that effectively divided the oblasts of Donetsk and Luhansk in half. More recently, since 2018, there has been new destabilisation in the Sea of Azov region. In addition, the adjoining oblasts of Zaporizhzhia, Dnipropetrovsk, and Kharkiv remain affected by economic disruption and an influx of internally displaced persons (IDPs). The September 2014 'peace' agreement (the Minsk Protocol), the renewal of its ceasefire provisions in February 2015 (Minsk II), and the main tenets of International Humanitarian Law (IHL) have all been repeatedly violated ever since. An overview timeline is provided in Figure 1.

Figure 1 Ukraine key events 2014-2018.

2014 HIP: EUR 11.3M	2015 HIP: EUR 32M	2016 HIP: EUR 28.4M	2017 HIP: EUR 20M	2018 HIP: EUR 26.7M
February Maidan events (18-19-20th) First ECHO staff deployed on mission March First ECHO project (Red Cross from DREF) First DG ECHO mission to Eastern Ukraine irst donor coordination meetings	January Temporary Order on 'Control of the Movement of People, Transport Vehicles and Cargo along the 'contact line' in Donetsk and Luhansk regions' introduced OCHA takes over humanitarian coordination from ECHO EU Civil Protection Mechanism provides in-kind assistance 1st EU Commissioner visit to	February EU Commissioner for HA mission to eastern Ukraine The Ministry of Temporarily Occupied Territories and IDPs was established March Social payments to over 600,000 IDPs suspended. Opening of a new checkpoint Zolote failed	January Rapid deterioration of security situation Government approved an Action Plan on 'reintegration of NGCA' ECHO sponsored international conference on Donbass in Brussels February De-facto entities introduced	February Law # 2268 on 'Reintegration of Donbass' came into force (24th) ECHO-UN Conference on the Humanitarian Situation in Easter Ukraine March EU JHDF released April
hosted by ECHO ECHO chairs general humanitarian coordination meetings	Donbass February Minsk II signed	June Security situation deteriorated, internittent closure of checkpoints	'external management' of Ukraine-based companies and declared the 'contact line' as a 'state border'	The Joint Forces Operation (JFC came into force, replacing the 'Anti-Terrorist Operation' (ATO)
May Presidential elections Self- proclamation of so-called 'Donetsk people's republic' & 'Luhansk people's republic' Beginning of the war in Donbass	Provisions included facilitation of humanitarian assistance Battle of Debaltseve, after which the front line stabilizes July De-facto entities required	July 1st ECHO facilitated EURONEWS mission to Ukraine	Battle of Adviivka leading to ad hoc humanitarian assistance EU Commissioner for HA mission to eastern Ukraine March EU joint JHDF mission to Ukraine	May United Nations Security Counci (UNSC) issued a Presidential Statement following a UNSC briefing, calling to upscale humanitarian efforts
August First Emergency Decision EUR 2.5M	'accreditation/registration' in NGCA. Humanitarian aid delivery to the area suspended October		<i>May</i> Spike in hostilities in Krasnohorivka and Mariinka close	August The law on 'Legal Status of Missing Persons' came into force
September Minsk protocol signed: First ceasefire October Second Emergency Decision	1st ECHO field mission to NGCA		to the 'contact line' July De-facto entities announced changes in the so-called 'accreditation/registration'	September Grand Chamber of Supreme Court rules unlawful to suspend pensions for IDPs based on verification grounds
EUR 5M Third Emergency Decision EUR 3.3M December Crisis in eastern Ukraine continued with major humanitarian implications	EUR 5M iird Emergency Decision EUR 3.3M December irisis in eastern Ukraine continued with major		procedures of humanitarian missions and activities August GoU approves 'Strategy of Integration IDPs and Implementation of Long-Term Solutions to Internal Displacement until 2020'	November Adoption of an Action Plan to support implementation of the National IDP Strategy Martial Law implemented in ter Ukrainian oblasts including Donetska and Luhanska for 30 days
			November ECHO sponsored international conference on Donbass in Berlin	December Adoption of Law on Mine Action

Over the last five years, millions of people have suffered the direct humanitarian consequences of the armed conflict in eastern Ukraine. According to the Organisation for Security and Co-operation in Europe (OSCE) Special Monitoring Mission in Ukraine (SMM), at least 147 civilians were injured or killed in 2019, mostly from shelling and light weapons fire. Also in 2019, there were 32 cases of deaths at the Entry and Exit Crossing Points (EECP), where mostly elderly civilians wait for long periods to cross the contact line.¹ The cumulative number of civilian deaths up to 15 November 2019 is 3,344, and over 7,000 civilians have been injured.² Still today, in early 2020, civilians are exposed to hostilities along the 427-kilometre contact line that divides the GCAs from the NGCAs. A major risk to life is related to mines and explosive remnants of war: it is estimated that these accounted for 42% of civilian casualties in 2018, and two-thirds of all reported child casualties in 2017.³

However, beyond the fighting itself, the population now suffers the more complex humanitarian consequences of the *de facto* separation of the eastern region into four entities: the government-controlled oblasts of Donetska and Luhanska, and the non-government-controlled self-proclaimed entities of the so-called "Donetsk People's Republic" and "Luhansk People's Republic".

3.1.2. The humanitarian needs

The Ministry of Social Policy has registered more than 1.5 million people as internally displaced. This figure is, however, somewhat misleading, as a number of the registered IDPs are "displaced in place" (living in damaged homes along the contact line) or continue to live in the NGCAs and have been required by the Government to register in order to access social payments. Ukrainians living in the NGCAs must travel at least every 60 days to the GCAs in order to maintain their eligibility to receive their pensions,⁴ while the Government of Ukraine will not make payments in the NGCAs.

Legislative measures continue to restrict trade and movement across the contact line and, after train and bus connections were suspended in August-September 2014, vulnerable people were particularly impacted, including the elderly and disabled, pregnant women and people with young children.⁵ With an average of 1.1 million crossings each month and only five checkpoints, each with long queues and limited services, crossing the contact line creates enormous challenges for civilians trying to maintain family ties, meet their basic needs, obtain social services and access their social payments. A high proportion of these impacted civilians were elderly (in November 2019, 66% of people crossing were over the age of 60).⁶

For the population remaining in the many villages and hamlets along the contact line, hospitals, schools, transportation, markets, financial outlets and basic services such as electricity and gas are frequently disrupted or, in some cases, unavailable. In some instances, this lack of availability is due to damage from shelling, but mostly it is because the contact line has arbitrarily cut communities off from their normal service providers. For example, the "normal" high schools and tertiary medical services are no longer easily connected by roads to their GCA communities, or now lie on the other side of the contact line in the major urban centres of Luhansk and Donetsk. Overall, the situation in the NGCAs remains less clear due to lack of access and credible data; however, it is widely considered by the international humanitarian community to be worse than in the GCAs, especially near the contact line.

¹ OSCE SMM, Status Report, 13 January 2020, accessed on 24 January 2020. https://www.osce.org/special-monitoring-mission-to-ukraine/444073?download=true.

² OHCHR, 28th Report on the Humanitarian Situation in Ukraine https://www.ohchr.org/Documents/Countries/UA/28thReportUkraine_EN.pdf.

³ Protection Cluster Ukraine, *Note on Mine Action in Ukraine*, February 2018, accessed on 4 September 2019. http://www.globalprotectioncluster.org/ assets/files/2018_02-protection-cluster-mine-action_en.pdf

⁴ UNOCHA, 2019 Humanitarian Needs Overview, Ukraine, December 2018, p.19.

⁵ UNOCHA, 2019 Humanitarian Needs Overview, Ukraine, December 2018, p.20.

⁶ UNHCR/R2P, Report on Crossing the Line of Contact: November 2019.

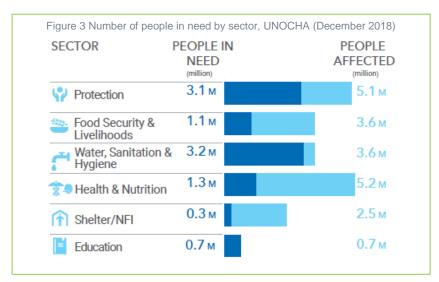
The protracted nature of the crisis has also diminished livelihoods, which were already stressed by the decline of heavy industries of the eastern region. Declining incomes and higher prices due to isolation and the economic blockade of the NGCAs have further depleted people's resources to a breaking point, with families having to resort to negative coping practices such as indebtedness, selling their household and livelihood assets, or reducing costly but necessary expenditures, such as medication. Conflict-related stress and psychosocial disorders are a serious concern across the whole population, and when combined with high levels of unemployment they exacerbate domestic violence and substance abuse. The risk of Gender-Based Violence (GBV), especially intimate partner violence and human trafficking remain high, but there is insufficient data on whether and how this has been made worse by the crisis.

GBV is generally assumed to be underreported, and in illegal detention settings GBV appears to be widespread against men as well as against women.⁷

The humanitarian needs in eastern Ukraine are significant, with 3.5 million men, women and children dependent to some extent on humanitarian assistance and protection services (see Figure 2).8 A defining characteristic of the crisis is that approximately 30% of the population in need (and 38% of the population along the GCA contact line) is aged over 60, with high rates of disability, immobility, neglect, malnutrition, and economic insecurity.9

As demonstrated in Figure 3, there are people in need across the spectrum of humanitarian assistance. In 2018, 1.1 million people were reached by humanitarian assistance, out of the 2.3 million people targeted and the 3.5 million in need. 10 Most humanitarian stakeholders are active in the country, 11 including national and international NGOs, United Nations Agencies and Red Cross/Red Crescent Organisations.





⁷ Global Protection Cluster, Eastern-Ukrainian Centre for Civic Initiatives, *Unspoken Pain, Gender-Based Violence in the Conflict Zone of Eastern Ukraine*, 2017.

⁸ Although DG ECHO has slightly different estimates of the affected and target populations in the HIPs, the evaluation team is using the UNOCHA estimates as the basis for this analysis.

⁹ Humanitarian Response Plan, January-December 2019, Ukraine.

¹⁰ Humanitarian Response Plan, End-of-Year Report for Ukraine, April 2019.

¹¹ A few key organisations had to leave the country mostly due to lack of financing, notably WFP, GOAL and Humanity and Inclusion.

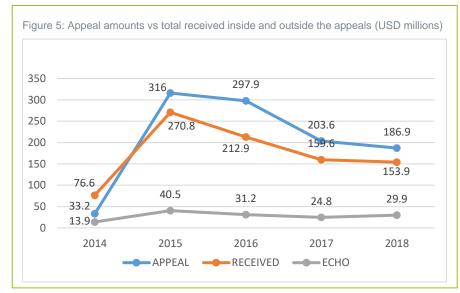
3.1.3. Overall humanitarian funding

The Ukraine crisis has been seriously underfunded since 2016. As illustrated in Figure 4, in 2018 only 37% of the required USD 187 million was provided against the Humanitarian Response Plan (HRP). However, additional funding was provided outside the appeal, notably to ICRC. Early



information on 2019 shows an improvement, with USD 82 million provided against an appeal amount of USD 164.4 million (50%). See sections 4.2.2 and 5.5.4 below for further discussions of funding relative to needs.

When we look at the overall trend of funding in relation to the appeals, and consider all funding (including ICRC) rather than only "on appeal" funding, we can see in Figure 5 (source: Financial Tracking Service (FTS)) that the funding to the Ukraine crisis has followed a typical humanitarian "boom/bust" pattern often found in sudden-onset crises, of highest funding in year two followed by a slight decrease in year three, then decline. We can also see that the gap between the appeal amount



and total funding has been fairly constant.

3.2. The EU's humanitarian response

3.2.1. DG ECHO's annual frameworks for Ukraine

When the crisis broke in 2014, DG ECHO's annual global allocations process (the World Wide Decision) had already been launched. Consequently, and as is normal in sudden-onset off-cycle crises, Ukraine was covered by three successive Emergency Decisions for the first year. From 2015 onwards, there has been a separate HIP for Ukraine. In 2018, the HIP was broadened to include a small programme in the Western Balkans.

As shown in Figure 6, DG ECHO has disbursed a total of EUR 118.4 million¹³ over the five-year period under evaluation. The uptick in DG ECHO spending in 2018 is because Ukraine was accorded higher priority as a Forgotten Crisis.¹⁴

Figure 6 Humanitarian funding to Ukraine (EUR millions)					
2014	11.3				
2015	32.0				
2016	28.4				
2017	20.0				
2018	26.7				

¹² FTS data for 2019, accessed on 24 January 2020.

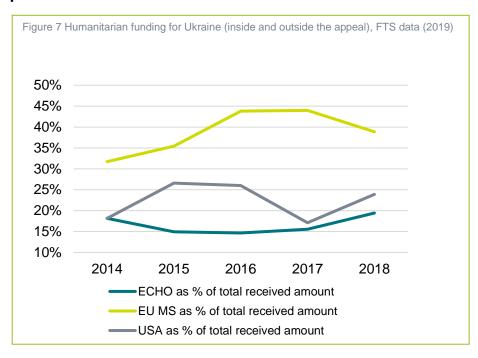
¹³ Note that *Figure 6* provides definitive numbers in Euros, while *Figure 5* is denominated in US Dollars and derived from FTS.

¹⁴ The Forgotten Crisis Assessment (FCA) index is a composite of four indicators: (1) Vulnerability Index; (2) Media coverage; (3) Donor interest as reflected in the level of public aid received per capita; (4) Qualitative assessment of DG ECHO geographical units and experts. Ukraine crisis is a severe, protracted humanitarian crisis where affected populations are receiving no or insufficient international aid and where there is little possibility or no political commitment to solve the crisis, accompanied by a lack of media interest, accessed on 4 September 2019. https://ec.europa.eu/DG ECHO/sites/DG ECHO-site/files/annex_4_fca_2019.pdf.

3.2.2. EU's conflict response financial allocations to Ukraine 2014-2018

Analysis of FTS¹⁵ shows in Figure 7 that DG ECHO's funding has remained fairly constant at 15-20% of all funding received by Ukraine (both on-appeal and outside the appeal), and that the funding of EU MS¹⁶ has started to decline in 2018, while both the United States of America (USA) and DG ECHO increased their support in 2018.

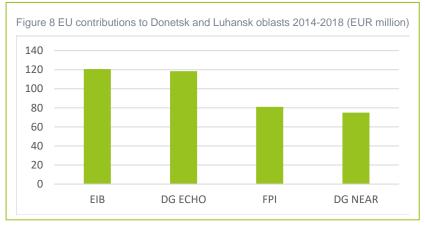
Over the five years under review, DG ECHO has provided 16.5% of all humanitarian funding. Overall, DG ECHO was the second-largest donor (equivalent to Germany), behind the USA.¹⁷



Since 2014, DG ECHO has delivered its assistance through 65 actions with 21 IPs. In 2018, the last HIP within the scope of this evaluation, assistance was delivered through 11 actions: the ICRC, United Nations Refugee Agency (UNHCR), UNOCHA, International Organization for Migration (IOM), United Nations Children's Fund (UNICEF), Save the Children (SC), *Première Urgence Internationale* (PUI), Norwegian Refugee Council (NRC), Danish Refugee Council (DRC), HelpAge International (HAI), and the ACCESS consortium led by People in Need (PIN) with *Médecins du Monde* (MdM) and ACTED.

Other EU financial flows also support the broader response to the humanitarian crisis in Ukraine. Funding is allocated from the European Investment Bank (EIB), from the ENI through DG NEAR-SGUA, and from the FPI through the IcSP. All have resources specifically targeted at the crisis-affected regions of eastern Ukraine but limited to the GCAs.

Figure 8 shows the approximate allocations from each EU funding stream. 18 While all EC services



have their own planning and approval processes, since late 2017 these four channels of assistance to eastern Ukraine have been loosely coordinated under a JHDF, which aims to facilitate the coordination and transition between humanitarian aid, stabilisation, early recovery and development, for the conflict-affected populations and regions (see discussion in section 5.2.6).

¹⁵ In this current analysis, it is recognised that there could be errors stemming from weaknesses in the accuracy of data entered by DG ECHO's partners. This data, downloaded in April 2020, was significantly different for 2017 and 2018 than the October 2019 data ¹⁶ Primarily Germany, UK and Sweden.

¹⁷ FTS reports that Germany was the largest humanitarian donor, but the evaluation team regards this data with some caution. A closer examination of the reported contributions from Germany shows them to include several large development programmes for eastern Ukraine. If these were partly discounted, it seems likely that the EU would be second largest humanitarian donor after USA.

¹⁸ The different funding sources are not strictly comparable. For the most part, these figures reflect allocations rather than expenditures. The EIB resources cover more than the conflict-affected population. The DG ECHO resources include allocations for the NGCAs while the other three instruments only allocate to GCAs, and the DG NEAR-SGUA amount includes expenditures in the GCAs beyond the initial EUR 50 million Special Measure (a EUR 10 million top-up to the special measure for response to the Azov Sea incident, and EUR 3 million contributions to the Office of the High Commissioner for Human Rights (OHCHR).

3.2.3. DG ECHO's priorities in Ukraine

The EU's sectoral priorities and geographic zones of intervention have evolved since 2014, as shown in *Figure 9*, which includes all EU programming instruments.

Figure 9 Overview of the evolution of the EU's programme in Donetsk and Luhansk oblasts 2014-2018

	Initial emergency	Organised response	Early Recovery with continued HA in NGCA and contact line	Nexus with continued HA in NGCA and contact line
	Early-mid 2014	Late 2014-mid 2015	Mid 2015-2016	2017-2018
Coordination	DG ECHO	UNOCHA	UNOCHA	UNOCHA and United Nations Development Programme (UNDP)
Broad types of assistance provided	In-kind humanitarian	Multi-Purpose Cash Transfers (MPCT), multi-sector humanitarian, stabilisation/peace	MPCT, multi-sector humanitarian, stabilisation/peace, early recovery	MPCT, multi-sector humanitarian, stabilisation/peace, early recovery, development
Target populations	IDPs displaced from Donetsk and Luhansk oblasts, mostly in Collective Centres, but also hosted by families/friends.	IDPs, affected people "displaced in place" along contact line and in the GCA of Donetsk and Luhansk oblasts.	IDPs only for protection, crossing points, affected people along contact line, affected people in NGCAs	Broader population of GCAs and IDPs (development through DG NEAR-SGUA and FPI), crossing points, affected people, along contact line, affected people in NGCAs
Humanitarian priorities for DG ECHO	Protection, Non- Food Items (NFI), Health, Food assistance	Protection, Health, Shelter (immediate repairs), Basic Needs	Protection, Health, Shelter (light and medium-term repairs), Basic Needs, WASH, Education in Emergencies (EiE)	Protection, Health, Shelter (medium-term repairs), Basic Needs, WASH, EiE
External humanitarian policy context	Inter-Agency Standing Committee (IASC) Transformative Agenda	High-Level Panel on Humanitarian Financing	World Humanitarian Summit	Education cannot Wait
EU actors	DG ECHO, FPI	DG ECHO, FPI, DG NEAR-SGUA, EIB	DG ECHO, FPI, DG NEAR-SGUA, EIB	DG ECHO, FPI, DG NEAR-SGUA, EIB

While DG ECHO initially covered a wide range of displaced and affected populations in the GCAs and NGCAs of Donetsk and Luhansk oblasts, since 2017 DG ECHO has focused on the most vulnerable¹⁹ people, in the following locations (by order of priority):

- 1. The population living along the contact line both in the GCA²⁰ and the NGCA
- 2. The particularly vulnerable resident population in the NGCAs outside the contact line

¹⁹ "Life circumstances (e.g. poverty, education) and/or discrimination based on physical or social characteristics (sex, disability, age, ethnicity, religion, sexual orientation, etc.) reducing the ability of primary stakeholders (for example, individuals/households/community) to withstand adverse impact from external stressors. Vulnerability is not a fixed criterion attached to specific categories of people, and no one is born vulnerable per se." DG ECHO, *Thematic Policy Document n°8, Humanitarian Protection*, May 2016, p.16, accessed on 4 September 2019. https://ec.europa.eu/DG ECHO/sites/DG ECHO-site/files/policy guidelines humanitarian protection en.pdf.
²⁰ In 2014-2016 DG ECHO also addressed the needs of IDPs in the GCAs further back from the contact line but shifted focus to the contact line and NGCAs as the GCA IDP population stabilized and started to receive assistance from the Government of Ukraine and development donors including DG NEAR-SGUA. While DG NEAR-SGUA and FPI can both work on the GCA side of the contact line, only DG ECHO can work in the NGCAs. From 2019 onwards DG ECHO narrowed the geographic focus to within 0-5km of the contact line, as well as nearby isolated communities

However, access to the NGCAs has always been a challenge. After an initial period when access was granted and then rescinded, the *de facto* authorities of the NGCA entities finally allowed a handful of UN agencies and NGOs to work in the NGCAs,²¹ with variation in access between the two NGCAs and changes over time. While this has provided a steadier platform for DG ECHO-funded activities in the NGCAs, access can and does change at short notice and cannot be taken for granted, and there are limitations on which sectors and communities DG ECHO's partners can work with.

Through the JHDF, DG ECHO seeks to work in a coordinated way with DG NEAR-SGUA and Commission Service for Foreign Policy Instruments (FPI) in the sectors of human security, including housing and rehabilitation of critical infrastructure; economic development and support to livelihoods; and health. Within this framework, and considering available resources and limited humanitarian access to the NGCAs, in 2018 DG ECHO prioritised the following sectors in rank order:²²

- 1. Humanitarian Food Assistance
- 2. Health (excluding Mental Health and Psycho-Social Support (MHPSS))²³
- 3. Shelter and NFIs

In addition, other activities were considered in Ukraine, including dedicated protection activities, MHPSS, Water, Sanitation and Hygiene (WASH), Education in Emergencies (EiE), and support for livelihoods. During the evaluation period, DG ECHO introduced some important new organisation-level policies (notably EiE), and these influenced country-level planning each year. Beyond the sectors, all humanitarian interventions funded by DG ECHO must integrate two cross-cutting themes: protection and gender equality.

3.2.4. DG ECHO's role in coordination in Ukraine

DG ECHO plays a key role in facilitating humanitarian coordination, information-sharing and humanitarian advocacy with various humanitarian organisations, including donors, authorities and IPs. As a matter of policy, DG ECHO supports the IASC's guiding principles and expects its partners to demonstrate their commitments to collectively agreed humanitarian objectives and to actively take part in coordination mechanisms (e.g. Humanitarian Country Team (HCT), clusters and technical working groups). DG ECHO funding support for UNOCHA and other coordination entities such as the International NGO Safety Organisation (INSO) backs this up. In Ukraine, DG ECHO also convenes the Humanitarian Donor Group (HDG), which shares information and coordinates funding, activities and advocacy among the main humanitarian donors.

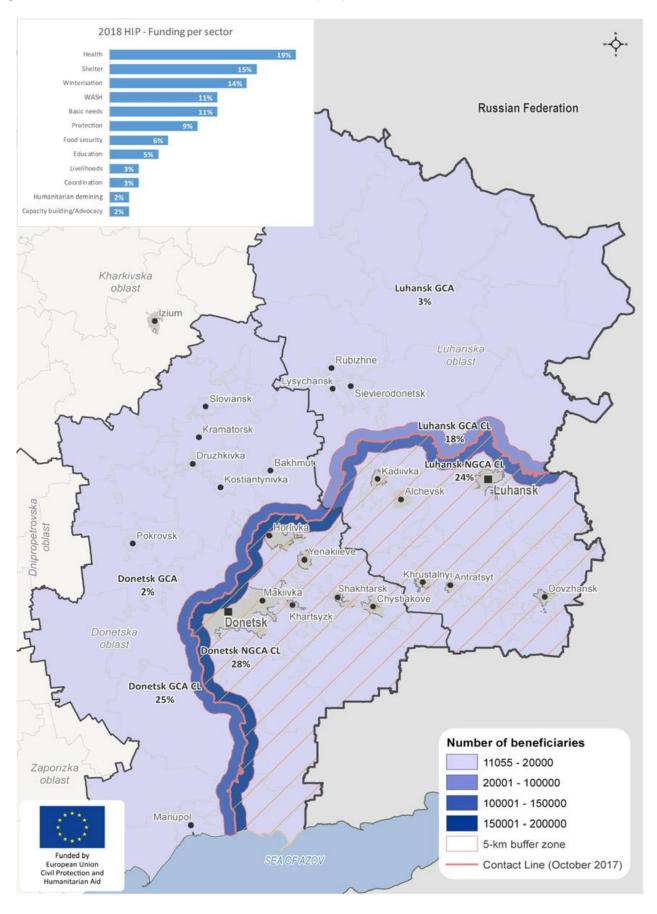
Coordination is also essential to achieve an effective approach to the humanitarian-development nexus. In addition to coordination with EU development channels through the JHDF, DG ECHO has actively advocated for longer-term commitments from development donors in the GCAs. Similarly, DG ECHO advocates for the humanitarian dimension to be included in the implementation of the recommendations of the Ukraine Recovery and Peace-building Assessment (RPBA) and similar exercises, which frame the Ukrainian Government's and donors' medium-term priorities.

The approximate distribution of DG ECHO's beneficiaries in 2018 can be seen in Figure 10.

²¹ DG ECHO's most important partner, ICRC, was able to maintain its presence and access in the NGCAs since the start of the conflict. ²² HIP 2018 adopted an approach that is unusual for DG ECHO in the way that it focused on a few sectors and ranked them in priority order. This strategic focusing was enabled by the agreed coordination of labour with DG NEAR-SGUA. Note however in *Figure 13* that actual funding was not so concentrated.

²³ The HIP clearly states that MHPSS is excluded from the health sector, but it is included as another activity that can be considered – just not as one of the top three priorities.

Figure 10 Distribution of DG ECHO assistance in 2018, DG ECHO (2019)



4. Findings

4.1. Relevance

4.1.1. Targeting the vulnerable

1. By 2018, DG ECHO's programme accounted well for the needs of vulnerable groups, but DG ECHO was slow to address vulnerabilities of age and mental health in the early response.

While women and girls represent 56% of the people in need, and children represent 16% of the people in need,²⁴ there is widespread agreement that the most important dimension of vulnerability in the Ukraine crisis is old age. Amongst the total affected population, 32% are elderly (defined as aged 60 or over),²⁵ and in the area within 20 km of the GCA contact line this rises to 37% of the population in rural areas and 39% of the population in urban areas.²⁶ Age vulnerability overlaps significantly with gender,²⁷ disability and chronic illness. A good illustration of these intersectional vulnerabilities is provided by REACH, where (in isolated settlements) 41% of the population is elderly, and over half of these either have a chronic illness, or a disability, or both.²⁸ In the Figure 11 below note that there are two other,

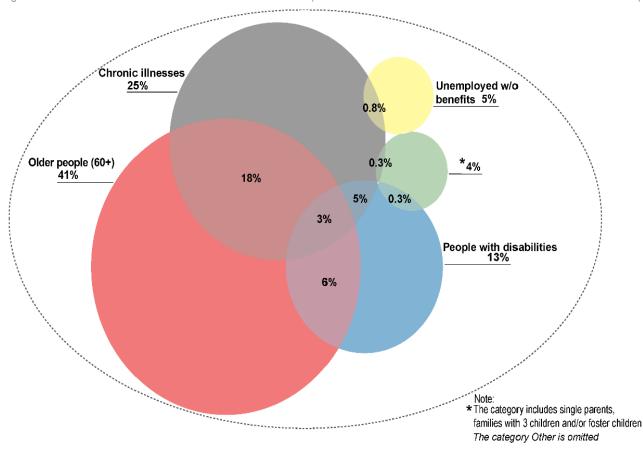


Figure 11 Intersectional vulnerabilities in the isolated settlements (REACH: Protection Assessment of Isolated Settlements in the GCAs)

²⁴ *Humanitarian Needs Overview*, 2020. During the inception phase, it was agreed that, although there is a child protection sub-cluster in Ukraine and child protection is a concern, the evaluation would focus its efforts on the more important (in Ukraine) and less well-studied issues of the elderly and disabled.

²⁵ ibid. The Government considers that 50% of registered IDPs are pensioners (January 2020 data), but this IDP registration figure is different from the UN's "population in need" and includes large numbers of NGCA residents who register as IDPs only because this is a prerequisite for them to receive pensions while residing in the NGCAs.

²⁶ REACH, Economic Security Assessment, March 2019, p.13.

²⁷ Approximately two-thirds of the elderly population is female: State Statistics Service of Ukraine, January 2016.

²⁸ REACH, Protection Assessment of Isolated Settlements in the GCAs, February 2019.

much smaller "vulnerability categories" in yellow (middle-aged adults too old to find work but too young to qualify for pensions), and in green (single parents and families with many children – only 4% of the identified vulnerabilities). These vulnerabilities were made more severe by COVID-19.²⁹

There is a significant Roma population in Ukraine that is well-documented as being marginalised, and according to 2001 census data the second and sixth largest concentrations were at that time in Donetsk and Luhansk oblasts. The actual number of Roma is generally assumed to be at least four times larger than official estimates. An OSCE report from 2014 estimated the number as 20,000 in Donetsk and 11,630 in Luhansk, but it is not known what proportion of the current Roma are in the GCAs or NGCAs. The evaluation team heard anecdotally of Roma children being included in education activities in the GCAs. The prevailing but untested view is that the Roma population in the conflict-affected region is small, and as a result, the Roma were not identified as a population at particular risk in the DG ECHO HIPs or in the UN HRPs. Following this lead, none of the implementing partners reached out and actively included the Roma within the scope of their programming. 32 33

The main finding of the evaluation team was that all humanitarian actors, including DG ECHO, were aware from the start of the high numbers of vulnerable elderly within the affected population, but were slow to adapt their approaches to this underlying structural factor. Most humanitarian actors designed their initial programmes on more generic humanitarian assumptions about vulnerability, for example giving equal emphasis for food security, cash and winterisation to contextually less relevant vulnerable groups, such as households with children and pregnant/lactating women. The elderly were "included" to the extent that they were listed as one of many vulnerable groups, but in the early years, they were not singled out as needing specific attention. As a result, the elderly received "normal" support, but not the particular kinds of support that they might need because of their special needs as elderly beneficiaries (limited mobility, chronic health conditions, social isolation, and extreme poverty).

There was an early attempt to focus on disabilities, and DG ECHO funded one project with Humanity and Inclusion (HI) in 2015. Unfortunately, HI's overall support from donors was thin, and after DG ECHO rejected their 2016 proposal (reportedly on the basis of weak design and high costs-perbeneficiary of their proposed approach), HI decided to close their Ukraine operation. Attention then shifted to age: HAI stepped in to chair the Age and Disability Technical Working Group in late 2015, they were directly funded by DG ECHO for the first time in 2018, and were included in the ACCESS consortium in 2019 (at DG ECHO's request).

Good practice

DG ECHO ensured that HAI was included in the ACCESS consortium, thereby anchoring technical capacity for age and disability response in the most important group of NGOs. The only weakness was that this came late in the crisis (2019)

Attention to age and disability has improved over the five-year period of the evaluation, and took a step further in 2019, spurred along by the adoption in 2019 of DG ECHO's new Operational Guidance on the Inclusion of Persons with Disabilities in EU-funded Humanitarian Aid

- ²⁹ The Protection Cluster's April 2020 update underlines the extent of this vulnerability in light of Covid-19:
- "Thirty six percent of people living in conflict-affected areas, and 41% living in isolated settlements along the contact line, are older people, with most having pre-existing health conditions. They are at heightened risk of infection and often have limited access to basic hygiene items, clean water, food and health services.
- Freedom of movement: As of March 16, the government began introducing restrictions for crossing of the contact line, and as of March 22, the checkpoints between GCA and NGCA were closed on both sides. This left people stranded on either side of the contact line, often with no place to stay, and at risk of family separation.
- Access to pensions: Due to the closure of checkpoints, people residing in NGCA cannot access pensions and social payments in GCA, leaving them at risk of destitution and unable to pay for food or medicines.
- Access to essential services: As of March 12, the suspension of public transport in GCA has left many people living close to the contact line without access to grocery stores, pharmacies, medical facilities, banking and other services. At the same time, people living in NGCA cannot cross the contact line to access medication and services available in GCA.
- Access to civil documentation: Due to the closure of the contact line, people are unable to travel to GCA to obtain civil documentation for births, deaths and marriages. In particular, this leaves children born in NGCA at increased risk of statelessness.
- Access to education: Only 60% of children living along the contact line in GCA have access to computers and the internet for distance learning introduced by the government.
- Access to healthcare: According to an assessment of medical facilities in conflict-affected areas in Luhansk GCA there is a shortage of medical staff; PPE, including respirators and masks; thermometers and COVID-19 testing kits, as well as limited capacity to hospitalize people infected with Covid-19.
- ³⁰ WHO, Rapid Assessment of Roma Health Situation and Social Determinants of Health in Ukraine, 2013.
- ³¹ OSCE/ODIHR, Situation assessment report on Roma in Ukraine and the impact of the current crisis, August 2014.
- ³² Partners also seemed to be unaware that DG ECHO protection guidance highlights the importance of including marginalised ethnic minorities.
- ³³ Before and during the Ukraine crisis, UNHCR has maintained a concern for the Roma from the viewpoint of reducing statelessness.

Operations, which DG ECHO made available in Ukrainian and Russian in collaboration with the Protection Cluster. However, this support for the elderly took a relatively general form. Even in 2020, DG ECHO has not taken the more deliberate measures of, for example requesting partners that are not specialised in the elderly (HAI) or disabled (HI) to build their GCA proposals around the specific and additional needs of the elderly and disabled (placing them at the centre of planning rather than including them in a list of vulnerable groups), requiring partners to target and report on the elderly in the same proportion as they are found in the target geographic area, or requiring partners to include age expertise in their technical teams (in the way that partners sometimes include

The nature and level of psychosocial stress experienced by the affected population was not as prominent in the early stages of the response, although it could have been anticipated based upon prior humanitarian crises. According to KIIs with MHPSS service-providers, psychosocial stress was sometimes masked by reluctance on the part of the affected population to recognise it (due to stigma), and by the inability of NGOs and health authorities to address it (due to weak capacity). Here again, there were some small early initiatives to consider mental health as a component of projects

gender expertise).34

Good practice

Including MHPSS within the education programme had beneficial effects that spread out from children to mothers - and from there to families and the elderly

with HI (2015) and GOAL (2015, 2016), but both organisations left Ukraine in early 2017 due to lack of funding. Within the family of EU institutions, there was an agreement that some aspects of MHPSS would also be addressed by FPI/IcSP,³⁵ which funded a key study in 2017 on the mental health of IDPs.³⁶ Notably, DG ECHO itself only referred to MHPSS explicitly for the first time in a HIP in 2018, which the evaluation team concluded was too late. However, the evaluation team also noted that important work on stress disorders has been taking place since 2016 through health (MdM, PIN and ICRC) and education (UNICEF and SC) projects that were tackling Post-Traumatic Stress Disorder among children, as well as depression and anxiety in families and among the elderly.

In the NGCAs, most actors assume that the need for support to the elderly and for mental health is equal or even greater than in the GCAs. However, there are particular problems of access compounded by a limited number of implementing partners, and a reported strong reluctance in the NGCAs to recognise stress and depression as significant and treatable mental disorders or to authorise MHPSS interventions.

³⁴ Because of access and service delivery constraints in the NGCAs, the same level of elderly and disabled-centric planning could not be expected.

³⁵ Two IcSP projects to some extent addressed MHPSS for civilian victims of the conflict (International Alert and UNICEF), and a third project with IOM focused on the psychosocial needs of Government ex-combatants.

³⁶ International Alert, Global Initiative on Psychiatry and London School of Hygiene and Tropical Medicine, *Hidden Burdens of Conflict*, May 2017.

Case study: reaching the elderly and the disabled

The issue

The Ukraine situation has a remarkable proportion of elderly and disabled, whose needs have been addressed only partially, and late in the response.

Country and Policy Context

There is widespread agreement that the most important dimension of vulnerability in the Ukraine crisis is old age. 37% of the rural population and 39 % of the urban population in the area within 20 km of the GCA contact line are aged over 60. Age vulnerability overlaps significantly with gender, disability and chronic illness: for example, in isolated settlements, over half of the elderly population has a chronic illness, or a disability, or both. The barriers to access to services for the elderly and disabled remain considerable and widespread particularly in remote or difficult-to-access locations of the GCA and in the NGCAs. 66% of the people crossing the contact line to access services and social payments are elderly. Disability was made a HIP priority from 2018 onwards, but not old age.

Global and EU guidance is fragmented: NGOs have strong guidance on age and disability,³⁷ the IASC has guidance on disability inclusion,³⁸ and guidance on age within the revised IASC Gender with Age Marker (sic). DG ECHO follows the pattern of IASC: the elderly are partly covered by DG ECHO policies on protection and gender, and there is extensive analytical guidance on age within DG ECHO's Gender and Age Marker, but neither DG ECHO nor the IASC provide practical guidance on what to do when the target population has a high proportion of elderly – although specialised agencies and some clusters do provide this. Also, like the IASC, since 2019 DG ECHO has had a guidance note on disability. As a result of the different analytical treatment of the elderly and the disabled (separately, or together), there is a patchwork of frameworks and limited concrete guidance to IPs facing situations with a very significant proportion of elderly in their target population.

Findings

DG ECHO's Ukraine actions were aligned with relevant thematic/sector policies, although there is room for improvement regarding the elderly.

Although the policy guidance on protection and gender encourages mainstreaming of age and disability, there was little evidence of this in the team's analysis of DG ECHO actions. Age and disability were usually "included" within the partners' listing of vulnerability factors to consider, but thereafter the approaches taken tended to be "one size fits all." In the early years, most humanitarian actors designed their programmes on generic humanitarian assumptions about vulnerability as guided by the ECHO HIPS and by their experience in other contexts - for example giving equal emphasis for food security, cash and winterisation to contextually less relevant vulnerable groups, such as households with children and pregnant/lactating women. The elderly and the disabled were not singled out as needing specific or adapted programming. More could have been done by partners to use best practice in moving beyond the barriers to inclusion and participation of the elderly and disabled within FGDs and community meetings, and to proactively "go the extra mile" to seek the views of people who were marginalised, isolated or housebound. Partly because of this consultation shortfall, the elderly received "normal" support, but not support that was adapted or tailored to meet the specific and additional difficulties, needs, and costs faced by those who are less mobile or housebound. Specifically, identification of an age and disability vulnerability through the Gender and Age Marker analysis did not translate into a corresponding adapted approach.³⁹

By 2018, DG ECHO's programme accounted well for the needs of vulnerable groups, but DG ECHO was slow to address vulnerabilities of age in the early response.

Regarding targeted action, in 2015, DG ECHO supported HI, aiming to assist primarily the warwounded and secondarily the elderly with functional limitations. This project was seen as a partial

³⁷ Humanitarian inclusion standards for older people and people with disabilities: 2018.

³⁸ Inclusion of persons with disabilities in humanitarian action: 2019.

³⁹ This could be because the whole humanitarian community is "wired" to focus on gender, but it could also be that the Marker guidance does not provide direction to partners on what to do when they find a high proportion of elderly in their target population.

success (in the end it reached more elderly than war-wounded), but was not continued in 2016 because of weak project management and high per-capita costs. Without funding, HI closed their Ukraine office in 2016. From 2016, there was specific support for the elderly built into the UNHCR actions, and HAI started chairing an Age and Disability Technical Working Group as well as programming with support from USAID and UNHCR. However, DG ECHO financial support for HAI only started in 2018, and built up in 2019 when DG ECHO asked that HAI be included in the ACCESS consortium. In the end the evaluation team concludes that DG ECHO's approach to targeted support for age and disability was disjointed: there was an early focus on disability with HI that was not continued, then a hiatus 2016-2017 with no particular emphasis on age or disability, and then a second start in 2018, when disability was included for the first time as a HIP priority, and DG ECHO's programming introduced a focus on the elderly with the first HAI action.

Even in 2020, in the view of the evaluation team, there is still insufficient HIP focus on the elderly. DG ECHO does not require partners to take more deliberate measures to better address their particular needs, for example placing the elderly and disabled at the centre of planning rather than including them passively in a list of vulnerable groups, or requiring partners to target and report on the elderly and disabled in the same proportion as they are found in the target geographic area, or requiring partners to include age and disability expertise in their technical teams (in the way that partners sometimes include gender expertise).

Recommendations

Existing DG ECHO guidance is somewhat fragmented between a disability guidance note, and the Gender-Age Marker toolkit. To overcome this constraint:

- (1) DG ECHO should strengthen the integration of gender and age, in line with relevant policies as well as through improved usage and implementation of the Gender-Age Marker, so that in situations where there is a target population with a high proportion of elderly, DG ECHO has stronger requirements of partners in their proposals to demonstrate that they have: (a) considered the special needs of the elderly and disabled in their needs assessment and protection analysis; (b) addressed the special needs of the elderly and disabled in their planning; (c) included age (as well as gender) disaggregation in all of their planning and reporting; (d) actively involved the elderly in project design; and (e) targeted the elderly in at least the same proportion as they are represented in the affected population
- (2) When the opportunity arises to review the disability guidance note, DG ECHO should broaden it to draw attention to the likelihood that a target population with a high proportion of elderly (a) is likely to require a response that goes beyond disability mainstreaming and inclusion, and also contains substantial disability-focused interventions; (b) would benefit from early activation of an Age and Disability Working Group; and (c) should be supported by the mobilisation of a specialised NGO to provide technical advice to all actors

In addition, DG ECHO Ukraine could work with the Global Protection Cluster and specialised agencies to develop and disseminate lessons learned from Ukraine that could be applicable to similar future situations with a high proportion of elderly and disabled in the target population.

4.1.2. Accountability to Affected Populations

2. DG ECHO's partners consulted beneficiaries adequately in the design of their initiatives.

Review of project documents, interviews and focus groups confirmed that projects were usually built on some degree of consultation with the intended beneficiaries, 40 especially in GCAs where access was uninhibited.41 This typically took the shape of community surveys, focus groups, and community consultations. In addition, the comprehensive needs assessment system built by REACH (with considerable support from DG ECHO and USAID) provided improved data on needs, perceptions and priorities that was used, in turn, by clusters and partners for planning. However, the team determined through interviews and field observation that very few partners reached beyond



disability case study: photo with permission)

the community meetings, "going the extra mile" to proactively seek the views of people who were marginalised, isolated or housebound, 42 and who were not interested in, or able to attend community meetings. By not being proactively inclusive, in some cases partners initially developed "one size fits all" approaches (built upon the community's identified general needs), and missed opportunities to tailor programmes to the specific additional needs of the most vulnerable.⁴³ Some of these partners later recognised these weaknesses and rectified them through separate household visits and subsequent adjustments to the project design.

3. DG ECHO's partners are falling short of the full expectations of Accountability to Affected Populations.

For the most part, DG ECHO partners included aspects of accountability in their governance systems and staff training. In the GCAs, they were transparent with affected populations by engaging with them in dialogue, and they set up feedback and complaints mechanisms. However, the effectiveness of the feedback mechanisms could be challenged: for example the FGD participants were somewhat less positive about feedback mechanisms (see Annex 4), and at least one partner survey found this to be a major weakness.⁴⁴ It is possible that the feedback mechanisms were in place (for example, complaints boxes and hotlines) but that these were not accessible to all beneficiaries, especially not to beneficiaries who were housebound, unfamiliar with mobile technology, or without connectivity. 45 Similarly, most partners reported that they conducted Post-Distribution Monitoring, 46 and yet in the FGD surveys the beneficiaries reported that only "to a lesser extent" were they contacted to check on the assistance they had received. Here again, it is likely that some types of projects lend themselves more easily to Post-Distribution Monitoring (for example cash, in-kind assistance and shelter), while other types of assistance less so.

⁴⁰ The data on this is somewhat mixed: all DG ECHO partners claim in their project proposals that consultation took place. However, at the same time the Ukraine Humanitarian Needs Overview (HNO) for 2019 stated that "the proportion of households that reported being consulted about their needs or preferences increased from 2017 to 2018- from 18 per cent to 28 per cent." 28% is indeed improvement, but it is far from sufficient.

⁴¹ In NGCAs the *modus operandi* is that the *de facto* authorities identify needs and provide beneficiary lists to the humanitarian partners, who then validate those lists prior to service delivery. In that context, there is little opportunity to consult beneficiaries during design.

⁴² According to HelpAge, 17% of the elderly are bedridden or immobile, and of these only 17% hold a disability certificate. HelpAge International, Emergency Protection-Based Support to Conflict-Affected Older Women and Men in the GCAs: Baseline Report, July

⁴³ To some extent, this mirrors the finding of the 2018 Third Quarter Evaluation of the ACCESS Consortium, which found that "The evaluation can confirm that those being reached are vulnerable, but cannot confirm if other narrowly defined vulnerable groups are overlooked"

⁴⁴ PUI, Hard-To-Reach Settlements Quick Multisector Needs Assessment, January 2018.

⁴⁵ Analysis of Donetsk and Luhansk oblasts hotline data shows that only 7% of enquiries were from persons aged over 65, and that 70% of enquiries were about access to Government payments and EECP procedures, not requests for humanitarian aid or complaints about services.

⁴⁶ The evaluation team did not have the time available to assess the depth of the qualitative information gathered by all the PDMs.

A review of humanitarian coordination in Ukraine in 2017⁴⁷ signalled weaknesses in the implementation of IASC policy on AAP and recommended that the HCT develop a Ukraine-specific guidance note. This note was finalised in mid-2017, and was featured in the HRPs of 2018 and especially 2019 as a core commitment of the humanitarian community. However, the HCT itself has concluded that it could still do better on AAP,⁴⁸ and the evaluation team was informed that the HCT has requested that additional

expert resources be deployed to Ukraine in 2020 to assist the HCT improve its AAP performance.

In relation to the IASC's four commitments on AAP⁴⁹ (see Figure 12), which are also reflected in the Ukraine-specific AAP guidance, DG ECHO partners did not always enable

the affected population to play an active role in the decisions that will impact their lives, through the establishment of clear (contextualised) guidelines and

Figure 12 IASC's four commitments on AAP

- LEADERSHIP
- PARTICIPATION and PARTNERSHIP
- INFORMATION, FEEDBACK AND ACTION
- RESULTS

practices on participation, and ensuring that the most marginalised and at risk are represented and have influence. In addition, DG ECHO partners rarely designed, monitored and evaluated the goals and objectives of programmes with the involvement of the affected populations, although there were examples of partners making programme adjustments as a result of beneficiary feedback.⁵⁰

In the NGCAs, access difficulties, and extremely narrow operating space, severely limit the ability of DG ECHO partners to pursue AAP goals.

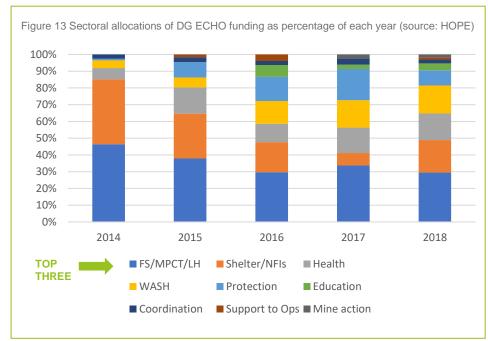
4.1.3. Relevance of HIPs

4. DG ECHO's Ukraine HIPs were clear and context-adapted.

There was an appropriate geographical evolution in the HIPs as the crisis evolved (see 5.1.4). The HIPs also adapted very deliberately to the JHDF's agreed division of labour between DG ECHO, DG NEAR-SGUA and FPI, when in 2018 the HIP became much more highly focused than is usual for DG ECHO, and brought the thematic priorities down from 7 priorities in 2017 to 3 in 2018 (although the actual allocation of funding as shown in *Figure 13* was only a little more concentrated in 2018 than in

2016 and 2017, and less concentrated than in 2014 and 2015). Partners appreciated the level of consultation in the 2018 HIP process, and regarded DG ECHO as flexible in the way that DG ECHO made course adjustments mid-year through HIP revisions and top-ups, complemented by widespread acceptance of Modification Requests.

Thematically, the core of the HIPs remained constant and relevant to the context: Food Assistance including MPCT and a small amount of Livelihoods support.



Shelter/ Winterisation and Health, plus WASH and cross-cutting support for Protection and Coordination.

⁴⁷ The UNOCHA Peer-to-Peer review mission to Ukraine in 2017 identified a "lack of systematic and comprehensive approach to Accountability to Affected populations" and recommended a course of action, which was implemented by the HCT later in 2017.

⁴⁸ UN, Summary Note of the June 2019 HCT Retreat.

⁴⁹ These commitments were revised by the IASC in November 2017 to align better with the Grand Bargain.

⁵⁰ For example, variations in the shelter packages, increases in the quantities of coal delivered, or options for in-kind assistance or cash.

Education was added as a priority sector in 2016, even though education would not seem to be a major humanitarian priority in the Ukraine context (see section 5.1.5). The HIPs did not always spell out the differing priorities between the GCAs and the NGCAs, and this is likely to become more important as the centre of gravity of DG ECHO's programming continues to shift to the NGCAs (see section 5.1.4).

If the evaluation team found a shortcoming in the relevance of the HIPs, it is (as discussed earlier) that both disability and MHPSS were only made explicit HIP priorities from 2018 onwards (even though these particular needs were well understood prior to this date), and that there was and still is insufficient focus on the elderly. Given the experience of the Balkan displacements (Bosnia 1992-1995, Kosovo⁵¹ 1998-1999) and of Georgia (2008), where still today the main residual displaced populations from those conflicts are the elderly, the evaluation team would have expected humanitarian actors in Ukraine to have provided a better response for this population.

4.1.4. Geographic focus

5. The geographic focus, first on Donetsk and Luhansk oblasts and then on the contact line and the NGCAs, was appropriate.

DG ECHO's geographic focus shifted in stages (see Figure 14 and Figure 9 above).

Figure 14 Geographic targeting of the Ukraine HIPs

Year	Targeting
2014	People affected by the violence in Ukraine, wherever they are
2015	Priority 1: IDPs, returnees and vulnerable host population in the areas directly affected by the fighting (mainly Donetsk and Luhansk oblasts) Priority 2: IDPs, returnees and vulnerable host population in GCAs Priority 3: Vulnerable refugees in neighbouring countries
2016	Priority 1: The population in disputed areas ('buffer zone') both under Government and Separatists' control - affected by the fighting Priority 2: The additional resident population in areas under the control of separatists (outside of the 'buffer zone').
2017	Priority 1: The population living along the LoC under both GCA and NGCA directly affected by the fighting.
	Priority 2: The particularly vulnerable resident population in NGCAs outside the contact line
	Priority 1: The population living along the LoC both in the GCA and the NGCA

There is evidence from several interviews that in 2014-2015 DG ECHO helped persuade the vast majority of the humanitarian community to shift focus from collective centres nationwide to the population "displaced in place"⁵² along the contact line. Later, through its 2019 HIP, DG ECHO further narrowed its own focus down on the 0-5km zone on both sides of the contact line (although justified exceptions have been permitted) – a decision that attracted some criticism from partners during the KIIs for its lack of sensitivity to local circumstances.⁵³

Various studies, mostly undertaken by REACH and funded by DG ECHO, have looked at the geography of vulnerability along the GCA side of the contact line. In terms of physical damage to infrastructure and housing, and the proximate risks of being wounded by periodic shelling or by the presence of Explosive Remnants of War and mines, the 0-5km is without doubt the zone that is most affected (on both sides). However, REACH argues that from a protection viewpoint <u>isolation</u> (rather

⁵¹ This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

⁵² People are 'displaced in place' when they are still living in their original communities, but major external factors (massive economic shocks, collapse of services, conflict, movement of borders etc.) mean that they experience many of the risks and vulnerabilities of displacement. In such situations, and Ukraine is an excellent example, assistance consists of helping a population stay in their original residences and thereby preventing displacement that, were it to take place, would be much more difficult to solve later.

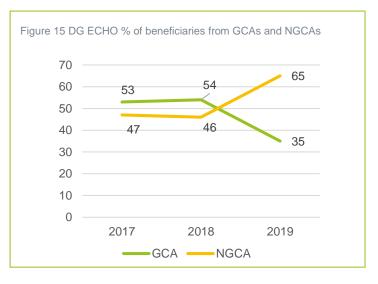
⁵³ According to one KII, DG ECHO was following the lead of the Regional Government, which reduced the "grey zone" to 0-5km in late 2017.

than distance from the contact line) correlates most strongly with need and vulnerability,⁵⁴ and not all the 53 identified isolated settlements in the GCAs are in the 0-5km zone (which includes several urban and semi-urban areas). Another REACH study shows that within the GCA 0-20 km zone, the major dividing line between whether populations have access to services (or not) is not the 5km line, but whether the settlements are rural or urban.⁵⁵ In this complex situation, and based upon the sources

consulted, it appears that DG ECHO's current decision (HIP 2019) to focus on the 0-5km zone and isolated areas beyond the 0-5km line⁵⁶ is appropriate. It is not a perfect geographic targeting, but an attempt to make it "perfect" would not be practical.

Regarding the NGCAs, the best available information from REACH and humanitarian actors is that the essential humanitarian needs in the NGCAs are increasing. The corresponding shift in DG ECHO's humanitarian funding from the GCAs to the NGCAs has been tracked by DG ECHO since 2017, and is shown in Figure 15.⁵⁷

Finally, recognising that there are significant numbers of displaced people from Ukraine in Belarus and in the Russian Federation,



DG ECHO made relatively small but judicious contributions to International Federation of the Red Cross programmes for Ukrainians in 2015 (Belarus) and again in 2017 and 2018 (Belarus and the Russian Federation) – contributions that were highly valued by the partners. These programmes provided vouchers and medical insurance to the most vulnerable persons, and appear to be efficient in their delivery and targeting.

6. The humanitarian needs in GCAs are either stable or gradually reducing (especially in urban areas).

By the time of the evaluation fieldwork in late 2019, the humanitarian crisis was in its sixth year, and the position of contact line was stable – although several hundred ceasefire violations were still being reported by OSCE every day. Three differences between the GCA contact line and other rural areas of Ukraine, all consequences of the creation of the contact line, are a reduction in population density (which triggers reduced government service levels and reduced market efficiencies), interruption of utilities (water, gas, electricity – which are sometimes cut as they cross back and forth across the contact line), and the way that many GCA residents are now cut off from their primary service centres (in Donetsk and Luhansk cities) which are now on the other side of the contact line. As a result, there are still pockets of great need, especially the elderly and the disabled, as well as people in isolated communities. Furthermore, within a few kilometres of the contact line there are reportedly higher levels of psychosocial stress and food insecurity due to shelling, unexploded ordinance and landmines (which affect agricultural land). For these reasons, even in 2020, some of the GCA contact line population can be seen as still experiencing the humanitarian consequences of the conflict.

However, conditions are definitely improving, especially in urban centres on the contact line like Shchastya, Lysychansk and Mariupol. Most of the damage to housing that could reasonably be repaired by a humanitarian shelter response (as opposed to a housing programme) has been repaired, and the immediate humanitarian risks to life has been removed or is being managed.

In certain parts of the GCAs, it is becoming difficult to distinguish between humanitarian needs, and deficits in government services. According to KIIs, the situation along the GCA contact line increasingly resembles the situation found in other communities of rural Ukraine, which experience similar problems of limited economic opportunities and inadequate government services, poor public transport and

⁵⁴ REACH, Protection Assessment of Isolated Settlements on GCAs along the contact line, February 2019.

⁵⁵ REACH, Economic Security Assessment in GCAs within 20km of the contact line, March 2019.

⁵⁶ The 2020 HIP seems to relax the geographic focus by including isolated communities as well as those within the 0-5km zone.

⁵⁷ The data on GCA vs NGCA beneficiaries is an approximation provided by DG ECHO. Note that the estimation counts as "NGCA beneficiaries" both the affected population assisted inside the NGCAs, and the NGCA population that is assisted at the EECPs and at various points of service in the GCAs (for example receiving legal assistance or health services while "visiting" the GCAs).

higher market prices, compounded by confusion resulting from government reforms that are not yet yielding their intended efficiencies (particularly in health and all services provided by local government).

The demand for support for micro-enterprises and kitchen gardens is high in the GCAs, and the evaluation team observed effective activities by the ICRC, but the scale of this investment by DG ECHO is small, and DG ECHO was reportedly reluctant to prioritise or expand this sector.

The prevailing view in the humanitarian community is that the Government of Ukraine could make some adjustments to policies⁵⁸ and resource allocations, and cover most of the remaining needs in the GCAs right up to the contact line, with the possible exception of support for livelihoods. Furthermore, if the Government chose to do this, then

ICRC micro-enterprise beneficiary: a disabled shoemaker whose economic independence has been restored (photo with permission)

interviews with development donors suggested that development donors would support the Government's efforts. However, development donors informed the evaluation team that they are less likely to step in and "take over" from the humanitarian community without the foundation of this government commitment. For further discussion of the humanitarian-development nexus, see sections 5.2.5, 5.2.6 and 5.6, and the case study.

4.1.5. Education in Emergencies

7. The small financial allocations to education in Ukraine are appropriate, given the modest needs.

Attention to EiE started to build in 2015 in the lead up to the Oslo Summit on Education Development, and gathered momentum through a global consultation in early 2016. This culminated in the creation in mid-2016 of the Education Cannot Wait fund, and important EU commitments to EiE at a global forum on EiE in November 2016, followed by further financial pledges, and DG ECHO EiE policies being issued in 2018 and 2019. As of 2019, the EC aims to allocate 10% of its global humanitarian assistance to EiE.

This policy commitment showed up in DG ECHO's Ukraine programme starting in 2016, first with a HIP top-up specifically allocated to education, and subsequently with explicit education spending targets within the overall HIP allocations.⁵⁹ These allocations were pushed more by Brussels policy, than led by Ukrainian demand.

In Ukraine, the number of school-aged children living along the GCA contact line is relatively small⁶⁰ and, although there are some gaps (damaged schools, teacher vacancies etc.) for the most part the Government is providing education services that already meet the humanitarian standards of the Inter-Agency Network on Education in Emergencies (INEE). The needs on the NGCA side are thought to be greater, as the affected population of children is larger,⁶¹ and it is reported that the level of services being provided by the *de facto* authorities is less, and also that informal costs (school fees, uniforms, books, supplies etc.) are higher than in the GCAs. However, there are limits on how much of the education needs in the NGCAs can actually be addressed by the humanitarian community, given the challenges of access and procurement. DG ECHO's spending on education in Ukraine in the period 2014-2018 was appropriately modest: starting with a high of 7% (boosted by the additional top-up) and then 3% and 4% of spending in 2017 and 2018 respectively.

⁵⁸ For example, on financial services close to the contact line, lowering beneficiary thresholds for the resourcing of education and health service centres, and making the Affordable Medicines Programme more accessible to people without connectivity. It needs to be recognized that the Government has a particular challenge with services to the contact line, in that the "normal" providers of employment and tertiary health and education services in contact line communities are in the cities of Donetsk and Luhansk, which now lie on the other side of the contact line. The effect of the contact line on interrupting the normal flow of employment and services is well-documented by REACH, especially in their raion-level capacity and vulnerability assessments. Given this, the Government faces an additional challenge in that, without a settlement to the conflict, some new investment will be required to create effective referral pathways and full services on the GCA side. For more discussion see section 5.2.5.

⁵⁹ Education was the only sector with a specific financial allocation within the HIPs in 2016-2018.

⁶⁰ According to REACH, 14% of the population in isolated settlements, and 18% of the population in the 0-20km zone is under 18. According to the 2020 HNO, there are 18,000 affected children of school age in the GCA 0-5km zone, and 69,000 in the 5-20km zone.

⁶¹ According to the HNO, there are 212,000 children in need of education support in the 0-20km zone of the NGCAs.

Analysis of the education projects, supported by KIIs and field visits, showed that the education programme being implemented by DG ECHO partners in Ukraine has a significant emphasis upon protection and on the provision of psychosocial services particularly to children (and through them, to parents and extended families), as well as WASH rehabilitation in schools and mine risk education. This broader interpretation of education (which is encouraged by the INEE standards for EiE) seems to be appropriate in the Ukraine context, given that core education services are relatively well-covered by the Government. For a discussion of the contribution of education programming to community resilience, see section 5.6.2 below.

4.1.6. Needs assessment

8. DG ECHO contributed substantially to establishing joint and impartial needs assessments.

Given that there was no established humanitarian community in Ukraine in 2014 when the crisis broke, and that many humanitarian actors were slow to engage, it is not surprising that the first generation of needs assessments were mostly conducted by separate UN agencies and NGOs, with the dual purposes of assessing sectoral or cluster needs, and fund-raising. The document analysis conducting during the desk phase revealed that, before the humanitarian community was fully built up, these assessments were not well-connected, sometimes overlapped in thematic coverage, and were less impartial to the extent that they were limited by the mandates of the sponsoring agencies.

DG ECHO did engage early, and from the start was a major advocate for improved and joint assessments. DG ECHO supported the March 2015 Multi-Sector Needs Assessment (implemented by

the NGO Forum with the technical support of ACAPS), and the 2016 Inter-Agency Vulnerability Assessment (implemented by REACH and mandated by the HCT). The quality and impartiality of needs assessment continued to improve over time, and by the end of 2016 REACH was established as the definitive platform for comprehensive and integrated needs assessments in Ukraine (see Figure 16). The emergence of REACH was directly facilitated by DG ECHO with early funding via PIN, and from 2017 onwards via the ACCESS Consortium (see

Figure 16 Comparative advantages of REACH in Ukraine

The evaluation team found that REACH assessments:

- Are of high quality
- Build capacity by involving agency staff in data gathering
- Are joint, usually with several NGOs and UN agencies
- Are comprehensive and multi-sectoral
- Are impartial (not captive to interests of a cluster lead agency)
- Often make their raw data available for further analysis
- Strongest in terms of assessing needs in NGCAs
- Branching out into development assessments

section 5.5.2).⁶² Since 2017, REACH assessments have become the basis for the production of the HNO. There were limited needs assessments in the NGCAs before 2016, and needs assessment in the NGCAs remains a challenge. However, there as well, the most comprehensive and impartial assessments available were conducted by REACH, using supplementary methodologies such as mobile phone surveys to overcome challenges of access.

In addition to the multi-sector work of REACH, there was still a need for specialised assessments, either of a particular issue (e.g., EECPs, collective centres, IDPs outside the contact line, mental health, GBV, the elderly, market prices, legal access) or detailed assessments at the sector level (e.g., education or shelter cluster). DG ECHO has supported specialised assessments implemented by DG ECHO partners (e.g., HAI, UNHCR/R2P, ACCESS). ICRC conducts its own needs assessments with DG ECHO co-financing, but as a matter of ICRC policy does not often share its assessment data with the broader humanitarian community.

In contrast with the high quality of joint needs assessments, the evaluation team has some doubts regarding the use of these assessments. Most stakeholders stated in their project proposals and in interviews that they use the sectoral needs assessments and REACH to inform their detailed planning. Other observers suggested, however, that many organisations (UN and NGO) plan according to their previous year programme or according to their own corporate planning frameworks, and then look for data in assessments to justify their planned activities. If indeed organisations used assessments to support their planning, rather than as the basis for their planning, this might partly explain, why the clear assessment evidence of the particular needs of the elderly did not translate into deliberate actions and programmes adapted to those needs.

⁶² The USA, via the Office of Foreign Disaster Assistance, has also been a major donor to REACH, and has funded a separate series of raion-level assessments.

4.2. Coherence

4.2.1. Respect for humanitarian principles

9. DG ECHO has made conscious and visible efforts to maintain humanitarian principles.

The humanitarian principle of impartiality (assistance on the basis of need alone) relies on solid needs assessment, and there is considerable evidence that DG ECHO strengthened that evidence base, and allocated its resources sectorally according to need. ⁶³ In a situation like Ukraine, impartiality also requires a good understanding of the geography of needs. By focusing its assistance first on Ukraine, then on Donetsk and Luhansk oblasts, then on the contact line, then on EECPs, then on the 0-5km zone, and more recently increasing the emphasis on the NGCAs, ⁶⁴ DG ECHO's successive HIPs have evolved as the location of the greatest needs has shifted, ⁶⁵ and this confirms DG ECHO's humanity (addressing human suffering wherever it is found). More generally, DG ECHO continues to be guided by the principle of humanity inasmuch as it keeps the international spotlight on Ukraine, and maintains significant allocations even as the Ukraine crisis has become "forgotten."

Regarding the humanitarian principle of neutrality (not taking sides in a conflict), KIIs identified at least four examples of DG ECHO making efforts to avoid taking sides. First, early in the response, DG ECHO helped prevent a politicised escalation of in-kind assistance, by discouraging the mobilisation of media-driven and high-cost international convoys of in-kind humanitarian assistance, which could have been seen as an attempt to counter Russian convoys. Second, later in 2014, DG ECHO successfully led advocacy with the Government to allow humanitarian actors to work in the NGCAs, when this could be seen by some in Ukraine as 'supporting one party to the conflict.' Third, DG ECHO quietly stepped in to ensure that volunteers working in DG ECHO-supported projects were themselves neutral, after early signs that some volunteers were somewhat partisan. Finally, DG ECHO has made efforts (through actions with the International Federation of the Red Cross) to ensure that Ukrainians displaced to Belarus and to the Russian Federation are also assisted. Overall, the evaluation team concluded that DG ECHO has placed a high priority upon humanitarian neutrality, and has – in a highly politicized context – succeeded in remaining trusted by all parties to the conflict, despite the weight of EU-Ukraine political relations.

In the Ukraine context, DG ECHO's humanitarian independence (autonomy from the political or economic objectives of any actor) effectively means independence from the European political and economic agenda. This is a more difficult element for the evaluation team to assess, as there is no escaping the fact that DG ECHO is an institution of the European Union, which has very explicit political objectives in Ukraine. However, the independence of DG ECHO in Ukraine was confirmed by all interviews with the European Delegation, European MS and other donors, as well as DG ECHO staff. Finally, it must be noted that DG ECHO is one of only two donors (the other is Switzerland) that are sufficiently trusted that they can regularly access the NGCAs to monitor implementation. That DG ECHO is tolerated by the *de facto* authorities – despite the EU's continuing explicit support for Ukraine to lean towards the European Union – is cited by many observers outside the EU family as the main testament to the political independence of DG ECHO.

4.2.2. Alignment with DG ECHO thematic policies

10. DG ECHO's Ukraine actions were aligned with relevant thematic/sector policies, although there was room for improvement regarding the elderly.

The evaluation team assessed DG ECHO's Ukraine programme against DG ECHO's thematic policies for health, shelter and settlements, cash and vouchers, WASH, education, protection, gender and disability inclusion. This analysis was conducted during the desk review stage primarily on the basis of project documents and reports. The team found the programme to be well aligned with these thematic policies, with some caveats as discussed below.⁶⁶ However, during the fieldwork it became clear that

⁶³ See sections 5.1.1 on targeting according to need, 5.1.4 on geographic targeting and 5.1.6 on needs assessment.

⁶⁴ Good information on the NGCAs is scarce. Despite improvement in NGCA needs assessment thanks to REACH, needs in the NGCAs are not known with certainty. Instead, all actors in the NGCAs work on the informed assumption that the population on each side of the contact line has similar underlying vulnerabilities, and yet since there are reported to be fewer jobs and social services in the NGCAs, then it is further deduced that the NGCA population must be more in need than the corresponding population in the GCAs.

⁶⁵ See also Figures 9, 14 and 15.

⁶⁶ Thematic policy compliance at the action level is usually high with DG ECHO, because DG ECHO's relevant thematic experts assess every proposal against prevailing policies.

partner agency field staff were generally not aware of DG ECHO's specific policies, and relied upon their head offices to ensure that proposals were coherent – suggesting that partners do not so much "follow" DG ECHO policies as follow their own policies or cluster policies, and then check that they are aligned with DG ECHO's before submitting a proposal.

Regarding health, the team closely examined DG ECHO alignment with its health policy, given that the incidence of morbidity and mortality in Ukraine would not normally meet DG ECHO health policy thresholds for triggering a health response. Mobile health units were also considered in more depth, because such high cost-per-beneficiary mechanisms are unusual in protracted humanitarian settings. After this closer examination the team was satisfied that the DG ECHO-funded health interventions are (as the policy requires) addressing critical gaps in the government system, for example supporting under-resourced primary health workers (*feldshers*) not substituting for them, and filling gaps in MHPSS coverage that government bodies are not equipped for. However, there is a need for DG ECHO to remain vigilant that such supplementary services are still required as the situation is continually evolving, and also to continue to press the Government to assume their agreed responsibilities. Finally, additional scientific (rather than general survey) research is needed on the extent of, and obstacles to government service coverage, in order to generate the evidence base for the health cluster to revise its strategy to support health services along the GCA contact line.

Shelter was a major sector of the humanitarian response in Ukraine, and DG ECHO played a large part in support to cluster coordination, needs assessment and implementation. As guided by the policy, DG ECHO discouraged the creation of camps and camp-like settlements (such as container villages), and phased out support to collective centres as soon as the initial fluid period of displacement was over. From 2015 onwards, the focus was on supporting people returning to, or remaining in, their own properties in settlements along the contact line that were physically damaged by the conflict. The shelter programme was well-coordinated, and systematic, with strong standard operating procedures and a good division of labour between donors and shelter actors. The basic goal of "one warm room" was appropriate to the context, and demonstrated (as recommended by the policy) a flexible peoplecentred approach: for example, DG ECHO partners could provide repairs and/or insulation depending on the needs. The delivery modality was appropriately flexible, allowing shelter actors to provide cash or repair kits or complete repair support, according to the specific assessed needs of the beneficiaries, and also considering market supply and the efficiencies of bulk purchasing (in this respect, in-kind building material supply was more appropriate in the NGCAs). Finally, as recommended by the policy, DG ECHO took a holistic approach to settlements (beyond simply housing), notably by supporting the de-mining of the agricultural land surrounding contact line settlements, and (albeit to a lesser extent) supporting the restoration of home gardens and basic livelihoods in the affected communities.

DG ECHO support for cash and voucher assistance is discussed in more detail separately in section 5.3.1 on EU value-added, and especially in section 5.4.1 under the heading of effectiveness.

Given that water supply in eastern Ukraine is mainly provided by large-scale piped water systems (an unusual situation in a humanitarian response) supplemented by established private wells, WASH was not a central priority for DG ECHO (and Ukraine was also a low global priority for the Global WASH Cluster). This sector was not however without its challenges, which DG ECHO addressed with advocacy (for the protection of water infrastructure from combat damage) and targeted investments, through strategic partners such as ICRC, for the rehabilitation and continued operation of critical water infrastructure – in particular those components situated in the NGCAs. Important WASH gaps in schools were also filled through the education projects.

The team reviewed DG ECHO's Ukraine programme against the more recent policy for education (2018). This is a communication from the Commission (not a separate policy guide), which calls for 10% of overall DG ECHO funding to be allocated to education. As discussed above in section 5.1.5, the education needs in Ukraine are unlike most humanitarian contexts, in that the proportion of children in the affected population is relatively small, and the quality of the government education system is relatively good. In the view of the evaluation team, the unique context of Ukraine does not justify such a high proportion of a limited budget, but in other respects the holistic approach taken by education actors in Ukraine is consistent with the education policy. Notably, education actors in Ukraine complement focused education support (for example classroom rehabilitation and basic materials supply) with complementary elements such as WASH facilities, mine risk education and enhanced MHPSS services – all of which provide a safer learning environment for Ukrainian children. Importantly, the bulk of education support is targeted at the NGCAs, where the needs are widely believed to be greater.

Regarding protection, while the funded actions were generally compliant with DG ECHO policy, a review of the eSingleforms showed inconsistent quality of the protection analysis. In addition, at least one partner was proposing individual protection assistance activities (cash and in-kind support) that DG ECHO felt were insufficiently focused on a protection outcome, and that DG ECHO decided to leave out of their initial approval because it did not meet DG ECHO's protection policy criteria.

The team considered application of the gender policy, Gender and Age Marker and disability as a package. DG ECHO's *Operational Guidance on the Inclusion of Persons with Disabilities in EU-funded Humanitarian Aid Operations* was released in January 2019, after the end of the period under review. The policy is comprehensive, but it is too soon to assess whether DG ECHO's staff and partners are aligning with it in Ukraine.⁶⁷ As discussed earlier (sections 5.1.1 and 5.1.3), where the team assessed that DG ECHO had room for improvement was in respect to the elderly, who the evaluation team believes should have been placed closer to the centre of programme and project design.

The elderly are covered partially by several different DG ECHO policies. Age is a dimension of analysis and vulnerability in the protection and gender policies, as well as in the disability inclusion guidance. ⁶⁸ Understandably, DG ECHO's thematic policies end up providing elaborate guidance on their primary topic, and little concrete guidance on what to do (or not) when the elderly are identified as the dominant vulnerable group.

Age is also an explicit parameter of the Gender-Age Marker. The Gender-Age Marker toolkit's 83 pages of guidance provide solid analysis of concerns around age: there are some examples of vulnerability relating to old age, but the bulk of the guidance on age centres upon children. It might reasonably be assumed that DG ECHO's emphasis on the use of the Gender-Age Marker would have pushed

partners towards a more deliberate inclusion of the elderly,

but this was not the case.

When the evaluation team considered the application of the Gender-Age Marker to Ukraine eSingleForms and Fichops⁶⁹ (see Figure 17), it was observed first of all that the overall Final Marks were low: the average of the Field Expert and Desk Officer Final Marks was 40% for 0/2 or n/a, 31% for 1/2, and 29% for 2/2. Secondly, Desk Officers seemed to be generally more negative in their scoring than Field Experts.⁷⁰

A detailed examination of the texts accompanying the marks also showed that the age dimension of the marker was underused. This could be in part because the whole humanitarian community is "wired" to focus on gender more than age,⁷¹ but it could also be that within overall analysis of

Figure 17 Final Report Gender-Age Marks of all DG ECHO projects in Ukraine (percentages of 65 projects). Scores are 0/2, 1/2 or 2/2.

50
40
30
20
10
GA Final Mark
Field Expert

0 or n/a
1 2

age, there is a much greater emphasis upon the vulnerabilities facing children rather than those facing the elderly.

In addition, in the period 2014-2018, there was a gap in programmatic guidance for humanitarian organisations encountering a beneficiary population that is made up of 38% elderly. The Gender-Age Marker toolkit is a guide to analysis, but is not intended to provide direction to partners on what to do, practically, when they find a high proportion of elderly in their target population, although some further information is provided in subsequent training sessions and online learning. Thematic guidance of this nature is normally the responsibility of technical agencies and clusters, not donors. The evaluation team looked beyond DG ECHO policies and determined that there is sufficient global guidance available on programming for old age and disability, notably in the *Humanitarian inclusion standards for older people*

⁶⁷ The team was however informed that few DG ECHO partners are actively engaging with local Disabled People's Organisations.

⁶⁸ The *Guidance Note on Disability Inclusion* makes few references to age, which the evaluation team assumes to be a policy decision on DG ECHO's part, since other guidance (for example the 2018 *Minimum Standards for Age and Disability Inclusion in Humanitarian Action*) bridges the elderly and disabilities within one policy statement.

⁶⁹ The eSingleForm is the outward-facing online tool used DG ECHO partners to submit and revise their project proposals, and to report their results. The FichOp is the internal document used by DG ECHO staff to record the evolution and performance of a project.

⁷⁰ The Ukraine Final Marks were compared with the 2014-2015 global average Final Marks as reported in the *Gender-Age Marker Assessment 2014-2015 Report* (October 2018). This showed that far fewer Ukraine projects scored 1/2 (30% in Ukraine vs 52% globally), whereas slightly more projects scored 2/2 in Ukraine than globally (29% in Ukraine vs 23% globally). Globally, Desk Officers gave lower marks than Field Experts, similarly to the Ukraine example.

⁷¹ Note that age only became a parameter of the universally used IASC marker in 2018.

and people with disabilities (2018), and in the case of Ukraine, specific guidance notes on the elderly and on disability that were developed by the Age and Disability Technical Working Group of the Global Protection Cluster in mid-2016. The main problem, in Ukraine, is that this guidance (as well as DG ECHO's operational guidance on disability inclusion) was made available rather late in the overall response, and took some time to become translated into practical action by partners.

4.2.3. Coordination of humanitarian donors

11. DG ECHO has been a strong coordination actor in its own right.

In 2014, and into early 2015 until UNOCHA was fully functional, the small DG ECHO team in Ukraine facilitated coordination of the overall humanitarian response. This was an important time when the nature of the crisis was still being framed, when the overall humanitarian strategy was being developed, and when the general approach of humanitarian donors was being defined. Key decisions in this formative period, and over which DG ECHO had considerable influence, were the decisions to identify Ukraine as a humanitarian crisis worthy of an international response, 72 to provide appropriate neutral humanitarian assistance rather than in-kind assistance through politically motivated "humanitarian convoys," to avoid the creation of camps, to shift humanitarian attention from collective centres to the contact line, and to open up access to the NGCAs (which required negotiation with both the Government in Kyiv, and the *de facto* authorities in the NGCAs).

Also, since 2014 and right through until today, DG ECHO has coordinated the HDG, a periodic meeting of Kyiv-based donors. In support of the HDG, DG ECHO maintains an evergreen spreadsheet of donor projects that helps identify gaps and overlaps, and allows DG ECHO to track other donor contributions in real time (thereby supporting better DG ECHO targeting).⁷³ The HDG also provides a forum for exchange of information (particularly regarding NGCAs), periodic presentations by external speakers on topics of shared interest, and for organizing advocacy.⁷⁴ The HDG is very well-regarded by participants, and some members felt that the HDG could go further in (a) dynamically aligning donor humanitarian strategies; (b) organising their collective leverage over development donors; (c) reducing competition between humanitarian agencies (mainly between UN agencies and ICRC); and (d) researching and coordinating humanitarian donor advocacy issues. These aspirations might be ambitious given that fewer and fewer donors have dedicated humanitarian experts in-country.

Building in part on its role as host of the HDG, DG ECHO represents the donor community in a number of humanitarian coordination fora, including participation at extended HCT meetings,⁷⁵ and participating on the Advisory Board of the UHF. For more on DG ECHO's value-added to MS and its convening role, see section 5.3.2 below.

In addition to its in-country coordination function, DG ECHO provided periodic briefings to MS in Kyiv and Brussels, facilitates MS missions to the conflict-affected regions, and together with NGO partners, organised outreach events in MS capitals (for example, in Brussels and Berlin in 2017, and Paris in 2019), aiming to maintain the profile of the Ukraine crisis.

4.2.4. Coordination of the humanitarian system

12. DG ECHO has also been a strong supporter of humanitarian coordination in Ukraine.

Even though DG ECHO considered that UNOCHA's early performance was relatively weak, DG ECHO stuck with its core commitment to support the UN system and funded UNOCHA in Ukraine consistently since 2015. As soon as UNOCHA was established in-country, DG ECHO then actively advocated for UNOCHA to increase its coordination presence in the field (Kramatorsk and NGCAs). This support was further extended in 2019, when - in an important breakthrough for DG ECHO and UNOCHA globally - DG ECHO made its first ever contribution to a Country-Based Pooled Fund (the UHF). Some donors further reported that DG ECHO's early pledge of support for the UHF had been instrumental in unlocking their own contributions.

⁷² This included persuading the Government that there was a humanitarian crisis behind the war, and that IDPs were not the "enemy".

⁷³ DG ECHO Kyiv also reports monthly to Brussels on important trends in other donor funding.

⁷⁴ UNOCHA expressed the desire to be connected more systematically to the HDG, perhaps not as a member but provided with regular debriefings. The evaluation team is not persuaded of the need for this, since there is a monthly General Coordination Meeting hosted by UNOCHA and involving donors.

⁷⁵ After extensive lobbying by DG ECHO and other donors, the HCT agreed to create a separate quarterly meeting between the HCT and humanitarian donors. Donors are not invited to participate in regular HCT meetings because the HCT feels this would overly politicize the HCT.

DG ECHO was also an important donor to cluster coordination, directly funding the protection and shelter clusters since the beginning and at different points in time also supporting the health cluster, the child protection sub-cluster, the age and disability working group, the cash working group, and the NGO Forum. Beyond the clusters, DG ECHO also supported several organisations that are providing systemwide support, notably REACH and in 2016, INSO. Finally, DG ECHO helped create the ACCESS consortium, which is itself a coordinating mechanism for several NGOs and allows them to achieve a more efficient division of labour (see section 5.5.2).

At the same time, there is concern about keeping the costs of coordination at the appropriate scale, especially as the overall levels of donors funding are declining. DG ECHO agrees with other donors (and some HCT members) that the humanitarian machinery (especially the cluster system) is presently overbuilt and more costly than necessary, and that the annual HNO and HRP processes have become too cumbersome – given that the situation is now protracted. DG ECHO has been active in encouraging the HCT to re-size the cluster coordination machinery, but an early 2019 HCT retreat concluded that it was preferable to reduce costs within the existing cluster structure (for example by nationalizing some cluster coordinator positions), rather than close clusters, so there seems to be little opportunity for reopening discussion of the cluster structure in the short term.⁷⁶

4.2.5. Coordination between humanitarian and development actors

13. System-level coordination between the humanitarian and development communities is not as advanced as internal nexus coordination within each donor government.

There are two underlying challenges with greater humanitarian-development coordination in Ukraine. The first is that the Government's overarching vision for the development of Donetsk and Luhansk oblasts is premised upon an integrated region (integrated social services, infrastructure and economies - reuniting the GCAs and the NGCAs), while in practice the GCAs and NGCAs are currently separate. This vision of a (re)integrated region is inhibiting the Government from investing in new infrastructure and service capacities in the GCAs - the sorts of investments that would be needed for full-service coverage of the GCAs in a way that recognises the strong barrier of the contact line. Furthermore, since the Government is not investing in new infrastructure that accommodates the de facto separation of Donetsk and Luhansk oblasts, then the Government is not encouraging development donors to invest in that way either. Given that there is no straightforward separation or integration solution at this time, the Government does not place priority on major new development investments in Donetsk and Luhansk oblasts, and this sustains the humanitarian needs. The Ukrainian Ministry of Temporarily Occupied Territories and IDPs (MinTOT)⁷⁷ attempted to address this conundrum but, after the Government restructuring following the elections in 2019, the role of MinTOT and the opportunity to reexamine Government policy regarding Donetsk and Luhansk

The second challenge is that, in line with the Government's priorities, development donor attention is focused on supporting the national reform agenda - as evidenced by the Government's Reform Action Plan 2017-2020, the Ukraine Reform Conference process, and the Ukraine/G7 policy agenda. Since 2016, several donors have opened up some branch of their development programmes for the recovery of Donetsk and Luhansk oblasts, but this is all recent (in development agency timeframes), development donor coordination for Donetsk and Luhansk oblasts

oblasts are back in limbo.78

New energy policy on deregulation

requires that energy should not be

the consumers in arrears is the Bakhmut water utility, which supplies water along a portion of the contact line. When the power and water supply were threatened, humanitarian organisations were asked to compensate with water trucking.

supplied to consumers in arrears. One of

Unintended consequences

is not very advanced, 79 and only in 2019 did this start to gain momentum. Unfortunately, the gap

⁷⁶ The coordination structure in the NGCAs is already much lighter than in the GCAs. In the NGCAs, agencies self-coordinate without clusters, more recently under an UNOCHA umbrella. In some respects, coordination is reportedly easier - because there are fewer actors due to lack of access, and less fragmented - because there is no clusterisation of partners, but rather a more holistic coordination of multi-sector programming.

⁷⁷ In September 2019 this Ministry was reorganized to become the Ministry for Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine, and in March 2020 Veterans Affairs was separated out so the Ministry is now called the Ministry for Reintegration of Temporarily Occupied Territories of Ukraine.

⁷⁸ In February 2020, the President placed a Deputy Prime Minister in charge of a new ministry for eastern Ukraine, which should help overcome some of the challenges of inter-ministerial coordination experienced by MinTOT.

⁷⁹ USAID hosted periodic coordination meetings of development donors, mainly to exchange information. At the project level, coordination is stronger, for example the UNDP's Recovery and Peacebuilding Programme unites several donors (including DG NEAR-SGUA) and ensures coordination with similar activities. There is a similar coordination group for the stabilisation and peacebuilding donors, which includes FPI.

between the (institutional and Kyiv-centred) reform agenda and the (operational and sub-national) humanitarian response is wide. There are some aspects of the national reform agenda that are incomplete or difficult to apply along the contact line, for example decentralisation,⁸⁰ energy policy (see box), as well as education and health reform,⁸¹ as a result of which many government services in the GCAs remain below standards, and humanitarian needs are sustained.

In the absence of a clear government policy on bridging the humanitarian-development nexus in Donetsk and Luhansk oblasts, most donors (EU included) have been working on their internal humanitarian-development nexuses (see section 5.2.6 below), rather than pursuing a system-level humanitarian-development discussion. The UN has attempted to bridge this gap, but the first nexus process (2016-2018) was too formal, UN-centric and humanitarian-driven, ⁸² and did not properly connect with Government or development donors and multilateral development banks. A new process was launched in late 2019, led by a new UN Coordinator and fresh energy. DG NEAR-SGUA and DG ECHO were both fully engaged in this newly created "Humanitarian-Development Nexus Forum," and this was later transformed in July 2020 into a 'Recovery and Reintegration' working group under the development coordination system and focused upon eastern Ukraine. Stakeholders are optimistic that this rebooted approach (more inclusive of development donors and government), will do better than its predecessor at bridging the nexus.

4.2.6. Coordination between EU humanitarian and development instruments

14. DG ECHO has made substantial efforts to encourage EU humanitarian-development coordination.

Within the EU family, DG ECHO has liaised closely with DG NEAR-SGUA and FPI since 2015, including deliberate complementary planning with Ukraine's exceptionally large IcSP allocation.⁸³

During HIPs 2015-2016, DG ECHO mainly advocated for other Commission services to do more in the east, and in particular in the GCA areas far from the line of contact from which DG ECHO was withdrawing. In 2017 attention to the nexus made a step change, as DG ECHO persuaded DG NEAR-SGUA, FPI and EEAS to develop a JHDF – a document to record joint analysis, shared goals and coordination of labour, and reportedly one of only a dozen within the EU at this time. The JHDF process was boosted by senior leadership from DG ECHO and DG NEAR-SGUA undertaking

Good practice

Joint missions to Ukraine by senior officials from DG ECHO and DG NEAR-SGUA were key to advancing shared understanding and solutions to nexus challenges.

several joint missions from Brussels, good inter-service collaboration in Kyiv and Brussels, and a planning workshop in Kyiv. On the programming side, in November 2017, DG NEAR-SGUA put in place Special Measure C(2017) 7515 to allocate EUR 50 million for the eastern region (see also Figure 8). This combined effort culminated in a JHDF document for the period 2017-2020, released in February 2018 (around the same time as the Government released its IDP strategy). Based on the JHDF's coordination of labour between the different EU services, DG ECHO's 2018 HIP was focused on fewer priority areas.⁸⁴

⁸⁰ The 10 July 2019 monitoring report of the Ministry of Regional Development shows that to date very few of the new decentralized government structures known as ATCs have been created in the raions near the contact line in the GCAs. This could be for several reasons, including reluctance on the part of current hromady to associate, concerns about absorbing responsibilities without resources, permissions to hold elections not being granted by electoral authorities, or simply being scheduled for a later round of amalgamation. For whatever reason, the delayed implementation of local governance reforms in these regions has left many communities in a limbo between two governance models, and when this is combined with overall resource shortages, the effectiveness of local governments in these regions is weaker precisely when it needs to be strongest.

⁸¹ The main concerns with education and health reforms are that they are premised upon reforms in local governance (since local governments are to assume many of the responsibilities currently carried by higher levels of government) but these are incomplete, and designed around normal patterns of population and service distribution. In the GCAs close to the contact line, the population densities and service systems have been disrupted or reduced, without sufficient compensatory measures from government that recognise the extraordinary circumstances of these raions.

⁸² DG ECHO's actions with UNOCHA 2017-2018 included support for an UNOCHA-led humanitarian-development nexus working group within the HCT which supported a nexus approach for the UN Programme Framework 2018-2022. In the 2018 UNOCHA action, the focus on the nexus became even sharper, and in March 2018 UNOCHA hosted a Humanitarian-Development Nexus workshop involving 60 participants from Government, UN, donors and NGOs. However, this early work on the nexus lost energy later in 2018.

⁸³ Complementary programming in humanitarian demining, MHPSS, IHL and social cohesion.

⁸⁴ However, see Figure 13 above, which shows that actual financial allocations in 2018 were not as focused as DG ECHO intended.

In 2018 and 2019 there was discussion about a possible update, but DG NEAR-SGUA and FPI

considered that the JHDF's main purpose had been achieved and saw limited benefit in a new process to update it when their programmes were mostly locked in – especially since the JDHF planning period was ending in 2020. A stock-taking in late 2019 concluded that there was no need for an update, that satisfactory progress was being made in all sectors except health, and that the best way to move forward was to work together on a follow-up to the JHDF.85

The JHDF has not been without its frustrations. DG NEAR-SGUA saw the process to develop the JHDF as too formal and heavy, and some staff saw it as too focused upon funding and not enough on complementary planning. For its part, DG ECHO felt that DG NEAR-SGUA was not moving quickly and closely enough to the pressing needs in the areas of the GCAs near to the contact line, and particularly not doing enough in the health sector (see box).

The evaluation team's conclusion is that underlying these different perceptions, there is incomplete understanding on both sides about their respective strategic drivers, planning and programming systems. In particular, there is a wide gap between DG NEAR-SGUA's support for government reforms through structural multi-year initiatives, and DG ECHO's beneficiary-focused short-term initiatives mostly through UN agencies and NGOs. Even when both DG NEAR-SGUA and DG ECHO agree on the importance of more assistance to the conflict-affected regions of

Humanitarian-development cooperation in the health sector

The situation in the health sector is a good example of the gap between the humanitarian and development approaches. The communities along the contact line have exceptional health needs because the population is elderly and there is a high prevalence of disability and chronic illness. DG ECHO believes that the Government should provide health services in this region, and encourages humanitarian service providers to align with and support government health systems rather than create parallel and unsustainable structures. However, Government is not stepping up, in part because health system and local government reforms, combined with the isolation and low population density of the contact line, result in major gaps (especially transport, staff and affordable medicines). In addition, it seems likely that the provision of health services by humanitarian actors serves as a disincentive to the Government to fill those gaps. As a result, the humanitarian community is caught in the middle, and continues to provide services that should be provided by Government.

When DG ECHO looks to DG NEAR-SGUA to help fill this gap, DG NEAR-SGUA takes the position that having a development donor take over the type of NGO programming that is conducted by the humanitarian sector is not efficient or sustainable. DG NEAR-SGUA will only engage significantly in the health sector if the Government itself is fully committed, and then DG NEAR-SGUA can support the Government.

The health sector example is also an illustration of another aspect of the DG NEAR-SGUA/DG ECHO relationship. Each service has its own comparative advantages. In: the health sector, the comparative advantage of DG NEAR-SGUA is probably less in programming, but more in the policy leverage that the whole EU programme provides. R:ather than funding projects, DG NEAR-SGUA could use programme conditionalities and structural advocacy to pressure the Government to sort out the jurisdictional and resource obstacles preventing the provision of nationally-appropriate levels of government health services along the contact line.

eastern Ukraine, how each organisation approaches that is, and will likely always be, very different.

All along, there has been a recognition that it is too soon to speak of development in the NGCAs. There is understandable political reluctance to invest in 'development' in the NGCAs, and furthermore, it is unlikely that *de facto* NGCA authorities would allow development efforts by 'Western donors.' Nevertheless, some development funding could address critical infrastructure issues (e.g., water supply) along the contact line, if political and security conditions allow.

⁸⁵ As of the drafting of the final evaluation report in May 2020, the agreed next steps in the process are on hold due to the restrictions imposed by Covid-19. When normal processes resume, it is expected that DG ECHO would contribute to planning for the next DG NEAR-SGUA programme cycle, that there would be a joint mission of senior DG ECHO and DG NEAR-SGUA officials to Ukraine and a joint planning workshop, and finally that there will be a successor to the JHDF. The sectors of future DG NEAR-SGUA-DG ECHO convergence and the availability of future funding from DG NEAR-SGUA and FPI, all remain to be determined. What was clear from interviews was that DG NEAR-SGUA would have no objection to future work including initiatives to improve government services and to reduce vulnerabilities in the affected regions of eastern Ukraine, and that DG NEAR-SGUA is willing to be informed by the recently rebooted nexus discussion convened by the UN. However, DG NEAR-SGUA would be designing its future programme around the agreed strategic priorities of the EU and the Government of Ukraine while taking the crisis into consideration – not exclusively designing its future programme around the crisis, or as an exit strategy for DG ECHO.

Case study: DG ECHO as a coordinator

DG ECHO is a key coordination actor globally and in Ukraine. This case study breaks down how this looks in the Ukraine situation, according to four aspects of coordination: knowledge and expertise, financing of coordination, convening external stakeholders, and finally, convening EC partners.

Findings regarding DG ECHO knowledge and expertise

- The broad humanitarian community felt that DG ECHO added value to programme delivery.
- EU member states agreed that DG ECHO adds considerable value.

DG ECHO's comparative advantage in coordination begins with the quality of its country analysis, which is built on corporate systems such as INFORM, the IAF and the Forgotten Crises Index. These tools were not closely examined in this evaluation, but together build a foundation for DG ECHO's knowledge base and external credibility. At country level, the team heard that EU MS regard the HIPs as an independent validation of HCT priorities, and that several smaller EU MS follow the lead set by the HIPs. Finally, DG ECHO's strong field office with experienced staff, access to the field, and its unique access to the NGCAs, allow DG ECHO to be a primary source of information for the donor community (including DG NEAR). Certainly, other donors greatly value the first-hand perspectives provided by DG ECHO at periodic briefings in Kyiv.

DG ECHO also shapes the direction of the response indirectly, through its policy and thematic guidance. Since nearly all of the major humanitarian actors hope to obtain DG ECHO funding, when they design their programmes to comply with DG ECHO requirements (for example, gender disaggregation of data, use of common cash standards, or focusing on the 0-5km zone) then these aspects of DG ECHO-centric design tend to be incorporated in their proposals to other donors, and from there they permeate the rest of the response. On occasion, this indirect influence has been reinforced by workshops and briefing sessions for IPs that have been facilitated by DG ECHO's thematic technical experts when traveling to Ukraine on mission.

Findings regarding DG ECHO financing of coordination actors and activities

- DG ECHO has been a strong supporter of humanitarian coordination in Ukraine.
- DG ECHO contributed substantially to establishing joint and impartial needs assessments.
- The creation of the ACCESS consortium had more effectiveness than efficiency benefits.

Despite some early concerns about UNOCHA's capacity and performance, DG ECHO worked closely with UNOCHA to ensure that they could be funded consistently from 2015 onwards - and in 2020 UNOCHA is reportedly the first organisation in Ukraine to benefit from a pilot initiative of multiyear programming. Even though INSO was not able to maintain a full-scale operation in Ukraine, DG ECHO support for INSO in 2016 was regarded by INSO as instrumental in launching their security work at a critical time. Beyond these institutions, DG ECHO used their arrangements with IPs to fund the coordination costs of several clusters (evolving over time), as well as the NGO consortium. Finally, three special initiatives stand out in Ukraine: the structural and long-term support that has enabled REACH to become the reference provider of comprehensive assessments (which mirrors DG ECHO's support to REACH at the global level as part of DG ECHO's Grand Bargain commitment to support joint needs assessment), the creation of the ACCESS consortium, and finally the support to the UHF - the first time globally that DG ECHO has supported a country-based pooled fund.



Findings regarding DG ECHO's convening of external stakeholders

- DG ECHO has been a strong coordination actor in its own right.

In 2014 and early 2015, prior to the full mobilisation of UNOCHA, DG ECHO actively coordinated humanitarian donors and implementing agencies, and had a major influence over the early strategy of the overall response. From that early period, DG ECHO has continued to convene the highly regarded Humanitarian Donor Group in Kyiv.

In order to maintain support for Ukraine in the face of pressures from other emergencies, DG ECHO convened regular briefings for MS in Brussels, both informally and more formally through the COHAFA. DG ECHO has supplemented this with periodic outreach events across Europe (together with IPs), as well as facilitated field visits to eastern Ukraine by COHAFA members and Kyiv-based representatives of MS. Put together, DG ECHO stands out (alongside the USA) as a leader of the humanitarian donor community in Ukraine.

Finding regarding DG ECHO's convening of European Commission partners

- DG ECHO has made substantial efforts to encourage EU humanitarian-development coordination.

Although not without its challenges, DG ECHO coordination with DG NEAR-SGUA and FPI/IcSP



COHAFA delegation visiting Ukraine in 2017



Tweet from ACCESS, promoting a DH ECHO-funded outreach event in Berlin in 2017

has improved over time, and took concrete form with the drafting of the JHDF in late 2017. The JHDF was one of the first such documents in DG ECHO's experience, and all the parties intend to maintain their collaborative planning after the end of the first JHDF period. In addition, it is noteworthy that this evaluation itself has benefited from the full engagement of DG NEAR-SGUA, both in the Interservice Steering Group as well is in the recommendations workshop in Kyiv.

Recommendations

The evaluation team did not make specific recommendations regarding coordination, because this is an area of DG ECHO strength. The highly valued work of DG ECHO in convening the Humanitarian Donor Group, and support for coordination actors should continue (including financing of the ACCESS consortium and the UHF – if their performance and cost-benefit are justified). Furthermore, DG ECHO should continue its encouragement of improved system-wide nexus coordination, as well as specific engagement with DG NEAR-SGUA and IcSP on the follow-up to the JHDF.

If there are two aspects of coordination within the EC that DG ECHO could pursue further, they would be (a) to work with EEAS to place humanitarian access to the NGCAs higher on the agenda (careful to avoid politicizing the issue), and (b) to work with DG NEAR-SGUA to ensure that the nation-wide governance and sectoral reform initiatives supported by development donors are structured and implemented in ways that recognise and reduce humanitarian vulnerability along the contact line.

4.3. EU value-added

4.3.1. Value-added to all humanitarian stakeholders

15. The broad humanitarian community felt that DG ECHO added value to programme delivery and at the policy and system level.

The evaluation team found that the overwhelming majority of stakeholders had a positive view of DG ECHO's value-added (see Annex 1). This was confirmed by the scorecard (Annex 3), where donor perceptions of DG ECHO's performance were similarly high. Through the document review, and especially through the interviews with MS, DG ECHO was felt to add value in three main areas:

DG ECHO added value for overall programme delivery in these ways:

- the speed of DG ECHO's start-up funding had a catalytic effect on the whole donor community ("getting the ball rolling");
- the scale of DG ECHO's funding helped create a healthy "humanitarian ecosystem" a situation
 where there was a diversity of actors and donors, allowing for innovation, competition and
 creating space for specialised organisations on issues like disabilities and the elderly, as well as
 a critical mass of support for the UHF;
- DG ECHO's programming was sensitive to filling gaps: for example, attracting funding to the NGCAs, addressing underfunded sectors like protection, MHPSS and education, and increasing emphasis on the elderly through the inclusion of HAI in the ACCESS consortium;
- encouraging operational efficiencies such as increased use of cash and voucher assistance, and the creation of the ACCESS consortium; and finally
- funding common services that strengthened the whole response (REACH, UNOCHA, INSO and cluster coordination).

DG ECHO added value at the policy and system level by:

- facilitating coordination of the humanitarian response, before handing over to UNOCHA in 2015;
- actively strengthening system coordination through its support for UNOCHA and the UHF;
- coordinating humanitarian donors (in Brussels and through the HDG);
- developing common advocacy positions, and then strengthening their delivery by engaging the EU Ambassador, and through him, other embassies in Kyiv;
- representing the humanitarian donor community (e.g., at extended meetings of the HCT, on the Advisory Board of the UHF, and in consultations with MinTOT); and
- maintaining EU visibility and MS attention on the humanitarian dimension of the conflict.

4.3.2. Value-added to EU member states

16. EU member states agreed that DG ECHO adds considerable value above and beyond the efforts of individual donor governments.

The third general area of value-added was specifically for EU MS. In addition to the community-wide benefits cited above, in interviews the MS highlighted these specific benefits. DG ECHO:

- was a major source of information and advice on humanitarian programming for MS at Brussels and Kyiv levels – for example some MS without humanitarian expertise felt that DG ECHO provided an expert-validated "seal of approval" on the proposed strategy of the HCT;
- informally represented MS at extended HCT meetings and on the UHF Advisory Board;
- facilitated MS understanding of (and occasionally access to) the NGCAs, thereby helping MS to better plan their own programmes;
- carried humanitarian advocacy messages that might be difficult for separate MS;⁸⁶
- gave MS without their own humanitarian programme a way to participate (especially Baltic MS);
- supported activities in the NGCAs that some MS could not support bilaterally;
- responded flexibly to changed situations, in ways many MS cannot do bilaterally;

⁸⁶ For example, common messages on the humanitarian crisis in Ukraine adopted at COHAFA on 16 December 2014

- monitored some partners and activities "by proxy," giving MS a higher level of confidence in their own investments; and finally
- facilitated MS and EU committee visits (for example under the Council working party on Humanitarian Aid and Food Aid (COHAFA), and a visit by the President of the European Council).

The foundation for these many aspects of added value was the strong and stable country team, backed up by regional technical expertise, with funding at scale, and access to the NGCAs. However, it is important to note that these key assets would be undermined if DG ECHO were not also able to operate with humanitarian independence (see section 5.2.1).

4.4. Effectiveness

4.4.1. Achievement of results

17. DG ECHO has been effective in reducing the humanitarian needs in eastern Ukraine

The challenge of assessing outcome results in the absence of programme objectives

The evaluation team has found it difficult to determine with certainty what were the outcome-level results of DG ECHO's programming in Ukraine: what difference DG ECHO has made in reducing the vulnerabilities and enhancing the well-being of the affected population. The team does not doubt that DG ECHO has made an important difference, but measuring and proving effectiveness with objective indicators has been problematic for several reasons.

First of all, DG ECHO itself does not have country-specific key performance indicators against which its programme or actions need to report (preventing the roll-up of outputs to an outcome level), nor does DG ECHO set annual results targets at country level.⁸⁷ or

report on country-level results.88

Second, there is very little longitudinal data on overall humanitarian trends in Ukraine, and when such data has been derived (for example the REACH trends analysis of 2019, see box) the trends do not clearly show significant change in the main humanitarian indicators. To some extent, this is because analysing trends is not the main thrust of these reports, which (like the HRPs) instead

In terms of humanitarian needs and trends from 2018, very few changes were observed, with slight improvements in some indicators (daily water shortages, receiving humanitarian assistance) along with slight deterioration in others (difficulties in accessing healthcare, households borrowing food)

REACH, Analysis of Humanitarian Trends, July 2019

tend to emphasise the current needs and especially the data that justifies the need for continued humanitarian funding, and to some extent inform targeting.

Third, most DG ECHO funding is a co-mingled contribution to a partner programme that is also funded by one or more other donors – rendering it difficult to separate out what might have been DG ECHO's results from the results achieved by other donors to the same organisations.

Fourth, the amount of humanitarian, development, government and private resources flowing into and through the affected GCAs of Ukraine areas are such that it would be hazardous to attribute any specific improvement in the general humanitarian situation to DG ECHO funding.⁸⁹

⁸⁷ HIPs provide an assessment of country needs, and list target sectors and locations in order to guide project proponents towards certain preferred investments, but HIPs are not strategic planning documents that can form the basis for assessment of country-level performance.

summarized the ongoing needs and constraints, and provided some general information. For Ukraine, in 2018, the Annual Report summarized the ongoing needs and constraints, and provided some general information, but no report on DG ECHO's results: "After four years of conflict, humanitarian needs persist in eastern Ukraine. The conflict has affected over 4.4 million people, out of which over 3.4 million are estimated to be in need of humanitarian assistance mainly in the non-government-controlled areas (NGCA) and along both sides of the contact line. This includes over 1.5 million IDPs and hundreds of thousands Ukrainian citizens who have fled to neighbouring countries. Despite the action of the humanitarian community since the beginning of the conflict, lack of humanitarian access and adverse political and security developments over the past year have led to deterioration of the humanitarian situation. The humanitarian response is challenged by a combination of factors, notably the high politicisation of the conflict and the decreased funding allocation of humanitarian donors. The EU, together with its member states, remained one of the largest humanitarian donors, with a total of EUR 232 million support in 2018. DG ECHO continued to provide life-saving assistance to the most vulnerable conflict affected population living in the most exposed conflict areas while promoting for a smooth transition to medium and long-term assistance in other areas of eastern Ukraine." DG ECHO, *Annual Activity Report*, 2018.

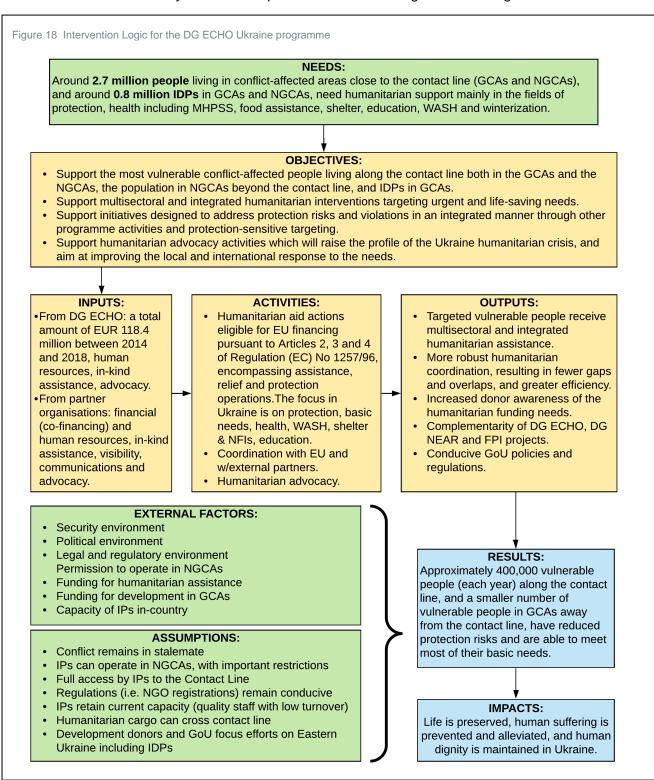
⁸⁹ Similarly, wherever the situation is reported to be deteriorating, for example as savings diminish and government services are reduced, this also cannot be considered to be a failure of humanitarian assistance and DG ECHO.

Finally, even if there are fragments of data that can tell a partial results story in the GCAs, there is no such data on the NGCAs, for reasons outlined elsewhere in this report.

In the absence of a strategic plan at country level, and data that can prove a causal link between DG ECHO's substantial contributions and improvement in conditions on the ground, the team has gathered two other types of evidence: evidence of contribution, and qualitative evidence.

Contribution analysis

The team's contribution analysis is based upon the Intervention Logic shown in Figure 18.90



⁹⁰ This intervention logic was based upon the HIPs, and then adjusted during the course of a working session with the DG ECHO Kyiv team during the inception phase.

The evaluation team did not propose or deploy a full contribution analysis, which is an evaluation methodology in its own right. However, a "light" contribution analysis was done by taking the agreed intervention logic of Figure 18, and testing (with reference to the terminology in Figure 18) whether the activities were undertaken, whether the outputs and results were achieved, and whether the assumptions remained valid. If these four elements are all confirmed, i.e. if the links in the results chain are all confirmed, then, according to the theory of contribution analysis, it can be generally concluded that the intervention <u>contributed</u> to the impacts.

For this light contribution analysis, the team first of all started right at the level of the activities, and mapped the output performance of each of the 65 actions against its targets (see Figure 19).⁹¹ This analysis determined that the vast majority of the actions funded by DG ECHO in the evaluation period exceeded their agreed output targets. Furthermore, in most of the instances where outputs were not exceeded, this was due to factors beyond the partner's control (such as interrupted access to NGCAs).

Figure 19 Achievement of output results (numbers of beneficiaries reached in relation to targets): Source DG ECHO FichOps

Partner	2014	2015	2016	2017	2018					
ACF		P1 - overachieved	P2 - overachieved							
Caritas		P1 - partly achieved								
DRC	P1 - partly achieved	P2 - overachieved		P3 - overachieved						
GOAL		P1 - overachieved	P2 - overachieved							
HelpAge					P1 - overachieved					
HI		P1 - overachieved								
ICRC	P1 - partly achieved	P2 - overachieved	P3 - partly achieved	P4 - overachieved P5 - partly achieved	P6 - overachieved					
IFRC	P1 - overachieved									
INSO			P1 - partly achieved							
IOM	P1 - overachieved	P2 - overachieved	P3 - overachieved		P4 - n/a					
MdM		P1 - overachieved	P2 - overachieved							
NRC		P1 - overachieved	P2 - overachieved							
PAH		P1 - overachieved								
PIN	P1 - overachieved	P2 - overachieved	P3 - overachieved	P4 - overachieved	P5 - n/a					
PUI		P1 - partly achieved	P2 - overachieved	P3 - overachieved	P4 - n/a					
STC	P1 - overachieved	P2 - overachieved	P3 - overachieved	P4 - overachieved	P5 - overachieved					
UNHCR	P1 - overachieved	P2 - overachieved	P3 - overachieved	P4 - overachieved						
UNICEF	P1 - overachieved	P2 - overachieved	P5 - overachieved	P6 - overachieved						
		P3 - overachieved								
		P4 - partly achieved								
UNOCHA		P1 - partly achieved	P2 - fully achieved	P3 - partly achieved	P4 - partly achieved					
WFP	P1 - overachieved	P2 - partly achieved	P3 - overachieved							
WHO	P1 - fully achieved	P2 - overachieved								
overachiev	ed = total number of b	eneficiaries (individuals a	and/or organisations) hig	gher than planned						
fully achiev										
partly achie										
n/a = data is not available										
P = Project	P = Project, listed in sequence of approval by DG ECHO									

Measuring outputs is, however, a rather crude measure of performance, because the type of assistance varied widely (compare for example, the "number of houses repaired" with the "number of people participating in an awareness session"), some projects counted beneficiary transactions (e.g. medical consultations) not unique beneficiaries, thereby allowing some double-counting of beneficiaries, and the integrity of beneficiary counting methods varied widely. ⁹²

⁹¹ For most actions, results were counted as the number of beneficiaries reached/served. For coordination projects (UNOCHA, INSO) the beneficiaries were participating institutions - a factor over which the partners usually had little control.

⁹² For example, some partners with funding from multiple sources will "allocate" a number of beneficiaries to the DG ECHO project somewhat arbitrarily and in a way that guarantees achievement of targets; other organisations changed their beneficiary counting methodology in mid-project, while others changed the nature of assistance provided.

In order to get a fuller results story, in a contribution analysis, it is important to analyse all the links in the intervention logic right through to the impacts. When looking along the chain at the next level (the five programme outputs in the intervention logic), the evaluation team determined with a high level of confidence that all five of the intended outputs of the DG ECHO intervention logic were achieved. Each of these five has also been examined in detail in its respective chapters of this evaluation report (see Figure 20).

Multisectoral and integrated

From a public (and taxpayer) accountability perspective, it is the first of the intervention logic outputs that is most important: that "targeted vulnerable people receive multisectoral and integrated humanitarian assistance." The targeting of vulnerability was well-demonstrated through the project documents and through the shifting geographic focus, and has been discussed at some length in sections 5.1.1 on vulnerability targeting, 5.1.3 on the relevance of HIPs, and 5.1.4 on geographic focus. Although we discuss below some of the

Intervention logic output **Evaluation evidence** Targeted vulnerable people Relevance: 5.1.1, 5.1.3, 5.1.4 receive multisectoral and Effectiveness: 5.4.1 integrated humanitarian Case Study on reaching the elderly assistance More robust humanitarian Coherence: 5.2.3, 5.2.4 coordination, resulting in Efficiency: 5.5.1, 5.5.2 **Case Study on coordination** fewer gaps and overlaps, and greater efficiency Increased donor awareness EU value-added: 5.3.2 of the humanitarian funding Effectiveness: 5.4.2 needs Complementarity of DG Coherence: 5.2.5, 5.2.6 ECHO, DG NEAR-SGUA Sustainability: 5.6.1, 5.6.3 and FPI projects Case Study on humanitarian -development nexus Conducive GoU policies and Effectiveness: 5.4.2 Sustainability: 5.6.1, 5.6.3 regulations

Figure 20 Analysis of intervention logic for DG ECHO in Ukraine

sectoral characteristics of DG ECHO's programme, in practice many of these components were combined in <u>multisectoral</u> and <u>integrated</u> programmes with broad-spectrum partners (notably ICRC, UNHCR and PIN/ACCESS consortium) that worked mainly on a geographic basis - providing linked packages of services to affected communities, based on evolving needs as assessed through frequent community visits, rather than remotely-planned and sectorally fragmented support.

Protection

Sectorally, DG ECHO was consistent in its support for protection, health, shelter and basic needs (which in turn included, at different times: food assistance, non-food item assistance and cash assistance). In the protection sector, the USA and DG ECHO were the key donors and, between them, helped to assure that the vast majority of the affected population in the GCAs and at the EECPs were protected from immediate risks, and also were able to enjoy their rights as Ukrainian citizens (including social payments). Protection activities were of five main types: (1) a major focus was upon legal access to services, including support for beneficiary legal awareness, legal training for NGOs and government, legal counselling services (in cities and at the EECPs), the NRC package of "Information, counselling and legal assistance," and support for the drafting and promulgation of legislation and regulations; (2) "protection by presence" which included frequent visits to isolated and contact line communities, regular engagement with communities and officials (especially in the GCAs), material support to isolated communities and households (which provided an opportunity for a "protection check"), and activities at the EECPs; (3) material assistance to persons facing a specific protection risk (Individual Protection Assistance, including some targeted support for the elderly and the disabled experiencing particular risks); (4) humanitarian de-mining and mine risk awareness; and (5) support for the protection cluster.

Health

Even though there is insufficient data on health outcomes along the contact line, DG ECHO's attention to health was signaled by the health cluster and by partners as having been vital to maintaining essential health services along the contact line, as well as key structural support for the primary and secondary Ukrainian health institutions. Health assistance was of five main types: (1) support for mobile health services including peripatetic support for Government clinics in underserved areas along the contact line; (2) the provision of medical supplies to chronically ill persons, and transport vouchers to permit isolated people to access their health services; (3) psychosocial support especially to children

and to a lesser extent to SGBV survivors; (4) material support (supplies, equipment, light repairs) to official health centres of all sizes on both sides of the contact line; (5) first aid training; and (6) support for the health cluster.

Shelter

Similarly, DG ECHO support for the pressing shelter needs (especially in the 2015-2017 period) was instrumental in ensuring that the vast majority of the affected population along the contact line met the minimum standards of shelter ("one warm room") by the end of 2018. The nature of shelter assistance evolved considerably throughout the conflict, starting with (1) immediate assistance to displaced people in collective centres; then (2) emergency repairs to damaged buildings in the most conflict-affected areas along the contact line; then (3) light repairs to allow houses to secure "one warm room"; and finally (4) heavy repairs to houses severely damaged by shelling. At the same time, assistance was provided (5) to confirm land and property rights, and for legal recourse to obtain compensation for damages caused by military actors; for (6) the restoration of community livelihood opportunities (for example kitchen gardens and small-scale livestock); and (7) shelter cluster coordination. The shelter sector is where the humanitarian needs were closest to being fully met, and as a result, in 2019 the shelter cluster was in the process of winding down its work.

Coordination

Regarding the second output, coordination,⁹³ not only has DG ECHO invested heavily in the operations of coordination agencies (UNOCHA and INSO) and in coordination functions (supporting civilian-military coordination, needs assessment, cluster coordination, NGO coordination and the UHF), but DG ECHO has itself facilitated coordination especially early in the response before UNOCHA was set up, and by convening the HDG. Coordination is so important, that DG ECHO globally gathers country-level readouts of the quality of humanitarian coordination, so that DG ECHO HQs has the information needed to contribute to global processes to improve the overall coordination of humanitarian response.

Coordination between donors (especially the financial tracking table maintained by DG ECHO for the HDG) helped reduce gaps and overlaps in funding, and reinforced a more rational division of labour between donors. At the sector level, cluster coordination served a similar function of introducing agreed standards (especially in cash and in technical areas such as health and shelter), mapping activities to help ensure coverage of gaps, harmonising advocacy messages, and permitting some pooling of knowledge and expertise. Coordination also took place geographically – somewhat formal and cumbersome in the GCAs -- but more usefully in the NGCAs, where there were fewer actors, and sharing of information and a clear division of labour was particularly important for getting the best results from scarce resources. Finally, it should be signaled that the coordination of multi-sectoral needs assessments through REACH was regarded by all stakeholders as highly effective.

Donor awareness of humanitarian needs in Ukraine

Outreach to other donors and to EU member states has been a feature of DG ECHO activity. As far as the team can establish from interviews with donors, DG ECHO has been more proactive in this regard than any other donor, including the organisation of periodic member state briefings in Brussels and in Kyiv, facilitated COHAFA visits, and structured outreach events in European capitals. The information provided by DG ECHO to member states, especially the level of understanding stemming from DG ECHO's fieldwork and information on the situation in NGCAs, was seen as a key element of DG ECHO's value-added. The evaluation team's assessment is that, without the efforts of DG ECHO (and to a lesser extent the USA) to keep the spotlight on Ukraine, the critical mass of support for the Ukraine response would probably have dried up by now, and many organisations (for example UNOCHA) would not have been able to remain in Ukraine as long.

Complementarity with other EU services

Regarding the complementarity of DG ECHO with the work of other EU services, the evaluation team's assessment is that DG ECHO did as much as it could to ensure this, although the flexibility of all services to adjust their programming was constrained by their respective mandates and priorities, and

⁹³ The link between coordination and effectiveness is central to the humanitarian system: "Humanitarian coordination seeks to improve the effectiveness of humanitarian response by ensuring greater predictability, accountability and partnership" (OCHA website: https://www.humanitarianresponse.info/en/coordination), but even this is hard to prove because the evidence is mainly anecdotal. For example, the 2019 *Evaluation of the European Union's humanitarian assistance in the Central Africa region, including humanitarian coordination, 2014-2018* concluded that "DG ECHO's support to humanitarian coordination assumes that humanitarian coordination is a key driver of effectiveness in any humanitarian response. The review includes multiple pieces of anecdotal evidence that humanitarian coordination is strengthening the effectiveness and efficiency of humanitarian responses" (p 102).

their different planning processes. The only area where there was a significant gap between services was in health, where DG ECHO urged DG NEAR-SGUA to take on a greater share of programming.

Conducive policies and regulations

Finally, regarding the fifth output of the intervention logic, "conducive policies and regulations," this was the key area of DG ECHO advocacy. In the next section of this report (5.4.2), we make the case that, in the GCAs, DG ECHO's advocacy work might have been as important for all-round effectiveness as DG ECHO's project activities, since this advocacy helped unlocked access to government services that are delivered at greater scale (and more sustainably) than humanitarian actions. Unfortunately, humanitarian effectiveness (and efficiency) are still harder to attain in the NGCAs, where access remains difficult, and the range of permitted activities is narrow and unpredictable.

Overall results

For the third component of the contribution analysis, the evaluation team considered the overall scope of the programme and the nature of the supported actions, the numbers of beneficiaries targeted and reached across the five years under review, and the overall situation of the affected population. Although there is less data on the NGCA side, the team nevertheless concluded that the target number of 400,000 vulnerable people each year have reduced protection risks and are able to meet most of their basic needs. If we consider counterfactuals, there were certainly no protection crises or acute gaps in basic needs reported during the evaluation period, and as time went on it was clear that DG ECHO and its partners were reaching more into the "forgotten corners" of the response: the hardest-to-reach people, and the most isolated settlements. By the time of the evaluation team's field visits in 2019, the communities along the contact line (especially in the GCAs) were largely stable, and most public services had resumed (albeit at less than optimal quality, and some administrative and financial services were limited in the 0-5km zone).

Assumptions of the intervention logic

Finally, the evaluation team reviewed the assumptions of the intervention logic. These all remained valid, although there was progress on some (access to the contact line, and conducive GoU regulations) and some increased difficulty with others (IP operation in the NGCAs).⁹⁴

All in all, the light contribution analysis allows the team to conclude with confidence that the impact has been achieved: "life has been preserved, human suffering has been prevented and alleviated, and human dignity has been maintained in Ukraine."

Qualitative analysis

The second way the team assessed effectiveness was qualitative. This was the primary method used by the evaluation team to answer all the evaluation questions, using several triangulated streams of evidence, 95 and to the extent possible converting patterns in the qualitative evidence into quantitative scores.

The results reported in project documents showed that partners were performing well, but it was also evident to the team that the rigid framework of the eSingleform (proposal and reporting) did not tell the full story of results. Furthermore, the team observed that the quality of IP reporting was often weak, requiring DG ECHO to seek multiple additional details on final reports before being able to close out actions. Only through field monitoring, could DG ECHO fully understand what was really happening in projects, and properly assess their results (see section 5.5.3).

The aggregate results of the evaluation team's qualitative analysis are found in section 5.8 below, and the details are found in Annexes 1-4. The consensus of the different sources was that DG ECHO's achievement of results was "strong," and one of the better measured parameters across the whole evaluation. When timeliness and appropriateness of modalities were considered (as aspects of effectiveness), the consensus was more muted, with an overall score of "good" (and some variation according to the evidence source).

⁹⁴ Very recently there have been some significant disruptions due to Covid-19 (notably the tightening of the border to humanitarian cargo deliveries), but these disruptions are not thought to be permanent.

⁹⁵ Sources of this qualitative evidence were the review of approximately 190 documents (including assessments made by DG ECHO staff in the Fichops on the performance of 38 actions), the 98 key informant interviews, the mini-survey/scorecard with 72 responses, the FGDs, and the field visits made by the evaluation team members (10 full-day field visits with nine IPs).

In addition to achieving results, there is evidence that DG ECHO continually sought to improve their results by responding to observed trends and adjusting the focus of their programme. For example DG ECHO increased emphasis in areas of performance weakness (MHPSS and attention to age and disability), moved away from sectors or locations where the activities were strong but the number of beneficiaries were decreasing (shelter in GCAs), and discontinued support for partners that were assessed as performing poorly.

Combining the two analytical approaches, sectors that seemed to the evaluation team to be particularly well performing were protection (where legal aid has had the effect of unlocking substantial Government resources), shelter (where most emergency shelter needs in GCAs have now been covered), and health (especially supply of medicines and vouchers for people with chronic illnesses). In all three of these sectors, the "essential humanitarian needs" have now mostly been met (see section 5.1.4).

DG ECHO's support for services at the EECPs was very effective and had particular benefits for the elderly who make up the bulk of people crossing the contact line. Appropriately, in 2020, steps are well advanced for some of those services to be handed over to the Government authorities and local NGOs. The team did not visit sites of water infrastructure repairs, but appreciated their importance and their high cost-effectiveness in a context where very large numbers of beneficiaries on both sides of the contact line rely upon piped water (see 4.5.2). Finally, although only a minor component of the DG ECHO programme, investment in kitchen gardens provided a low-cost and high-impact way of boosting household food security.



Electric shuttle assisting the elderly to cross the Stanitsa Luhanska EECP (photo with permission)

By agreement with DG ECHO, the evaluation team did not visit field sites in NGCAs. However, interviews and document review related to the NGCAs show that DG ECHO actions achieved most of their expected outputs in NGCAs as well, although access was difficult and sometimes interrupted, late endorsement of some projects by the *de facto* authorities delayed implementation, the range of possible programming was restricted, and data for targeting and reporting was difficult to obtain.

To summarise the analysis of effectiveness: when the qualitative evidence of the interviews, FGDs, survey and site visits is considered alongside the contribution analysis, the evaluation team has two types of analysis that confirm DG ECHO's effectiveness, and therefore is confident in concluding that DG ECHO has achieved its intended results in Ukraine, leading to an overall assessment of "good" (section 5.8).

18. DG ECHO provided an appropriate mix of cash and in-kind assistance.

As part of the effectiveness line of enquiry, the team looked at whether DG ECHO used the appropriate modalities - specifically regarding cash or vouchers, or in-kind assistance. Cash was slow to take hold in the Ukraine humanitarian response, largely because Ukraine did not have experience with humanitarian programming prior to 2014, and so both the institutions and staff had to learn about the effectiveness of cash and set up appropriate systems from scratch. DG ECHO favoured the cash modality as soon as it was established, ⁹⁶ and actively supported the Cash Working Group. Highly targeted vouchers and subsidised medical insurance were also widely used by DG ECHO partners in Belarus and the Russian Federation.

The only criticism expressed to the evaluation team about the cash programme (heard from some partners and some beneficiaries) was that the transfer value of multi-purpose cash was not sufficient to meet the minimum expenditure basket, although it did follow the Cash Working Group recommendations. There were also several situations where DG ECHO partners concluded that cash

⁹⁶ Review of Fichops determined that 17 out of 22 partners used cash in at least one year: organisations not using cash were UNOCHA, INSO, WHO, UNICEF and HAI. Although the perception in interviews was that DG ECHO could have advocated more for cash and earlier, the evidence of the Fichops is that 16 of the 17 organisations using cash did so in 2014 or 2015.

and voucher assistance was not the appropriate modality, or allowed the beneficiaries to determine the modality best suited to their situation. Some of the more common reasons for not providing cash were the economies of scale with bulk procurement (for example education and building supplies), or lack of target beneficiary mobility, or poorly functioning markets. The evaluation team was informed that the possibilities of cash and voucher assistance are severely limited in the NGCAs, partly because of great reluctance from the Government to allow cash transfers to individuals in the NGCAs on security grounds, and partly because of the absence of recognised financial institutions. Nevertheless, some voucher systems have been used in the NGCAs by NGOs, and an expansion of voucher use would seem desirable if and when it is possible.

4.4.2. Advocacy results

19. DG ECHO's advocacy was effective, but there is still more to be done on access to the NGCAs and on the humanitarian-development nexus.

The evaluation team analytically distinguishes between strategic and tactical advocacy. Strategic advocacy was particularly important in the early stages of the response, when the situation was fluid, when the major strategic decisions were being made by the Government and the humanitarian community, and when policy positions were soft and amenable to influence. As discussed earlier (see sections 5.2.4 and 5.3.1) DG ECHO was key to (1) drawing global attention to Ukraine and overcoming perceptions that it was a temporary or "middle income" crisis not requiring a full humanitarian response, (2) persuading the Government to allow assistance to the NGCAs at a time when this was seen as "helping one party to the conflict" (and when registration with de facto authorities was seen as implying recognition), (3) persuading the Government (through policy conditionality of the EC's Directorate-General for Economic and Financial Affairs) to report on and increase assistance to IDPs – which was the trigger for DG ECHO (and other donors) to re-focus assistance on the contact line and NGCAs, (4) persuading the humanitarian community to move their centre of gravity to the east (only partially successful as all clusters remain based in Kyiv), and (5) paving the way for targeted in-kind assistance and cash (rather than internationally-sourced humanitarian convoys). Still at the strategic level, more recently DG ECHO contributed to system-wide advocacy for a Humanitarian Law in Crisis Situations (not yet approved), and for a Mine Action Law (approved, and then also revised to address some shortcomings).

At a tactical level, DG ECHO has invested significant staff time in working together with other donors, the cluster leads and the NGO Forum⁹⁷ on a large number of specific issues – with varying degrees of success. One component of this was the set of common messages on the humanitarian crisis agreed between DG ECHO and MS in December 2014, and updated in 2017. Some advocacy was undertaken directly by DG ECHO, some was undertaken by the UN, EUD⁹⁸ and other donors on DG ECHO recommendation and/or with DG ECHO support, and still other advocacy initiatives (both at the strategic level and at the technical level) were undertaken by partners with DG ECHO funding. DG ECHO's own advocacy was buttressed by a well-articulated (internal) advocacy strategy.

Over time, advocacy became more deliberate, more clearly included in HIPs (2016 onwards), and became increasingly funded as an explicit objective of actions. Since advocacy themes are well articulated throughout the entire system (particularly through the protection cluster), and all key actors convey the same messages, when there is a policy breakthrough this cannot usually be attributed to any one advocate.

Advocacy initiatives that DG ECHO has supported and that have been largely successful include:

- Adoption of the Safe School Declaration
- Improved conditions (and government taking responsibility) at EECPs
- Strategic litigation on a range of IDP rights (via NRC and UNHCR/R2P)
- Reasonable and enabling requirements for NGO registration (in the GCAs only)
- Personal Income Tax exemption for cash transfers to beneficiaries
- Standardisation of cash packages and inclusion of all cash actors in the Cash Working Group.

⁹⁷ Although the NGO Forum is now closed, while it operated it developed an advocacy agenda and provided advocacy training.

⁹⁸ The active support of successive Heads of the EU Delegation for DG ECHO's work in Ukraine has been substantial and highly valued by DG ECHO, while respecting the humanitarian independence of DG ECHO.

Other advocacy initiatives supported by DG ECHO are still being pursued:

- Increase compliance with IHL by parties to the conflict
- Donors to increase humanitarian funding to Ukraine (via awareness-raising events in European capitals)
- Development donors (and DG NEAR-SGUA) to focus more on transition in eastern Ukraine
- Free movement of people and goods across the contact line (revision to law/regulations)
- Access to NGCAs and permission to support more sensitive sectors (protection, MHPSS)
- Compensation for housing damaged by shelling or occupation (by either side)
- Revisions to the pension payment regulations (reducing the need to cross the contact line).⁹⁹

Finally, during the evaluation team's field mission, the team was informed of emerging advocacy issues, some of which are bordering on the development domain, some of which are now on the DG ECHO agenda and others that the humanitarian and development communities are considering how best to tackle:

- More effective empowerment of local governments in the communities along the contact line
- Improvement of the Government disability management regime¹⁰⁰
- Improved public transport to isolated communities along the contact line
- Financial services in the 0-20km zone (especially small business loans)
- Technical fixes to the Government's affordable medicines programme¹⁰¹
- Ensuring that the Normandy Process disengagement plans do not create new pockets of vulnerability.¹⁰²

While the advocacy agenda in the GCAs is now well established and the various actors are making steady progress, there has been less success regarding advocacy with the *de facto* authorities of the NGCAs. Humanitarian partners working in the NGCAs regularly place humanitarian access high on their advocacy agendas, a new working group on NGCA access has been created by the HCT, and DG ECHO is supporting a study on NGCA access through the ACCESS consortium. However, as the centre of gravity of humanitarian effort follows the needs and continues to move more towards the NGCAs, the problems of access and coverage in the NGCAs are becoming more and more critical to overall humanitarian effectiveness. This is not a new frontier, but it would greatly benefit from some fresh thinking and renewed energy on the part of the whole humanitarian community. It could also be an area for DG ECHO leadership.

⁹⁹ This is generally regarded as the single most important advocacy issue, as this policy is the driver behind the huge number of elderly persons obliged to cross the EECP monthly, in order to receive their meagre pension and social payments. There is reportedly some progress on this in early 2020.

¹⁰⁰ In particular allowing the stacking of social benefits, reduced bureaucratic requirements to obtaining disability certificates required for social payments, no requirement to requalify periodically if the disability is permanent, and improved services to the disabled.

¹⁰¹ The problem seems to be, at least in part, that isolated communities do not have sufficient connectivity to access the online system.

¹⁰² The concern is that, if military forces withdraw to 15km from each side of the contact line without putting in place appropriate arrangements, then this could create a 30-km wide No Man's Land where security and services are limited, placing the civilian population in that zone at additional risk.

Case study: working in hard-to-reach areas

The issue

Since 2015, humanitarian access to the NGCAs has been restricted: there are Government prohibitions on the movement of people, goods and cash across the contact line, and the *de facto* authorities limit which organisations can work in the NGCAs, and in which sectors. There are also pockets of isolation along the contact line in the GCAs, but those access constraints are logistical and not covered here.

Context

The access challenges of Ukraine are not immediate security risks to humanitarian workers and their project assets – this is not a situation like Yemen, Syria or South Sudan. Instead, access problems are the consequence of the creation of a temporary border, separating GCAs from the NGCAs.

The creation and arbitrary location of the contact line have obliged a massive rearrangement of economic, social and administrative flows, interrupting electricity and water supplies, and cutting communities off from their normal and local banks, jobs, schools and hospitals.

Policy decisions on the part of the Government have restricted the flow of people, goods and cash across the contact line, and large numbers of NGCA residents cross at the EECPs every day to access their pensions and social payments in the GCAs.

The de facto authorities in the NGCAs exercise tight control over which organisations can work there, and which activities they can undertake. There are important differences between the de facto authorities in the Luhansk and Donetsk NGCAs: in Luhansk access is limited to few humanitarian agencies and there are no local NGOs, which in some ways has made coordination easier (fewer actors and a clearer division of labour). In the Donetsk NGCA; there are more international and national NGOs allowed to operate. In both NGCAs, there is a preference for "classic" relief programmes, especially non-food items and education or medical supplies, and distrust of activities that address protection, social organisation, mental illness or cash. Over time, humanitarian agencies have learned to live within the operational constraints, and have found ways to



DRC/Danish Demining Group Mine Risk Education taking place at the Contact Line. Photo with permission.

assess needs, access beneficiaries, and monitor project performance. However, they feel they are always walking on eggshells, and that their precarious permission to operate can be withdrawn at any time, for any reason.

The situation in the NGCAs cannot be assessed as comprehensively as in the GCAs, but REACH and others do their best. The resulting picture is that food security, health and poverty all continue to decline, because of the economic blockade, out-migration of the young and healthy, decline in industrial production, reduction in state services (now provided by the *de facto* authorities from a diminished revenue base) and the reduction in Russian humanitarian aid. It is assumed that MHPSS and protection needs are pressing than in the GCAs, and IPs attempt to address these indirectly wherever possible.

Implementing partners in the NGCAs face two particular sets of challenges. There are the inefficiencies of working in the NGCAs: for example, increased costs due to lack of local supply (except coal), and delayed implementation due to requirements to obtain project-by-project permissions from the *de facto* authorities after receiving approval from DG ECHO. In addition, IPs carry additional risks in the NGCAs: in Donetsk NGCA humanitarian partners must work with a limited number of local NGOs which are not subject to the usual financial and management accountability safeguards, and all IPs run the risk that they could have their operations suspended at any time, for any reason.

Findings

DG ECHO advocacy was important for increasing NGCA access by the whole humanitarian community

The early initiatives by DG ECHO (and others) to persuade the Government to allow assistance to the NGCAs were key to opening up humanitarian access to places." Furthermore, from 2016 onwards DG ECHO was a strong advocate for UNOCHA to open up a coordination hub in the NGCAs.

DG ECHO's monitoring in the NGCAs was important for donor confidence and humanitarian neutrality

Only two donors have regular access to the NGCAs: Switzerland and DG ECHO. DG ECHO's access is important for several reasons: it provides a greater level of confidence to other donors (especially EU MS but also the USA and Canada) of the performance of the few humanitarian implementing partners in the NGCAs (thereby helping sustain other donor funding), it reminds the *de facto* authorities that agencies working there are accountable to DG ECHO for their financial and project performance, and it provides DG ECHO with a closer understanding of the challenges facing IPs - which in turn allows IPs to adapt with a greater degree of donor flexibility. Most importantly of all, it demonstrates DG ECHO's humanitarian neutrality in relation to the EU itself.

DG ECHO's effectiveness in the NGCAs was inhibited by factors largely beyond its control

However, DG ECHO's effectiveness was also limited by the constraints imposed by the *de facto* authorities, as well as its own programming boundaries. The context does not allow for conventional cash programming, although there have been some limited attempts to introduce vouchers for non-food items, and nor does it allow IPs to explicitly address protection and MHPSS concerns, which are at the heart of humanitarian response. Some winterisation programming was late because of bottlenecks in the approval and supply chain, and in general, there was a sense expressed by NNGOs that DG ECHO's assistance was always the same, perhaps lacking innovation and adaptability. At the same time, given the depressed economy, there were significant needs in the NGCAs for



NGCA resident receives coal from IOM in 2017

support for socio-economic activity – and yet (with the exception of limited support through ICRC) this is the sector where DG ECHO is not engaged.

Some DG ECHO partners feel that they are carrying significant risks when working in NGCAs

One of the inhibiting factors was the limited number of partners able to operate in the NGCAs, including a small number of local NGOs, which are not subject to the normal range of financial and governance checks and balances. As such, some IPs felt rather exposed, and were unsure if DG ECHO would support them if they ran into reporting and audit problems.

Recommendations

To increase access and effectiveness in the NGCAs, DG ECHO should: (1) step up the policy dialogue with all key stakeholders on access; (2) advocate for policy and regulatory changes to allow increased use of cash and voucher assistance in the NGCAs (provided that the required financial infrastructure is in place); (3) strongly promote the mainstreaming of protection and MHPSS into all activities as much as feasible; (4) determine distinct priorities for the NGCAs in the 2021 HIP; and (5) continue to increase funding to the NGCAs.

4.5. Efficiency

For analysis of efficiency, the evaluation team followed the approach outlined in the ADE Study on cost-effectiveness. The team made a continuous assessment of cost-effectiveness throughout the interviews and the document review (see Annexes 1 and 2 respectively), and also asked FGD participants in the FGD survey "Do you think that the assistance you received was good value for money (good quality for good price)?" The consensus of these assessments was that overall cost-effectiveness was good. Kicking off from the comments on cost-effectiveness offered mainly in interviews, and using the qualitative line of enquiry recommended by the ADE study, team-members then identified a number aspects of cost-effectiveness for closer examination. These are highlighted in the different findings below. The team also considered (ref footnote) the optional indicators 4.2 (value of transfers reaching populations compared to administrative costs) and 4.4 (cost per unit / beneficiary in key sectors) as shown below in Figures 25 and 26.

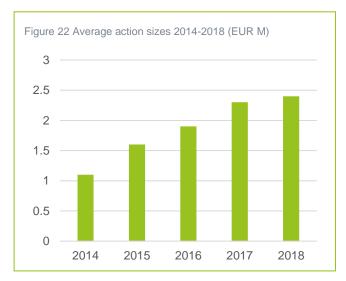
4.5.1. Efficiency in the early phase of response

20. The overall response (all agencies) was less efficient in the first 18 months.

In the first 12-18 months of the response, neither the Government nor the UN had an appropriate institutional setup to coordinate a displacement emergency, there was little installed capacity for humanitarian work (few experienced national staff and only a small handful of established humanitarian organisations), and everyone had higher start-up/mobilisation costs. Furthermore, there was limited understanding even in the United Nations Country Team of humanitarian tools, standards and systems. At the same time, early staff deployments from partner agencies tended to be more junior and more short-term, as organisations struggled to find Russian-speaking staff and were also unsure whether Ukraine would develop into a full-fledged and well-funded humanitarian response.

When there is a large number of small projects, this is regarded by the evaluation team as *ipso facto* less efficient – because there are more overall administrative and transaction costs on the part of DG ECHO and partners, and fewer economies of scale when considering that organisations have fixed costs. In the Ukraine response we saw a clear trend of having a larger number of smaller projects in the period 2014-2016, evening out in 2017-2018 to an average project size that was around EUR 2.4 million (see Figures 21 and 22).





¹⁰³ Study on Approaches to Assess Cost-Effectiveness of DG ECHO's Humanitarian Aid Actions, ADE, August 2016. This study recommends that efficiency and cost-effectiveness be assessed mainly with qualitative methods, as quantitative approaches are prone to even greater methodological flaws. The essence of the approach recommended by the ADE study is laid out in Table 9 of the Study:

Judgement criteria and indicators on the cost-effectiveness of ECHO-funded actions

JC 4 Humanitarian actions funded by ECHO were efficient (defined as 'How well are inputs turned into outputs?')

Indicator 4.1 Qualitative evidence that partners and actions supported were efficient

Optional indicator 4.2 Value of transfers reaching populations compared to administrative costs

Optional indicator 4.3: Evidence that largest cost drivers were well-managed

Optional indicator 4.4: Cost per unit / beneficiary in key sectors

JC 5 Humanitarian actions funded by ECHO were cost-effective (defined as 'achievement of intended outcomes in relation to costs.') Indicator 5.1: Qualitative evidence that partners and actions supported were cost-effective

Optional indicator 5.2: Main quantitative or monetary outcomes of ECHO-funded projects compared to costs.

There are however offsetting factors to the argument that many/smaller is less efficient. The first is that this data only reflects DG ECHO's contributions to these partners. In many cases, especially the case of larger UN agencies and NGOs, DG ECHO is only contributing a portion of the overall value of the partners' projects, and in those cases the partners could still be deriving benefits of economies of scale (although they do incur the administrative inefficiencies of submitting multiple proposals in different donor formats, for what is essentially the same activity).

A second offsetting factor is that a simple calculation of project sizes does not reflect the quality of an action. Especially in the humanitarian domain (as distinct from the development domain), efficiency is often not as important as effectiveness. Consider for example the very high cost per capita of helicopter airlifts. No humanitarian organisation would argue that such high cost-per-beneficiary activities should become the norm, but all humanitarian actors would also agree that in some life-saving situations, such high per-capita costs are fully justified by their effectiveness.

Finally, DG ECHO country team put forward a strong argument that, early in this response, it was important to support a large number of smaller activities for three reasons. Firstly, this creates a healthy humanitarian ecosystem – an environment that provides many organisations an opportunity to engage and many of which will be able to find their own additional donors as a result of this experience that was in a sense "seeded" by an early contribution. 104 Secondly, casting the net wide encourages quality and innovation through competition. Thirdly, supporting a large number of small partners creates the space for specialised organisations like INSO, HI and HAI, which might not otherwise have the critical mass of funding to mobilise at all.

Some stakeholders observed that an important factor in the 2014-2015 period, which to some extent might have compensated for the reduced efficiency outlined above, was the exchange rate change.

Some partner eSingleforms from 2014 and 2015 reported that funding from DG ECHO stretched further than expected because of the substantial exchange rate swing in favour of the Euro in the early part of the conflict. The team mapped the change in the exchange rate and Ukrainian inflation, and confirmed that the relative purchasing power of the Euro was significantly higher in 2014 (20%) and 2015 (10%), but that by 2016 there was no more exchange rate bonus. Indeed, after 2016 the rate of inflation in Ukraine would have had a mild detrimental effect on purchasing power (see Figure 23).



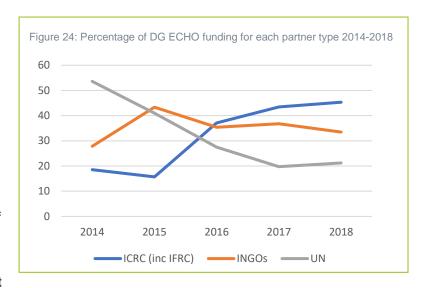
4.5.2. Efficiency in the mature phase of the response

21. Costs per beneficiary were so varied across the response that the relative efficiency of different partner types could not be determined.

Some stakeholders advanced the hypothesis that different partner types were more cost-effective, so the team tried to look into this further. Over the evaluation period, there was a clear evolution in spending towards ICRC and away from UN agencies – while funding to INGOs remained fairly constant and high (see Figure 24). From interviews with the DG ECHO team and analysis of internal project selection dashboards it seems that the main factors driving this evolution were (a) partner availability (especially in 2014), (b) access to the NGCAs, (c) assessed partner performance, and (d) sectoral evolution.

¹⁰⁴ Two organisations no longer funded by DG ECHO specifically credited DG ECHO with being the make-or-break factor in their engagement in Ukraine.

There is evidence from the internal notes of DG ECHO staff that they do consider cost-effectiveness when assessing proposals, but there does not seem to be a standard methodology for this assessment. Furthermore, since there is no requirement for partners to submit their budgets in the same format, DG ECHO staff would have difficulty making objective assessments on a comparative basis. The evaluation team conducted a detailed analysis of project budgets and came up against the same challenges. In addition to project size and number of partners, the evaluation team looked in detail at



ratios of staff to activity costs, and costs per beneficiary in each sector – comparing between NGOs, the Red Cross (mainly ICRC) and UN agencies.¹⁰⁵ Notwithstanding the widespread perception that NGOs are the most cost-effective, followed by UN agencies and finally ICRC, the data did not clearly endorse that view.

First, each partner has unique project designs with their own specific logistical and geographical contexts, and unique beneficiary criteria and delivery standards. To cite some examples of variation: some projects (INSO, UNOCHA) had organisations as beneficiaries, others had institutions (schools, clinics) and others had individual people. Likewise, some partners had one office, some partners had several offices (with different fixed cost and transport cost structures), and some projects took services to the doorstep of beneficiaries. Even in the sectors of cash and shelter (which both had response-wide agreed standards) close examination of activities revealed that there was little valid basis for cost comparison between partners and years.

Secondly, the staff-to-activity ratio varies widely depending upon whether the sector is staff-intensive (i.e. MHPSS) or commodity-intensive (i.e. winterisation), and furthermore many organisations are working multi-sectorally, thereby making it difficult to usefully disaggregate costs by sector. Some sectors and locations lend themselves more easily to a higher proportion of national staff, while others do not. In addition, other variables such as transport requirements, and whether activities are in GCAs or NGCAs further drive important variations in delivery costs. An analysis of costs by sector and year (Figure 25) shows how programming evolved, with for example, more health services delivered individually in 2015-2016 and more collectively in 2017-2018, and a peak in shelter costs per beneficiary in 2017, which is when shelter actors tackled the houses needing heavy repairs.

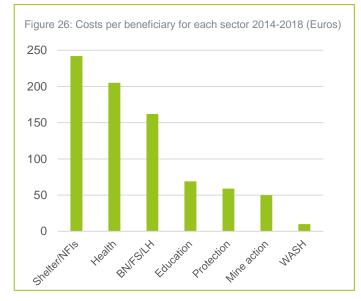
Figure 25: EUR costs per beneficiary per year 2014-2018

	2014	2015	2016	2017	2018
BN/FS/LH	84	88	149	81	296
Shelter/NFIs	81	189	202	682	256
Health	9	663	533	61	85
WASH	4	11	24	4	10
Protection	0	16	109	46	61
Education			30	31	125
Mine action				80	21

¹⁰⁵ The analytical methodology also extracted detailed data on the ten organisations with DG ECHO funding for three or more years, in order to analyse if there were trends in costs per beneficiary over time with the same organisation, but even here the variation was substantial and did not permit the team to discern a trend.

In the end, the most useful conclusion that the team could draw from a significant amount of analysis (see Figure 26) was that WASH has a very low overall cost per capita (all agencies all years), followed by education, protection and mine action. Shelter/NFIs, which is highly individualised assistance (especially shelter), had the highest cost per capita. What is perhaps surprising is the high overall cost per capita of health care, although on this matter (as explained above) it should be noted that this combines support to individuals and support to institutions, and not all health partners used the same methodology for counting their beneficiaries.

In their field site observations and document review, the evaluation team did not come across obvious examples of waste or



duplicated effort. Even if organisations are taking different approaches to the same problems (for example, a variety of different health service strategies), the sectoral and geographic division of labour, as well as practical field-level coordination, appeared to be sound.

22. The proposal application and review process were a source of frustration for partners.

The most frequent observation made by partners regarding efficiency was the burden of the project application process. Analytically we can break this down into a few components: the eSingleform interface, the eSingleform structure, and the agreement negotiation process.

Regarding the online interface, partners noted that this is slow and difficult to use even where there is good connectivity, and very difficult where connectivity is limited. Users reported having to reenter data several times because of system crashes, and problems resulting from the limited number of characters allowed in some fields. Regarding the content of the eSingleform, although the eSingleform was seen as transparent (i.e. modifications and

ECHO is the best field donor and partnership is always the best, but the project proposal is the most time consuming and difficult one

Anon. Implementing Partner

evolution can be seen), some partners considered that it did not provide a good and clear overview of the project, due to the large number of sections, repetitive questions, and the overall length of the document. Organisations with dedicated DG ECHO project proposal units had learned to live with these difficulties, but the partners who struggled most were those bearing the high costs of learning everything for the first time, and even experienced organisations that expect their field offices to develop their proposals. Some UN agencies felt strongly that DG ECHO should be flexible and accept the project design and reporting frameworks that have already been standardised and negotiated with a number of their donors. Other organisations argued that when their activities are not significantly different from one year to the next, there should be a different pathway that allows them to adjust their existing design rather than draft a new proposal from scratch.

While the frustration of partners regarding the eSingleform is palpable, the evaluation team is of the view that this perceived inefficiency is not easy to solve. On the one hand, there is something of a trade-off, in that the more rigid the proposal template is for partners, the more efficient it is for DG ECHO itself to assess and compare proposals: one party's inefficiency is offset by the efficiency gain of the other. Furthermore, the problem of aligning an organisation's design and reporting frameworks with those of donors is a system-wide problem, and to date no donor seems to have resolved this conundrum to the satisfaction of all parties. ¹⁰⁶

Successful partners further pointed out that a lot of transaction time is spent on revisions and clarification. Despite the efforts made by DG ECHO to make the process of "revisions and versions" more systematic, proposals are circulated quite widely to DG ECHO's desk officers, field officers and

¹⁰⁶ The challenge of harmonising and simplifying reporting is being tackled by the Grand Bargain workstream 9, but the evaluation team is not aware of a process to harmonise the frameworks or formats for project designs.

¹⁰⁷ See section 5.4.1: when proposals are approved in April, and there is a further delay for endorsement by *de facto* authorities, some winterisation activities in NGCAs can be approved so late that they have the inefficiencies of rushed procurement and delayed delivery.

technical experts, all of whom offer comments aimed at improving proposal quality. The evaluation team did not look at this process closely, and did not examine project-level e-mails and versions, but assumes that this process did improve the quality of proposals and the coherence of the programme, and thereby increased effectiveness (even if the transaction burden was less efficient).

Partners made a similar remark regarding project reporting. On the one hand, DG ECHO tries to keep the reporting burden light by requiring only two reports in a project lifetime: an Interim Report and a Final Report. However, some partners also pointed out that there is far more to this than the simple submission of two reports, because each report is also circulated for review and comment, and can result in a lengthy process of clarification and submission of additional information that, in the eyes of some partners, takes management time but adds little value. The DG ECHO perspective on this matter is that the process of clarifying reports is often required in order to better understand whether a project is on track to achieve its results on time, and to compensate for the poor quality of some reporting.

There is one final point to make regarding the revision process. In many instances, the back-and-forth discussion between DG ECHO and its partners is concerned with scaling down an initial proposal because of limited DG ECHO budget. While this is understandable, this can introduce new inefficiencies, especially when an organisation has uncompressible fixed costs. This could perhaps be mitigated if DG ECHO indicated during the HIP process what would be their expected proposal maximum values, based upon their assessment of the likely portfolio of proposals from established partners, relative to the likely budget allocation.

23. The creation of the ACCESS consortium had more effectiveness than efficiency benefits.

Consideration of FichOps, the 2018 *Evaluation of the ACCESS Consortium* and interviews yielded a somewhat complex picture of the advantages of the consortium approach. On the whole, there were significant reported effectiveness benefits, in particular stronger and better coordinated advocacy in Ukraine and internationally, harmonisation of approaches (for example, agreement on a greater cash transfer value and on the content of hygiene kits, and a consistent methodology for beneficiary selection), opening up consortium member access to the NGCAs, greater geographic reach, and more technical skills available within the group (especially since HAI joined the consortium at DG ECHO's suggestion in 2017). These effectiveness benefits were important and in the view of the evaluation team¹⁰⁸ already justified the consortium approach.

However, efficiency benefits were harder to find. Because each consortium member was generally working in different sectors and locations, and planning independently, 109 there were few opportunities for economies of scale or sharing of resources (there were some examples of organisations sharing equipment and transport pooling, some shared training, and for a while two NGOs shared an office). As of 2018, the expected benefits of a beneficiary cross-referral system had not yet been achieved, primarily because the consortium members were not working with the same beneficiary populations in the same locations. However, even if the expected efficiency benefits of working as a consortium were not fully realised by the members, a clear efficiency gain from the DG ECHO viewpoint was reduced transaction costs by virtue of negotiating and signing one agreement, and receiving one consolidated report, which was reportedly also of higher quality.

24. DG ECHO partners did not gain the benefits of multi-year funding.

The timing of DG ECHO funding was predictable, but the system of annual planning, proposal submission, selection and negotiation is such that funds are not usually released until April. Large organisations with several donors and their own core resources are able to implement activities continuously and carry the risks of funding being received late (or not at all), but smaller organisations often do not have the reserves for this. As a result, many NGO projects effectively started in April, were initially planned for 9 months, and then often extended into the next year. While signature of agreements in March or April meets legal and accountability requirements, short project durations can reduce effectiveness and can reduce efficiency if procurement is rushed. In particular, winterisation activities were sometimes affected by late programme approvals, and activities in the NGCAs were most affected because delays from the DG ECHO side were compounded by delays in getting approval from the *de facto* authorities and in procurement. Once the financial decisions were taken, DG ECHO was quick with payment and their pre-financing policy meant that most organisations received 80% of their annual budget in their initial payment.

¹⁰⁸ And the independent team conducting the 2018 Third Quarter Evaluation of the ACCESS project.

¹⁰⁹ Note that most consortium member organisations also received non-consortium funding from other donors – therefore the consortium was only a part of the operating environment for member organisations.

DG ECHO allows projects to extend beyond 12 months through Modification Requests, and many actions were extended in this way. Since 2017, DG ECHO HIPs (including Ukraine) have allowed partners to submit 24-month proposals in education and, since 2018, in all sectors, However, beyond these terse statements in the HIPs, it does not seem that DG ECHO Brussels has issued related guidance to the field on how to proceed, in particular there is no guidance on how to reconcile the apparent contradiction of multi-year funding with the spirit of "open competition," or encouragement to experiment. As a result, despite the many efficiency benefits of multi-year projects, 110 both DG ECHO and partners seem to avoid the perceived risks, and no partners submitted multi-year proposals in the evaluation period. The evaluation team has been informed that a multi-year arrangement is being piloted with UNOCHA in 2020, using a Modification Request mechanism. Given the protracted nature of the conflict, the continuous/repeat nature of several key actions (i.e. ICRC, UNOCHA, UNHCR, ACCESS), the multi-year perspectives of the HCT, and the desire to reinforce resilience as well as to favour better linkages with development funding, the evaluation team believes that there is a strong case in Ukraine for some measure of multi-year funding. The team does however also accept that it is not a perfect planning environment, and that the situation in the NGCAs could change rapidly for the worse (or for the better) at any moment – demanding a flexible approach to Modification Requests.

25. Efficiency was advanced through localisation, within the constraints of the Ukraine context.

Humanitarian assistance has been delivered by international organisations using a high proportion of national staff (thanks to the availability of a highly educated and yet underemployed Ukrainian workforce), by Government agencies working in partnership with UN agencies (for example Ministries of Health and Education working with the World Health Organisation (WHO) and UNICEF), and by national NGOs working as partners of INGOs (R2P as a member of the ACCESS consortium, Slavic Heart working with SC) or as sub-contractors (the model mostly used by UNHCR partners such as R2P and Proliska). In some cases, building capacity was an explicit objective of a project. However, this local NGO capacity-building work seems to have been rather ad hoc, usually at individual level (training of staff and volunteers) rather than institution-level, and might not lead to increased structural capacity to support the affected population without external assistance. An important exception to this general observation is the UNHCR project with the Free Legal Aid Centres (FLAC), which has been more systematic and holistic in its approach to capacity building.

DG ECHO further supported localisation by encouraging partners and clusters¹¹¹ to convert international staff positions to national staff; in some cases, this also increased effectiveness since national staff have more local knowledge and stay in their positions for longer. This was especially the case for the GCAs, but in the NGCAs there were constraints to localisation (a small number of capable local NGOs in Donetsk, and lack of *de facto* authority permission for local NGOs to operate in Luhansk), and furthermore ICRC felt required to maintain a high proportion of international staff in order to retain their political neutrality.

On the whole, it does not seem that local capacity is a major constraint at this point in time in the GCAs (possibly it was a constraint in the early phase of the response and maybe still in niche areas like GBV, MHPSS) – but rather the lack of available funding for local actors, either from Government sources, development sources or Ukrainian private (philanthropic) donors. In part to overcome this funding bottleneck, a vector of localisation in Ukraine was the creation of the UHF, which from the outset aimed to favour NGOs as implementing partners. DG ECHO was a supporter of the Fund (see section 5.2.4), and by channeling some DG ECHO funding through the UHF DG ECHO is probably channeling funding more directly to local NGOs than in most other contexts. The UHF is still in its first year of operation and it is too soon to assess its performance, but in principle, the UHF could become an efficient way of supporting both coordination and localisation in Ukraine, provided that UNOCHA takes a streamlined approach to fund management, and that the fund is large enough to carry its fixed management costs.

^{110 &}quot;Multi-year planning and funding lowers administrative costs and catalyses more responsive programming, notably where humanitarian needs are protracted or recurrent and where livelihood needs and local markets can be analysed and monitored. Multi-year planning must be based on shared analysis and understanding needs and risks as they evolve. Collaborative planning and funding mechanisms for longer programme horizons that are incrementally funded can produce better results and minimize administrative costs for both donors and aid organisations. They can identify results which highlight the linkages between humanitarian, development, stabilisation and conflict management initiatives that are fundamental to decreasing humanitarian need." (IASC https://interagencystandingcommittee.org/Quality-funding). Note that as long as there is informed multi-year planning, then most of the benefits can still be achieved if the actual funding is provided incrementally (i.e. through annual HIPs).

¹¹¹ For further discussion of the efficiency of humanitarian coordination at a time of diminishing resources, see section 5.2.4.

¹¹² Due to its financial regulations, DG ECHO cannot directly finance local NGOs, although DG ECHO often supports local NGOs indirectly as national partner of an international organisation that is eligible to receive DG ECHO funding.

4.5.3. DG ECHO monitoring

26. DG ECHO partners valued the field monitoring undertaken by DG ECHO staff.

As a matter of operational policy, DG ECHO attempts to visit all projects at least once while they are being implemented, and more often if there are concerns with the pace or quality of implementation. In Ukraine, FichOps showed that DG ECHO was not able to visit every project in 2014, but monitored all projects from 2015 onwards. DG ECHO does not have a standard organisational methodology for monitoring, nor does DG ECHO provide staff training on monitoring, but there is general guidance provided in DG ECHO's internal project reporting templates. 114

Partners confirmed in interviews that the monitoring visits were useful and helped improve or retain quality, especially the visits of DG ECHO's regional technical experts. In contrast, the visits of senior EU and EU MS officials were seen as having valuable relationship, advocacy and awareness-raising benefits, but at the same time, they were also often seen as a burden. Some partners expressed the desire for monitoring visits to be better coordinated between donors: either joint visits (when multiple donors are funding the same programme), or visits timed in such a way that partners were not hosting multiple similar missions in close proximity, or having one donor (for example DG ECHO) monitor on behalf of other donors. DG

Good practice

DG ECHO technical experts sometimes provide a training session in conjunction with their monitoring visits: considered as useful for building capacity and explaining details or changes in thematic policies.

ECHO staff were of the view that their monitoring missions are more technical than general donor visits (which are anyway infrequent because most other donors do not have in-country humanitarian expert staff), and furthermore that other donors were not able to visit the NGCAs. Nevertheless, a few joint donor visits did take place (either under UNOCHA/HCT lead, or directly organised or facilitated by DG ECHO) including a COHAFA mission, a joint DG ECHO-Sweden mission, a joint DG ECHO-OFDA mission and an ICRC donor support group mission.

4.5.4. Was DG ECHO's budget appropriate and proportionate to the needs?

27. Stakeholders felt strongly that DG ECHO's response was not commensurate with the needs.

All stakeholders interviewed expressed the view, albeit to different degrees, that DG ECHO's funding for Ukraine was not enough. This was confirmed by the different document reviews and the scorecard (see Annexes 1-3, where adequacy of DG ECHO funding was universally scored lowest of all measured parameters).

28. DG ECHO funding for Ukraine was proportionally higher than it is globally.

However, when looked at in relative terms, DG ECHO's funding for Ukraine may be seen as relatively generous compared to DG ECHO's support for other humanitarian crises around the world.¹¹⁵

Using data from FTS,¹¹⁶ Figure 27 compares the European Commission's global humanitarian funding



¹¹³ The evaluation team found only four external evaluations conducted by partners: a UNHCR evaluation in 2016, a UNICEF evaluation of its life skills project in 2016, a 2018 NRC evaluation of its legal programme, and the aforementioned ACCESS evaluation in 2018.

¹¹⁴ The evaluation team elected not to make a specific recommendation on building DG ECHO capacity in monitoring, but nevertheless believes that, given the trend of using short-term staff in many field positions, there would be a benefit in DG ECHO developing a simple guide to project monitoring, - a "how-to note" that would include some key definitions, the DG ECHO regulatory framework, and practical advice on what to look for in field monitoring, how to avoid some of the obvious weaknesses of partner-managed visits, how to plan risk-based monitoring, and how to draft useful reports.

¹¹⁵ During the Desk Review phase, the evaluation team compared the patterns of DG ECHO funding to Ukraine and Colombia, which the team considered to be the most comparable situation (major recent displacement crisis in a middle-income country also identified as a "forgotten crisis"), but then concluded that this comparison had too many contextual variables to make this sort of comparison valid.

¹¹⁶ This calculation considers all the humanitarian funding provided by the EU and all humanitarian funding reported to FTS, regardless of whether this was contributed by DG ECHO or other EU services (which as far as we know only happens in the case of Turkey), and regardless of whether the funding was "on- or off-appeal." In most cases, this does include funding for the ICRC, which is reported to FTS but "off appeal."

to its Ukraine humanitarian funding. In every year except 2016,¹¹⁷ the proportion of DG ECHO's funding to Ukraine was higher than globally.

Note in particular the trend since 2016, and that in 2018 DG ECHO's share of funding to Ukraine was 2.5 times more than its share of global funding. Recall also (Figure 8) that the EIB, FPI and DG NEAR-SGUA also make important development and stabilisation contributions to the conflict-affected regions.

The most common reason provided by interviewees for why Ukraine has received such a high level of support from the EU is the political importance of Ukraine to European MS. It is possible that the same logic extends to DG ECHO specifically, but DG ECHO itself does not advance that argument: DG ECHO makes the case for Ukraine on the basis of needs, and adds to that the fact that Ukraine is a "forgotten crisis." In DG ECHO, the relative estimation of needs across emergencies is done through the Integrated Analysis Framework (IAF) – an annual analytical exercise where DG ECHO compares needs across all known crises and decides the overall country resource allocations. While the IAF does look at a number of objective factors, it is not an exact science, and in the end the financial allocation decisions are made at senior levels in Brussels considering many factors that are not all known to programme staff or to the general public. As a result, the evaluation team does not know with certainty why Ukraine was proportionally better funded.

29. The evaluation team cannot assess appropriateness and proportionality of DG ECHO funding to Ukraine, because there is no objective measure of the monetary value of the humanitarian needs.

Ukraine's needs assessments measure the demographic profile of people affected, how they are affected, and often service availability. However, they do not place a monetary value on those needs. Even the high-quality Ukraine REACH assessments do not convert needs to dollars.

Historically, in Ukraine and elsewhere, HRP values are the sum total of the programme requests of the responding agencies, modified by their capacity to deliver, and then adjusted (usually down) to a level judged by the HCT as what donors are likely to provide. This is known as "project-based costing." Since 2014, the IASC has been working to develop a more objective methodology for costing HRPs, based on agreed and contextually defined costs per beneficiary for different activities: this is known as "unit-based costing." A recommended global methodology for unit-based costing was rolled out by the IASC in 2018.

The IASC's HRP guidance for 2020 was to apply unit-based costing globally, but this requires planning lead time and complex country-by-country negotiations between agencies. Judging that Ukraine was not yet ready for this, or perhaps that the HRP is not sufficiently large to justify the high upfront effort of reorganizing the planning system, the Ukraine HCT has decided not to use unit-based costing for the 2020 HRP. Even though some participating agencies might apply some degree of unit-based costing within their proposals (e.g., the Ukraine shelter cluster has a more objective estimate of the financial requirements to repair a finite number of known houses, and the amount allocated for cash assistance is standardised across all agencies), the current situation is that the Ukraine HRP is not based upon an estimate of costs, but instead represents a compromise between agency "demand" and predicted donor "supply."

Estimation of the budget requirements for the Ukraine humanitarian response is further complicated by two factors. First of all, as discussed in section 5.1.4 above, the boundary between humanitarian needs and government service deficits is very unclear, especially since the vast majority of beneficiaries in GCAs are not displaced but living "at home" in communities that government services and development agencies could and many believe should be reaching. Secondly, there is very little objective data on the needs in the NGCAs, which is where the majority of the humanitarian needs are thought to be (see section 5.1.4).

Thus, it is that in Ukraine, the vast majority of stakeholders <u>feel</u> that the funding is not enough (see Finding 27) because they see "unmet" needs and because the HRP is "underfunded." They extrapolated this feeling in their interviews with the evaluation team, hoping that this will build the case for DG ECHO to provide more assistance. However, there is at present no objective way of determining how much is enough, or what DG ECHO's appropriate share should be in the specific Ukraine context.

¹¹⁷ 2016 was a year of lowest relative DG ECHO funding to Ukraine (see also *Figure* 7), and this was also the year that there was a massive spike in DG ECHO funding to Turkey.

30. DG ECHO's funding to the NGCAs is not yet sufficient.

There is one final point to make regarding the appropriateness of funding, and that is how "appropriate and proportionate" is DG ECHO's funding at the sub-national level. Simply put, the evaluation team believes that the quality of spending is at least as important as the quantity: in other words, it is better to spend less money well than to spend more money poorly. In this regard, the evaluation team's assessment is that DG ECHO has followed the appropriate strategy – constantly redirecting funding to follow the greatest needs as the location and character of those needs have evolved over time. From the initial decision to leave the GCAs far from the contact line and focus on the contact line, then to focus on the EECPs, then to focus on the 0-5km zone along the contact line, and more recently to deemphasise the GCAs and shift emphasis further to the NGCAs, DG ECHO has ensured that its funding has followed the needs within Ukraine. In this respect, there is a good case for DG ECHO to maintain a higher than average level of funding in Ukraine: because it can be spent well, and in particular because DG ECHO is more able to programme in the NGCAs than other donors. Several partners did however indicate concern about the risks of programming in the NGCAs, risks associated with the small number of local NGO partners, and lack of transparency. These risks need to continue to be very carefully managed.

Case Study: DG ECHO and the Grand Bargain in Ukraine

DG ECHO has committed to the 2016 Grand Bargain and co-chaired its Workstream 5 to improve joint and impartial needs assessments. In 2003, DG ECHO was also a founding member of the humanitarian donor group for Good Humanitarian Donorship, and is currently the GHD co-chair.

Context



Along with other donors, DG ECHO self-reports annually on its progress against the GB commitments. Each of the GB workstreams also commissions its own studies and issues its own reports, and there is an annual external review of GB progress.

Globally, DG ECHO is regarded as doing well on transparency, cash and needs assessments, and less well on localisation, management costs and AAP/participation revolution. Three other areas are more complex, because multi-year financing, 118 reduced earmarking and simplified reporting are all caught up in the more highly regulated world of financial and project management – which in the case of DG ECHO is a single complex programming and reporting system with many interdependencies, and which allows limited flexibility and experimentation. In 2019 DG ECHO was reviewing the Framework Partner Agreement with a view to tackling some of these constraints, but as of the drafting of this report it is not known whether that process will yield the desired GB progress and related efficiencies.

¹¹⁸ DG ECHO has reported global progress on multi-year financing, reaching 50% in 2019. It seems to the evaluation team likely that such a high number is partly a result of some genuine progress, but also of a few extraordinarily large multi-year initiatives such as the Facility for Refugees in Turkey. It is also possible that this 50% figure includes as "multi-year" some single-year actions that are extended beyond 12 months – which is not the same as multi-year planning.

Regarding the nexus, in 2016 the EU put in place a corporate policy (*Lives in Dignity*) governing all the EU instruments, and deliberate nexus approaches have been piloted in several countries. However, progress has been slow and varied according to personalities and context – in particular the degree of underlying coherence between EU political, development and humanitarian objectives. Generally, DG ECHO is seen as pushing the nexus, with some resistance from the development side.

Findings

In Ukraine, DG ECHO is providing stronger support than usual for local and national responders

Ukraine is the first response ever, worldwide, where DG ECHO is piloting support for a Country-Based Pooled Fund. The UHF places a priority on national NGO partners working on the most critical problems in the most at-risk communities along the contact line, and is extending its services to the NGCAs.

In Ukraine, DG ECHO has invested significantly in state-of-the-art impartial needs assessments

Through its partnerships with PIN and later with the ACCESS consortium, DG ECHO and USAID have together established REACH as the definitive source of needs assessment information for the humanitarian sector. REACH is now underpinning the HNO, and undertaking development assessments in the GCAs (thereby also strengthening the nexus).

In Ukraine, DG ECHO has strongly encouraged nexus planning with other EU services

Despite early encouragement from DG ECHO, UN efforts to bring together humanitarian and development analysis and planning had something of a false start; these are being relaunched in early 2020. Meanwhile, from late 2017 DG ECHO actively engaged DG NEAR-SGUA and FPI in joint analysis and planning within the family of EU institutions. While this has not achieved all that DG ECHO had hoped, in the view of the evaluation team this collaboration has achieved all that it could achieve, given the current institutional context and the limited programming flexibilities of all parties. The evaluation team is optimistic that there is sufficient awareness and intent to take nexus collaboration to the next level in 2020, when DG NEAR-SGUA is inviting DG ECHO to contribute to its multi-year planning process.

In Ukraine, there has not been any <u>multi-year programming</u>, despite a somewhat favourable context

DG ECHO has allowed limited multi-year programming since 2017, and opened this up a little more in 2018. However, this was not actively encouraged by the Ukraine country team, and no multi-year proposals were submitted by partners in the period under review (one is being piloted in 2020). Overall, the evaluation team's assessment was that Ukraine is a fairly favourable context for multi-year planning given the nexus opportunities, the protracted crisis and the limited number of established partners. - DG ECHO argues, however, that the situation in the NGCAs is unstable and that access there could change rapidly for the worse, or for the better, at any moment.

Recommendations

DG ECHO should work more strategically on the humanitarian-development nexus

While continuing to encourage other EC services to increase their development programming in the affected communities of the GCAs, DG ECHO should primarily see DG NEAR-SGUA as a strategic ally for advocacy for policy reforms and for increased reach and quality of Government services in the GCAs

DG ECHO should improve efficiency through multi-year programming, and localisation

The most important efficiency gains, for DG ECHO and for partners, would come from multi-year programming. These would also have the benefit of supporting linkages with development programmes (of the EU and other donors). Secondarily, DG ECHO should continue the current suite of activities aimed at furthering localisation.

4.6. Sustainability/connectedness

4.6.1. Programme-level sustainability

31. In a "big picture" perspective, DG ECHO has taken major steps to increase sustainability and connectedness.

Document review and interviews with the current and former coordination actors show that, from the outset, the Ukrainian Government and national civil society accepted their responsibility for supporting their own displaced population, although their ability to do this was curtailed in the NGCAs. For this reason, the broad strategy of the international community (as reflected already in HIP 2014 and in the 2014 PRP) has been to encourage and support the Ukrainian Government and civil society to meet their obligations, not to substitute for Government. As a consequence, direct humanitarian assistance has been directed in a complementary way towards those locations (along the contact line, in NGCAs) and those sectors (for example legal assistance) that government services are not yet reaching.

DG ECHO deliberately contributed to this with the early decisions to stop humanitarian programming in the GCAs far from the contact line, to avoid the creation of camps and to de-emphasise collective centres, and to enable the affected population to access government services and social benefits. These early initiatives were supplemented by DG ECHO's later work to support MinTOT, to develop the JHDF with DG NEAR-SGUA and FPI, and to fund development-oriented studies such as the 2019 REACH study on economic opportunities in the 0-20km zone of the GCAs.

However, by early 2020, the move towards sustainability has slowed, as Government engagement seems to have reached its limits, perhaps only temporarily. The problem is two-layered: firstly, the Government has not yet settled on its policy and institutional framework for Donetsk and Luhansk oblasts. The former MinTOT has been through a few iterations since the 2019 Presidential elections and as of early 2020 is still not settled in terms of its scope and direction. Secondly, some of the Government's national reforms affecting the population in Donetsk and Luhansk oblasts (especially health, civil administration, and education) are still incomplete: in some areas, the regulations and resources required for implementation have not yet caught up with the policy changes, and there are gaps in coverage and in service. For example, government energy policy reforms have had some unintended humanitarian consequences (see section 5.2.5), and some primary health centres along the contact line are not functioning properly because of jurisdictional changes (from health ministry to local government responsibility¹¹⁹) in combination with low population densities (below revised service thresholds) and inadequate resourcing. In situations like this, as discussed in section 5.1.4, some humanitarian assistance is compensating for deficits in government services.

4.6.2. Sector- and action-level sustainability

32. DG ECHO paid less attention to recovery and sustainability at the sector and action levels.

While DG ECHO made outward-looking efforts to encourage nexus thinking and to engage DG NEAR-SGUA, within its own project portfolio DG ECHO stuck to a more traditional "core" humanitarian approach. Review of FichOps, the stakeholder scorecard and interviews with DG ECHO and partners all confirmed that DG ECHO was reluctant to fund activities proposed by partners that were intended to promote recovery, in the expectation that development donors would be moving into that space. The

In view of the persisting humanitarian needs, of the weak humanitarian donor response, and of the existing gaps in coverage, DG ECHO continues to focus on humanitarian and lifesaving activities, and therefore is not in position to address early recovery needs

JHDF internal document, 2019

one exception found by the evaluation team was the small amount of support that DG ECHO provided to micro-enterprise development through ICRC. This sectoral focus on the "humanitarian core" of DG ECHO's mandate seems to have been re-emphasised after the division of labour with DG NEAR-SGUA was agreed (see box).

33. Resilience thinking was found throughout the humanitarian response.

Resilience is not a type of activity, it is a way of thinking: it is not so much about the "what" of an activity but instead about the "how," and resilience thinking can be found across the humanitarian-development

¹¹⁹ The new amalgamated local governance structures are only due to be launched in parts of Donetsk and Luhansk oblasts in 2020.

spectrum. DG ECHO introduced the resilience marker in November 2014, and made it applicable to all humanitarian actions from 2015 onwards. The Ukraine HIPs provided little specific guidance on resilience (for example what it means in the Ukraine context, how important it is for DG ECHO in Ukraine), but from 2015-2018 onwards HIPs did include generic encouragement of resilience and the requirement to use the resilience marker. The eSingleform template required proponents to discuss resilience, and analysis of the eSingleform narratives showed that the partners' understanding of resilience varied across the response: many partners equated resilience with recovery or development, or with cash assistance. Analysis of the FichOps showed that DG ECHO staff also had varied interpretations of resilience.

The evaluation team's assessment is that even though recovery and development were discouraged at the sector and action level (see above), resilience as a way of thinking about and delivering assistance was quite prevalent in DG ECHO's Ukraine programme. This assessment is supported by the DG ECHO Ukraine teams' average resilience marker score of 1.3/2.0.121 To the extent that resilience includes activities that meet a humanitarian need in a way that reduces future humanitarian need, then resilient activities in Ukraine included: repairing or upgrading infrastructure that is already part of the Ukrainian system (e.g., water supply, medical or education facilities); repairing shelter; unlocking eligibility for social assistance (for example, through legal assistance or documentation); providing a disability solution (prosthetic device, wheelchair, etc.) or promoting community-based homecare solutions that maintain the capacity for the elderly and disabled to remain independent; strengthening the capacity of sustainable organisations (government or civil society); and building community

solidarity (through support for voluntarism, peaceful coexistence, or community-based protection).

To illustrate resilience in the humanitarian context, consider the way that small investments in school repairs, WASH and utility supply allowed government schools to stay open, which in turn slowed the exodus of young families from the contact line. At the same time, psychosocial support through schools engaged mothers and reduced household-level stress factors. In combination, these measures increased community resilience,

Thanks to this diverse support, our school is thriving. The school is the heart of the village. Some people have even come back to the village with their children. Much has been done to improve and repair the school. Moreover, with support of the psychologists, the children have become more active and positive. Parents are very satisfied with the changes and happy that their children will have one more year of this project's support

School Director in Novobakhmutivka, cited in an ACCESS Consortium news release 10 Sept 2018

which, in turn, sustained the community support system for the elderly and the disabled.

The major *caveat* regarding resilience is that there was less evidence of resilience thinking in the NGCAs, where few of the contextual and institutional prerequisites for resilience were in place.

4.6.3. Consideration of exit strategies

34. DG ECHO has had exit in mind since early in the response, but there was little sign that DG ECHO's partners considered exit strategies until they had to.

Since 2015, every HIP has had a short section entitled "exit scenario," which is part of the HIP template. Each year this has been repeated in some form in a similar statement about linking relief, rehabilitation and development, with reference to the most promising humanitarian-development process at the time (in 2015-2017 this was the post-RPBA process of building a national recovery programme for eastern Ukraine, and in 2018 reference to the EU's JHDF was included as well). It was reported to the evaluation team that DG ECHO is somewhat cautious about discussing exit in the HIPs, because it can send a mixed message when there are still humanitarian needs.

In practice, the evolution in DG ECHO's programme (shown through HIPs, action selections and advocacy initiatives) reveals a more deliberate approach to exit than is suggested by those short chapters. The implicit DG ECHO exit strategy seems to have had three main components: (1) strengthen local capacity and localisation (see section 5.5.2); (2) move as many affected persons as possible (including people at crossing points) into state services and social safety nets (see section 5.6.1); and for those that are not (yet) covered by government services, (3) encourage the creation of development programmes for the affected population (indirectly through UNOCHA nexus planning, or

¹²⁰ Even though some partners stated in their proposals that multi-purpose cash enhances resilience, the team's view is that to strengthen resilience the cash would need to exceed the minimum expenditure basket, and that furthermore the resilience value of cash depends entirely on what the cash is spent on. Being multi-purpose does not in itself guarantee "resilient spending."

¹²¹ Interestingly, as with the Gender-Age marker, DG ECHO Field Officers tended to score resilience higher than the Desk Officers.

directly through advocacy with DG NEAR-SGUA through the JHDF, see sections 5.2.5 and 5.2.6). This strategy has allowed DG ECHO to exit from some geographic areas and from some types of activity, and to sharpen the focus on a residual humanitarian zone ever closer to the contact line and in the NGCAs, where state services do not fully reach.

From interviews with DG ECHO staff, the team established that DG ECHO would like to shrink further its footprint in the GCAs, but that some programming would need to be retained for some time for three reasons. The first is that DG ECHO believes it is important that a basic humanitarian infrastructure be maintained in the GCAs so that there is a foundation to scale back up again rapidly in the event of resurgence of active conflict and new displacement. Secondly, it needs to be remembered that many of the providers of services to the NGCA population are actually providing those services in the GCAs (for example, legal support to access pensions, some MHPSS services and other medical consultations). Finally, DG ECHO believes it is important to continue its humanitarian and nexus advocacy, for which they need to keep a viable programme in the GCAs.

As for DG ECHO's partners, UNHCR has been considering how it can reduce its programme delivery and return to its core protection mandate since 2016.¹²² In 2017 and especially in 2018, some clusters were planning to shrink and/or close, ¹²³ but the final decision was to keep the same cluster structure and reduce its costs by cutting some positions and nationalizing others.¹²⁴ Some major actors (such as UNICEF and ICRC) are now speaking openly about partial exit from the GCAs. Within the community of DG ECHO partners, a few partners have left the country entirely (WFP, Humanity and Inclusion, GOAL) – but this seems to be more because of reduced funding than because they felt that the job was done. Other NGOs claim to have exit strategies (Action Contre la Faim and SC), but the vast majority of NGOs do not seem to have exit strategies at all. In some cases, the evaluation team felt that there appeared to be a potential for partial cost-recovery from beneficiaries (for example for legal, day-care, and transport services) that could stretch the humanitarian funding further, and provide a bridge towards sustainability.

The whole humanitarian community has yet to fully engage in the NGCAs. Unfortunately, barring a sudden breakthrough in the political negotiations, it is hard to envisage an exit strategy from the NGCAs for the foreseeable future. Nevertheless, the evaluation team believes that even now, activities in NGCAs could and should be designed in such a way that exit will be possible a few years into the future.

4.7. Overview of Evaluation Questions and related Findings

Evaluation Questions	Findings
EQ.1 To what extent did the design and implementation of DG ECHO-funded actions take into	1. By 2018, DG ECHO's programme accounted well for the needs of vulnerable groups, but DG ECHO was slow to address vulnerabilities of age and mental health in the early response.
account the needs of the most vulnerable groups, (women, children, elderly and people with	2. DG ECHO's partners consulted beneficiaries adequately in the design of their initiatives.
disabilities (PWD)?	DG ECHO's partners are falling short of the full expectations of Accountability to Affected Populations.
	6. The humanitarian needs in GCAs are either stable or gradually reducing (especially in urban areas).
	7. The small financial allocations to education in Ukraine are appropriate, given the modest needs.
EQ.2 To what extent was a clear and context-adapted strategy provided and applied in Ukraine during 2014-2018?	4. DG ECHO's Ukraine HIPs were clear and context-adapted.5. The geographic focus, first on Donetsk and Luhansk oblasts and then on the contact line and the NGCAs, was appropriate.

¹²² Evaluation of UNHCR's Ukraine Country Programme (2017).

¹²³ The shelter cluster has a definitive list of remaining work in the GCAs and is advanced in its planning for closure and exit.

¹²⁴ Shrinkage and consolidation of the Ukraine clusters was first recommended by an interagency assessment mission in 2016.

Evaluation Questions	Findings
	6. The humanitarian needs in GCAs are either stable or gradually reducing (especially in urban areas).
	7. The small financial allocations to education in Ukraine are appropriate, given the modest needs.
	12. DG ECHO has also been a strong supporter of humanitarian coordination in Ukraine.
	14. DG ECHO has made substantial efforts to encourage EU humanitarian-development coordination.
	18. DG ECHO provided an appropriate mix of cash and in-kind assistance.
EQ. 3 To what extent has DG ECHO contributed to establishing joint and impartial needs assessments?	8. DG ECHO contributed substantially to establishing joint and impartial needs assessments.
EQ.4 To what extent was DG ECHO's response aligned with the	9. DG ECHO has made conscious and visible efforts to maintain humanitarian principles.
humanitarian principles, and DG ECHO's relevant thematic/sector policies?	10. DG ECHO's Ukraine actions were aligned with relevant thematic/sector policies, although there was room for improvement regarding the elderly.
EQ.5 To what extent was DG ECHO successful in coordinating its response with that of other humanitarian donors in the country, including EU member states, and by that avoiding overlaps and ensuring complementarities?	11. DG ECHO has been a strong coordination actor in its own right.12. DG ECHO has also been a strong supporter of humanitarian coordination in Ukraine.
EQ.6 In the context of the Nexus and humanitarian-development coordination instruments, what measures were taken by DG ECHO to link the EU's humanitarian and development actions, and how successful were these measures?	13. System-level coordination between the humanitarian and development communities is not as advanced as internal nexus coordination within each donor government.14. DG ECHO has made substantial efforts to encourage EU humanitarian-development coordination.
EQ.7 What was the added value of DG ECHO in Ukraine	15. The broad humanitarian community felt that DG ECHO added value to programme delivery and at the policy and system level.16. EU member states agreed that DG ECHO adds considerable value above and beyond the efforts of individual donor governments.
EQ.8 To what extent were DG ECHO's objectives (as defined in the HAR, the Consensus and the specific HIPs) and expected results achieved? After five years, what overall results have been	 6. The humanitarian needs in GCAs are either stable or gradually reducing (especially in urban areas). 17. DG ECHO has been effective in reducing the humanitarian needs in eastern Ukraine. 18. DG ECHO provided an appropriate mix of cash and in-kind assistance.
achieved?	19. DG ECHO's advocacy was effective, but there is still more to be done on access to the NGCAs and on the humanitarian-development nexus.

Evaluation Questions	Findings
	23. The creation of the ACCESS consortium had more effectiveness than efficiency benefits.
	30. DG ECHO's funding to the NGCAs is not yet sufficient.
EQ.9 How successful was DG ECHO through its advocacy and communication measures in influencing other actors by direct and indirect advocacy on issues like humanitarian access and space, respect for IHL, addressing gaps in response, applying good practice, and carrying out follow-up actions of DG ECHO's interventions?	19. DG ECHO's advocacy was effective, but there is still more to be done on access to the NGCAs and on the humanitarian-development nexus.
EQ.10 To what extent did DG ECHO achieve cost-effectiveness	20. The overall response (all agencies) was less efficient in the first 18 months.
in its response in Ukraine, and what factors affected it?	21. Costs per beneficiary were so varied across the response that the relative efficiency of different partner types could not be determined.
	22. The proposal application and review process was a source of frustration for partners.
	23. The creation of the ACCESS consortium had more effectiveness than efficiency benefits.
	24. DG ECHO partners did not gain the benefits of multi-year funding.
	25. Efficiency was advanced through localisation, within the constraints of the Ukraine context.
	26. DG ECHO partners valued the field monitoring undertaken by DG ECHO staff.
EQ.11 Was the size of the budget allocated by DG ECHO to Ukraine	27. Stakeholders felt strongly that DG ECHO's response was not commensurate with the needs.
appropriate and proportionate to the needs?	28. DG ECHO funding for Ukraine was proportionally higher than it is globally.
	29. The evaluation team cannot assess appropriateness and proportionality of DG ECHO funding to Ukraine, because there is no objective measure of the monetary value of the humanitarian needs.
	30. DG ECHO's funding to the NGCAs is not yet sufficient.
EQ.12 To what extent did DG ECHO manage to achieve	31. In a "big picture" perspective, DG ECHO has taken major steps to increase sustainability and connectedness.
sustainable results through its actions?	32. DG ECHO paid less attention to recovery and sustainability at the sector and action levels.
	33. Resilience thinking was found throughout the humanitarian response.
	34. DG ECHO has had exit in mind since early in the response, but there was little sign that DG ECHO's partners considered exit strategies until they had to.

4.8. Overall assessment of DG ECHO performance

Aggregating all data sources (the document review, the key informant interviews, the focus groups discussions and the key informant scorecards) yields the following high-level picture of the strengths and weaknesses of DG ECHO's programme in Ukraine 2014-2018:

Overall assessment of DG ECHO's Ukraine programme 2014-2018 against the Evaluation Questions					
Evaluation Question	DG ECHO did not meet any stakeholder expectations	DG ECHO met some stakeholder expectations but the evaluation team identified several areas for improvement	DG ECHO mostly met stakeholder expectations; the evaluation team assessed DG ECHO's response as adequate	DG ECHO exceeded some stakeholder expectations; the evaluation team assessed DG ECHO's response as good	DG ECHO exceeded stakeholder expectations; the evaluation team assessed DG ECHO's response as excellent
EQ.1 To what extent did the design and implementation of DG ECHO-funded actions take into account the needs of the most vulnerable groups, (women, children, elderly and people with disabilities (PWD)?					
EQ.2 To what extent was a clear and context-adapted strategy provided and applied in Ukraine during 2014-2018?					
EQ. 3 To what extent has DG ECHO contributed to establishing joint and impartial needs assessments?					
EQ.4 To what extent was DG ECHO's response aligned with the humanitarian principles, and DG ECHO's relevant thematic/sector policies?					
EQ.5 To what extent was DG ECHO successful in coordinating its response with that of other humanitarian donors in the country, including EU member states, and by that avoiding overlaps and ensuring complementarities?					
Evaluation Question	DG ECHO did not meet any stakeholder expectations	DG ECHO met some stakeholder expectations but the evaluation	DG ECHO mostly met stakeholder expectations; the evaluation	DG ECHO exceeded some stakeholder expectations; the evaluation	DG ECHO exceeded stakeholder expectations; the evaluation

Overall assessment of DG ECHO's Ukraine programme 2014-2018 against the Evaluation Questions					
		team identified several areas for improvement	team assessed DG ECHO's response as adequate	team assessed DG ECHO's response as good	team assessed DG ECHO's response as excellent
EQ.6 In the context of the Nexus and humanitarian-development coordination instruments, what measures were taken by DG ECHO to link the EU's humanitarian and development actions, and how successful were these measures?					
EQ.7 What was the added value of DG ECHO in Ukraine					
EQ.8 To what extent were DG ECHO's objectives (as defined in the HAR, the Consensus and the specific HIPs) and expected results achieved?					
EQ.9 How successful was DG ECHO through its advocacy and communication measures in influencing other actors by direct and indirect advocacy on issues like humanitarian access and space, respect for IHL, addressing gaps in response, applying good practice, and carrying out follow-up actions of DG ECHO's interventions?					
EQ.10 To what extent did DG ECHO achieve cost-effectiveness in its response in Ukraine, and what factors affected it?					
EQ.11 Was the size of the budget allocated by DG ECHO to Ukraine appropriate and proportionate to the needs?					
EQ.12 To what extent did DG ECHO manage to achieve sustainable results through its actions?					

5. Conclusions

Overall, ECHO has provided a rapid and effective response to the humanitarian crisis in Ukraine, and the DG ECHO programme has performed very well. Furthermore, DG ECHO has demonstrated system-wide leadership in strategic thinking and coordination and has supported several innovations: notably advancing an explicit JHDF with the other EU services, and supporting the creation of the UHF.

5.1. Relevance: vulnerability and targeting

DG ECHO followed an appropriate strategy of shifting its geographic targeting to follow the evolving needs, as assessed by joint and independent needs assessments notably by REACH. By 2019, DG ECHO ended up with a narrow focus in the GCAs on the 0-5km zone along the contact line, a zone that approximates the areas of high needs and least services, as well as the NGCAs. The weight of funding has also shifted over time, from evenly balanced between GCAs and NGCAs in 2017/2018, to about 2/3 in the NGCAs and 1/3 in the GCAs in 2019.

Regarding AAP, DG ECHO's partners in the GCAs sometimes fell short of meeting the full expectations of the IASC commitments in respect to participation. DG ECHO's partners consulted beneficiaries in the design of their initiatives, but could have made greater efforts to reach out to include beneficiaries who were bedridden or socially isolated, and unable to attend community meetings. Furthermore, although some complaint mechanisms and hotlines were in place, partners rarely sought the active involvement of beneficiaries in assessing programme performance.

Regarding the specific vulnerabilities of the affected population in Ukraine, DG ECHO and its partners were aware from the start of the high numbers of vulnerable elderly (and often also chronically ill or disabled) within the affected population, but were slow to adapt their approaches to this underlying structural factor. As a result, the elderly received "normal" support, but not the particular kinds of support that they might need because of their special needs as elderly beneficiaries. This early weakness was corrected from 2017 onwards with a greater role for HAI and the increased efforts of the Age and Disability Technical Working Group, both given considerable support by DG ECHO. Similarly, attention to psychosocial needs was weak in the early stages and increased over time. By 2019, needs assessment was comprehensive, vulnerability targeting was much improved, most of the pressing humanitarian needs in the GCAs were being met, and the remaining area of significant underaddressed needs was in the NGCAs, where access remains difficult.

5.2. Coherence: coordination and the nexus

DG ECHO was a vitally important coordination actor in the initial stages of the response, when few humanitarian agencies were present. After UNOCHA was mobilised and humanitarian agencies were set up, DG ECHO continued to play an important role as the convenor of the Humanitarian Donor Group and as a major financial supporter of UNOCHA and the cluster system. EU MS and other donors highly valued DG ECHO's leadership and information sharing, enabled by the fact that DG ECHO has more specialised humanitarian staff in-country, and more access to the NGCAs, than any other donor government. The evaluation team concluded that the HDG could do more (see also recommendations regarding efficiency), and that DG ECHO could consult with the HDG members on their shared goals for the HDG with a view to developing a medium-term agenda.

From an early date, DG ECHO encouraged the humanitarian community to link up with development donors and with the newly created government ministry MinTOT, but the UN's early initiatives in this regard were rather too bureaucratic and humanitarian-centric, and seemed to be more concerned with capturing development funding than aligning approaches and seeking purposeful complementarity. In late 2019, there was a relaunched initiative to bring the humanitarian agencies, development donors and government representatives together to consider a fresh approach to working together in selected sectors and on an area basis, in which both DG ECHO and DG NEAR-SGUA are participating.

It is within the domains of the different donor governments (notably Canada, USA, EU) that humanitarian-development coordination has made more progress. The evaluation team sees the EU's own work on the nexus, through the drafting and implementation of the JHDF, as a qualified success.

The fact that there is high-level commitment to a joint strategy, including deliberate division of labour and complementary programming from DG NEAR-SGUA, FPI, EIB and DG ECHO, is already a significant achievement. The conclusion of the evaluation team is that the perceived weaknesses of the JHDF are not so much weaknesses with the strategy itself, as with the different mandates of DG NEAR-SGUA and DG ECHO, underpinned by different planning and programming systems. Because of these different worldviews, there is incomplete understanding on the parts of both DG ECHO and DG NEAR-SGUA about the other, which have in turn resulted in disappointed expectations. The evaluation team is however optimistic that mutual understanding has increased over time, and that the next round of interservice discussion about the way forward will come closer to a shared vision.

5.3. Effectiveness: programme and advocacy results

DG ECHO's programme increased in effectiveness as humanitarian organisations became better established and better coordinated, and as some needs that were under-emphasised in the early stages of the response moved from the background to front and centre - especially the unique needs of the elderly and disabled, and the needs for psychosocial assistance. By 2017, the programme in the GCAs had reached a mature and stable state, cash and voucher assistance was being used wherever appropriate, the overall quality of the programme portfolio had increased as it was reduced to fewer and stronger partners, and the programme was well-situated in relation to DG NEAR-SGUA and other humanitarian donors. The evaluation team was struck by how even a few small activities such as school repairs, kitchen gardens, community meeting places and transport vouchers can have a significant impact on community resilience and on the indigenous support systems for the most vulnerable. Without fanfare, DG ECHO complemented its Ukraine programme with small-scale but appreciated and effective support to Ukrainians displaced to Belarus and the Russian Federation.

By the end of 2018, it was becoming increasingly clear that the critical "life-saving" humanitarian needs were largely being met, for example the shelter programme in the GCAs was working on a final list of remaining damaged properties, Ukrainian organisations were taking over the social services at EECPs, and economies of scale were reducing as partners were reaching out to smaller and more isolated groups of beneficiaries. By 2019, it seems that some activities were starting to spill over the boundary into the space that should be covered by government services, especially in health and education.

The remaining frontier, the area where needs remained high and where effectiveness was less certain, was the NGCAs. Even into 2020, the best available information (still far from perfect) is that the situation of many residents of the NGCA, not only along the contact line, is worsening as economic opportunities and social services continue to decline. Constraints in partners' access to the NGCAs is now the single largest obstacle to DG ECHO's continuing effectiveness in the Ukraine response.

Beyond projects, DG ECHO had an important impact on the overall quality and direction of the humanitarian response. Through its early engagement and effective advocacy, DG ECHO played an important role in identifying Ukraine as a significant crisis justifying the mobilisation of UNOCHA and the HCT, in overcoming donor reluctance to engage in a middle income country, and in shaping some of the early policy decisions (for example discouraging camps and humanitarian convoys, providing assistance to people "displaced in place" along the contact line, and persuading the Government to allow assistance to the NGCAs) which paved the way for greater effectiveness across the whole humanitarian response. Likewise, DG ECHO's support for coordination and for quality needs assessment through REACH benefited the whole humanitarian community. In the NGCAs, DG ECHO's access and programming have increased the level of confidence on the part of other donors, and similarly paved the way for a more effective response that might not have materialised if there had not been an "anchor donor."

Regarding overall funding levels, the evaluation team concludes that, for as long as DG ECHO is focusing on the needs in the NGCAs, able to manage the risks of working in the NGCAs, and reducing its spending in the GCAs, then there is a strong case for continued high levels of funding. This logic also implies that access to the NGCAs should be a very high advocacy priority, and that DG ECHO should be readying itself and its partners so they can scale up rapidly in the NGCAs if and when the opportunity arises to do more there. Conversely, if for any reason access to the NGCAs is suddenly shut down, then it would seem that the case for a proportionately large funding emphasis on Ukraine would not be so well-founded.

5.4. Efficiency: a protracted humanitarian crisis in a country of declining needs and interest

The armed conflict and the humanitarian crisis in Ukraine are protracted. For as long as there are frequent ceasefire violations it is not considered to be frozen, but the stability of the contact line and continued Russian political support for the *de facto* authorities are such that Ukraine exhibits most of the characteristics of a frozen conflict. Progress towards peace seems possible (although difficult) and is the political objective of the Government and western allies, while a descent into the active mobile combat of 2014 is very unlikely.

In 2020, the humanitarian needs in the GCAs and humanitarian donor interest are steadily reducing, and the challenge of humanitarian efficiency is to maintain a sufficient humanitarian response in a context of reducing funding. To do this requires that donors and implementing agencies make significant changes to the way they work but, so far, the observed changes have been piecemeal and incremental. Some measures taken by the humanitarian community including DG ECHO have helped improve efficiency, notably shaving back on the costs of cluster coordination, localizing staff positions, encouraging the creation of the ACCESS consortium, and some pooling of resources for shared services such as REACH's needs assessments and the UHF. However, the conclusion of the evaluation team is that these measures are not yet going far enough to gain step changes in efficiency. For that to happen, would require bold measures and discipline on the part of the HCT and the humanitarian donors: some such bold measures could include a resolution of the competition between UN agencies, a firmer division of labour between organisations, greater efforts to share resources, and an overall reduction in the number of humanitarian implementing organisations.

In the view of the evaluation team, a relatively "quick win" to increase efficiency is to move from annual to multi-year planning and programming: in year six of an "almost-frozen" conflict, there is no strong argument for planning and funding on an annual basis as if each year is a new humanitarian crisis. The efficiency gains of multi-year planning and programming are well established and constitute a core commitment of the Grand Bargain. The HCT itself seems somewhat hesitant to move in this direction, promising in 2019 a two-year HRP 2019-2020 but asking for single-year funding for 2019, and followed up with another HRP in 2020. An additional factor of hesitation is the uncertainty regarding the NGCAs, where all humanitarian actors are hoping that there could be breakthrough in access and an opportunity to scale up rapidly. The evaluation team believes that there are practical ways in which the benefits of multi-year planning can still be achieved (notably reduced administrative burden on DG ECHO and partners, greater certainty for staff and economies of scale for procurement) in ways that do not inhibit DG ECHO and partners from making mid-programme adjustments if circumstances change.

5.5. Sustainability: resilience and humanitarian exit

The Ukraine humanitarian crisis is not unusual because it is protracted, but because it is taking place in a middle-income country, where government services function and the Government accepts its responsibility to protect and assist its own population. In such a context, the question is not so much how well DG ECHO has been able to "hand over" to development actors, but rather, how well did DG ECHO and other international stakeholders support the Government to protect and assist its own citizens. In this respect, the conclusion of the evaluation team is that DG ECHO did well strategically, for example rapidly phasing out of areas and sectors where the Government was able and willing to step in, facilitating the access by affected persons to their government pensions and social benefits (this is the ideal sort of cash programme), moving its centre of effort to the most affected zone along the contact line and later to the NGCAs, and encouraging development donors to step in. The evaluation team also found evidence of resilience thinking on the part of implementing partners, and examples of resilience in the affected communities having been strengthened by DG ECHO-funded actions.

However, the evaluation team also concludes that DG ECHO could have done better tactically. First of all, DG ECHO overestimated the ability of development donors to introduce projects into the affected region that would at best continue to fund some of the activities at the development end of the spectrum and that humanitarian donors were funding until now (i.e., livelihoods, education, chronic health care, social housing, water infrastructure), or at the very least provide longer-term development-oriented

¹²⁵ This is reportedly due to different views within the HCT of the optimal strategies for resource-mobilisation, and the varied abilities of different HCT members to prepare multi-year plans. It might also reflect different approaches of new UN and UNOCHA senior management.

support to the most affected region right up to the GCA contact line. Although there have been some development-funded activities of this type notably through the UNDP's RRP, the evaluation team concludes that it is unlikely that development donors will provide direct funding to the eastern region on the scale of previous humanitarian funding: for the reasons outlined in this report, the donors' priorities are more oriented towards reforms at the national level than towards projects in Donetsk and Luhansk oblasts, and "handing over" to development donors will only be partial.

The second way in which the team concludes that DG ECHO could have been more successful, would have been to act on the knowledge that the Ukrainian Government accepts its responsibility to provide services, by orienting its programme from the early stages so that it would facilitate engagement with a range of government departments (rather than development donor). We do not want to overstate this point. DG ECHO did what it could to support MinTOT, but that Ministry's best intentions - under the previous presidency - did not translate into action because of its political weight, and the limitations of its mandate, resourcing and organisational capacities. There has been some progress: DG ECHO's partners in education were working from the start with the Government system, DG ECHO has managed to hand some EECP services over to government, and DG ECHO might yet see success with its support for a more sustainable approach to legal assistance through the FLACs. In these ways, DG ECHO did align with and hand over to government systems in some areas. But in other areas such as health, mental health, elder care and winterisation, DG ECHO supported partners that were effective but unsustainable: they either developed parallel service delivery systems, or developed models of support to government that are beyond what government systems can sustain in the long run (for example higher staffing levels, higher salaries, more transport, subsidised supplies). In these areas, there is a risk that government will not step in, both because they do not want to create a precedent for a higher level of service than they can sustain, or because there is little incentive to step in for as long as humanitarian actors are willing to continue.

5.6. The special challenges of the NGCAs

As in most aspects of the DG ECHO programme that the evaluation team has considered, almost "none of the above applies to the NGCAs." When talking about the nexus and humanitarian coordination, when looking at the partner reports and examining the village-level data available in the REACH reports, when visiting activities along the contact line and thinking about exit strategies, it is easy to lose sight of the fact that the GCAs are substantially less vulnerable than NGCAs. The much greater challenges still facing DG ECHO, in terms of meeting needs, reaching the vulnerable, advocacy priorities, efficiency and effectiveness, are all in the NGCAs. The evaluation team's appreciation of the NGCAs is nothing like as complete, and yet the evaluation team is still confident concluding that DG ECHO needs to continue along the path set in 2019 and 2020, and increase focus and funding on the NGCAs. This also suggests that NGCA access should stay on top of the DG ECHO advocacy priority list because, without improved access, it will be difficult to scale up activities and results.

COVID-19 and DG ECHO in eastern Ukraine

In early March 2020, as this report was being finalised, the world experienced the outbreak of COVID-19. As of May 2020, there were relatively few cases in eastern Ukraine. However, COVID-19 has still had a significant impact upon the humanitarian situation in Donbas, primarily due to the near-total closure of the contact line, restrictions on transport and service delivery, and the worsening economic situation.

The closure of the contact line has severely restricted humanitarian access to the NGCAs including transport of COVID-related medical supplies from GCAs to NGCAs. More importantly, the near-total closure of the contact line has also prevented the movement of people to access social payments, seek essential services, return to their primary residences, and remain in contact with family. The interruption of access to social payments is likely to have the largest and most immediate impact, as approximately 300,000 NGCA residents rely upon these payments for their most basic needs.

People in isolated settlements along the GCA contact line, many of whom are elderly and have underlying health conditions, are experiencing further reductions in the availability of services including empty ATMs, as well as reduced availability and further increased costs of essential supplies and transport. Furthermore, some regular support services for the elderly, disabled and chronically ill have been diverted to COVID-19 response, leaving many people even more isolated and vulnerable than previously. Children in isolated settlements and poor families without internet access are unable to move over to online learning.

Implications for DG ECHO

The overall consequence of COVID-19 in the GCAs does not seem to be the creation of an additional and severe health risk, but rather the rapid worsening of several structural factors that DG ECHO has been addressing for some time, notably access to the NGCAs, difficulties with accessing social payments and pensions, and extending essential services to isolated settlements and individuals. It seems to the evaluation team likely that everything that DG ECHO is already doing remains relevant, but that the obstacles and needs across the entire response are all made several degrees more severe by the logistical and social disruption caused by COVID-19. With a strong team on the ground, DG ECHO is very well-informed about the trends and the needs, and is already adjusting its existing programming to adapt to the evolving situation and needs. On the coordination front, DG ECHO is co-chairing a COVID-19 Technical Response Group with Switzerland.

In the NGCAs, it seems likely that the consequences of COVID-19 could be more severe than in the GCAs, because the NGCA population is already less resilient, and the provision of basic supplies and services was already more stressed prior to COVID-19. In addition, there might be a case for some greater emphasis on COVID-19 medical preparedness and response in the NGCAs. There do not appear to have been any humanitarian convoys to the NGCAs from the Russian Federation in 2020, and supplies from the GCAs to the NGCAs are severely restricted, so it seems likely that NGCA medical services will not have sufficient basic medical supplies to cope with a serious COVID-19 outbreak in the NGCAs.

6. Recommendations

Recommendations were developed together with DG ECHO, and are intended to home in on a few key practical measures. The first recommendation is intended for DG ECHO globally if this is supported by findings from similar humanitarian situations, and the other four recommendations are intended for DG ECHO in Ukraine. The listing under each heading should be regarded as a menu of options, some or all of which could be adopted by DG ECHO depending on the circumstances.

6.1. Inclusion of the elderly and disabled¹²⁶

Existing DG ECHO guidance is somewhat fragmented between a disability guidance note, and the Gender-Age Marker toolkit. To overcome this constraint:

- (1) DG ECHO should strengthen the integration of gender and age, in line with relevant policies as well as through improved usage and implementation of the Gender-Age Marker, so that in situations where there is a target population with a high proportion of elderly, DG ECHO has stronger requirements of partners in their proposals to demonstrate that they have: (a) considered the special needs of the elderly and disabled in their needs assessment and protection analysis; (b) addressed the special needs of the elderly and disabled in their planning; (c) included age (as well as gender) disaggregation in all of their planning and reporting; (d) actively involved the elderly in project design; and (e) targeted the elderly in at least the same proportion as they are represented in the affected population
- (2) When the opportunity arises to review the disability guidance note, DG ECHO should broaden it to draw attention to the likelihood that a target population with a high proportion of elderly (a) is likely to require a response that goes beyond disability mainstreaming and inclusion, and also contains substantial disability-focused interventions; (b) would benefit from early activation of an Age and Disability Working Group; and (c) should be supported by the mobilisation of a specialised NGO to provide technical advice to all actors

In addition, DG ECHO Ukraine could work with the Global Protection Cluster and specialised agencies to develop and disseminate lessons learned from Ukraine that could be applicable to similar future situations with a high proportion of elderly and disabled in the target population. Increasing access and programming in the NGCAs.

6.2. Increasing access and programming in the NGCAs

In Ukraine, DG ECHO should:

- (1) Continue the policy dialogue with all key stakeholders, 127 in order to increase humanitarian access to the NGCAs and to broaden the range of organisations that can work there as well as the sectors they can work in 128
- (2) In coordination with EEAS, maintain the focus on humanitarian access in high-level policy dialogue
- (3) Advocate for policy and regulatory changes that would eventually permit increased use of cash and voucher assistance in the NGCAs: consider inviting key NGCA stakeholders on a study tour to observe how cash and voucher assistance works in similar contexts
- (4) Determine distinct priorities for the NGCAs in the 2021 HIP (creating a two-track HIP with a GCA portion and an NGCA portion that would allow better tailoring of initiatives and partners to the NGCA context)

¹²⁶ The evaluation team considered making a recommendation regarding global policy, but concluded that another global policy would not be helpful. Instead, existing global policies on the gender and age marker, protection, disability and gender could be revised (in due course) to sharpen the inclusion of the elderly. DG ECHO might wish to develop an internal practical guide for those few situations where age is the main dimension of vulnerability.

¹²⁷ Support the existing HCT initiative to increase access to the NGCAs, and tackle this bilaterally as well. For example, when appropriate, DG ECHO senior officials could engage with interlocutors in the NGCAs and perhaps in Moscow.

¹²⁸ As part of this advocacy, the HCT should be encouraged to conduct a review of the readiness of the humanitarian community to scale up its NGCA programming in the event of a desired breakthrough.

(5) Continue to increase funding to the NGCAs, while maintaining sufficient funding in the GCAs (a) to support the NGCA population receiving services in the GCAs, (b) to address remaining critical humanitarian needs, and (c) to be able to respond to a new displacement crisis.

6.3. Working more strategically on the humanitarian-development nexus

In Ukraine, DG ECHO should:

- 1. Continue to participate fully (as with the 2018 JHDF process) in the analysis and planning for the next DG NEAR-SGUA multi-year strategy
- 2. Continue the good practice of joint missions by senior DG NEAR-SGUA and DG ECHO officials to Ukraine, as a primary means of improving shared understanding on the situation and on the preferred ways to cooperate on solutions
- 3. Provide a foundational training on humanitarian protection in Ukraine to relevant EUD staff, so that EUD colleagues gain a deeper understanding of what it means to place protection at the centre of planning and response
- 4. Recognising that DG NEAR-SGUA is a strategic ally on development advocacy and that DG NEAR-SGUA has privileged access to government, collaborate with DG NEAR-SGUA and EEAS on an explicit advocacy campaign with three objectives: (a) for the Government to agree to provide services up to the contact line, (b) for the Government to follow through on its planned reforms that relate to Donetsk and Luhansk oblasts and to the affected population (i.e., education, health, decentralisation), making appropriate adjustments for the unique context of the isolated communities along the contact line, and (c) for the Government to make available sufficient funding and (as required) sufficient incentives in order for services along the contact line to reach national standards
- Encourage DG NEAR-SGUA to continue to support government service delivery in the GCAs of Donetsk and Luhansk oblasts.

6.4. Improving efficiency through multi-year programming, localisation and harmonised reporting/monitoring

In Ukraine, DG ECHO should:

- 1. Encourage selected partners to submit two-year proposals for the 2021-2022 HIPs¹²⁹
- 2. Reduce earmarking, within the constraints of prevailing DG ECHO financial regulations. In practice, this could consist of requiring partners to provide less detail in their proposals regarding what they would do and how they would allocate their funding, thereby providing them with more flexibility to respond to evolving needs and opportunities. Note that partners would still be required to report on what they had done and on how the funds had been spent (thereby retaining financial accountability)
- 3. Continue current localisation initiatives, including the conversion of international to national staff positions, the capacity development of national NGOs, and the use of national NGOs twinned with DG ECHO-eligible international organisations, in order to improve programme relevance and sustainability, and to reduce the costs of programme delivery
- 4. Through the HDG, initiate a discussion about improving the coordination of donor field monitoring visits. For organisations that are funded by several donors, this could include the possibility of joint visits when appropriate, and "delegated monitoring" using the principles of delegated cooperation that are well established within DG DEVCO.

¹²⁹ The evaluation team was not aware of guidance from Brussels to DG ECHO Field Offices regarding multi-year funding, even though this is a Grand Bargain commitment on which DG ECHO reports regularly, and there are pilots under way in DG ECHO. In the absence of institutional guidance, the evaluation team suggests that (a) selected partners should have an organisationally-approved multi-year strategy for Ukraine, and (b) should be necessary partners ("incontournable"). The proposals should cover two years of activities and with a two-year budget, but it would be understood that DG ECHO would only make a firm commitment to the first year of funding in 2021, and that funding for 2022 would be provided in 2022 and contingent upon a sufficient financial allocation to Ukraine for 2022. The agreement could also make provision for a review of the proposed programme and budget in January 2022, to take into account any changes in the context or opportunities that have arisen in the course of 2021.

6.5. Preparing deliberately for humanitarian exit from the GCAs

In Ukraine, DG ECHO should:

- (1) Through the HDG, seek agreement that all humanitarian donors would start requiring their partner agencies to develop gradual GCA exit strategies by the beginning of 2021, expecting that implementation would take several years and follow different timeframes (according to the organisation and the sector). If and when agreed, this would then become a requirement of DG ECHO's HIP for 2021
- (2) Advocate through the HCT and the cluster leads for (a) greater involvement of government ministries and local authorities in coordination for the GCAs, with a perspective of transitioning in due course from humanitarian clusters to development sector coordination mechanisms, (b) humanitarian implementing agencies in Ukraine to align their activities to government systems and standards,¹³⁰ and (c) to move towards harmonisation of salaries and incentives so that government and non-government staff are similarly compensated for similar work in similar working conditions
- (3) Encourage humanitarian organisations providing cost-recoverable services (for example day care and pre-school services, legal assistance, household water delivery, garbage disposal, community support for elder care, youth activities etc.) to move towards partial cost-recovery
- (4) Narrow the focus of GCA programming from 2021 onwards on those activities that cannot be provided by government, on selected activities that are providing services to NGCA residents, and selected partners whose response capacity needs to be sustained so that they can scale up again rapidly if there is a sudden displacement crisis.

¹³⁰ Including the reduction of situations where a humanitarian agency is <u>substituting</u> for a Government service (through a parallel system), and increasing the situations where a humanitarian agency is <u>supporting</u> a Government service.

Annex 1: Interviewee perceptions of DG ECHO performance¹³¹

Strong Good Adequate Needs improvement

- 7. To what extent did DG ECHO add value beyond what could have been provided by member states individually?
- 1.1 To what extent did actions address the needs of vulnerable groups (women, children, the elderly and PWDs)?
- 8.2 To what extent did DG ECHO's actions achieve their intended results?
- 2.1 To what extent were the HIPs clear, relevant and annually adapted to the situation and its varied operating contexts?
- 2.2 To what extent did DG ECHO develop an appropriate approach for (a) reaching the affected population, and (b) monitoring whether its actions continued to reach the affected population and meet needs?
- 5. How well did DG ECHO coordinate (common approach, division of labour) with the HCT and with other humanitarian donors?
- 1.2 To what extent were the affected population and specific vulnerable groups meaningfully consulted by IPs, and did that consultation influence the design and implementation of the actions?
- 3.2 To what extent were needs assessments used by stakeholders for planning and programming?
- 4.2 To what extent were DG ECHO's actions aligned with its thematic and sector policies?
- 4.1 To what extent was DG ECHO perceived as humanitarian (humanity), neutral, impartial and independent in GCAs and in NGCAs?
- 12.1 To what extent did DG ECHO's actions build the capacity of local partners?
- 10. To what extent were there any ways that DG ECHO's programme could have been more cost-effective?
- 12.2 To what extent did DG ECHO go beyond delivering assistance to strengthen resilience?
- 3.1 To what extent did DG ECHO support satisfactory, joint and impartial needs assessments?
- 9. To what extent was DG ECHO effective in its humanitarian advocacy, including advocacy for additional funding?
- 8.1 To what extent did DG ECHO provide its funding in a timely manner, and were the most appropriate modalities adopted by IPs?
- 12.3 To what extent did DG ECHO actions envisage exit strategies, and were they implemented?
- 6. To what extent did DG ECHO actively improve linkages between its humanitarian actions and development initiatives?
- 11.1 To what extent was DG ECHO's budget allocation commensurate with the needs?
- 11.2 To what extent was DG ECHO's budget proportionate in relation to similar humanitarian situations?

¹³¹ The evaluation team made the scoring judgement based upon each interview, during which the interlocutors were sometimes directly asked to rate DG ECHO performance on a five-point scale.

Annex 2: Team assessments of DG ECHO performance from document review¹³²

Strong	Good	Adequate	Needs improvement

- 3.2 To what extent were needs assessments used by stakeholders for planning and programming?
- 5. How well did DG ECHO coordinate (common approach, division of labour) with the HCT and with other humanitarian donors?
- 4.2 To what extent were DG ECHO's actions aligned with its thematic and sector policies?
- 8.2 To what extent did DG ECHO's actions achieve their intended results?
- 1.1 To what extent did actions address the needs of vulnerable groups (women, children, the elderly and PWDs)?
- 2.2 To what extent did DG ECHO develop an appropriate approach for (a) reaching the affected population, and (b) monitoring whether its actions continued to reach the affected population and meet needs?
- 2.1 To what extent were the HIPs clear, relevant and annually adapted to the situation and its varied operating contexts?
- 8.1 To what extent did DG ECHO provide its funding in a timely manner, and were the most appropriate modalities adopted by IPs?
- 3.1 To what extent did DG ECHO support satisfactory, joint and impartial needs assessments?
- 1.2 To what extent were the affected population and specific vulnerable groups meaningfully consulted by IPs, and did that consultation influence the design and implementation of the actions?
- 10. To what extent were there any ways that DG ECHO's programme could have been more cost-effective?
- 12.1 To what extent did DG ECHO's actions build the capacity of local partners?
- 4.1 To what extent was DG ECHO perceived as humanitarian (humanity), neutral, impartial and independent in the GCAs and in the NGCAs?
- 9. To what extent was DG ECHO effective in its humanitarian advocacy, including advocacy for additional funding?
- 7. To what extent did DG ECHO add value beyond what could have been provided by member states individually?
- 12.2 To what extent did DG ECHO go beyond delivering assistance to strengthen resilience?
- 6. To what extent did DG ECHO actively improve linkages between its humanitarian actions and development initiatives?
- 12.3 To what extent did DG ECHO actions envisage exit strategies, and were they implemented?
- 11.1 To what extent was DG ECHO's budget allocation commensurate with the needs?
- 11.2 To what extent was DG ECHO's budget proportionate in relation to similar humanitarian situations?

¹³² The evaluation team made the scoring judgement based upon their reading of the documents reviewed, in particular the DG ECHO internal documents on project performance.

Annex 3: Results of scorecards completed by key informants¹³³

Strong	Good	Adequate	Needs improvement	
How well did DG ECHO (or your	DG ECHO-funded action) achi	eve its intended results?		
Was the assistance provided in	a way (modality, i.e. cash, vou	cher, in-kind) that was approp	oriate for the beneficiaries?	
How well did DG ECHO reach th	e affected population?			
How well did DG ECHO meet the	needs of the most vulnerable	population?		
How well did DG ECHO's Annua	l Strategies (HIPs) address the	priority humanitarian needs?	?	
How well did DG ECHO's progra	mme evolve as the situation e	volved from 2014-2018?		
How effective was DG ECHO's h	umanitarian advocacy?			
To what extent did DG ECHO pro	ovide its funding to partners in	a timely manner?		
How effective was DG ECHO at strengthening the capacity of Ukrainian partners?				
To what extent did DG ECHO go beyond emergency response to strengthen resilience?				
To what extent was DG ECHO's	budget for Ukraine commensu	rate with the humanitarian ne	eds?	

Overall perceptions of DG ECHO Ukraine, ranked by stakeholder type (raw score 1-5)			
DG ECHO staff	4.4		
Donors	4.3		
NGCA IPs	4.0		
GCA IPs	3.9		
EUD (EEAS, DG NEAR- SGUA, FPI)	3.7		
Coordination actors	3.5		

¹³³ Either during interview, or after interview (through survey monkey), all interviewees were asked to complete a scorecard – a 2-minute survey. All scorecard results were then consolidated, and finally analysed by stakeholder type. The quick-scorecard method did not provide an opportunity for narrative comments. In this survey n=72.

Annex 4: Perceptions of beneficiaries as captured in an FGD survey¹³⁴

Ctuana	Cood	A	No a da importante est
Strong	Good	Adequate	Needs improvement

Did you receive this assistance at the time you needed it?

Do you feel the organisation which provided the support listened to your views and planned the activity to better meet your household's needs?

Was the assistance provided in a way that was appropriate to people (e.g. goods/services delivered, vouchers, cash, or payments received)?

Do you think that the assistance you received was good value for money (good quality for good price)?

From your point of view, was the assistance provided without political or other bias?

Were you consulted by the organisation which provided the support?

Was the assistance you received enough to meet your basic needs?

Were you given opportunities to complain about the assistance, or fix problems?

Have there been changes in the activities or approach of the organisation that provided the assistance as the situation in Ukraine changed?

Did the organisation which provided the support contact you to check on what assistance you had received?

Do you think there have been long term impacts that make your household better able to recover from a future crisis?

Were there people in need in your community who were not reached with this assistance?

Have you noticed any duplication of effort by different agencies in the delivery of assistance?

Total sample: n = 30 Male = 6 Female = 21 Did not identify = 3 Disabled = 8 Aged 0-17 = 0 Aged 18-59 = 18 Aged >59 = 11 Age not specified = 1

¹³⁴ FGD participants were asked to complete an instant paper survey (available in Russian and Ukrainian) at the end of each focus group session. The results were then tabulated and analysed.

Annex 5: Evaluation Matrix

Criteria	Evaluation Questions	Judgment Criteria	Key questions	Indicators
Relevance	EQ.1 To what extent did the design and implementation of DG ECHO-funded actions take into account the needs of the most vulnerable groups, (women, children, elderly and people with disabilities (PWD)?	The design and implementation of DG ECHO actions have been informed and adapted to the needs of the most vulnerable groups affected by the conflict in Ukraine, in line with the EU regulatory and policy framework for humanitarian aid. The affected population has been adequately and meaningfully consulted, and this process has been translated into adapted targeted design and the implementation of DG ECHO actions	groups (women, children, the elderly and PWDs)? 1.2 To what extent were the affected population and specific vulnerable groups meaningfully consulted by IPs, and did that consultation influence the design and implementation of	Evidence that the most vulnerable have been consulted (e.g. consultation reports, FGD responses, FGD survey results etc.) Evidence that vulnerability assessments have informed the design and implementation of DG ECHO actions (e.g. baselines, indicators, targets, data disaggregated by age, gender, disability etc.) Evidence that actions have been adapted to the needs of the most vulnerable people, by gender and for protection purposes. Evidence of a gender-sensitive needs assessment or gender analysis
	EQ.2 To what extent was a clear and context-adapted strategy provided and applied in Ukraine during 2014-2018?	DG ECHO developed and applied a clear and context-specific strategy tailored to the humanitarian situation in Ukraine DG ECHO and its partners have adequately adapted their approaches and programming as the situation changed	2.1 To what extent were the HIPs clear, relevant and annually adapted to the situation and its varied operating contexts? 2.2 To what extent did DG ECHO develop an appropriate approach for (a) reaching the affected population, and (b) monitoring whether its actions continued to reach the affected population and meet needs?	Evidence that AIPs have clear objectives Evidence that adequate situation analyses have been carried out (e.g. analysis of: gaps in funding, the strategies of other actors / donors, the socio-economic and geo-political situation, needs assessments) Key milestones of the emergency response were monitored and responded to (e.g. the evolving capacity of government and partners, humanitarian access, and the evolving needs of people affected)

Criteria	Evaluation Questions	Judgment Criteria	Key questions	Indicators
	EQ. 3 To what extent has DG ECHO contributed to establishing joint and impartial needs assessments?	DG ECHO has been successful in supporting joint and impartial needs assessments (based on the definition of impartiality as a humanitarian principle and the Grand Bargain commitments)	3.1 To what extent did DG ECHO support satisfactory, joint and impartial needs assessments? 3.2 To what extent were needs assessments used by	Number, type and scope of joint or other needs assessments conducted by DG ECHO and its partners Degree of impartiality of the joint needs' assessments
			stakeholders (IPs) for planning and programming?	(i.e. based on needs alone, regardless of race, status, gender, age, political views, etc.)
Criteria	Evaluation Questions	Judgment Criteria	Key Questions	Indicators
Coherence	EQ.4 To what extent was DG ECHO's response aligned with the humanitarian principles, and DG ECHO's relevant thematic/sector policies?	DG ECHO's response is well aligned with the four humanitarian principles of Humanity, Neutrality, Impartiality and Independence, as per the Consensus DG ECHO's funded projects are aligned with relevant thematic and sector policies	4.1 To what extent was DG ECHO perceived as humanitarian (humanity), neutral, impartial and independent in the GCAs and in the NGCAs? 4.2 To what extent were DG ECHO's actions aligned with its thematic and sector policies?	Evidence that stakeholders perceive ECHO as respecting humanitarian principles of humanity, neutrality, impartiality and independence Degree of alignment (e.g. design, scope, approach, targeting, etc.) with relevant policies (e.g. Cash-and Vouchers, Humanitarian Food Assistance Health, WASH, Shelter, Protection, etc.)
	EQ.5 To what extent was DG ECHO successful in coordinating its response with that of other humanitarian donors in the country, including EU member states, and by that avoiding overlaps and ensuring complementarities?	DG ECHO coordinated its operations successfully with other humanitarian donors, thereby avoiding overlaps (financial, coverage, programmatic) and ensuring complementarities (comparative advantage, synergies)	5. How well did DG ECHO coordinate (common approach, division of labour) with the HCT and with other humanitarian donors?	Perceptions of humanitarian stakeholders on the type, level and effectiveness of coordination initiatives and mechanisms Degree of complementarity of DG ECHO response with other humanitarian donors (e.g. funding gaps reduced, programme duplications reduced, coverage increased, comparative advantage leveraged)
	EQ.6 In the context of the Nexus and humanitarian-	DG ECHO has undertaken successful measures to better	6. To what extent did DG ECHO actively improve linkages	Evidence of measures taken by DG ECHO to coordinate the development and humanitarian actions (for example

Criteria	Evaluation Questions	Judgment Criteria	Key questions	Indicators
	development coordination instruments, what measures were taken by DG ECHO to link the EU's humanitarian and development actions, and how successful were these measures?	link and increase the impact of the EU's humanitarian and development actions	between its humanitarian actions and development initiatives	by facilitating the transfer of responsibilities and programmes to development partners (including DG NEAR-SGUA) and Ukrainian authorities)? Degree of coordination achieved among actors and instruments (e.g. Coordination meetings, regular information exchange, joint missions, joint needs assessments, funding decisions, programme design, joint monitoring) Examples of concrete joint actions taken by both humanitarian and development actors to reduce need
Criteria	Evaluation Questions	Judgment Criteria	Key Questions	Indicators
EU Added- Value	EQ.7 What was the added value of DG ECHO in Ukraine	DG ECHO, as part of the EU, leveraged its financial, political and technical advantages and provided added-value, as illustrated in the Consensus, that could not have been provided by member states individually	7. To what extent did DG ECHO add value beyond what could have been provided by member states individually?	Perceptions of stakeholders and evidence of added value elements of DG ECHO's intervention
Criteria	Evaluation Questions	Judgment Criteria	Key Questions	Indicators
Effective- ness	EQ.8 To what extent were DG ECHO's objectives (as defined in the HAR, the Consensus and the specific HIPs) and expected results achieved? After five years, what overall results have been achieved?	DG ECHO resources were provided in a timely manner and IPs implemented using the most effective modalities to achieve the intended results DG ECHO's objectives in Ukraine have been achieved in line with the HAR, the Consensus and the HIPs		Perceptions of stakeholders and evidence that implementing partners delivered relevant and timely assistance, in an effective, efficient and appropriate way (transfer modality – Cash, voucher, in-kind) Degree of achievement of DG ECHO's planned results in each sector/action

Criteria	Evaluation Questions	Judgment Criteria	Key questions	Indicators
	EQ.9 How successful was DG ECHO through its advocacy and communication measures in influencing other actors by direct and indirect advocacy on issues like humanitarian access and space, respect for IHL, addressing gaps in response, applying good practice, and carrying out follow-up actions of DG ECHO's interventions?	DG ECHO has successfully influenced other actors through direct and indirect, well-targeted and relevant advocacy (e.g. improved access to NGCA, respect for IHL, reduced gaps in response, improve good donorship, improved legislative and regulatory framework, improved Government's policies etc.) contributing to humanitarian results Did ECHO act as an advocate for increased humanitarian funding from other donors	9. To what extent was DG ECHO effective in its humanitarian advocacy, including advocacy for additional funding?	Evidence of advocacy and communication measures/strategies implemented by DG ECHO directly and/or in coordination with other EU actors and through its partners Evidence that the actions of other actors have changed as a result of DG ECHO's advocacy and communication measures
Criteria	Evaluation Questions	Judgment Criteria	Key Questions	Indicators
Efficiency	EQ.10 To what extent did DG ECHO achieve cost- effectiveness in its response in Ukraine, and what factors affected it?	Qualitative evidence that actions funded by DG ECHO were cost-effective (using general guidance contained in the Study on Approaches to Assess Cost-Effectiveness of DG ECHO's Humanitarian Aid Actions, ADE, August 2016)	10. Were there any ways that DG ECHO's programme could have been more cost-effective?	Where appropriate: proportion of funding reaching populations compared to operational costs The proportion of actions using more cost-efficient modalities Qualitative evidence that the actions supported were cost-effective
	EQ.11 Was the size of the budget allocated by DG ECHO to Ukraine appropriate and proportionate to the needs?	DG ECHO's budget allocations to Ukraine are based on needs, the programmes of other donors and DG ECHO objectives	11.1 To what extent were DG ECHO's budget allocations commensurate with the needs? 11.2 To what extent was DG ECHO's budget proportionate, in relation to similar humanitarian situations?	Perceptions and evidence that DG ECHO's budget allocations are based on needs Perceptions and evidence that DG ECHO's budget allocations considered the allocations of other donors Proportion of DG ECHO funding compared to total humanitarian funding in Ukraine

Criteria	Evaluation Questions	Judgment Criteria	Key questions	Indicators
		DG ECHO's budget was proportionate in relation to similar humanitarian situations		Evidence that DG ECHO's budget size was commensurate to ECHO objectives and expected outcomes Perceptions and evidence that Ukraine funding was
				proportionate to other similar situations.
Criteria	Evaluation Questions	Judgment Criteria	Key Questions	Indicators
Sustainability – Connectedness	EQ.12 To what extent did DG ECHO manage to achieve sustainable results through its actions?	DG ECHO has increased the sustainability of its actions, for example by building sustainable capacity and considering exit strategies	12.1 To what extent did DG ECHO's actions build the capacity of local and international partners? 12.2 To what extent did DG ECHO go beyond delivering assistance to strengthen resilience? 12.3 To what extent did DG ECHO actions envisage exit strategies, and were they implemented?	Perceptions and evidence of effective capacity building of IPs. Were beneficiaries any better able to withstand shocks and stresses as a result of ECHO funded actions? Perceptions and evidence of effective exit strategies on the part of ECHO or IPs?

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Annex 7: List of key stakeholders interviewed

Coordination actors

HELPAGE	Project officer	
HELPAGE	Protection & Inclusion Coordinator	
UNOCHA	ICCG coordinator	
Other NGO	Cash Working Group Lead	
PIN	Project Head	
PIN	Deputy emergency coordinator	
STC	Programme Operations Manager	
STC	Programme Development & Quality Manager	
UNDP	Nexus Coordinator Slovyansk	
UNDP	Mine Action sub-cluster	
UNFPA	GBV sub-cluster	
UNHCR	Shelter cluster	
UNHCR	Protection cluster	
UNICEF	Child Protection sub-cluster	
UNICEF	WASH Cluster and Infrastructure Coordinator	
UNRCO	Resident Coordinator	
UNRCO	Former Resident Coordinator	
WFP	Food Security cluster	

UN agencies as Implementing Partners

IOM	Emergency and Stabilization Officer, Luhansk NGCA
IOM	Project Specialist, Donetsk NGCA
IOM	Former emergency coordinator
UNOCHA	Field Coordination Assistant, Lugansk NGCA
UNOCHA	Head of Field Office Slovyansk
UNOCHA	Senior Humanitarian Affairs Officer, Donetsk NGCA
UNOCHA	Country Director
UNOCHA	Field Coordination Officer, Donetsk NGCA
UNOCHA	Field Coordination Officer, Lugansk NGCA
UNHCR	Head of Office
UNHCR	Country Director
UNICEF	Deputy Representative
UNICEF	Head of UNICEF field office in Donetsk
UNICEF	Project Specialist, Lugansk NGCA
WHO	Ukraine Desk Officer for HQ

INGOs and Red Cross movement members

CARITAS	General Secretary
DRC	DRC-DDG Base Manager
DRC	DDG Technical Advisor
DRC	DRC Legal Assistance Team Leader
DRC	DDG Demining Supervisor
DRC	DDG Team Leader
DRC	DDG Head of Programme
DRC	Country Representative
GOAL	Former Country Director
HELPAGE	Humanitarian Programme Coordinator
ICRC	Former Head of Delegation
ICRC	Deputy Head of Delegation
ICRC	Head of Office, Severodonetsk
ICRC	Head of Office, Slavyansk
IFRCS	Head of Office, Belarus
IFRCS	Head of Office, Russian Federation
INSO	Head of Office
MdM	Psychologist, Stanitsa Luhanska
MdM	Deputy Coordinator
MdM	Psychologist, Mobile Unit, Popasna district
MdM	Field Coordinator
MdM	Doctor, Mobile Unit, Popasna district
MdM	Health Officer, NGCA
NRC	Shelter Project Manager, Severodonetsk
NRC	ICLA Project Coordinator
NRC	Head of Programmes in Ukraine
NRC	Shelter Community Engagement Coordinator
NRC	ICLA Project Manager, Severodonetsk
NRC	Shelter Engineer
NRC	Lawyer on Human Rights,
NRC	General Lawyer, Center of Legal Assistance
PAH	Country Representative
PIN	Area Coordinator, Lugansk NGCA
PIN	WASH and Shelter Coordinator, Lugansk NGCA
PIN	Country Director
REACH	Country Coordinator
STC	Coordination actor

STC	Child Poverty & Supply Chain Officer, Donetsk NGCA
STC	Child Protection/Education Officer, Donetsk NGCA
STC	NGCA Field Coordinator, Donetsk NGCA
STC	Country Director

NNGOs

Bridge	Head of the Foundation Supervisory Board
DDC	Chairwoman of the NGO, Donetsk NGCA
Maximal	Director of the NGO, Donetsk NGCA
Mira	Director of the NGO, Donetsk NGCA

Government of Ukraine

GoU Other	Former First Deputy Governor, Donetsk
GoU MINTOT	Former Deputy Minister

Other donors

Canada	First Secretary
Estonia	Country Programme Assistant
Germany	Economic Cooperation Officer
Switzerland	Former Head Swiss Cooperation Ukraine
UK	Humanitarian Advisor
USA	OFDA Kyiv
USA	Desk Officer PRM Washington

EU officials

EEAS	Political officer/advocacy
EEAS	Head of IcSP
EEAS	Country Director
EUD	Former Ambassador to Ukraine
NEAR-SGUA	Head of Operations Section in Ukraine
NEAR-SGUA	Development Officer
NEAR-SGUA	Director

ECHO

ECHO Amman	Technical Assistant
ECHO Amman	Regional FS & Cash Expert Technical Assistant
ECHO Amman	Technical Assistant
ECHO Brussels	Former Desk Officer
ECHO Brussels	Technical Assistant

ECHO Brussels	Desk Officer for Ukraine
ECHO Brussels	Director
ECHO Brussels	Former Desk Officer for Ukraine
ECHO Kyiv	Programme Officer
ECHO Kyiv	Head of office
ECHO Kyiv	Former Head of Office
ECHO Kyiv	Technical Assistant

Annex 8: Terms of Reference



- EUROPEAN COMMISSION
- DIRECTORATE-GENERAL FOR CIVIL PROTECTION AND HUMANITARIAN AID OPERATIONS DG ECHO

ANNEX I

Terms of Reference

for the evaluation of the European Union's humanitarian assistance in Ukraine, 2014-2018

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1. EU HUMANITARIAN INTERVENTION

1.1. FRAMEWORK

- 1. The **legal base** for Humanitarian Aid is provided by <u>Article 214</u> of the Treaty on the Functioning of the European Union, and the <u>Humanitarian Aid Regulation</u> (HAR). The objectives of European Union (EU) humanitarian assistance are outlined there and could for evaluation purposes be summarized as follows: From a donor perspective and in coordination with other main humanitarian actors, to provide the right amount and type of aid, at the right time, and in an appropriate way, to the populations most affected by natural and/or manmade disasters, in order to save lives, alleviate suffering and maintain human dignity.
- 2. The humanitarian aid budget is implemented through annual funding decisions adopted by the Commission, which are directly based on Article 15 of the HAR. In general, there are two types of financial decisions: decisions adopted in the context of non-emergency situations (currently entitled World Wide Decisions (WWD)), and decisions which are adopted in emergency situations. The WWD defines inter alia the total budget and the budget available for specific objectives, as well as the mechanisms of flexibility. It is taken for humanitarian operations in each country/region at the time of establishing the budget. The funding decision also specifies potential partners, and possible areas of intervention. The operational information about crises and countries for which humanitarian aid should be granted is provided through 'Humanitarian Implementation Plans' (HIPs). They are a reference for humanitarian actions covered by the WWD and contain an overview of humanitarian needs in a specific country at a specific moment of time.
- 3. The European Consensus on Humanitarian Aid (the Consensus) which has been jointly developed by the Council, the EU member states, the European Parliament and the Commission provides a reference for EU humanitarian aid, and outlines the common objectives, fundamental humanitarian principles and good practices that the European Union as a whole pursues in this domain. The aim is to ensure an effective, high quality, needs-driven and principled EU response to humanitarian crises. It concerns the whole spectrum of humanitarian action: from preparedness and disaster risk reduction, to immediate emergency response and life-saving aid for vulnerable people in protracted crises, through to situations of transition to recovery and longer-term development. The Consensus has thus played an important role in creating a vision of best practice for principled humanitarian aid by providing an internationally unique, forward-looking and common framework for EU actors. It has set out high-standard commitments and has shaped policy development and humanitarian aid approaches both at the European and member state level. Furthermore, with reference to its overall aim, the Consensus has triggered the development of a number of humanitarian sectoral policies.
- 4. DG ECHO¹³⁵ has more than 200 partner organisations for providing humanitarian assistance throughout the world. Humanitarian partners include non-governmental organisations (NGOs), international organisations and United Nations agencies. Having a diverse range of partners is important for DG ECHO because it allows for comprehensive coverage of the ever-expanding needs across the world and in increasingly complex situations. DG ECHO has developed increasingly close working relationships with its partners at the level of both policy issues and management of humanitarian operations.
- 5. DG ECHO has a worldwide network of **field offices** that ensure adequate monitoring of projects funded, provide up-to-date analyses of existing and forecasted needs in a given country or region, contribute to the development of intervention strategies and policy development, provide technical support to EU-funded humanitarian operations, and facilitate donor coordination at field level.
- DG ECHO has developed a two-phase framework for assessing and analysing needs in specific countries and crises. The first phase of the framework provides the evidence base for prioritisation of needs, funding allocation, and development of the HIPs.

¹³⁵ DG ECHO is the European Commission's Directorate-General responsible for designing and implementing the European Union's policy in the fields of Civil Protection and Humanitarian Aid

- 7. The first phase is a global evaluation with two dimensions:
- Index for Risk Management (INFORM) is a tool based on national indicators and data which
 allows for a comparative analysis of countries to identify their level of risk to humanitarian crisis
 and disaster. It includes three dimensions of risk: natural and man-made hazards exposure,
 population vulnerability and national coping capacity. The INFORM data are also used for
 calculating a Crisis Index that identifies countries suffering from a natural disaster and/or conflict
 and/or hosting a large number of uprooted people.
- The Forgotten Crisis Assessment (FCA) identifies serious humanitarian crisis situations where
 the affected populations do not receive enough international aid or even none at all. These
 crises are characterised by low media coverage, a lack of donor interest (as measured through
 aid per capita) and a weak political commitment or ability to solve the crisis, resulting in an
 insufficient presence of humanitarian actors.

The second phase of the framework focuses on context and response analysis:

- Integrated Analysis Framework (IAF) is an in-depth assessment carried out by DG ECHO's humanitarian experts at field level. It consists of a qualitative assessment of humanitarian needs per single crisis, also taking into account the population affected and foreseeable trends.
- 8. In 2016, the Commission endorsed the <u>Grand Bargain</u>, which is an agreement between more than 30 of the biggest donors and aid providers, with the aim to close the humanitarian financing gap and get more means into the hands of people in need. To that end, it sets out 51 commitments distilled into 10 thematic work streams, including e.g. gearing up cash programming, improving joint and impartial needs assessments, and greater funding for national and local responders. For humanitarian donors, the commitments refer to: 1) more multi-year humanitarian funding; 2) less earmarks to humanitarian aid organisations; 3) more harmonized and simplified reporting requirements.

1.2. SCOPE & RATIONALE

- 9. The European Union aims at being a **reference humanitarian donor**¹³⁶, by ensuring that its interventions are coherent with the **humanitarian principles**¹³⁷, are relevant in targeting the most vulnerable beneficiaries, are duly informed by needs assessments, and promote <u>resilience building</u> to the extent possible. DG ECHO also takes the role of when necessary leading, shaping, and coordinating the response to crises, while respecting the overall coordination role of the UN UNOCHA.
- 10. Interventions have a focus on funding critical sectors and addressing gaps in the global response, mobilising partners and supporting the overall capacity of the humanitarian system. As a consequence of the principled approach and addressing gaps in overall response, the EU intervenes in forgotten crises¹³⁸, i.e. severe, protracted humanitarian crisis situations where affected populations are receiving no or insufficient international aid and where there is little possibility or no political commitment to solve the crisis, accompanied by a lack of media interest. Although a significant share of EU funding goes to major crises like the conflict in Syria, approximately 15% of the EU's initial annual humanitarian budget is allocated to forgotten crises. The FCA 2018-2019 identified the existence of 15 forgotten crisis situations, including the Sahel food and nutrition crisis, the Colombia armed conflict, the Sahrawi refugees in Algeria, the Rohingya people in Myanmar/Burma and Bangladesh, Haiti and Ukraine.
- 11. Actions funded comprise assistance, relief and protection operations on a non-discriminatory basis to help people in third countries, with priority to the most vulnerable among them, and mainly those in developing countries, victims of natural disasters, man-made crises, such as wars and outbreaks of fighting, or exceptional situations or circumstances comparable to natural or man-made disasters. The actions should extend the time needed to meet the humanitarian requirements resulting from these different situations.

¹³⁶ I.e. a principled donor, providing leadership and shaping humanitarian response.

¹³⁷ Humanity, Impartiality, Neutrality and Independence

¹³⁸ See also http://ec.europa.eu/echo/what/humanitarian-aid/needs-assessments_en

- 12. Food and Nutrition: The poorest people carry the greatest exposure to the consequences of disasters such as food insecurity and under-nutrition. Insufficient food production or an inability of vulnerable people to purchase sufficient nutritious food leads to malnutrition and under-nutrition. Moreover, dramatic interruptions in food consumption heighten risks of morbidity and mortality. Addressing under-nutrition requires a multi-sector approach. Humanitarian food assistance aims at ensuring the consumption of sufficient, safe and nutritious food in anticipation of, during, and in the aftermath of a humanitarian crisis. Each year, DG ECHO allocates well over EUR 100 million to humanitarian assistance actions that are explicitly associated with specific nutrition objectives.
- 13. Health is both a core sector of humanitarian aid interventions and the main reference for measuring overall humanitarian response. With the global trends of climate change and a growing and ageing population, together with the increasing frequency and scale of natural disasters and the persistency of conflicts, humanitarian health needs are continuing to increase. Given the significance of the EU's humanitarian health assistance, DG ECHO developed a set of Guidelines (operational in 2014) to support an improved delivery of affordable health services, based on humanitarian health needs.
- 14. Protection is embedded in DG ECHO's mandate as defined by the HAR and confirmed by the European Consensus on Humanitarian Aid. Its objective is to reduce physical and psychological insecurity for persons and groups under threat. When providing general assistance, humanitarian actors must ensure that their actions neither undermine protection, nor increase existing inequalities (do-no-harm principle). The 2009 funding guidelines for humanitarian protection activities define the framework in which DG ECHO may support protection activities, including the type of partners and the kind of activities it may finance. DG ECHO supports non-structural activities aimed at reducing the risk, and mitigating the impact of human-generated violence, coercion, deprivation and abuse of vulnerable individuals or groups in the context of humanitarian crises.
- 15. Shelter and settlements assistance is one of the main humanitarian sectors supported by DG ECHO, as an immediate response to, or in anticipation of, a disaster. Because of the importance of adequate housing, shelter may also be supported in the recovery phase, if the reconstruction or maintenance of shelter and settlements addresses the health, protection or livelihoods needs of the affected population. In 2017, DG ECHO's humanitarian funding for shelter and settlements amounted to more than EUR 150 million. The Humanitarian Shelter and Settlements Guidelines, published in 2017, aim to ensure that vulnerable people's shelter needs are met in an optimal and efficient way. The European Union plays an active role in the Global Shelter Cluster, a multi-agency initiative across the humanitarian shelter sector, which aims to strengthen cooperation of aid efforts and deliver faster, more suitable responses while improving the aid delivery in the immediate aftermath of a disaster.
- 16. Water, sanitation and hygiene (also known as WASH) are closely connected and essential for good public health. DG ECHO is one of the largest humanitarian donors of WASH assistance worldwide. In 2017, it provided EUR 136 million for projects improving access to water, sanitation and hygiene. DG ECHO draws its expertise in this humanitarian area from a network of regional and global WASH and shelter experts, its country experts as well as its NGO, UN and Red Cross partners. It also provides support to the Global WASH Cluster, led by UNICEF.
- 17. Education in emergencies (EiE) is crucial for both the protection and healthy development of girls and boys affected by crises. It refers to ensuring uninterrupted and quality learning opportunities for all ages. EiE can rebuild children's lives; restore their sense of normality and safety, and provide them with critical life skills. It helps children to be self-sufficient and to have more influence on issues that affect them. It is also one of the best tools to invest in their long-term future, and in the peace, stability and economic growth of their countries. Yet it has traditionally been one of the least funded humanitarian sectors. With the level of funding at 1% of its annual humanitarian budget still in 2015, DG ECHO increased this share to 8% in 2018 and aims to reach 10% by 2019. Globally, less than 3% of global humanitarian funding is allocated to education.
- 18. <u>Urban areas</u> are complex settings to implement humanitarian assistance and are different from rural areas in terms of needs and vulnerabilities of the affected people. Furthermore, capacities, methods, and preparedness of local actors, institutions, and partners vary considerably between cities. Humanitarian actors, including DG ECHO, have developed an extensive range

of policies, practices, standards and tools for humanitarian work that are often adapted to rural areas, but far less to urban areas. In the past few years, a number of studies have been conducted to explore the drivers of urbanization and its consequences and implications to humanitarian crises and the execution of humanitarian aid. Some of these studies have formulated suggestions on how international humanitarian aid can best engage with the changing settlement patterns.

- 19. Each year millions of people are forced to leave their homes and seek refuge from conflicts, violence, human rights violations, persecution or natural disasters. The number of forcibly displaced persons (refugees, asylum-seekers and internally displaced persons) continued to rise in 2017, calling for increased humanitarian assistance worldwide. The majority of today's refugees live in the developing world, which means that they flee to countries already struggling with poverty and hardship. In April 2016, the European Commission adopted a new development-led approach to forced displacement, aimed at harnessing and strengthening the resilience and self-reliance of both the forcibly displaced and their host communities. The new approach stipulates that political, economic, development and humanitarian actors should engage from the outset of a displacement crisis, and work with third countries towards the gradual socio-economic inclusion of the forcibly displaced. The objective is to make people's lives more dignified during displacement; and ultimately, to end forced displacement.
- 20. The <u>cash-based assistance</u> approach (See <u>DG ECHO Thematic Policy document no 3</u>) ensures humanitarian aid reaches directly and more efficiently those with the greatest need in a timely manner. DG ECHO uses cash and vouchers and other alternative forms of humanitarian assistance only after thoroughly evaluating all options. It recognises that cash and voucher programmes have to be cautiously planned in order to prevent unintended inflation, depression or social imbalances in local markets while reaching the most vulnerable groups (women, children and the elderly).
- 21. Natural disasters and man-made crises are not **gender and age** neutral, but have a different impact on females and males of all ages, including the elderly. Gender-based violence and sexual exploitation and abuse are reported to increase during and in the aftermath of emergencies. Emergency aid must be adapted to cater for the specific needs of the different gender and age groups. Gender and age related vulnerabilities must be taken into account in protection and other response strategies. While emergency situations can intensify disparities, they are also an opportunity to challenge gender and age-based inequality, and to build the capacities of those who are underprivileged in this regard.
- 22. The EU attaches great importance to the link between humanitarian aid, as a rapid response measure in crisis situations, and more medium and long-term development action. The Humanitarian-Development Nexus is complex and requires increased coordination leading to joint humanitarian-development approaches and collaborative implementation, monitoring and progress tracking. The Council Conclusions on Operationalising the Humanitarian-Development Nexus of 19 May 2017 welcomed cooperation between EU humanitarian and development actors, including in the framework of the EU approach to forced displacement and development.

2. CONTEXT OF THE EVALUATION

2.1. HUMANITARIAN NEEDS IN UKRAINE

- 23. The conflict that started in the east of the country between Ukrainian government forces and separatist armed groups in 2014 has directly affected an estimated 5.2 million people since 2014. Over 10,000 people were killed or wounded; hundreds of thousands fled to neighbouring countries, of whom a relatively small number to the EU, while 1.5 million spread throughout the country becoming internally displaced people (IDPs).
- 24. The situation ended up in the following people needing help:
 - 1) Around 4 million people living in conflict-affected areas, on both sides of the contact line between the government-controlled areas (GCA) and non-government-controlled areas (NGCA). Frequent damage to housing and civilian infrastructure, such as water and

- electricity supply systems, as well as school and health facilities, lack of access or affordability of basic needs made some of them extremely vulnerable, and more so during the winter period.
- 2) Around 1.5 million IDPs spread throughout the country faced difficulties accessing proper accommodation and vital social services, such as social benefits, pensions, or health care. Those who fled to neighbouring countries also lived in conditions of vulnerability.
- 25. Humanitarian needs have mainly been in the fields of protection, health including mental health and psychosocial support (MHPSS), food assistance, shelter and non-food items, water, sanitation and hygiene (WASH) and winterization. They are well described in the annual https://example.com/humanitarian-lmplementation-plans (HIPs).
- 26. According to UN UNOCHA¹³⁹, currently about 5.2 million people in Ukraine are affected by the crisis; 3½ million are in need of humanitarian assistance; there are still 1½ million IDPs, and funding needs are estimated at around \$162 million for 2019.

2.2. DG ECHO'S RESPONSE IN UKRAINE

- 27. The priorities and scope of the humanitarian intervention are defined annually in the HIPs. When the political crisis in Ukraine escalated into an armed conflict in 2014, an Emergency Decision was taken to cater for the emerging humanitarian needs. From 2015 to 2017, HIPs specifically dedicated to Ukraine were defined and, in 2018, the HIP for Ukraine also included the rest of the Eastern Neighbourhood region and the Western Balkans. The following are the resources allocated under each Plan and Decision:
- ECHO/UKR/BUD/2014/01000, EUR 10,800,000
- ECHO/WWD/BUD/2015/01000, EUR **32,000,000**
- ECHO/WWD/BUD/2016/01000, EUR 28,400,000
- ECHO/UKR/BUD/2017/91000, EUR 20,000,000
- ECHO/UKR/BUD/2018/91000, EUR 26,000,000 (includes EUR 2,000,000 for the Eastern Neighbourhood)
- 28. The EU has focused its humanitarian aid activities on 1) the vulnerable population living in the areas directly affected by the conflict, 2) the IDPs and 3) the returnees. The main sectors covered have been:
- a) Protection, which has included registration and access to documentation, case management, mine action and legal counselling.
- b) Health the focus has been on areas where local health systems were dysfunctional and the response has included provision of emergency and primary health care; supply of medical equipment and medicines; access to curative or preventive health care; addressing the gaps in secondary/tertiary health care (mainly war surgery); MHPSS and capacity building of local professionals.
- c) Multi-purpose Cash Transfers (MPCT), when and wherever feasible and considered a preferred option, to help the affected population cope with basic needs.
- d) Food security and livelihoods, through the provision of in-kind, voucher or cash support to restore or maintain an adequate diet, when a basic needs approach through MPCT was not possible.
- e) Shelter the focus has been on rehabilitating and repairing damaged or destroyed housing, and has included winterization, i.e. providing such items as heating provisions (coal, fuel, briquettes), blankets and winter clothes when a basic needs approach through MPCT was not possible. Actions at the beginning of the assistance also included providing accommodation to IDPs and returnees.
- f) WASH provision of access to safe water, including infrastructure maintenance and rehabilitation, as well as supply of equipment like generators, water pumps and water treatment systems.

¹³⁹ https://reliefweb.int/report/ukraine/situation-report-ukraine-20-dec-2018

- 29. The response has often been constrained by ceasefire violations bringing about a high level of insecurity to the local population and humanitarian aid workers, and by bureaucratic and political impediments, including a limited access to the NGCA.
- 30. Other than DG ECHO, additional actors in the humanitarian response have been:
- a) National/local response The Ukrainian government was ill-prepared for the crisis, but took some steps to address the needs of IDPs and, in April 2016, established the Ministry for Temporarily Occupied Territories and Internally Displaced People. However, financial and human resources from the Government of Ukraine have been scarce. In addition, state social assistance, including pensions, has been suspended to hundreds of thousands of IDPs. Civil society has played an important role in delivering aid. However, de-facto authorities in the NGCA imposed various restrictions towards international humanitarian actors, which effectively reduced the delivery of humanitarian aid.
- b) International response –The UN's requests for funding have been decreasing since their USD 316 million peak in 2015, and there are symptoms of donor fatigue. The EU has actually defined the situation as a forgotten crisis in the FCA 2018-2019. The EU, together with its member states, has provided an estimated EUR 385 million in humanitarian assistance since the beginning of the crisis (the EC alone has contributed EUR 116.1 million through DG ECHO).
- 31. Ukraine has also been beneficiary of development assistance and other forms of support (not the subject of this evaluation). The EU has provided funds under the EU Support to Ukraine's Regional Development Policy Programme, the European Neighbourhood and Partnership Instrument/European Neighbourhood Instrument and the Instrument contributing to Stability and Peace. Also the World Bank, the European Investment Bank, the Japanese government, the Norwegian Government, the Canadian Government and USAid, among others, have provided support to Ukraine.

3. PURPOSE AND SCOPE OF THE EVALUATION

3.1. PURPOSE AND GENERAL SCOPE

- 32. Based on Art. 30(4) of the Financial Regulation and Regulation (EC) 1257/96, the purpose of this Request for Services is to have an independent evaluation of the EU's humanitarian interventions in Ukraine, covering the period of 2014 2018.
- 33. The evaluation should provide a retrospective assessment of DG ECHO's interventions in Ukraine, which should help shaping the EU's future humanitarian approach in the country. Thus, some of the evaluation questions listed below and their conclusions/responses may need to be broken down in a way that appropriately captures the specific features of each population group and geographical area affected.
- 34. The evaluation should cover the evaluation criteria of relevance, coherence, EU added value, effectiveness, efficiency and sustainability, as further detailed below in the Evaluation Questions.
- 35. A maximum of 5 prospective, strategic recommendations should be provided. These strategic recommendations could possibly be broken down into further detailed, operational recommendations.
- 36. The main users of the evaluation report include inter alia DG ECHO staff at HQ, regional and country level, other EU actors, national and regional stakeholders, implementing partners and other humanitarian and development donors including EU members and agencies.

3.2. EVALUATION QUESTIONS

37. The conclusions of the evaluation will be presented in the report in the form of evidence-based, reasoned answers to the evaluation questions presented below. These questions should be further tailored by the Evaluator, and finally agreed with the Steering Group in the inception phase.

Relevance

- 1) To what extent did the design and implementation of DG ECHO-funded actions take into account the needs of the most vulnerable population affected, particularly women, children, elderly and disabled people? To what extent were beneficiaries consulted in the design and implementation of DG ECHO-funded projects?
- 2) To what extent was a clear and context-adapted strategy provided and applied in Ukraine? To what extent were DG ECHO and its partners successful in adapting and adjusting their approach as the needs evolved over time?
- 3) To what extent has DG ECHO contributed to establishing joint and impartial needs assessments?

Coherence

- 4) To what extent was DG ECHO's response aligned with:
 - a. the humanitarian principles, and
 - b. DG ECHO's relevant thematic/sector policies?
- 5) To what extent was DG ECHO successful in coordinating its response with that of other donors in the country, including EU members, and by that avoiding overlaps and ensuring complementarities?
- 6) In the context of the Nexus and humanitarian-development coordination instruments, what measures were taken by DG ECHO to coordinate the EU's humanitarian and development actions, and how successful were these measures?

EU Added Value

7) What was the EU added value of DG ECHO's actions in Ukraine?

Effectiveness

- 8) To what extent were DG ECHO's objectives (as defined in the HAR, the Consensus and the specific HIPs) achieved? What concrete results were achieved?
- 9) How successful was DG ECHO through its advocacy and communication measures in influencing other actors by direct and indirect advocacy on issues like humanitarian access and space, respect for IHL, addressing gaps in response, applying good practice, and carrying out follow-up actions of DG ECHO's interventions? Was there an 'advocacy gap'?

Efficiency

- 10) To what extent did DG ECHO achieve cost-effectiveness in its response? What factors affected the cost-effectiveness of the response and to what extent? (*The methodology applied for responding to this question must be based on the Cost-effectiveness guidance for DG ECHO evaluations*¹⁴⁰, which is to be adapted to and applied proportionally to the current exercise.)
- 11) Was the size of the budget allocated by DG ECHO to Ukraine appropriate and proportionate to what the actions were meant to achieve?

Sustainability/Connectedness

12) To what extent did DG ECHO manage to achieve sustainable results of its interventions? What could be further done (enabling factors, tools, mechanisms, change of strategy, etc.) to promote sustainability and strengthen links to interventions of development actors? To what extent were appropriate exit strategies put in place and implemented?

¹⁴⁰ https://publications.europa.eu/en/publication-detail/-/publication/c0bcc4e2-e782-11e6-ad7c-01aa75ed71a1/language-en/format-PDF/source-45568954

3.3. OTHER TASKS UNDER THE ASSIGNMENT

- 38. The Contractor should:
- 1) Draw up an **intervention logic** for DG ECHO's intervention in Ukraine during the evaluation period;
- 2) Define and analyse **DG ECHO's portfolio** of actions in **Ukraine** during the evaluation period;
- 3) Identify the **main lessons learnt from EU-funded actions**; what worked and what did not work;
- 4) Based on the research carried out for responding to the evaluation questions, and at a general level, identify the main factors **limiting the success of the projects** funded in the country over the period covered by the evaluation. *COMMENT: This relates to an audit recommendation;* success-limiting factors should be identified in order to develop indicators for focused monitoring, with the overall purpose of strengthening the monitoring system;
- 5) Provide a statement about the **validity of the evaluation results**, i.e. to what extent it has been possible to provide reliable statements on all essential aspects of the intervention examined. Issues to be referred to may include scoping of the evaluation exercise, availability of data, unexpected problems encountered in the evaluation process, proportionality between budget and objectives of the assignment, etc.;
- 6) Make a proposal for the **dissemination** of the evaluation results:
- 7) Provide a French **translation** (in addition to the English version) of the executive summary of the Final Report;
- 8) Provide an **abstract** of the evaluation of no more than 200 words.

4. MANAGEMENT AND SUPERVISION OF THE EVALUATION

- 39. The Evaluation Sector of DG ECHO is responsible for the management and the monitoring of the evaluation, in consultation with the Unit responsible for the evaluation subject, ECHO C2. DG ECHO's Evaluation Sector, and in particular the internal manager assigned to the evaluation, should therefore always be kept informed and consulted by the evaluator and copied on all correspondence with other DG ECHO staff.
- 40. The DG ECHO Evaluation manager is the contact person for the evaluator and shall assist the team during their mission in tasks such as providing documents and facilitating contacts.
- 41. A Steering Committee, made up of Commission staff involved in the activity evaluated, will provide general assistance to and feedback on the evaluation exercise, and discuss the conclusions and recommendations of the evaluation.

5. SPECIFIC REQUIREMENTS

5.1. METHODOLOGY

- 42. In their offer, the bidders will describe in detail the methodological approach they propose in order to address the evaluation questions listed above, as well as the tasks requested.
- 43. This will include a proposal for indicative **judgment criteria**¹⁴¹ that they may consider useful for addressing each evaluation question. The judgment criteria, as well as the information sources to be used in addressing these criteria, will be discussed and validated by the Commission during the Inception phase.

¹⁴¹ A judgement criterion specifies an aspect of the evaluated intervention that will allow its merits or success to be assessed. E.g., if the question is "To what extent has DG ECHO assistance, both overall and by sector been appropriate and impacted positively the targeted population?", a general judgement criterion might be "Assistance goes to the people most in need of assistance". In developing judgment criteria, the tenderers may make use of existing methodological, technical or political guidance provided by actors in the field of Humanitarian Assistance such as HAP, the Sphere Project, GHD, etc.

- 44. To the extent possible, the methodology should promote the participation in the evaluation exercise of all actors concerned, including beneficiaries and local communities when relevant and feasible.
- 45. The conclusions of the evaluation must be presented in a transparent way, with clear references to the sources on which they are based.
- 46. The evaluator must undertake **field visits**, to be proposed in the tenderer's offer and agreed in the inception phase. The set of field visits will have to take into account the security situation in the conflict areas. At this stage, it does not seem appropriate to visit the NGCA in view of security and 'political' considerations. However, DG ECHO has a field office in Kyiv, which can organise a meeting with partners specifically on NGCA operations.

5.2. EVALUATION TEAM

47. In addition to the general requirements of the Framework Contract, the team should include experience of working in unsafe environments.

6. CONTENT OF THE OFFER

- A. The administrative part of the bidder's offer must include:
- 1. The tender submission form (annex C to the model specific contract);
- 2. A signed Experts' declaration of availability, absence of conflict of interest and not being in a situation of exclusion (annex D to the model specific contract please use corrected version sent by e-mail on 12 April 2018).
- B. The <u>technical part</u> of the bidder's offer should be presented in a maximum of **30 pages** (excluding CVs and annexes), and must include:
- A description of the understanding of the Terms of Reference, their scope and the tasks covered by the contract. This should include the bidder's understanding of the evaluation questions, and a first outline for an evaluation framework that provides judgement criteria and the information sources to be used for answering the questions. The final definition of judgement criteria and information sources will be agreed with the Commission during the inception phase;
- 2. The methodology the bidder intends to apply for this evaluation for each of the phases involved, including a draft proposal for the number of case studies to be carried out during the field visit, the regions to be visited, and the reasons for such a choice. The methodology will be refined and validated by the Commission during the desk phase;
- 3. A description of the distribution of tasks in the team, including an indicative quantification of the work for each expert in terms of person/days;
- 4. A detailed proposed timetable for its implementation with the total number of days needed for each of the phases (Desk, Field and Synthesis).
- C. The CVs of each of the experts proposed.
- D. The <u>financial part</u> of the offer (annex E to the model specific contract) must include the proposed total budget in Euros, taking due account of the maximum amount for this evaluation. The price must be expressed as a lump sum for the whole of the services provided. The expert fees as provided in the Financial Offer for the Framework Contract must be respected.

7. AMOUNT OF THE CONTRACT

48. The maximum budget allocated to this study is EUR 250 000.

8. TIMETABLE

49. The indicative duration of the evaluation is **8 months**. The duration of the contract shall be no more than **9 months**).

- 50. The evaluation starts after the contract has been signed by both parties, and no expenses may be incurred before that. The main part of the existing relevant documents will be provided after the signature of the contract.
- 51. In their offer, the bidders shall provide a schedule based on the indicative table below (T = contract signature date):

Indicative Timing	Event
T+1 week	Kick-off
T+4 weeks	Draft Inception Report
T+5 weeks	Inception meeting
T+9 weeks	Draft Desk Report
T+10 weeks	Desk Report meeting
T+12 – 15 weeks	Field visits
T+17	Draft Field Report
T+18	Field Report Meeting
T+26 weeks	Draft Final Report
T+28 weeks	Draft Final Report meeting
T+32 weeks	Final Report
T+33 weeks	A presentation to DG ECHO of the evaluation results

9. PROVISIONS OF THE FRAMEWORK TENDER SPECIFICATIONS

- 1) **Team composition**: The Team proposed by the Tenderer for assignments to be contracted under the Framework Contract must comply with Criterion B4 (see Section 5.2.4 of the Tender Specifications for the Framework Contract).
- 2) Procedures and instructions: The procedures and instructions to the Tenderer for Specific Contracts under the Framework Contract are provided under Section 6 of the Tender Specifications for the Framework Contract.
 - Sections 6 6.4 are fixed and must be fully taken into account for offers submitted in response to Requests for Services. E.g. the **Award Criteria** are presented under Section 6.2.2;
 - Section 6.5 is indicative and could be modified in a Request for Services or discussed and agreed during the Inception Phase under a Specific Contract.
- 3) **EU Bookshop Format**: The template provided in Annex M of the Tender Specifications for the Framework Contract must be followed for the Final Report. Any changes to this format, as introduced by the Publications Office of the European Union, will be communicated to the Framework Contractors by the Commission.

10. RAW DATA AND DATASETS

- 52. Any final datasets should be provided as structured data in a machine-readable format (e.g. in the form of a spreadsheet and/or an RDF file) for Commission internal usage and for publishing on the Open Data Portal, in compliance with Commission Decision (2011/833/EU)¹⁴².
- 53. The data delivered should include the appropriate metadata (e.g. description of the dataset, definition of the indicators, label and sources for the variables, notes) to facilitate reuse and publication.

¹⁴² If third parties' rights do not allow their publication as open data, the tenderers should describe in the offer the subpart that will be provided to the Commission free of rights for publication and the part that will remain for internal use.

54. The data delivered should be linked to data resources external to the scope of the evaluation, preferably data and semantic resources from the Commission's own data portal or from the Open Data Portal 143. The contractor should describe in the offer the approach they will adopt to facilitate data linking.

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