This action is funded by the European Union

ANNEX

of the Commission Implementing Decision on the financing of the special measure for “Building Rohingya refugees and host community resilience in Cox’s Bazar” for 2018

Action Document for Building Rohingya refugee and host community resilience in Cox’s Bazar

| 1. Title/basic act/CRIS number | Building Rohingya refugee and host community resilience in Cox’s Bazar  
CRIS number: MIGR/2018/041-387  
financed under the Development Cooperation Instrument |
|-------------------------------|--------------------------------------------------------------------------------------------------|
| 2. Zone benefiting from the action/location | Bangladesh  
The action shall be carried out at the following location: Cox's Bazar District, Bangladesh |
Multi-annual Regional Indicative Programme (RIP) for Asia 2014-2020² (EUR 5 million) which has been amended following the mid-term review³ |
| 4. Sector of concentration/thematic area | GPGC: Migration and Asylum  
Asia RIP: People – Migration and Forced Displacement  
DEV. Aid: YES |
| 5. Amounts concerned | Total estimated cost: EUR 18 million  
Total amount of EU budget contribution EUR 15 million, of which EUR 10 million from the GPGC MIP and EUR 5 million from the Asia RIP.  
This action is co-financed in joint co-financing by UNICEF for an amount of EUR 3 million |
| 6. Aid modality(ies) and | Project Modality: Indirect management with UNICEF |

¹ C (2018)4919 of 30.07.2018  
² C (2014)6112 of 03.09.2014  
The Action contributes to addressing the needs of Rohingya refugees and their host communities through an integrated approach to strengthen resilience. Considering that the current emergency situation is expected to continue throughout 2018, the Action will strengthen the humanitarian-development nexus by focusing on improved access to effective basic services – in education, food and nutrition security, and water, sanitation and hygiene – for Rohingya refugees and host communities. The Action applies community development to promote social cohesion and mitigate the risk of conflict. As such, the Action seeks to reinforce public systems for structural service delivery to Rohingya refugees and host communities, thereby avoiding protracted humanitarian assistance. In all activities, promoting protection, gender equality and disaster risk reduction will underpin the intervention logic. The Action will be implemented in indirect management with an international organisation. The Action is designed so that it can be scaled up to enlarge coverage in the Cox's Bazar district, if additional funding becomes available.
1 CONTEXT

1.1 Country and district context

In the last two decades, Bangladesh has achieved strong developmental progress and is well positioned to make progress towards the Sustainable Development Goals (SDGs). However, Bangladesh also remains one of the poorest and most densely-populated countries in South Asia and the income, gender, socio-cultural and subnational disparities in the coverage of basic social services between rural and urban locations and geographic regions have hampered overall progress. In particular, the provision of high-quality basic services to the urban poor and areas that are hard to reach or vulnerable to climate change remains a key challenge for achieving the Government’s objective to inclusively distribute its prosperity.

Cox’s Bazar district, with a population of 2.29 million people, is one of Bangladesh’ most vulnerable districts. The district faces the poorest access to social services in the country creating crisis level malnutrition, food insecurity and health status and its poverty rate is well above Bangladesh' national average with high levels of unemployment and under-investment in the economic sector and infrastructure. Even before the influx, one in five households already had poor and borderline food consumption patterns – which was much higher than the national average. On average, 33% live below the poverty line and 17% below the extreme poverty line. The primary school completion rate for Cox’s Bazar is 54%, while the divisional and country level rate is about 80%. In terms of child-related and gender inequality indicators progress is equally lacking, with 40% of children under-5 suffering from moderate or severe malnutrition, primary school completion rate stands at 55%, 52% of girls get married before the age of 18 and an estimated 49,000 children are engaged in child labour. Creating an even more complex picture, Cox Bazar is also one of the most vulnerable districts to natural disasters and the impact of climate change in Bangladesh.

Prior to the August 2017 influx, close to 300,000 Rohingya refugees lived among host communities and in formal camps in the Ukhia and Teknaf sub-districts. Despite a number of negative impacts due to their numbers, their presence had, in some instances, positively impacted the local economy and even some marriages between the Rohingya and local populations took place.

However, the arrival of more than 670,000 Rohingya refugees since August 2017 has put a significant strain on the Cox's Bazar district and its communities – according to UN Joint Response Plan, 336,000 Bangladeshis are in need due to the crisis. Of the new arrivals in Cox’s Bazar, 58% are children and 60% are women, including a high percentage of pregnant (3%) and lactating women (7%). The influx has had a severe impact on local infrastructure like schools and health facilities and has created a disruption of normal education and health-related activities and services. Traffic congestion is already a major problem that limits access and mobility around large sites, thereby increasing safety risks. Environmental and ecosystem degradation has increased substantially since the influx, due to the expansion of settlements and the need for cooking fuel. Competition has increased for scarce livelihood options like agriculture, fishing and daily wage labour. The influx of desperate workers lowered day labour wages and increased the price of basic food and non-food items. Preliminary results from a recent nutrition assessment in Kutupalong camp and among new arrivals reflect an alarming nutrition situation with a 7.5% prevalence of life-threatening severe acute malnutrition, a rate double compared to Rohingya child refugees in May 2017. The 2018 monsoon season will only aggravate the situation in the hilly areas.
1.1.1 Public Policy Assessment and EU Policy Framework

At the time of drafting, the Government of Bangladesh' official position is that the only durable solution to the Rohingya refugee crisis is the safe, voluntary and dignified return of the Rohingya refugees to Myanmar. Bangladesh is not a party to the 1951 Refugee Convention or its 1967 Protocol. On 23 November 2017, the Governments of Bangladesh and Myanmar signed an arrangement on the return of displaced persons from Rakhine State. The repatriation was supposed to have commenced on 23 January 2018, but delays have been incurred. Under the current arrangement, it would take many years for all Rohingya refugees to return to Myanmar. As such, even if the repatriation process would eventually start, it is expected that a significant part of the refugee caseload will remain in Bangladesh in the foreseeable future. Therefore, transitional solutions to host Rohingya refugees in Bangladesh need to be found, whilst access to durable solutions – voluntary return, resettlement or local integration – for Rohingya refugees remains high on the EU's political agenda.

In line with its current official position, the Government does not promote structural development-oriented interventions to assist Rohingya refugees and is mainly focused on repatriation and meeting emergency needs. However, the Government has agreed to develop a two-year education/learning opportunities strategy with the Education Cannot Wait fund, under which related actions in the sector targeting Rohingya refugee children would fall. In addition, the Government recognizes the immense pressure the Rohingya refugee crisis has placed on the Bangladeshi population in Cox's Bazar. The Government requests more attention of the international community to addressing needs in the host communities in terms of education, livelihoods and environmental degradation, to ensure continued social cohesion.

The coordination of the emergency response is led by a troika co-chaired by United Nations Resident Representative, United Nation High Commissioner for Refugees (UNHCR) and International Organization for Migration (IOM). An Inter-Sectoral Coordination Group is in place, with sectors led by the designated United Nations (UN) agency and some of them in co-lead with (International) Non-Governmental Organizations ((I)NGOs) – in line with the UN Transformative Agenda. Most UN agencies have been allowed to work with some margin of manoeuvre on more medium-term activities, resulting from continuous advocacy and negotiations. However, (I)NGOs face systemic barriers in registration, project approval and obtaining work visas for staff and as such mainly work as implementing partners of UN agencies. This has slowed down the implementation of activities at field level and hampers an effective and efficient response.

The Action responds to the 2030 Agenda's call to leave no one behind and to manage migration, including forced displacement, well. The EU has been at the forefront of pushing forward comprehensive, development-led responses to forced displacement, on the basis of its approach set out in the communication "Lives in Dignity", confirmed in the new European Consensus on Development (2017/C 210/01)and in the communication 'A Strategic Approach to Resilience in the EU's external action'. In addition, enhancing the currently limited support to the Rohingya refugee crisis sends a strong signal for comprehensive approaches globally, and should garner support of Bangladesh and its neighbours as important allies in the preparation and implementation of the Global Compact on Refugees.

1.1.2 Stakeholder analysis

Rohingya refugees and their host communities in Cox's Bazar, particularly children, adolescents and pregnant and lactating women and their families, as beneficiaries of the action, are key stakeholders.
Key stakeholders are also the national and local Government authorities, including the Ministry of Foreign Affairs, Ministry of Disaster Management and Relief (including the Refugee, Relief and Repatriation Commissioner), Ministry of Health and Family Welfare, Institute of Public Health Nutrition, Ministry of Livestock, Ministry of Education, Ministry of Primary and Mass Education, Directorate of Primary Education, Directorate of Madrassa Education, Directorate of Secondary and Higher Education, Ministry of Women and Children Affairs, Ministry of Social Welfare and the Ministry of Local Government and Rural Development (including the Deputy Commissioner of Cox’s Bazar District). Other main stakeholders are the international organisations, notably UN agencies operating in Cox’s Bazar, relevant local and international civil society and non-governmental organizations, as well as any other development partners assisting Rohingya refugees and host communities, like the EU and its Member States.

The main stakeholders have been associated and consulted during the design of this Action, in particular in form of a regular information sharing of the EU with the relevant Government partners, the UN system, (I)NGOs as well as Member States represented in Bangladesh and other development partners. Stakeholders were consulted and Member States were debriefed during the joint Commission – European External Action Service mission to Bangladesh in January 2018, which aimed specifically at developing the EU response to the Rohingya refugee crisis in light of the EU pledge at the Geneva pledging conference held in October 2017.

1.1.3 Priority areas for support/problem analysis

The unprecedented number of Rohingya refugees arriving in Cox Bazar in August 2017 overwhelmed already weak service-delivery systems which were and remain unable to effectively serve Bangladeshi host communities, let alone the Rohingya refugee population.

In both populations a high proportion of children (55% of the Rohingya refugees are under 18 years of age) and youth (20% of the total refugees and host community populations) creates a particularly worrying environment, in the immediate in terms of child protection, and in the medium term creating a 'lost generation' in terms of education and nutrition. An estimated 625,000 children and youth (ages 3-24) lack access to learning opportunities. Refugees are not permitted to enrol in formal education facilities and they are denied certification even where they are allowed informal access to education. Cox’s Bazar is among the lowest performing districts in the country with regards to education access, retention and achievement. The dropout rate for Cox’s Bazar is 45% for boys and 30% for girls; both Rohingya and Bangladeshi children mention low levels of family income as a key reason for dropping out to find work. Also, within both refugee and host communities, girls face additional socio-cultural barriers combined with safety concerns and supply-related issues such as a lack of trained female teachers or gender-segregated latrines. As such, there is a need to support children and youth to improve their resilience in a context that is fragile and filled with risks, including trafficking, drug abuse, early marriage, as well as hazardous or exploitative work. This can be achieved through the use of the learning environment in a way that serves the educational, skills and protection needs of the present while helping to build the capacity of the system to serve current and future needs.

In terms of food security, previous assessments in Rakhine State in Myanmar showed a high percentage of the Rohingya refugee population suffering food insecurity. Current food insecurity among refugees in Bangladesh is a result of forced displacement, lack of physical and economic access to food, high mobility within settlements, lack of cooking fuel, movement restrictions and protection issues. Violence, massive human rights violations and the strenuous journey across the border to Bangladesh have further weakened their resilience. High levels of undernutrition observed among refugees are triggered by pre-existing vulnerabilities such as consistently high levels of stunting above 40%, food insecurity, inappropriate hygiene and sanitation conditions, …
and limited access to safe water as well as poor living conditions that are conducive to recurring communicable disease outbreaks, resulting in increased risk of negative nutrition outcomes among boys, girls and other most vulnerable groups. The arrival of more than 671,000 refugees has had a major impact on Bangladeshi host community resilience and food security; lack of economic access to food, low food production, decreased employment opportunities, poor food utilization, resource depletion (including environmental impact), increase in food prices, and market access are the main drivers of food insecurity. Natural disasters, deforestation, disease outbreaks, and restriction of movement may prolong and worsen the food insecurity situation throughout 2018 for host communities and refugees.

Due to the massive population increase following the influx of Rohingya refugees into Cox’s Bazar, water, sanitation and hygiene (WASH) facilities in settlements are under strain. Acute Watery Diarrhoea (AWD) is a key concern for the Sector as well as the high rate of malnutrition, whereas access to safe drinking water and handwashing with soap at critical times will reduce such risks. Groundwater from tube-wells is the traditional potable water source as it is abundant in general but becomes progressively scarce towards the south of Cox’s Bazar, resulting in Teknaf Upazila relying on treated surface water. The new influx puts an additional strain on scarce water resources in this area. There is a risk of many shallow tube-wells becoming non-functional during the peak of the dry season. The quality of drinking water is one of the major concerns, as 50% of samples at source and 89% of samples at a household level were contaminated in the last monitoring round.

Taking a 'food system' lens, increasing the production of high quality diverse foods – thereby boosting livelihood opportunities, especially for ultra-poor women – improving the access to safe, clean water and preserving the environment through the reduction of use of firewood for cooking will comprehensively reduce food insecurity and improve nutrition in the medium-term.

Humanitarian assistance to meet life-saving needs as well as structural investments to support the District's service-delivery capacity is urgently needed. A joint humanitarian and development response from the outset of the crisis will ensure life-saving needs are met and effective investments into structural service-delivery and sustainable livelihoods for both Rohingya refugees and Bangladeshi host community populations and institutions are made in the medium-term.

2 RISKS AND ASSUMPTIONS

<table>
<thead>
<tr>
<th>Risks</th>
<th>Risk level (H/M/L)</th>
<th>Mitigating measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Lack of support from Government authorities towards medium-term activities.</td>
<td>L/M</td>
<td>(1) EU will continue its engagement with the Government, the UN coordination mechanisms and other key stakeholders to facilitate Government’s buy-in for medium-term activities and to address the difficulties related to (I)NGOs involvement in the response to the crisis (restrictions).</td>
</tr>
<tr>
<td>(2) Operating environment affected by natural disasters, like landslides, floods, drought and cyclones which would exacerbate humanitarian, life-saving needs</td>
<td>M</td>
<td>(2) Disaster risk reduction is mainstreamed into the Action. UN agencies have developed an Emergency Preparedness and Response Plan (EPRP) for Cox’s Bazar with the aim of strengthening its preparedness for</td>
</tr>
</tbody>
</table>
natural disasters.

(3) Government position changes to pushing for forced return or making conditions for refugees dire enough so that return is seen as the only option.

(4) Host communities become more negative towards refugees and social conflicts arise.

L

(3) This intervention is complemented by continued EU engagement with other development partners, including through political and policy dialogue, humanitarian assistance and EU support to social cohesion and preventing violent extremism through specific programmes. The international community will react to a worsening of Government's position versus Rohingya.

M

(4) The programme will intensify the public services delivery in the concerned areas under risk, in coordination with other relevant actors.

Assumptions

(1) An improvement of service delivery by Government systems in Cox's Bazar district, supported also by other EU programmes, will facilitate the implementation of the action;
(2) The coordination mechanism among humanitarian, development and Government actors strengthens the humanitarian-development nexus and expands space for medium-term activities and durable solutions. This includes effective coordination among international actors, including EU;
(3) Lengthy repatriation process.

3 COMPLEMENTARITY AND CROSS-CUTTING ISSUES

3.1 Lessons Learned

The EU has followed a comprehensive approach in addressing the plight of the Rohingya by using all instruments at its disposal, including political and human rights dialogue, humanitarian assistance and development cooperation, already since 1992, from the very beginning of the major influx of Rohingya into Bangladesh. Under the Aid to Uprooted People programme, DG DEVCO has funded seven individual projects, mainly of support to UNHCR registered refugee camps, for a total envelope of EUR 31 million (including EUR 3 million top-up to the fourth phase to extend support during 2018 and 2019). In addition to development assistance, the EU has contributed to humanitarian assistance to Bangladesh in the context of the Rohingya refugee crises. That is, DG ECHO has been supporting key life-saving humanitarian activities (providing basic health, water, sanitation and nutrition assistance) with more than EUR 50 million since 2007, addressing the needs of both Rohingya refugees residing in the makeshift camps and vulnerable host populations in Cox’s Bazar district. Other related EU provided support focused on community-based disaster preparedness programmes.

Previous actions of support to Rohingya refugees in the registered camps have produced a number of lessons learnt in the major components of the programme implemented in the camps, namely on protection, nutrition, education and livelihood. In terms of protection, previous projects learned how to negotiate with a significantly politicised environment. Significant efforts were made to ensure respect of refugees’ rights, with capacity building of camps institutions and networks of refugees and law enforcement officials, assistance to individual cases and
counselling to victims of gender based violence, promoting confidence especially of women and girls.

Concerning nutrition, efforts led to consolidating trends in reduction of anaemia in children, while food diversification and nutritional situation was considerably improved through the introduction of the WFP food-voucher system for refugees. Greater diversification of diet by distributing seeds/fertilize and enhancing awareness on nutrition issues and food security also improved food consumption trends over the last years.

In education, the major achievements related to the fact that primary education programme and limited secondary education were implemented in the camps, supported by the adoption of a national curriculum, textbooks and connection of schools building with water and sanitation facilities. As for self-reliance and livelihoods, improvements showed that a significant amount of refugees were involved in some form of employment outside the camps, albeit restrictions limited business and work opportunities for refugees.

Whereas some lessons learnt from previous actions in the region could be drawn, the magnitude and scale of this unprecedented crisis is new to members of the international community involved in providing support to Rohingya refugees and affected host communities. However, the key challenges remain the same although with higher impacts, for both the refugees and the host communities. In a sense, the August 2017 crisis emphasised the need, to a greater extent, to include makeshifts and host communities in the EU-funded interventions, going beyond the limited actions in official camps – something which was evident already last year, before the major influx.

At a global level, in 2016 the EU adopted a new policy to address forced displacement from a development-led approach – through the Communication 'Lives in Dignity' and accompanying Council Conclusions in May 2016. The new policy outlines the need to engage from the outset of a forced displacement crisis with political, developmental and humanitarian instruments, to boost the resilience and self-reliance of forcibly displaced persons and their host communities and avoid protracted crises and humanitarian assistance. The approach is being rolled out throughout DG DEVCO partner countries affected by displacement and underpins the logic of this Action.

The present action will be implemented in close coordination with the government authorities and international community, to ensure that synergies are maximised and lessons learnt from present experience by other parties, if relevant and applicable, can be fed into the present programme.

3.2 Complementarity, synergy and donor coordination

The action will complement: (1) ongoing EU development cooperation with Bangladesh in the 2014-2020 MIP priority areas of education and human development, and food and nutrition security and sustainable development; and (2) under the RIP, overall support to UNHCR for assistance to Rohingya refugees in the official camps (EUR 9 million in the 4th phase of the programme running until 2020). It will also be complementary to EU humanitarian assistance, focusing on emergency multi-sectoral needs with an additional EUR 30 million foreseen, as well as to the Instrument contributing to Stability and Peace (IcSP) support to registration and identity management (EUR 5 million with UNHCR) and potential support to preventing violent extremism amongst adolescents.

Activities under Result Area 1 – education – will be in line with the 2 year education program facilitated and financed by Education Cannot Wait and which will be implemented by UNICEF, UNHCR and UNESCO. It will focus on promoting education for Rohingya refugees and host communities in Cox’s Bazar.
Donor coordination takes place under a three-layered structure: (1) Policy group; (2) Senior Executive Group (SEG); and (3) Donor briefing. Meetings, which the EU attends regularly, are called on a regular or ad hoc basis.

3.3 Cross-cutting issues

Specific needs of displaced women, girls and boys will be reflected and protection aspects integrated in stand-alone activities as well as mainstreamed. The action will strengthen societal resilience by reducing the strain of displacement on Rohingya refugees and their host communities and enhance social cohesion. The action aims to reduce environmental impact by improving access to water and overall hygiene, and sanitation conditions, promoting the use of safer and environmentally friendly cooking, and by increasing sustainable local food production and provision.

Promoting gender equality and disaster risk reduction will be mainstreamed in all activities.

4 DESCRIPTION OF THE ACTION

4.1 Objectives/results

The overall objective of the action is to contribute to strengthening the resilience of Rohingya refugees and their host communities in an integrated manner in Cox’s Bazar District.

The Specific Objective of the action is: Improved access to effective basic services for Rohingya refugees and host communities.

This programme is relevant for the Agenda 2030. It contributes primarily to the progressive achievement of SDG Goals 2, 4 and 10.7, but also promotes progress towards Goals 3, 5 and 6. This does not imply a commitment by the country benefiting from this programme.

The results (outputs) of the action are:

**Result 1**: Improved access to education services and learning opportunities - pre-school, primary education and non-formal technical education – in a protective environment for Rohingya refugees and host communities.

**Result 2**: Enhanced food and nutrition security for Rohingya refugees and host communities.

**Result 3**: Improved access to water and overall hygiene and sanitation conditions for Rohingya refugees and host communities.

4.2 Main activities

To ensure sustainability of the action in the medium-term, all activities will be undertaken together with government partners (i.e. line ministries) and through government channels, whenever possible.

**Activities under Result 1:**

The envisaged activities under this result will address Rohingya refugees and their host communities. Strengthening government services forms a key part of the strategy. Activities may include the following: i) develop teaching and learning strategies that are tailored to the varying needs of Rohingya refugee children and their host communities, ii) identify areas and set up functioning learning centres jointly with the communities and local authorities; iii) identify areas and set up functioning child friendly spaces (CFS) jointly with the communities and local authorities; iv) provide learners and teachers with education materials; v) training of teachers; vi) provision of basic learning skills, life skills and protection services to refugee children of pre-school and primary school age in learning centres and CFS; vii) develop and implement
programmes for (informal) technical education and life skills for adolescents; viii) set up Education Committees and community based student retention initiatives; ix) set up community based child protection mechanisms (CBCPs); x) enhance dialogue with government and development partners on 1) access to education services for refugees and host communities, especially also at secondary level, 2) ensure linking curricula for Rohingya refugees to Bangladesh/internationally certified curricula, language of instruction adapted to durable solutions and 3) create linkages with national education programmes/systems to the maximum extent possible.

Activities under Result 2:
The envisaged activities under this result will address Rohingya refugees and their host communities. Strengthening government services forms a key part of the strategy. Activities may include the following: i) introduce and promote environmentally-friendly community actions for livelihoods – especially for ultra-poor women – to increase quality food production, promote diet diversification, food preservation and counselling ii) implement community-based nutrition programmes, potentially including child nutrition grant in host communities to strengthen complementary feeding iii) provide prenatal and postnatal care and infant feeding, including adolescent mothers iv) promote use of alternative fuels, v) promote safe and environmentally friendly cooking stoves, vi) enhance dialogue with government and development partners on sustainable food production and improved nutrition services for host communities and Rohingya refugees and create linkages with the national food and nutrition security strategy to the maximum extent possible.

Activities under Result 3:
The envisaged activities under this result will address Rohingya refugees and their host communities. Strengthening government services forms a key part of the strategy. Activities may include the following: i) expand small, medium and large scale surface water supply systems, ii) rehabilitate existing dysfunctional water sources iii) reinforce systems to monitor aquifers and check water quality at source and household levels, iv) support studies, assessment on ground water monitoring, and water resource mapping v) support the development of a comprehensive, sustainable plan to improve access to water throughout the year in areas particularly affected by water scarcity during the dry season in Cox Bazar, vi) promote adequate sanitation and hygiene practices, to encourage uptake of household water treatment, excreta disposal, safe water handling, hand-washing with soap, and menstrual hygiene management, vii) provide hygiene kits, BABY-WASH kits and bathing cubicles for women and adolescent girls viii) community mobilization on effective solid waste management for improved environmental sanitation, including the provision of household and communal waste disposal bins, ix) enhance dialogue with government and development partners on sustainable access to water for host communities and Rohingya refugees.

4.3 Intervention logic
The basic hypothesis of this action is that by improving access to effective basic services for Rohingya refugees and their host communities in an integrated manner, (1) the resilience of both populations in Cox’s Bazar district will be strengthened in the medium term, (2) social cohesion will be promoted and (3) the risk of conflict mitigated, as the community develops in the medium term. Reinforcing public systems for structural service delivery in the District through development support will also contribute to avoiding protracted humanitarian assistance and ensure sustainability.

First, increased access to education services and learning opportunities in a protective environment is to be achieved: (1) by providing non-formal basic education services and
learning opportunities in child-friendly environments for Rohingya refugee and host community children, to build children’s potential and resilience; (2) by providing (informal) technical education and life skills to empower the most disadvantaged and vulnerable adolescents, particularly girls, through the enhancement of skills that will enable them to become productive citizens of the country; (3) by providing protective spaces that will offer safe, enabling and stimulating environments for children, to extend recreational and psychosocial support to vulnerable children to cope with trauma, as well as a registration and identification of unaccompanied minors and separated children. Ensuring educational continuity is an important part of the recovery process and thus all activities will include components to strengthen the capacity of the schools and learning centres to better protect children and enhance the education system in Cox’s Bazar district and to develop the capacity of critical government and community based protection services to strengthen the protective environment for all children.

Second, **enhanced food and nutrition security** is to be achieved by (1) working on increasing sustainable and diverse food production, thereby generating livelihoods for vulnerable households, particularly women, and restoring deforested and otherwise crisis-affected areas (2) safe and environmentally friendly preparation and conservation of food, to reduce the use of firewood and consequentially deforestation. Both areas aim to reduce the environmental impact of the Rohingya refugee crisis in the District. Finally, (3) improving nutrition-sensitive approaches to food security for vulnerable families with infants and adolescent mothers, aims to contribute to ensuring children and their mothers have better nutritional status and health. Thereby, they should be better able to benefit from access to learning opportunities (Result area 1) or access to livelihood opportunities (Result area 2).

Third, by working on **access to safe and clean water, improved sanitation and hygiene**, together with working on food and nutrition security, the Action will contribute to improving the overall health status of Rohingya refugees and their host communities. An overall improvement of hygiene and sanitation conditions helps to prevent illness and disease, and in particular, reduces child mortality and undernutrition rates. Prevention focuses on households and communities, including schools, learning and health centres, as the starting point for improving water quality, sanitation and hygiene, and for reducing child deaths from diarrhoea. This will create more conducive conditions for ensuring learning and livelihood opportunities have an impact at the individual level in terms of resilience and self-reliance.

The proposed intervention is implemented through an integrated programme with a holistic approach to ensure maximum coherence and complementarity, enhancing synergies and interlinkages/nexuses between the expected results (outputs) and main activities within each result area. In all result areas and activities, promoting protection, gender equality and disaster risk reduction underpins the intervention logic. The action is designed to respond to the identified need to complement the continuing immediate humanitarian needs with a medium to longer term approach, which can address development needs in the refugee and host community.

The programme is based on a balanced and systemic approach, targeting both Rohingya refugees and their host communities and using Government public systems to the extent possible. As such, it creates the conditions for building a strong nexus between humanitarian and development support in its proposed areas of intervention, which can be scaled up, enlarging coverage and targeting larger numbers of population. The programme contributes to building district-wide capacity in government and non-government partners, key stakeholders of this intervention, ensuring the sustainability of the action in the longer term, regardless of whether Rohingya refugees are repatriated, resettled or integrated within host communities in the future.
The programme will start to operate with the host communities having the largest impact of the influx (Chakaria, Cox's Bazar Sadar, Ramu, Pekua, Ukhia and Teknaf Upazillas of the Cox's Bazar District), with a possibility of expansion of coverage/scale up in neighbouring areas.

The Action builds and expands on the Joint Response Plan (March – December 2018), which was developed in close coordination with the Government. It particularly contributes to the objective of supporting host communities to improve their ability to cope with and to maximise the gains and opportunities this presents for strengthening resilience and development in the sub-districts in the medium and long term.

5 IMPLEMENTATION

5.1 Financing agreement

In order to implement this action, it is not foreseen to conclude a financing agreement with the partner country, Bangladesh.

5.2 Indicative implementation period

The indicative operational implementation period of this action, during which the activities described in section 4.1 will be carried out and the corresponding contracts and agreements implemented, is 48 months from the date of adoption by the Commission of this Action Document.

Extensions of the implementation period may be agreed by the Commission’s authorising officer responsible by amending this decision and the relevant contracts and agreements; such amendments to this decision constitute technical amendments in the sense of point (i) of Article 2(3)(c) of Regulation (EU) No 236/2014.

5.3 Implementation modalities

5.3.1 Indirect management with an international organisation

This action may be implemented in indirect management with UNICEF. This implementation entails activities related to strengthening the delivery of services through investments in improved skills of frontline public officials; building district capacities in evidence-based planning and budgeting; and targeted interventions to address the most disadvantaged and vulnerable.

This implementation is justified because implementation by UNICEF will allow ensuring adequate and necessary political coverage and imperative support from the Government granted specifically to UN entities in the Rohingya crisis context and sustainability of the action as it will involve working with the Government systems as much as possible. Within the UN-led intersector coordination group (ISCG), UNICEF is cluster sector lead in nutrition and child protection and co-lead in education and WASH, all key areas of intervention of this action. It will also ensure efficient and effective contracting modalities, as UNICEF can directly receive foreign funding and under Bangladesh regulations sub-contract local and international NGOs. UNICEF will be partnering and continue working closely with concerned line ministries/Government authorities, including: the Ministry of Health and Family Welfare, Institute of Public Health Nutrition, Ministry of Women and Children Affairs, Ministry of Education, Ministry of Primary and Mass Education, Directorate of Madrassa Education, Directorate of Secondary and Higher Education, also at local level, and civil society partners; and it will implement the action through selected local and international NGOs. As part of its development-focused country programme, as agreed with the government of Bangladesh, UNICEF works simultaneously with the
government, local and international NGOs and other civil society organisations, and with the local private sector, and coordinates and mobilizes their support.

The entrusted entity would carry out the following budget-implementation tasks: conducting procurements, awarding grant contracts, managing the resulting contracts and carrying out payments to contractors and grant beneficiaries.

5.4 Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participation in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act shall apply.

The Commission’s authorising officer responsible may extend the geographical eligibility in accordance with Budget Article 9(2)(b) of Regulation (EU) No 236/2014 on the basis of urgency or of unavailability of products and services in the markets of the countries concerned, or in other duly substantiated cases where the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

5.5 Indicative budget

<table>
<thead>
<tr>
<th></th>
<th>EU contribution (amount in EUR)</th>
<th>Indicative third party contribution, in currency identified</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.3.1 – Indirect management with UNICEF</td>
<td>15 000 000</td>
<td>EUR 3 000 000</td>
</tr>
<tr>
<td>TOTAL</td>
<td>15 000 000</td>
<td>EUR 3 000 000</td>
</tr>
</tbody>
</table>

5.6 Organisational set-up and responsibilities

A Programme Implementation Committee (PIC) will be established to overview programme implementation, ensure coordination/synergies with relevant stakeholders and actions and provide, strategic guidance, notably in terms of corrective measures/adaptation and prioritisation of needs in line with fast-changing developments.

The PIC will be chaired by the EU and will include relevant stakeholders and actors involved in programme implementation with UNICEF. It will be held on a quarterly basis (also in Cox’s Bazar as required).

5.7 Performance monitoring and reporting

It is of vital importance that a sound reporting and monitoring system is put in place.

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process and part of the implementing partner’s responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (outputs and direct outcomes) as measured by corresponding indicators, using as reference the log frame matrix (for project modality). The report shall be laid out in such a way as to allow monitoring of the means envisaged and employed and of the budget details for the action. The final report, narrative and financial, will cover the entire period of the action implementation.
The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

5.8 Evaluation

Having regard to the nature of the action, a baseline study is foreseen to collect information required to measure progress on the indicators laid out in the Action. A mid-term and a final evaluation will be carried out for this action via independent consultants. The mid-term evaluation and final evaluation will be carried out to inform policy and programming at various levels (including for policy and programming revision).

The Commission shall inform the implementing partner at least 2 months in advance of the dates foreseen for the evaluation missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports shall be shared with the partner country and other key stakeholders. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner country, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

The financing of the evaluation shall be covered by another measure constituting a financing decision.

5.9 Audit

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audits or expenditure verification assignments for one or several contracts or agreements.

The financing of the audit shall be covered by another measure constituting a financing decision.

5.10 Communication and visibility

Communication and visibility of the EU is a legal obligation for all external actions funded by the EU.

This action shall contain communication and visibility measures which shall be based on a specific Communication and Visibility Plan of the Action, to be elaborated at the start of implementation and supported with the budget indicated in section 5.5 above.

In terms of legal obligations on communication and visibility, the measures shall be implemented by the Commission, the partner country, contractors, grant beneficiaries and/or entrusted entities. Appropriate contractual obligations shall be included in, respectively, the financing agreement, procurement and grant contracts, and delegation agreements.

The Communication and Visibility Manual for European Union External Action shall be used to establish the Communication and Visibility Plan of the Action and the appropriate contractual obligations.
The activities, the expected outputs and all the indicators, targets and baselines included in the log frame matrix are indicative and may be updated during the implementation of the action, no amendment being required to the financing decision. When it is not possible to determine the outputs of an action at formulation stage, intermediary outcomes should be presented and the outputs defined during inception of the overall programme and its components. The indicative log frame matrix will evolve during the lifetime of the action: new lines will be added for including the activities as well as new columns for intermediary targets (milestones) for the output and outcome indicators whenever it is relevant for monitoring and reporting purposes. **Note that all indicators should be disaggregated by age, gender and Rohingya refugee/host community.**

<table>
<thead>
<tr>
<th>Results chain</th>
<th>Indicators</th>
<th>Baselines (incl. reference year)</th>
<th>Targets (incl. reference year)</th>
<th>Sources and means of verification</th>
<th>Assumptions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall objective: Impact</td>
<td>Contribute to strengthening the resilience of Rohingya refugees and their host communities in an integrated manner in Cox’s Bazar District</td>
<td>1) Participation rate of children, youth and adults in formal and non-formal education and training in the previous 12 months, compared to district and the national average</td>
<td>1) % increase to be determined</td>
<td>To be determined</td>
<td>To be determined</td>
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<tr>
<td></td>
<td></td>
<td>2) Proportion of target population using safely managed drinking water services, compared to the district and national average;</td>
<td>2) % increase to be determined</td>
<td>To be determined</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>3) Proportion of target population using safely managed sanitation services, including a hand-washing facility with soap and water, compared to the district and national average;</td>
<td>3) % increase to be determined</td>
<td>To be determined</td>
<td></td>
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<td></td>
<td>4) Proportion of target population subjected to physical, psychological or sexual violence since becoming displaced or in the last 6 months (whichever is more recent)</td>
<td>4) % decrease to be determined</td>
<td>To be determined</td>
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<tr>
<td></td>
<td>Improved access to effective basic services for Rohingya refugees and host communities</td>
<td>1) % of target population with access to formal and non-formal education and training</td>
<td>1) to be determined</td>
<td>To be determined</td>
<td>(1) Improvement of service delivery by Government systems in Cox's Bazar district, supported also by other EU programmes, facilitates the implementation of the Action; (2) Coordination mechanism among humanitarian, development and Government actors strengthens the humanitarian-development nexus and expands space for medium-term activities and durable solutions. This includes</td>
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<tr>
<td></td>
<td></td>
<td>2) % of target population with enhanced food and nutrition security</td>
<td>2) to be determined</td>
<td>To be determined</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>3) % of target population with access to an improved water source</td>
<td>3) to be determined</td>
<td>To be determined</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>4) % of target population with access to improved sanitation facilities</td>
<td>4) to be determined</td>
<td>To be determined</td>
<td></td>
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<td></td>
<td>5) Proportion of target population who engage in negative coping mechanisms such as early marriage (under the legal age), child labour and prostitution</td>
<td>5) to be determined</td>
<td>To be determined</td>
<td></td>
</tr>
</tbody>
</table>

4 Mark indicators aligned with the relevant programming document mark with '*' and indicators aligned to the EU Results Framework with '***'
<table>
<thead>
<tr>
<th>Outputs</th>
<th>Result 1: Improved access to education services and learning opportunities - pre-school, primary education and non-formal technical education – in a protective environment for Rohingya refugees and host communities.</th>
<th>1.1) Number of service providers in education, trained/recruited by the Action for coverage of target population (location, sector) 1.2) Number of target population receiving education, learning opportunities and informal skills training through this Action 1.3) Number of education infrastructure/facilities rehabilitated, enhanced or constructed 1.4) Number of persons engaged in local projects aiming to eliminate barriers to access to education services for target population (disaggregated by sex, displacement status)</th>
<th>1.1) 0 1.2) 0 1.3) 0 1.4) 0 A baseline study is foreseen at the inception phase to collect information required to measure progress on the indicators laid out in the Action.</th>
<th>1.1.1) 100 district, upazila and other sector personnel (est.) 1.1.2) 400 teachers (est.) 1.2.1) 180,000 children (est.) 1.2.2) 44,000 adolescents (est.) 1.2.3) 18,000 out-of-school children (est.) 1.3) 100 learning centres 1.4) to be determined</th>
<th>To be determined</th>
<th>(1) Lengthy Rohingya refugee repatriation process (2) Target population is accessible and Government continues to be supportive of assistance provided</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Result 2: Enhanced food and nutrition security for Rohingya refugees and host communities.</td>
<td>2.1) Proportion of service providers in food and nutrition security trained/recruited by the Action for coverage of target population (location, sector) 2.2) Number target population benefiting from community-based nutrition and livelihood support programmes implemented through this Action 2.3) Number of persons engaged in local projects aiming to eliminate barriers to access to food and nutrition services for target population (disaggregated by sex, displacement status)</td>
<td>2.1) 0 2.1) 0 2.3) 0 A baseline study is foreseen at the inception phase to collect information required to measure progress on the indicators laid out in the Action.</td>
<td>2.1) to be determined 2.2.1) 91,000 pregnant and lactating mothers (est.) 2.2.2) 56,000 children under 5 (est.) 2.2.3) 30,000 adolescent (est.) 2.3) 10,000 (est.)</td>
<td>To be determined</td>
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<td></td>
<td>Result 3: Improved access to water and overall hygiene and sanitation conditions for Rohingya refugees and host communities.</td>
<td>3.1) Number of service providers in WASH trained/recruited by the Action for coverage of target population (location, sector) 3.2) Number target population with access to basic WASH services through this Action 3.3) Number of WASH infrastructure/facilities rehabilitated, enhanced or constructed 3.4) Number of persons engaged in local projects aiming to eliminate barriers to access to WASH services for target population (disaggregated by sex, displacement status)</td>
<td>3.1) 0 3.2) 0 3.3) 0 3.4) 0 A baseline study is foreseen at the inception phase to collect information required to measure progress on the indicators laid out in the Action.</td>
<td>3.1) 560 (est.) 3.2) 170,000 (est.) 3.3) 2,500 (est.) 3.4) 560 (est.)</td>
<td>To be determined</td>
<td></td>
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</tbody>
</table>