Syrian Arab Republic

Submission to the UN Universal Periodic Review
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Joint submission by World Vision International, Syria Relief NGOs in General Consultative Status with ECOSOC

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Background:

1 Total word count 5,533 excluding the Cover Page

2 World Vision International is a Christian relief, development and advocacy organisation founded in 1950, dedicated to working with children, families and communities worldwide to reach their full potential by tackling the causes of poverty and injustice. World Vision International is dedicated to working with the world’s most vulnerable people. World Vision International serves all people regardless of religion, race, ethnicity or gender.

3 Syria Relief was launched shortly after the start of the Syrian crisis in 2011. Since then, we have grown to become the largest Syria-focused, UK-based charity. Our aim is to support the millions of people who are affected by the ongoing crisis and in the process, help to reduce the mass migration from Syria.
1. This joint UPR report is submitted by two organisations, who are either child-focused or are heavily involved with education projects inside Syria, based on their observation and research to raise particular violations of Human Right and IHL that children are subjected to in the Syrian Arab Republic.

2. After 10 years of war and over 600,000 lives lost, 55,000 of whom were children, the crisis in Syria remains a last priority for the international community. Human rights abuses continued unabated by all parties to the conflict and the grave violations against children remained alarmingly high. A report from the UN Secretary-General to the Security Council on June 21, on children and armed conflict highlights violations against children by Syrian Armed Forces, intelligence forces, and pro-government militias. The violations, in a climate of total impunity, include killing and maiming of children, recruitment or use of children as soldiers, sexual violence against children, abduction of children, attacks against schools or hospitals, denial of humanitarian access for children. In the report ‘Too high a price to pay: the cost of conflict for Syria’s children’, World Vision investigated this March 2021, the impact that ten years of war has had on children and child rights, on Syria’s economic growth (in GDP), and on its human capital, with a specific focus on Syria’s children. The findings are concerning - an entire generation is on the brink of being lost to this conflict and children will bear the cost through lost education and health due to attacks on educational facilities, schools and hospitals, preventing many from supporting the country’s recovery and economic growth, once the war ends. All this, a result of a continuous cycle of grave violations against children, heavy economic costs and shattered opportunities for future generations.

3. Since the last UPR in 2016, the Government of Syria has done little to implement the recommendations it supported. We would particularly wish to highlight the following condensed list of supported recommendation on issues that will be developed further that we feel have not progressed since the last review:

- Ensuring unhindered access to education and the protection of schools (109.191-195), the access of children to basic medical services and protection from worse forms of child labour (109.191).
- Taking concrete steps to stop sexual violence against women and girls in particular put an end to child marriage and ensure that victims are given protection and assistance (109.15, 109.85, 109.177-180).
- Ensure the protection of children and their rights, in particular by ensuring the demobilization of all children; the prohibition of forced recruitment of children into the armed forces and the prosecution and punishment of those responsible for forcibly recruiting children. (109.184-187)
- Providing for the safe and voluntary return of refugees and internally displaced persons to their homes and ensuring the rehabilitation of affected areas in accordance with international law (109.197-198)

**Humanitarian access**

**Grave violations against children: denial of humanitarian access for children**

4. Children and their families have been systematically impacted by the widespread denial of humanitarian access, cutting off lifelines of the most basic assistance essential to survival. Syria is the most dangerous country to deliver life-saving assistance and humanitarian services to,

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with 272 aid workers killed as of December 2020.\(^5\) Access constraints range from indiscriminate and disproportionate attacks, use of siege and starvation tactics of war, presence of armed checkpoints, complex bureaucratic permissions and politisisation of principled humanitarian action to deny assistance to specific populations based on shifting areas of control. Taken together, the pervasive denial of humanitarian access has served to disconnect children from mental health and psychosocial support, education, food, shelter, healthcare, clean water, sanitation and protection.

5. The grave violations perpetrated against children amount to an immeasurable loss for an entire generation, but one that has very real and quantifiable impacts on Syria’s human capital, economy and future. Deeper and less quantifiable costs, consequent to the loss of life, experience of trauma, the loss of education and lack of safe access to healthcare, will remain the burden of a generation of Syrian children as they navigate an eventual end to the war.

**Cross border access challenges - barriers to physical health, education, and economic stability**

6. The disproportionate impact of the war on children has longer-term implications for the ability of the country as a whole to recover from the war. Although it is possible to rebound from conflict relatively quickly, this becomes more difficult if there is a long-lasting fall out for the education and health of a population. Access to these basic services and others, such as shelter, food and water are critical for children as they represent the “human capital” of Syria, like in any other country.

7. The burden of recovery after a protracted war is inevitably heaviest on those who were children, or were born during it, as they are likely to be at the most economically active age when peace finally comes. By depriving children of their most basic rights during their development such as education and protection, and by damaging their health, a war jeopardizes the ability of a country to recover. While it is hard to quantify the cost of the horrendous violence against children inside Syria, we know that violence against girls and boys has significant economic costs for individuals and societies, globally estimated to total US$7 trillion annually.\(^6\) More importantly, the impact of violence on children’s psychosocial well-being is immense. Children become highly susceptible to depression, anxiety, and other forms of mental illness in the short term when living in conflict zones.\(^7\) These challenges often act as barriers to physical health, education, and economic stability.

8. The situation for many children and families in Syria remains precarious, with nearly 90 per cent of children in need of humanitarian assistance, a 20 per cent increase in the past year alone.\(^8\) To date, there are more than 13 million people in need of support inside Syria. Half of them - over 6.1 million - are children; and nearly all (94 per cent) of them are living in areas of severe, extreme or catastrophic education conditions.\(^9\)

9. The UN Security Council Resolution extended this July 9th, the cross-border mechanism via Bab al Hawa for six months, with an additional six-month extension subject to the issuance of a report by the Secretary-General. This extension will come at the start of winter and will be critical to ensure delivery of life-saving aid is not disrupted during a time of heightened risk. More than 8.5 million people in need in Northern Syria could be left with limited or no medical care or protection. An estimated half of them are girls and boys.

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10. **Child protection concerns related to potential denial of humanitarian access** - Children need more than basic survival and basic goods (shelter, food, medicine). The distribution of physical goods is just one form of assistance that is needed to meet the needs of populations in the area. Other forms of necessary assistance that are provided cross-border include – protection services such as case management and support to gender based violence survivors, child protection programming and or other programs that require regular, predictable access and longer presence such as the facilitation of water stations.

- **Northwest Syria maintains the highest rate of conflict related incidents and children are the most affected**: reports indicate that more than 75% of Syrian children in NWS display post-traumatic stress disorder (PTSD) symptoms and are in need of critical mental health and psychosocial support.\(^{10}\)
- **Half of the school-aged children are not in school**. That is higher than regional averages in North East Syria. A possible contributing factor is older children pulled from school to work, as households struggle to afford increasingly high priced goods and services. **Non-food items are reportedly inaccessible in 88% of the communities in Northwest of Syria.\(^{11}\)**
- Multiple reports, including World Vision, confirm **the high increase of child marriage and child labour as the main protection risks for children**. 63% of the communities in Northwest Syria report this and all the children that World Vision spoke to less than a year ago.

11. Any challenge in delivering cross border assistance into Northern Syria leads to **severe or total interruptions to education, case management, life skills and resilience building activities and programming, and leave children further exposed to child labour, early marriage, domestic violence, street beginning and psychological stress and trauma.**

12. The consequences are not only felt in the immediacy but also the longer term as children will be unable to support any resolution, peace process, or recovery process.

13. **Protection sector will be heavily impacted in delivering monitoring and identification of risks and needs, legal advice or counselling, capacity building and response to protection concerns.** These are critical functions of the OCHA Protection Cluster which will set back the quality of the responses, the needs based approach of aid interventions and the principled continuous advocacy Syria crisis needs for governments to provide adequate funding and political support.

In Northwest of Syria,

- an estimated 20,000 Syrian women may face reduced access to activities each year aimed at empowering women and girls, and preventing gender based violence. Adolescent girls and female household owners or single women are even at a higher risk.
- Child protection and GBV case management will also be heavily impacted. Almost 53,000 case management processes will be delayed or interrupted.
- The extension of cross-border operations for six additional months starting in January 2022 is also critical to avoid further protection risks such as threats to physical safety as violence is expected to increase, curtailed enjoyment of property rights and especially, freedom of movement given tightened security procedures between districts.

14. **Specific impacts on healthcare**: 82% of those in need in NWS are at risk of **not having access to essential health services including ongoing COVID-19 prevention and treatment if the cross border access is halted or hindered**. The immediate and long term consequences will be risk to catch the virus, unequipped hospitals for critical care, no medicines and much more.

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\(^{10}\) Syria Relief report, March 2021, [Destruction you can’t see.](https://www.reach.eu/)

\(^{11}\) REACH Factsheet NWS February 2021
15. The secondary health services are crucial for children and communities are fully dependent on the cross-border mechanism. NGOs rely heavily on the UN for its ability to procure pharmaceuticals and provide key medicines that NGOs would not be able to procure bilaterally.

In Northwest of Syria,
- UN is the only provider of vaccines and the main source of personal protective equipment, and COVID-19 testing kits, where the population faces high needs and significant challenges to accessing essential services.
- Only 52,000 vaccines have been shipped to Northwest Syria targeting mostly health workers; the rest of the communities are at huge risks of infection especially as the second shipment expected in June 2021 is delayed.

Access to critical services and supports pertinent to children’s life, survival and development

16. The conflict has caused a drastic increase in out-of-school children, exacerbated by the COVID-19 pandemic and the increase in child labour, child marriage and child recruitment. Analyzing the dropout data of the 319 schools in Northern Syria operated by Syria Relief between the period of November 2019-February 2020 (when the Idlib crisis was at its most intense) and from March 2020-December 2020 (once the pandemic had begun), factoring in boys, girls, boys with disabilities and girls with disabilities, the Idlib crisis when it was at its most violent caused one in five children (20.4%) to drop out of school. The COVID-19 pandemic has caused three in ten children (29.23%) to drop out of school. When looking at the entire 13-month period, both the Idlib crisis and the Covid pandemic caused a number representing 52.31%, of the total number children enrolled by year end, to drop out of education. When we break it down by gender and children with disabilities we find that the Idlib crisis caused slightly more boys - 20.13% compared to the number at the end of the Idlib crisis than girls - 19.06%. Covid-19 has caused slightly more girls, 28.82% of the number by the end of 2020, to drop out than boys, of which the number is 27.69%, but once again children with disabilities have been massively impacted 330% of boys with disabilities and 838% of girls with disabilities. The reason this percentage is so high is because we have taken the number of pupils who have dropped out throughout the time periods as a percentage. Looking at the data, school-by-school for mixed schools. Throughout the reporting period, there were more schools where there were more girls who dropped out, than boys. 139 schools had more girls drop out than boys and 128 had more boys drop out than girls. We, for obvious reason, didn’t count boys-only or girls-only schools in this (hence why the total of schools – 319 – is less than the combined number of these schools - 267.) Such a significant amount of children not in school is regularly leading to negative coping mechanisms, like child recruitment, child labour and early marriage.

17. The widespread use of cluster munitions and the rising poverty levels have created a context where Unexploded Ordnances (UXOs) have become a major issue. Two children who attend our schools have been killed by UXOs in 2021 alone, several have been maimed. In all cases it has been children who were scavenging, in order to find items to sell, picked up a metal object which they did not realise to be a UXO.

18. Economic circumstances in the pandemic mean many children are unable to continue their education through home learning as they do not have access to any/ enough connected electronic devices.

19. Physical barriers to access the essential services and participation in essential activities for children, especially children with disabilities who reside in internally displaced people (IDP) sites are often extreme in northwest Syria. Research Syria Relief conducted in 2018, in a survey of 789 children with disabilities across the four provinces that we then operated in (Idlib, Aleppo, Homs

12 The submitting NGOs are currently collecting evidence and data in this regard.
and Rural Damascus) found that:

- 89% of all children surveyed indicated a need for medical rehabilitation services. 69% indicated that these services were not available in their area.
- 80% of all children surveyed indicated a need for accessible health care services. 62% indicated that these services were not available in their area.
- 77% of all children surveyed indicated a need for assistive devices. 78% indicated that assistive devices were not available in their area.
- 65% of all children surveyed indicated a need for educational services. 82% did not have access to these services in their area.
- 61% of all children surveyed indicated a need for counselling services. 87% did not have access to these services in their area.
- 56% of all children surveyed indicated a need for mental stimulation. 76% of children with intellectual and/or psychological difficulties indicated a need for mental stimulation.

20. We have found that people who live close to conflict lines between the Government of Syria and Non-State Armed Groups, such as in areas like Ariha and Jisr Al-Shour, suffer from an extreme lack of services.

21. Parents and caregivers are expressing serious fears of the potential return of tension between conflicting parties.

22. Throughout Northwest Syria there is a lack of child-friendly spaces and information about where all services are available. The lack of capacity of NGOs to cover children’s needs and provide suitable protection mechanisms as a result of the disintegration in civil and social structures and lawlessness.

Recommendations:

- Full adherence and respect for international law by national actors and all parties to the conflict. The complete cessation of targeting of protected persons and objects, civilian life and infrastructure, which is both causing the need for services and destroying the facilities to provide the services.
- The immediate cessation targeting and attacks on schools, hospitals, homes and markets in particular.

Grave Violations of child rights

23. The conflict in Syria has been defined by the continued perpetration of grave violations of children’s rights, reflecting a collective failure to protect the most innocent. Almost 6 million children have been born inside Syria and in the neighbouring countries since the war began in 2011.13 These children know nothing but death, displacement and destruction.

24. The picture painted through the UN monitoring of grave violations demonstrates the compounded cost in lives and futures for Syrian children, but only shows what is believed to be the tip of the iceberg. Child casualties in Syria are among the highest in modern conflicts; attacks on education and healthcare, a defining feature of the war, the most consistently pervasive globally since 2014. Both of these grave violations have the most devastating direct and long-term impacts on child survival and overall socio-economic cost to Syria.

Killing and maiming of children

25. Grave violations against children continue to be the highest in the northwest of Syria, where violence and conflict are ongoing, having killed 7 girls and boys on 3rd July alone, in Idlib. Seventy-five per cent of the total of child casualties across Syria last year were recorded in the

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northwest, along with nine out of ten attacks on schools and seven out of ten children recruited and used in the conflict.14

26. Nearly 6,000 children have been reported to have been killed or maimed in the Syrian conflict between 2014 and 2019.15 This includes at least 152 deaths by summary execution or torture.16 Prior to the start of the verified UN reporting, the UN Secretary-General raised the alarm that between 2011 and 2013 at least 10,000 children had already been killed in the conflict.17

**Attacks on Education**

27. Strategic and widespread attacks on education have been a characteristic of the Syrian conflict, systematically targeting education infrastructure and personnel, despite schools being intended as safe spaces, essential to children’s development. Instead, the UN has verified year-on-year increases in attacks on schools and teachers.

28. Of the 306 schools Syria Relief operates in Northern Syria, 8 have been the target of airstrike or shelling since 2019, most recent being June 10th 2021. Children and teachers are often killed and injured in the attacks. As there is a strongly-held belief, supported by evidence, that schools are deliberately targeted, many parents choose to keep their children from and not send them to school - meaning they lose out on education and sometimes forced into child labour instead or early marriage.

29. Since verified reporting began in 2014, the UN has documented 671 attacks on education, including 61 in 2020.18 UN reporting consistently identifies that the majority of attacks on education and health to be caused by air strikes perpetrated by government or pro-government forces.19 As a consequence, over 3.5 million children are out of school inside Syria – nearly 40 per cent are girls.20 After a decade of conflict, more than half of children inside Syria have been deprived of a basic education.21

**Attacks on health infrastructure and personnel**

30. Attacks on health infrastructure and personnel have been among the most severe and targeted in modern conflict, devastating the prospects for child survival and development. Physicians for Human Rights have mapped 600 attacks against 350 separate medical facilities between March 2011 and June 2021, finding 90 percent were perpetrated by the Syrian government and allied forces.22 The UN has verified to date 569 attacks from 2011 to 2020.23

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14 Ibid 9
Every four days in 2019 a health facility was attacked in Syria.24 Since April 2019, when a new spike in attacks on health care was reported, 40 attacks occurred only in western Aleppo, Idlib and Hama - areas that host millions of children and displaced families, of which many are solely reliant on external aid and scarce local services.25

31. Few conflicts have been so characterised by the targeting of health personnel directly, with 1007 health workers killed or injured between 2014 and 2020.26 The COVID-19 pandemic has added a new layer of complexity and demonstrates the fragility of the Syrian healthcare system, with 46 percent of reported cases resulting in death in North West Syria partly due to the inability of the health system to cope.27

32. For 10 years, additional grave violations have been routinely perpetrated against Syrian children at an unprecedented scale, often increasing with each year of conflict, fundamentally denying girls and boys a protective environment and contributing to immeasurable loss.

**Recruitment or use of children as soldiers**

33. Children have been recruited and used by all parties in the conflict since at least 2013, with the UN verifying over 4,894 children associated with armed forces or groups.28 An estimated 82 percent of children have been used in direct combat roles and 25 percent of children have been under the age of 15 years.29 The brutal and unabating use of children directly and indirectly in the conflict will carry a heavy cost for Syria’s future.

**Abduction of children**

34. Further denying their future, children continue to be abducted and detained, often linked to a real or perceived association with an armed group. *The UN has documented at least 889 abducted children since reporting began until 2020.*30 Over 1,700 children have been detained or deprived of their liberty, often for years at a time. In at least 88 of these cases, children experienced torture while detained.31

**Sexual violence against children**

35. Sexual violence against children has been a disturbing and consistent feature of the conflict, with the UN reporting the perpetration of rape, sexual assault, forced marriage and sexual slavery. *The stigma and sensitivity of reporting, absence of survivor centred care and destruction of health facilities have contributed to gross underreporting.* World Vision research conducted in 2020 found that 100 percent of girls and 94 percent of boys surveyed thought the practice of early and forced marriage of girls had increased since the start of the conflict; 71 percent felt conflict and insecurity were the primary drivers of this practice.32 107 cases were able to be verified by the UN since 2014 until 2020, but as it is widely known, sexual and gender based

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24 In 4 years, 494 attacks on health killed 470 patients and health staff in Syria, World Health Organization, March 2020.
25 Ibid 18
29 Ibid 24
31 Ibid 26
32 Ibid 4
violence is vastly underreported due to stigma, discrimination and fear.\textsuperscript{33}

36. Since the COVID-19 pandemic began last year, the situation has grown even direr for children, with the devastating socio-economic impacts resulting in increased incidence of child labour, including begging on streets, and early forced marriages. We observe increasing protection risks for girls, such as random attacks when moving within the community, as well as normalization of sexual violence, while restrictions to access GBV services have increased due to the ongoing lockdowns to mitigate the spread of COVID-19. Nearly all of the girls and boys that World Vision spoke with in Northwest Syria last year knew someone who had been married at an early age.\textsuperscript{34}

**The rights of internally displaced children and returning refugee children**

37. Multi-displacement has caused the emergence of numerous cases of unaccompanied and separated children or children living with older/disabled caregivers, increasing the risk of exposure to violence and exploitation. Since the Covid-19 pandemic, children and their families, or caregivers were more vulnerable and our teams on the ground are reporting observing regular returns to the camps from the other non-camp settlements. This is due to the compounded affected the health crisis has had on the local economy while insecurity remained similarly high as before the pandemic. This also continued to further displace people internally in Northern Syria. \textit{For example, hostilities in the southern Idlib region escalated in June and early July, causing displacement and civilian casualties, including of humanitarian and healthcare workers.}

38. Forced displacement is also the main driver of child protection risks and 70\% of children refugees in Jordan and Lebanon that World Vision spoke to at the beginning of this year, as well as those displaced in Northwest Syria, had to flee because of spikes in violence and attacks.\textsuperscript{35}

39. \textit{Long term displacement, ongoing conflict, chronic stressors, uncertainty of the future, lack of access to basic needs for children and youth are continually increasing the severity and scale of mental health needs, with various access barriers impacting genders differently.} Access to mental health and psychosocial support services (MHPSS) is further compounded by broad societal stigma attached to mental health seeking behaviour.

40. The reported numbers of children displaying symptoms of psychosocial distress has doubled in 2020.\textsuperscript{36} Research\textsuperscript{37} on the impact of war on the mental health of displaced Syrian boys and girls revealed painful accounts of the exposure to traumatic events, violence and displacement, destroying the supportive environment and sense of safety while heightening a sense of fear.

41. \textit{According to Human Rights Watch’s latest report, authorities also continued to unlawfully confiscate property and restrict access to areas of origin for the returning Syrians.}\textsuperscript{38} This includes restricting access to residential buildings and unlawfully demolishing homes without adequate compensation. As of May 2021, the UN High Commissioner for Refugees (UNHCR) records indicate that a total of 13,423 self-organized spontaneous returns had taken place from neighboring host countries.\textsuperscript{39}

42. Syria Relief, working with qualified mental health professionals and NGO partners, developed a method of ascertaining the prevalence of post-traumatic stress disorder (PTSD) symptoms, which we have done in IDP camps in Idlib, refugee camps in Lebanon and to Syrians accessing refugee services in Turkey. Across all 3 geographic areas 74\% of under 18s had symptoms

\textsuperscript{33} Ibid 26
\textsuperscript{34} Ibid 4
\textsuperscript{35} Ibid 1
\textsuperscript{36} No Lost Generation Advocacy Brief, March 2021.
\textsuperscript{38} Human Rights Watch World Report 2021
\textsuperscript{39} World Report 2021: Syria | Human Rights Watch (hrw.org)
compatible with PTSD. Breaking this down by gender, 70% of boys have PTSD symptoms, yet 79% of girls have PTSD symptoms. The numbers by geographic area are particularly alarming in Idlib, where 100% of the children responding showed potential PTSD symptoms, both boys and girls. Out of 15 possible symptoms, in Idlib, 31% had 10 or more and 73% had 7 or more – girls being more prone to multiple symptoms than boys. In Lebanon, 60% of children under 18 have PTSD symptoms. 53% of boys and 68% of girls. While in Turkey, we reach the number of 69% of children under 18 being subject to PTSD symptoms. 60% of boys and 100% of girls. The prevalence of PTSD symptoms is alarmingly high in both IDP and refugee contexts, however being born into or growing up inside an active conflict zone is significantly more detrimental to a child’s mental health. Girls are disproportionately impacted, they are not only much more likely to have PTSD symptoms than boys, but are more likely to have more symptoms than boys.

43. As part of this process we also asked respondents how accessible mental health services are to them. Across all 3 geographic areas, 16% believe they have access to mental health support, for just children 15% believe they have access to mental health support. However, there are big discrepancies by geographic location. In Turkey 65% of the total respondents, and 80% of under 18s, believe they have access to mental health support, however in Lebanon it is just 15% or 14% of under 18. In Idlib, just 1%, 0% of under 18s, believe they have access to mental health support.

Civil documentation

44. For years, UN assessments have found that the majority of Syrians in the country lack various types of civil documentation, and communities polled consistently say they consider this to be a pressing concern. As Syrian people have been displaced multiple times, papers have been lost or destroyed, and many Syrians have been cut off from the Government – the only legal authority that can officially register births and deaths and issue the paperwork that keeps track of these events. For many Syrians who lack identification cards and other documents crucial for accessing healthcare, education, and aid, this is a critical gap. This simply adds to the loss of opportunities children experience for a decade in Syria, thus further adding to the immense loss of human capital and mental stress.

45. There are also challenges related to birth registration of children due to time and status constraints caused by those displaced by the conflict or returning refugees.

46. Returnees face physical security threats, poor access to justice and the rule of law, deteriorated essential services, poor ability to meet basic needs through sustainable livelihoods, damaged infrastructure and many fear to return due to security threats. Due to this, many refugees believe that the only option available to them over the next 5-10 years is to stay where they are.

47. We call on all parties to the conflict to:

- Take concrete steps to immediately cease grave violations against children’s rights done by all parties to the conflict, and ensure they are held accountable by the international community for violations they committed. Syria’s children have suffered enough. Without accountability, any chance of reconciliation and peace will remain elusive. To this end, the international community must continue to support the United Nations-led Monitoring and Reporting Mechanism for Syria as to systematically monitor and report grave violations of children’s rights, including the tracking of age- and sex-disaggregated data on casualties and other violations.
- Implement all relevant UN Security Council resolutions, particularly those related to needs based humanitarian assistance, and facilitate the arrival of unrestricted humanitarian aid and assistance, in particular to the areas most affected by the conflict.

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40 World Report 2021: Syria | Human Rights Watch (hrw.org)
• **Put an end to the deliberate attacks on civilian infrastructure** that limits children’s access to basic services such as health facilities, hospitals, schools or any other educational facility.

• Taking all necessary measures to ensure the Government of Syria cooperates with the Independent International Commission of Inquiry and allows it to access its territory, to document, monitor and report on the abuses of human rights and the grave violations against girls and boys.

• Take immediate steps in ensuring the administrative requirements to apply for documentation are kept to a minimum, and time limits on registering vital events that took place during the conflict should be reasonable.

• Should introduce alternative and simple identity determination procedures (including for example those with a low evidentiary threshold), in recognition of the above mentioned challenges faced by displaced Syrians in accessing civil documentation in the place of displacement.

• Should clearly identify the bodies responsible for issuing documentation and should be provided with the resources necessary for the completion of these tasks, including reinforcing their capacity in terms of number of staff and training.

• Ensure the safe return of displaced Syrians who decide to return to their country of origin, by abiding to the International Human Rights Standards so they do not get arrested, detained, tortured, or pursue returnees by terrorism courts upon return as noted in the European Asylum Seeking Office (EASO) June 2021 report.41