



Evaluating UNRWA After the Colonna Report

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At left, workers inspect a UNRWA building damaged by an Israeli strike in Gaza's Nuseirat refugee camp; at right, French diplomat Catherine Colonna, head of the UN's review group. SHUTTERSTOCK, REUTERS

On January 26, 2024, in response to information from Israeli authorities, the commissioner-general of the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) announced his decision to “immediately terminate the contracts” of several staff members alleged to have been involved in the October 7, 2023, attack.¹ The goal, according to the statement, was to “protect the Agency’s ability to deliver humanitarian assistance.” Thereafter, on February 5, 2024, the UN secretary-general appointed an independent review group to evaluate the agency’s neutrality.² Headed by former French foreign minister Catherine Colonna, the group presented its report to the secretary-general on April 20, 2024, and it was made public two days later.³ The stated objectives of the Colonna report, as it is

known informally, were “to assess whether UNRWA is doing everything within its power to ensure neutrality and respond to allegations of serious neutrality breaches when they are made, taking into account the...context in which it has to work, especially in Gaza, and to make recommendations for UNRWA to improve and strengthen in this area, if necessary.”⁴

Given its intent to evaluate UNRWA’s efforts to ensure neutrality and respond to alleged breaches of neutrality, the report does not purport to investigate either the Israeli allegations that UNRWA Gaza staff members participated in the October 7 atrocities, or the subsequent Israeli allegations that significant numbers of the Gaza staff belong to Hamas and that nearly half have a close relative who is a Hamas member.⁵ The secretary-general has directed the UN Office of Internal Oversight Services to address at least the first of those accusations.⁶

The clear majority of the report’s fifty recommendations—all of which are addressed in the analysis to follow—deal with managerial problems, such as the need to increase staff and funding resources, boost training, clarify or increase managers’ accountability, foster coordination with other organizations, limit the influence of staff unions, employ more women in senior positions, and improve partnerships with other UN and non-UN aid providers in Gaza. That such recommendations needed to be made at all reflects UNRWA’s failure to utilize basic principles of competent management. More important, the report identifies two longstanding moral failures: UNRWA’s resistance to—and obstruction of—vetting staff for terrorist connections and its refusal to remove from its educational materials content contrary to UN principles, primarily antisemitic, anti-Israel, or pro-violence content. All told, the report’s identification of those moral failures along with the many basic management failures amount to a damning indictment of the agency’s current and past leadership.

A year ago, the Colonna report would have been welcomed by those who for decades have urged reforms on UNRWA, some of which are identified

in the report’s recommendations. The discussion, however, largely has moved on from reforms: the primary question now is not how to reform UNRWA but whether the agency should continue to exist at all.⁷ The report addresses that latter question only in a conclusory manner—mirroring the view of UNRWA and the UN secretary-general:

In the absence of a political solution between Israel and the Palestinians, UNRWA remains pivotal in providing life-saving humanitarian aid and essential social services, particularly in health and education, to Palestinian refugees in Gaza, Jordan, Lebanon, Syria and the West Bank. As such, UNRWA is irreplaceable and indispensable to Palestinians’ human and economic development. In addition, many view UNRWA as a humanitarian lifeline.⁸

This paper, for its part, aims to assess what the Colonna report does and does not reveal about UNRWA’s managerial and moral failures. The analysis here is not meant as a critique of the report itself—although it does include observations on the relative utility of its many findings.

What the Report Does Not Address

Given that its mandate was limited to “neutrality,” the Colonna report ignores many reforms that have been urged on UNRWA for decades, starting with the need to reconcile the agency’s definition of a “Palestine refugee” with the universally accepted definition of a refugee set forth in the UN Convention and Protocol Relating to the Status of Refugees. According to the Refugee Convention, as it is known, a person cannot be both a citizen under the protection of that person’s state of residence and a refugee.⁹ Adhering to this rule would reduce UNRWA’s rolls of 5.9 million “Palestine refugees” by nearly a third, prominently including about 1.8 million oxymoronic “citizen-refugees” in Jordan alone. One might also

question whether, given that 146 states and counting have recognized the state of Palestine, UNRWA's "Palestine refugees" living in the West Bank and Gaza—who hold the same political rights as their "non-refugee" neighbors—should be counted under the Refugee Convention.¹⁰ Beyond this, even UNRWA concedes that it provides services to large numbers of people and their descendants who fail to meet the agency's loose standards for a "Palestine refugee," including the so-called economic refugees, a category that includes some poor residents of Gaza and Jerusalem, certain cases foisted on UNRWA by the Lebanese government, some Bedouin, and others.¹¹ Removing such individuals and their descendants would allow aid to be directed to truly deserving recipients, as would reversing UNRWA's longtime refusal to base its provision of services, such as education and healthcare, on need rather than "Palestine refugee" status.

Lastly, while the report asserts that "all UNRWA beneficiaries, contractors, vendors, non-State donors, or any other individual or organization affiliated with UNRWA are screened annually by the agency using the UN and the World Bank sanctions lists,"¹² it recommends more thorough vetting only for staff members.¹³ Because under the Refugee Convention an assortment of crimes can lead to forfeiture of refugee status,¹⁴ and because donors may not wish to provide aid to criminals (or terrorist supporters), the recommendation for increased vetting with regard to staff should be expanded to cover UNRWA beneficiaries, contractors, vendors, nonstate donors, and any other affiliated individual or organization.

What the Report Does Address

The Colonna report delineates eight areas for UNRWA improvement—(1) engagement with donors, (2) governance, (3) management and internal oversight structures, (4) neutrality of staff, (5) neutrality of installations, (6) education,

(7) staff unions, and (8) strengthened partnership with UN agencies—followed by recommendations. Each is subjected to analysis in the following sections.

Engagement with donors. The report recommends that UNRWA increase the frequency and transparency of its communications with donors regarding finances and neutrality issues in order to "restore trust." Such an increase in frequency and transparency is obviously desirable and a basic managerial responsibility, but the recommendation begs the question "Why is this not already being done?"—a question that, as shall become apparent, applies to many of the report's recommendations.

Governance. The report suggests that UNRWA's Advisory Commission counsel the agency on fulfilling its mandate, with a standing agenda item on "neutrality," a working group on "neutrality and integrity issues," and "additional governance arrangements to assist in providing strategic direction to UNRWA and improving external communications." Again, the recommendations are unexceptional, and again the question arises: why is this not already being done?¹⁵

Management and internal oversight structures. Included in the fifteen recommendations here are proposed ways to increase resources for investigating neutrality violations—more investigatory personnel, creation of a "Neutrality Investigation Unit," transfer of investigatory personnel to field offices, interaction with other UN investigatory offices. Suggestions also include periodic evaluation of the investigative offices, characterization of neutrality violations as a "strategic risk," and assigning of responsibility for such risk to "the Deputy Commissioner-General Operational Support." Although adding personnel should speed up investigations of neutrality and perhaps enhance their thoroughness,¹⁶ periodic evaluations of all UNRWA offices should already be occurring as a normal element of good management. Transferring responsibility to a higher-ranking officer, who likely already has other important responsibilities, may or may not strengthen the actual emphasis on neutrality.

The report also suggests that senior local staff receive increased training and increased responsibility for the neutrality of their subordinates, including a requirement for “regular engagements with their teams on neutrality.” Again, these recommendations appear to be requiring only the implementation of standard management practice—increased training in an area of perceived deficiency and holding managers responsible for their subordinates’ knowledge of rules and behavior.

Two other recommended management improvements seem more peripheral to neutrality. Placing more women in senior local staff positions may well be a sound idea, and “internationalization”—replacing some local senior staff with personnel from abroad, presumably—could reflect a perception that individuals from abroad are less likely to be influenced by local politics and security dynamics.

The next two recommendations—covering publication of and training on a new code of ethics (evidently already updated on February 24, 2024),¹⁷ and increased adherence to the “outside and political activities policy”—make sense, but the latter suggests that UNRWA management thus far has failed to ensure an acceptable level of compliance.

Finally, three recommendations under the subheading “Projects”—involving the role of donors in project management, the engagement of third-party managers, and the compatibility of projects with UNRWA objectives—simply set forth good management practices that already should be in place.

Neutrality of staff. This section is the most responsive to the secretary-general’s instructions and includes some ten recommendations. The first three are rather mundane in themselves: updating neutrality rules to address “social media and new technologies,” providing training on the updated rules, and creating procedures for dealing with “allegations of irregularities, misconduct or neutrality breaches.” Here, the focus on social media adherence may strike some as a surprising acknowledgment of failed existing policy, given the many reports of UNRWA social media breaches

already available in open sources.¹⁸ The inability to promulgate and enforce effective rules for dealing with neutrality violations would again reflect the agency’s managerial incompetence. Here, moreover, the report misses an opportunity to identify a greater, related problem: UNRWA’s seemingly willful refusal to transparently deal with credible, well-supported allegations of staff neutrality violations on social media,¹⁹ despite having many times been alerted to this problem by NGOs.²⁰

The next three recommendations involve early screening of UNRWA staff, sharing of staff identities with host countries and Israel, and continuous vetting, especially at promotion. The first of this trio falls short by failing to indicate specific ways to screen—e.g., through lists from host and donor countries, including Israel²¹—and will ring hollow to critics who have advised similarly to UNRWA for well over a decade.²² As for the second, only since March 2024 has UNRWA revealed to Israel the identification numbers of its staff after decades of not doing so;²³ the former reticence reflected management incompetence at best, intentional concealment of potential terrorist links at worst. The third recommendation appears, once again, to reflect a need for UNRWA to implement basic management practices.

The last three recommendations for this section cover UNRWA detection of improper social media posts, improved reporting of neutrality breaches, and strengthened whistleblower protections. In addition to the seemingly omnipresent questions about management competence these recommendations raise, they beg a series of questions: Has UNRWA previously requested additional funds to strengthen its detection of (well-known) improper social media posts? And if not, why not? Does UNRWA immediately report neutrality breaches to donors and host countries, including Israel? If not, why not? What in the UNRWA whistleblower protection procedure is insufficient, and why has UNRWA not earlier addressed this insufficiency? Why does the report stop short of suggesting wide publicizing of all established neutrality breaches to demonstrate serious intent to address the problem? Finally, these recommendations do not indicate

specific proposed UNRWA remedial actions, making compliance difficult to assess.

This section mentions briefly Israel’s allegations of terrorist involvement or close relative association by almost half of UNRWA’s Gaza staff,²⁴ contending that Israel has yet to provide supporting evidence.²⁵ More narrowly, of the nineteen UNRWA staff members alleged by Israel to have participated in the October 7 massacre, fourteen cases remain under UN investigation, four cases have been suspended due to a lack of information or evidence, and one has been closed due to lack of evidence.²⁶

The report, meanwhile, makes a connection between social media neutrality breaches by UNRWA staff and their mental trauma from “incidents of violence affecting colleagues or relatives,” and in turn suggests creating five new international positions—one for each UNRWA field of operation—“to ensure that personnel are given a space to discuss these traumatic incidents...” If such new positions are needed, the assignment of counselors should be based on the incidence of violence, thus requiring the heaviest resources in Gaza and a lighter presence in, for instance, Jordan.

Neutrality of installations. The first two of five recommendations in this section concern staff training and publicity campaigns on the civilian nature of UNRWA installations. While such activities cannot hurt, the report cites no evidence that UNRWA staff or the civilian population actually lacks this understanding or that such a factor has played into past breaches of neutrality. During the author’s several years with UNRWA, a misunderstanding of the civilian nature of installations never figured in breaches of their neutrality.

As called for next, installation inspections more frequent than the current quarterly regime and more wide-ranging might in theory be useful, but in practice—especially if conducted by local staff, who can be more subject to pressure from state or de facto authorities—they are unlikely to make much difference.

The last two recommendations in this section—on strengthening collaboration with host countries and Israel regarding misuse of installations (including joint visits) and transparently informing donors of misuse of UNRWA’s installations—reflect positive steps, but they again cast a glaring light on past managerial failures. All such breaches must be reported to all donors and host nations, including Israel, and be publicized to demonstrate UNRWA’s seriousness in addressing the problem. Secrecy can only be justified if publicizing information would compromise an active investigation.

Education. While the exact nature of the recommendation is not clear, potentially the most significant initiative in this section involves calls for “digitalization of educational content” and “the use of digital teaching platforms to increase transparency.” As it stands, the largely if not solely in-person system allows much leeway to educators, even as reports have suggested that some could be connected to terrorist groups.²⁷ In an environment inflected with extremism, even otherwise neutral teachers can face threats to present materials dictated by the government or de facto authorities. If UNRWA provides prerecorded or live lessons transmitted directly from the headquarters, then it could be assured that at least part of the official curriculum would reach students. Moreover, a two-way connection would allow headquarters to monitor what is actually being taught in classrooms—information it now receives only via reports from its local staff.

The report also recommends reviewing UNRWA’s textbooks and supplements with host countries, including Israel and the Palestinian Authority, banning hate speech/racism/incitation of violence from textbooks and supplements, and conducting annual reviews of textbooks and supplements with guidelines provided by the UN Educational, Scientific, and Cultural Organization and conducting reviews with UNESCO. Such recommendations mirror those repeatedly made to and ignored by the agency over several decades.²⁸ That these recommendations are still needed is a scandal and represents a monumental failure of current and

past management. Nevertheless, one can hope that UNRWA will now follow this counsel, even as the recommendations should be broadened from “textbooks and supplements” to “all educational materials.”

After a recommendation encouraging the “empowerment of women to take managerial responsibilities within the UNRWA education system”—admirable on its own but lacking an apparent connection to neutrality—the report offers two further suggestions regarding neutrality in the classroom: the first calling for a hotline to report “problematic teaching content and to support teachers seeking advice” and the second supporting “teaching inspections in classrooms.” As with the inspections of UNRWA installations, these initiatives may be useful in principle, but local staff facing pressure from state or de facto authorities may fear using the hotline or reporting accurately on their “teaching inspections.”

The final education-related recommendation suggests “establishing” training for UNRWA principals and teachers regarding neutrality, humanitarian principles, and human rights. If the existing training is insufficient, this would again be a matter of basic managerial competence; if such training truly needs to be “established,” however, that would reflect a major failing on the part of current and previous UNRWA management. Such values obviously should have been taught from the start, and they must be instilled thoroughly if the system is to have any hope of fostering a generation free of prejudice.

Staff unions. This section encompasses six recommendations, none directly linked to neutrality. They involve (1) better aligning the UNRWA statute regulating staff unions with the UN system—an apparently reasonable suggestion; (2) increasing “workforce representativity [*sic*],” including of women—an issue addressed in other sections; (3 and 4) procedures for vetting current and newly elected staff union representatives, another apparently useful suggestion, even as vetting union candidates before they hold office might be

preferable; (5) outsourcing pay and pay-related benefits, a step that could beneficially reduce friction between staff unions and UNRWA management; and (6) exploration of additional options for staff representation, which also could prove beneficial.

Strengthened partnership with UN agencies.

The three recommendations included in this section constitute the most interesting political statements in the report: (1) that non-UNRWA humanitarian organizations should strive to “sustain and scale up support to UNRWA’s humanitarian operations in Gaza”; (2) that UNRWA should increase its coordination with other humanitarian organizations; and (3) that UNRWA should “drive an internal cultural shift” that would facilitate more effective work with other humanitarian organizations. These recommendations are striking given an (undenied) report that the UN secretary-general has told other UN organizations that they should *not* accept additional funds or responsibilities in Gaza that would diminish the funds available to UNRWA or encroach on its responsibilities.²⁹ Amid Israel’s refusal to work with UNRWA in Gaza,³⁰ however, the report appears to be urging the provision of aid in the territory by whatever means possible, with UNRWA cooperation when other groups assume its previous functions. On this matter, observers should pay close attention to the rhetoric and actions of UNRWA, the secretary-general, and other UN agencies.

The Elephant in the Room

Recommendations to improve UNRWA’s neutrality are unlikely to prompt significant changes so long as the agency is operating in an environment like Gaza, where the de facto authority is a terrorist group. The overarching problem is that UNRWA can train its staff on neutrality, proper procedures, educational curriculums, and the like, but when it comes to actions—e.g., teaching anti-Israel or antisemitic material—staff members do what Hamas or like-minded actors tell them to do, whether out of conviction or intimidation. Moreover, the costs of

deviating from Hamas are likely much higher than the costs of not following UNRWA's demands: anti-Hamas transgressions will reach the group via local staff (e.g., fellow teachers) or UNRWA beneficiaries (e.g., students), whereas anti-UNRWA actions are unlikely to reach the agency's few top-ranking international officers (local staff would not dare tell them). In the best case, following the report's recommendations may improve UNRWA's internal operations, but doing so is unlikely to achieve more than surface-level enhancements to neutrality in a territory subject to Hamas rule.

Conclusion

The Colonna report makes some useful suggestions, but the obvious nature of many of the fifty recommendations points to scandalous mismanagement at UNRWA over many decades. Moreover, the longtime insistence on not properly vetting staff members to avoid employing terrorists or terrorist

supporters, and on not removing educational materials containing content contrary to UN principles, reflects not just a management failure but a moral failure. The current commissioner-general—and all the officials who in particular ignored earlier, oft-repeated calls for similar or even identical reforms—should resign or face dismissal.

Limited in its scope by the secretary-general, the report fails to offer remedies for many troubling policies, starting with the need to reconcile the agency's definition of a "Palestine refugee" with the universally accepted definition set forth in the UN Refugee Convention. In addition, the UN should examine why UNRWA, after seventy-five years in existence, is still providing governmental services for "Palestine refugees" who—by UNRWA's own admission³¹—have lived for generations in areas where the local government operates a parallel system providing the same services. The UN should propose transferring UNRWA's resources to those local governments, which derive financial benefit from the presence of "Palestine refugees" without providing them with governmental services. ❖

NOTES

- 1 Philippe Lazzarini, “Serious Allegations Against UNRWA Staff in the Gaza Strip,” UNRWA, January 26, 2024, <https://www.unrwa.org/newsroom/official-statements/serious-allegations-against-unrwa-staff-gaza-strip>.
- 2 “Guterres Appoints Independent UNRWA Review Panel,” *UN News*, February 5, 2024, <https://news.un.org/en/story/2024/02/1146207>.
- 3 See UN, “Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality,” final report for the United Nations secretary-general, April 20, 2024, https://www.un.org/sites/un2.un.org/files/2024/04/unrwa_independent_review_on_neutrality.pdf.
- 4 UN, “Independent Review,” 3, https://www.un.org/sites/un2.un.org/files/2024/04/unrwa_independent_review_on_neutrality.pdf. The elision appears in the original text of the report, while the secretary-general’s tasking, as set out in the annex (p. 47), describes the “context” to be “taken into account” to include “the Agency’s mandate, its capacities and resources and the unique and frequently difficult operational, political and security context in which it has to work...” The elision may have been intended to better allow recommendations not overly limited by the consideration of the secretary-general’s elaboration of the “context.”
- 5 See, e.g., Carrie Keller-Lynn and David Luhn, “Intelligence Reveals Details of UN Agency Staff’s Links to Oct. 7 Attack,” *Wall Street Journal*, updated January 29, 2024, <https://www.wsj.com/world/middle-east/at-least-12-u-n-agency-employees-involved-in-oct-7-attacks-intelligence-reports-say-a7de8f36>.
- 6 See “Statement from the Spokesperson of the UN Secretary-General on the OIOS Investigation Regarding Allegations Against UNRWA Staff,” UNRWA, April 26, 2024, <https://www.unrwa.org/newsroom/official-statements/statement-spokesperson-un-secretary-general-oios-investigation>.
- 7 James G. Lindsay, *Options for UNRWA: From Systemic Reform to Dissolution*, Policy Note 146 (Washington DC: Washington Institute, 2024), <https://www.washingtoninstitute.org/policy-analysis/options-unrwa-systemic-reform-dissolution>.
- 8 UN, “Independent Review,” 4, https://www.un.org/sites/un2.un.org/files/2024/04/unrwa_independent_review_on_neutrality.pdf. In reality, UNRWA is not at all irreplaceable. In all five UNRWA fields of operation (Jordan, Lebanon, Syria, the Gaza Strip, and the West Bank, including East Jerusalem), the local authorities provide those residents whom UNRWA has not designated “Palestine refugees” with services, such as education and healthcare, more or less mirroring services provided by UNRWA. If the agency’s resources were transferred to these local authorities, they could expand their operations—in most cases utilizing at least some of the same personnel currently employed by UNRWA. Moreover, if necessary, many UNRWA functions could be taken over temporarily by other UN entities, e.g., the World Food Program, which could expand its food distribution operations in Gaza specifically.
- 9 UN Convention and Protocol Relating to the Status of Refugees, Article 1.C(3), <https://www.unhcr.org/us/media/convention-and-protocol-relating-status-refugees>.
- 10 See “Mapping Which Countries Recognise Palestine in 2024,” *AJ Labs*, updated May 28, 2024, <https://www.aljazeera.com/news/2024/5/22/mapping-which-countries-recognise-palestine-in-2024>. Not only does citizenship preclude refugee status, but so does a situation in which the putative refugee is “a person who is recognized by the competent authorities of the country in which he has taken residence as having the rights and obligations which are attached to the possession of the nationality of that country.” UN Convention and Protocol Relating to the Status of Refugees, Article 1.E, <https://www.unhcr.org/us/media/convention-and-protocol-relating-status-refugees>.
- 11 UNRWA, “Consolidated Eligibility and Registration Instructions,” January 1, 2009, Article III.A.2, <https://www.unrwa.org/resources/strategy-policy/consolidated-eligibility-and-registration-instructions>.
- 12 UN, “Independent Review,” 22, https://www.un.org/sites/un2.un.org/files/2024/04/unrwa_independent_review_on_neutrality.pdf.
- 13 UN, “Independent Review,” 24, recommendations 22–25, https://www.un.org/sites/un2.un.org/files/2024/04/unrwa_independent_review_on_neutrality.pdf.
- 14 The full passage describes these crimes: “(a) he has committed a crime against peace, a war crime, or a crime against humanity, as defined in the international instruments drawn up to make provision in respect of such crimes; (b) he has committed a serious non-political crime outside the country of refuge prior to his admission

- to that country as a refugee; (c) he has been guilty of acts contrary to the purposes and principles of the United Nations.” UN Refugee Convention, 16, <https://www.unhcr.org/us/media/convention-and-protocol-relating-status-refugees>.
- 15 Furthermore, the report indicates that even a step so seemingly uncontroversial as removing material contrary to UN principles from UNRWA textbooks failed to receive agreement from the Advisory Commission. Indecisiveness on such an easy choice not bode well for the commission as an arbiter of political or otherwise sensitive issues. UN, “Independent Review,” 7, https://www.un.org/sites/un2.un.org/files/2024/04/unrwa_independent_review_on_neutrality.pdf.
 - 16 The report indicates fifty ongoing breach-of-neutrality investigations, a task evidently suffering from a “clear capacity challenge.” UN, “Independent Review,” 14, https://www.un.org/sites/un2.un.org/files/2024/04/unrwa_independent_review_on_neutrality.pdf.
 - 17 UN, “Independent Review,” 20, https://www.un.org/sites/un2.un.org/files/2024/04/unrwa_independent_review_on_neutrality.pdf.
 - 18 See, e.g., Hillel Neurer and Dina Rovner, “Submission by United Nations Watch to the Independent Review Group on UNRWA Neutrality,” April 9, 2024, <https://unwatch.org/wp-content/uploads/2024/04/United-Nations-Watch-Submission-to-UNRWA-Review-Group.pdf>.
 - 19 Neurer and Rovner, “Submission by United Nations Watch,” <https://unwatch.org/wp-content/uploads/2024/04/United-Nations-Watch-Submission-to-UNRWA-Review-Group.pdf>. As recounted by UN Watch, when the group submits social media neutrality breaches to UNRWA, it receives no feedback on actions involving associated personnel.
 - 20 See, e.g., UN Watch, *UNRWA’s Terrorgram: How a Telegram Group of 3,000 UNRWA Teachers in Gaza Celebrated the October 7th Hamas Massacre* (Geneva, January 2024), <https://unwatch.org/wp-content/uploads/2024/01/UN-Watch-UNRWA-Terrorgram-.pdf>; see also “Submission by United Nations Watch,” <https://unwatch.org/wp-content/uploads/2024/04/United-Nations-Watch-Submission-to-UNRWA-Review-Group.pdf>.
 - 21 See James G. Lindsay, *Fixing UNRWA: Repairing the UN’s Troubled System of Aid to Palestinian Refugees*, Policy Focus 91 (Washington DC: Washington Institute, 2009), 59–60, <https://www.washingtoninstitute.org/policy-analysis/fixing-unrwa-repairing-uns-troubled-system-aid-palestinian-refugees>.
 - 22 Lindsay, *Fixing UNRWA*, <https://www.washingtoninstitute.org/policy-analysis/fixing-unrwa-repairing-uns-troubled-system-aid-palestinian-refugees>.
 - 23 UN, “Independent Review,” 20, https://www.un.org/sites/un2.un.org/files/2024/04/unrwa_independent_review_on_neutrality.pdf. As UNRWA is well aware, identifying staff members using only names is often worthless given their frequent similarity—like using “John Smith” in a U.S. context.
 - 24 See Keller-Lynn and Luhnnow, “Intelligence Reveals Details,” <https://www.wsj.com/world/middle-east/at-least-12-u-n-agency-employees-involved-in-oct-7-attacks-intelligence-reports-say-a7de8f36>. As a practical matter, UNRWA does not disqualify terrorist operatives, terrorist group members, terrorist group supporters, or individuals related to terrorist group supporters in its hiring process, and recent polls have shown at least 40–50 percent support for Hamas in Gaza, suggesting that the Israeli figures are likely roughly correct. For UNRWA hiring practices, see Lindsay, *Fixing UNRWA*, 41 and fn. 16, <https://www.washingtoninstitute.org/policy-analysis/fixing-unrwa-repairing-uns-troubled-system-aid-palestinian-refugees>. For support of Hamas in Gaza, see “Public Opinion Poll No (92),” Palestinian Center for Policy and Survey Research, June 12, 2024, <https://www.pcpsr.org/en/node/980>.
 - 25 UN, “Independent Review,” 22, https://www.un.org/sites/un2.un.org/files/2024/04/unrwa_independent_review_on_neutrality.pdf.
 - 26 See Reuters, “UN Gives Update on UNRWA Staff Accused by Israel of Oct. 7 Involvement,” *Jerusalem Post*, April 26, 2024, <https://www.jpost.com/israel-hamas-war/article-798821>.
 - 27 Dan Williams and Gabrielle Tétrault-Farber, “Israel Accuses 190 UN Staff of Being ‘Hardened’ Militants,” Reuters, January 29, 2024, <https://www.reuters.com/world/middle-east/israeli-intelligence-accuses-190-gaza-un-staff-hamas-islamic-jihad-roles-2024-01-29/>.
 - 28 See, e.g., Lindsay, *Fixing UNRWA*, 60–61, <https://www.washingtoninstitute.org/policy-analysis/fixing-unrwa-repairing-uns-troubled-system-aid-palestinian-refugees>.
 - 29 Colum Lynch, “Exclusive: U.S., UN Clash over Beleaguered Palestinian Refugee Agency,” *Devex*, February 20, 2024, <https://www.devex.com/news/exclusive-us-un-clash-over-beleaguered-palestinian-refugee-agency-107097>.

- 30 Jacob Magid et al., “Israel Wants UNRWA out of Gaza After Staffers Fired for Involvement in Oct. 7 Onslaught,” *Times of Israel*, January 27, 2024, <https://www.timesofisrael.com/israel-to-seek-to-end-unrwa-gaza-activities-after-staffers-fired-for-oct-7-involvement/>. UNRWA commissioner-general Philippe Lazzarini says Israel has denied him permission to enter Gaza from Israel, and on May 7, 2024, Israeli forces occupied the Gaza side of the lone Gaza-Egypt border crossing. See UNRWA, “#Gaza: The Israeli Authorities Continue to Deny Humanitarian Access to the United Nations,” May 5, 2024, <https://www.unrwa.org/newsroom/official-statements/gaza-israeli-authorities-continue-deny-humanitarian-access-united-nations>; and Einav Halabi and Yoav Zitun, “IDF Seizes Control of Rafah Border Crossing, Palestinians Say,” *Ynetnews*, May 7, 2024, <https://www.ynetnews.com/article/r8olOzqkt>.
- 31 See references to “basic education and community health, [which] are parallel to host government services,” in UNRWA, “Commissioner-General’s Statement at Ministerial Conference: ‘Refugees in the Muslim World,’” May 14, 2012, <https://www.unrwa.org/newsroom/official-statements/commissioner-generals-statement-ministerial-conference-refugees-muslim>.

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