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REPORT CARD ON UNRWA REFORM

***An Evaluation of the Agency's Claims Against the Evidence
On Implementation of the Colonna Report***

September 2026

EXECUTIVE SUMMARY

In 2024, after donor states suspended \$450 million in funding for UNRWA in wake of the revelations of UNRWA ties to terrorism—including that employees took part in the October 7th massacre—the UN Secretary-General commissioned an independent review, led by former French Foreign Minister Catherine Colonna, to examine whether UNRWA's policies and practices for maintaining neutrality were fit for purpose. The objective of the Review was to restore donor confidence.

Colonna's report made 50 recommendations, identifying serious deficiencies involving staff vetting, politicized unions, educational content and misuse of UNRWA facilities. Yet the report primarily addressed administrative reforms instead of the deeper institutional problems: the entrenchment of Hamas ideology within UNRWA schools, systemic links of hundreds of UNRWA staff to terrorism, and the very purpose of the agency which perpetuates Palestinians as dependents and encourages them to aspire for the destruction of Israel.

Two years later, as of June 2026, UNRWA reports that 41 of Colonna's 50 recommendations are completed or closed. This figure substantially overstates actual reform. UNRWA counts policies, training, pilot programs, drafted rules and other administrative milestones as completed recommendations even where the prescribed measures have not been fully implemented or the underlying terrorism problems remain. Post-Colonna evidence—continuing terrorist affiliations among UNRWA personnel, inflammatory and hateful educational content, and Hamas-dominated union resistance to neutrality-related discipline—demonstrates the gap between administrative completion and results on the ground.

Ultimately, these failures reflect a structural problem that administrative reform cannot resolve. UNRWA perpetuates Palestinian refugee status and the claimed "right of return," provides government-like services to that population, and is overwhelmingly staffed by Palestinians. Measures perceived as threatening perpetual refugee status, the claimed "right of return" or the rejection of Israel will therefore face entrenched resistance from within. The Colonna reforms cannot make politically neutral an institution whose mandate, workforce and role in Palestinian society are bound up with an anti-Israel political project that sustains the grievances and ideology exploited by Hamas.

INTRODUCTION AND BACKGROUND

► The Colonna Report was Intended to “Reassure Donors”

In February 2024, the UN Secretary-General appointed an Independent Review Group led by former French Foreign Minister Catherine Colonna to examine UNRWA's adherence to the humanitarian principle of neutrality.^[1] The Review was tasked with assessing whether UNRWA's existing mechanisms and procedures were adequate and “fit for purpose” and whether the organization was “doing everything within its power to ensure neutrality and respond to allegations of serious neutrality breaches when they are made.”^[2]

The Review was commissioned in response to unprecedented evidence of terrorist infiltration and support for terrorism within UNRWA. In January 2024, UN Watch exposed a Telegram group of approximately 3,000 UNRWA teachers and other Gaza staff in which members celebrated the October 7 attacks, praised the terrorists, and shared Hamas propaganda.^[3] This evidence formed part of UN Watch's broader UNRWA Terror Network research, documenting hundreds of UNRWA employees with ties to Palestinian terrorist organizations.^[4] Days later, Israel disclosed intelligence alleging that 12 UNRWA employees had participated in the October 7 attacks.^[5] Seventeen donor states subsequently suspended or paused over \$450 million in funding, threatening UNRWA with a severe financial crisis.^[6]

Although the Review's formal mandate focused on neutrality, UNRWA and its defenders made clear that the real objective was to restore donor confidence. UN spokesman Stéphane Dujarric said Colonna had been appointed to “reassure those donors who may have doubts.”^[7] Colonna herself said the exercise was intended to enable donors to “regain confidence” in UNRWA's operations.

1. Independent Review Group to Assess United Nations Relief Agency for Palestine Refugees (UNRWA), led by Ms. Catherine Colonna of France, UN (February 5, 2024), <https://www.un.org/sg/en/content/sg/personnel-appointments/2024-02-05/independent-review-group-assess-united-nations-relief-agency-for-palestine-refugees-%28unrwa%29-led-ms-catherine-colonna-of-france>, archive link: <https://cdn.unwatch.org/archived-page/Independent%20Review%20Group%20to%20Assess%20%28UNRWA%29.html>.

2. Id.

3. Group of 3,000 UNRWA teachers celebrates Hamas massacre and rape, UN Watch (January 10, 2024), <https://unwatch.org/group-of-3000-unrwa-teachers-celebrates-hamas-massacre-and-rape/>; see also UNRWA's Terrorgram, UN Watch (January 10, 2024), <https://unwatch.org/unrwa-terrorgram/>.

4. The UNRWA Terror Network, UN Watch (Last visited August 24, 2026), <https://unwatch.org/unrwa-terror-network/>.

5. 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/>, archive link: <https://archive.ph/Irri7>.

6. UPDATED: List of Countries Suspending and Reinstating UNRWA Funding, UN Watch (May 26, 2024), <https://unwatch.org/updated-list-of-countries-suspending-unrwa-funding/>.

7. Daily Press Briefing by the Office of the Spokesperson for the Secretary-General, UN (February 21, 2024) <https://press.un.org/en/2024/db240221.doc.htm>, archive link: <https://archive.ph/J4kVh>.

^[8] Chris Gunness, a surrogate spokesman for UNRWA, expressed hope that the Review would give donors “further cover” to resume funding.^[9]

At the same time, a network of influential UNRWA supporters worldwide actively organized to reverse the funding suspensions. As UN Watch documented, the Global Network on the Question of Palestine (GNQP), associated with UN Special Rapporteur Francesca Albanese, discussed a “Ten-Point Recovery Plan” that included targeted lobbying of governments that had suspended funding. The strategy employed overtly racist messaging about the threat of Arab “illegal migration” overwhelming Europe as a talking point to be made by network members “particularly to officials from right-wing, anti-immigration governments,” to scare them that failure to fund UNRWA (despite its terror ties) would mean “millions of Palestinians are forced to flee the Middle East.”^[10] The plan also contemplated shaping media coverage in anticipation of the UN investigations into UNRWA employees’ participation in the October 7th atrocities, including efforts to cultivate sympathetic journalists before the investigative findings were known.^[11]

The independence of the Colonna Review itself also raised concerns. As documented in a report by UN Watch, UNRWA’s Rigged “Independent” Review, the three research organizations selected to support Colonna had histories of ardently pro-UNRWA and anti-Israel advocacy and included personnel with extensive records of similar advocacy.^[12] Particularly significant was Kjersti G. Berg of the Chr. Michelsen Institute (CMI), a researcher specializing in UNRWA who was also a member of Albanese’s GNQP.^[13] The overlap between a network actively working to restore UNRWA’s funding and personnel associated with an institute conducting the purportedly independent review presented an obvious conflict of interest.

Notably, UN Watch submitted evidence to the Colonna Review drawing on years of research documenting UNRWA’s ties to Hamas, staff promotion of jihadi terrorism and antisemitism, and repeated warnings UN Watch had provided to UNRWA’s senior leadership over nearly a decade.^[14] Despite UN Watch’s role as a primary NGO documenting these issues, the Review made no attempt to meet with or interview UN Watch and failed to address its submission.

8. @HillelNeuer, X (March 22, 2024, 1:39 PM), <https://x.com/HillelNeuer/status/1771139517170205067>.

9. UNRWA’s Money Woes May Be Easing as Some Donors Return, but US Is Unlikely, PassBlue (March 14, 2024), <https://passblue.com/2024/03/14/unrwas-money-woes-may-be-easing-as-some-donors-return-but-us-is-unlikely/>, archive link: <https://archive.ph/gtMLq>.

10. The 10-Point Plan: How Francesca Albanese’s Global Influence Network Manipulated Countries to Reinstate Funding, UN Watch (June 11, 2024), <https://unwatch.org/ten-point-recovery-plan-for-unrwa-how-francesca-albaneses-global-network-planned-to-influence-countries-to-reinstate-funding/>; Ten-Point Recovery Plan for UNRWA, ARDD (March 2024), https://ardd-jo.org/wp-content/uploads/2024/03/Ten-Point-Recovery-Plan-for-UNRWA_ChG_V4.pdf

11. Id.

12. Exposed: UNRWA’s Rigged “Independent” Review, UN Watch (April 15, 2024), <https://unwatch.org/exposed-unrwas-rigged-independent-review/>.

13. Id. See also, Exposed: Francesca Albanese’s Global Influence Network Targeting Israel, UN Watch (June 11, 2024), <https://unwatch.org/exposed-francesca-albaneses-global-influence-network-targeting-israel/>.

14. Submission by United Nations Watch to the Independent Review Group on UNRWA Neutrality, UN Watch (April 9, 2024), <https://unwatch.org/wp-content/uploads/2024/04/United-Nations-Watch-Submission-to-UNRWA-Review-Group.pdf>.

When the Colonna Report was released in April 2024, UNRWA and its defenders quickly portrayed it as vindication.^[15] Yet that characterization obscured some of the Review's most important findings.

► Colonna Identified Structural Problems but Prescribed Administrative Solutions

Despite its generally supportive approach to UNRWA, the Colonna Report acknowledged serious weaknesses that went well beyond insufficient policies or training.^[16]

Among other things, the Review:

- Recognized that UNRWA lacks the “policing, military or wider investigative capacities or competencies required to detect” critical neutrality violations such as weapons, military activity and tunnels in its facilities.
- Documented longstanding concerns about politicization of UNRWA staff unions, including links with Palestinian political factions, politicized elections and union resistance to neutrality-related disciplinary action.
- Identified continuing problems with educational materials and called for the removal of hate speech, incitement to violence and antisemitic content.
- Noted the limitations of UNRWA's existing screening and vetting to identify prohibited affiliations among its workforce.

These findings went to the heart of UNRWA's neutrality problem: who UNRWA employs, what its employees do inside its schools and facilities, what they teach, and whether UNRWA can detect and act against terrorist affiliation or military exploitation.

Yet Colonna largely responded to these structural problems with managerial solutions: additional oversight, training, policies, reporting, vetting procedures, donor engagement, inspections and cooperation mechanisms. Many may be worthwhile administrative improvements, but they do not adequately address the underlying neutrality failures. Their success also depends on the very institution whose neutrality is compromised—and overwhelmingly on its locally recruited workforce—to implement and enforce them.

15. UNRWA Preliminary Response - Final Report of the Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, 20 April 2024, UNRWA (April 24, 2024), <https://www.unrwa.org/resources/reports/unrwa-preliminary-response-final-report-independent-review-mechanisms-and>, archive link: www.cdn.unwatch.org/archived-page/UNRWA%20Preliminary%20Response%2020%20April%202024.html; Boost for UNRWA as UK decides to restore funding, UN (July 19, 2024), <https://news.un.org/en/story/2024/07/1152326>, archive link: <https://archive.ph/tqVLJ>.

16. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

► UNRWA Redefined "Completion" Around Administrative Milestones

Over the following two years, UNRWA issued a series of progress reports presenting steadily rising implementation rates.^[17] A major turning point came in June 2025, when UNRWA adopted a "Minimum Viable Product" methodology allowing a recommendation to be classified as completed once its "core functional objective" had been achieved, even where further measures remained necessary for full institutionalization.^[18] UNRWA's overall number of completed recommendations rose from five in April 2025 to 20 by June.^[19] By Q2 2026, UNRWA reported 41 of Colonna's 50 recommendations closed or completed.^[20]

The category figures create an impressive appearance of reform: 13 of 15 recommendations completed on management and internal oversight, nine of ten on staff neutrality, five of eight on education, and all six recommendations concerning staff unions closed.

Yet a close examination produces a different picture. UNRWA repeatedly treats completion of its own administrative action as completion of the reform itself. For example:

- A commercial-vetting recommendation was closed after a pilot and costed implementation plan even though implementation remained subject to funding.
- Staff-union vetting recommendations were closed while actual vetting likewise remained funding-dependent.
- The required reform of the Staff Union Statute was closed after UNRWA drafted and transmitted a new statute, although the unions have not adopted it.
- Recommendation 46 was closed despite UNRWA expressly determining that the prescribed structural reform was "unimplementable."
- UNRWA declared Category 8 fully completed while simultaneously describing the required institutional "cultural shift" as still "underway."

Several recommendations also depend on cooperation with Israel, including external checking of staff information and cooperation concerning misuse of UNRWA installations. Since January 2025, Israeli law has prohibited government authorities from maintaining official contact with UNRWA.

17. Sustaining neutrality, strengthening trust: UNRWA's implementation of the Colonna Report, UNRWA (Last visited August 24, 2026), https://www.unrwa.org/Colonna_Report, archive link: <https://cdn.unwatch.org/archived-page/UNRWA%20Colonna%20Report%20Home%20Page.html>.

18. One Year On: Implementing the Colonna Report at UNRWA: Annual Report June 2024-June 2025, UNRWA (August 5, 2025), https://www.unrwa.org/sites/default/files/content/resources/ist_082025_annualreport_final.pdf, archive link: https://unwatch.org/wp-content/uploads/ist_082025_annualreport_final.pdf.

19. Id. See also UNRWA Implementation of Colonna Report April 2025, UNRWA (April 23, 2025), https://www.unrwa.org/sites/default/files/content/resources/ist_05_2025_quarterlyreport.pdf, archive link: https://unwatch.org/wp-content/uploads/ist_05_2025_quarterlyreport.pdf.

20. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

Those safeguards, therefore, cannot presently function as Colonna envisaged, yet UNRWA continues to count some of the affected recommendations as completed.

Indeed, a recommendation-by-recommendation review finds that at most 13 of Colonna's 50 recommendations^[21] have actually been completed as prescribed. By contrast, UNRWA classifies 41 recommendations as completed or closed, including numerous recommendations for which implementation remains partial, geographically incomplete, funding-dependent, or limited to preparatory measures.

Moreover, UNRWA's completion statistic gives equal weight to very different types of measures. Issuing an ethics policy, conducting training, establishing a hotline, achieving a gender target, drafting a union statute and creating a vetting plan each count equally toward the claimed completion rate, regardless of the significance or practical impact of those measures.

► Facts on the Ground Contradict UNRWA's Reform Claims

Events since Colonna demonstrate that UNRWA's claimed completion rate does not reflect the extent of actual reform on the ground.

► Staff Screening

UNRWA still has no demonstrated mechanism that systematically screens its workforce for Hamas membership. Its principal sanctions screening relies on the UN Security Council Consolidated Sanctions List,^[22] which does not list Hamas or Palestinian Islamic Jihad (PIJ). UNRWA's own rules also distinguish political affiliation from prohibited membership in armed or militant groups.^[23] Detecting clandestine military affiliation therefore requires precisely the intelligence capabilities UNRWA acknowledges it does not possess.

The disparity between UNRWA's internal mechanisms and external investigations is striking. UNRWA reported that its Neutrality Investigations Unit received 40 complaints in 2025, authorized 31 investigations and substantiated 13 allegations.^[24] By June 2026, however, the independent United States Agency for International Development (USAID) Office of Inspector General (OIG) had referred 108 current or former UNRWA personnel for suspension or debarment consideration based on

21. Recommendations 3, 4, 5, 8, 13, 17, 19, 21, 25, 29, 37, 39, and 47.

22. Statement by Philippe Lazzarini, UNRWA Commissioner-General at the Meeting of the Advisory Commission (AdCom), UNRWA (June 25, 2025), <https://www.unrwa.org/newsroom/official-statements/statement-philippe-lazzarini-unrwa-commissioner-general-meeting-0>, archive link: www.cdn.unwatch.org/archived-page/Philippe%20Lazzarini%20%28AdCom%29.html.

23. Code of Ethics, UNRWA (2023), https://www.unrwa.org/sites/default/files/content/resources/unrwa-code-of-ethics-v4-2023-english_1.pdf, archive link at https://unwatch.org/wp-content/uploads/unrwa-code-of-ethics-v4-2023-english_1.pdf; Statement by UNRWA Commissioner-General ad interim Christian Saunders at the Pledging Conference, UNRWA (June 30, 2026), <https://www.unrwa.org/newsroom/official-statements/statement-unrwa-commissioner-general-ad-interim-christian-saunders>, archive link at www.cdn.unwatch.org/archived-page/Pledging%20conference%20Saunders.html.

24. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

evidence of participation in the October 7 attacks and/or affiliation with Hamas's military wing. They included school principals, deputy principals, teachers, security personnel, counselors and medical staff.^[25]

Days later, UNRWA dismissed 70 Gaza employees following a safety and security assessment. Significantly, UNRWA stated that the dismissals were not part of a disciplinary process and did not constitute validation of the allegations.^[26] Thus, after reporting extensive progress in its investigation and disciplinary systems, UNRWA confronted dozens of terrorism-related cases without resolving the underlying allegations through those systems.

Individual cases illustrate the disparity. *Mohammad Juma Shuwaideh*, an UNRWA school principal and senior Gaza Staff Union official previously identified in UN Watch's *Schools in the Grip of Terror*, was among the 70 dismissed employees.^[27] UN Watch had documented his Hamas role, even as he exercised responsibility for UNRWA shelter operations during the war.^[28] Another dismissed employee, *Muhammad Abd Al-Nasser Al-Khatib*, was identified as a commander in Hamas's Maghazi Battalion.^[29]

The case of *Imad Yousef Al-Samhouri* is particularly emblematic. Al-Samhouri was a veteran UNRWA educator and school principal who was killed by Israel in 2025. Hamas subsequently eulogized him in a martyr video identifying him as a Hamas operative and commander.^[30] Yet he continued to be treated publicly by the United Nations as a fallen UNRWA employee. In June 2026, he was among UN personnel commemorated at a memorial ceremony at which Secretary-General António Guterres paid tribute to UN staff killed in the conflict.^[31] Al-Samhouri's Hamas role has never been acknowledged by the UN. A further case emerged in July 2026, when the Gaza Staff Union mourned *Nabhan Mohammed Nabhan Al-Amsi* as an UNRWA teacher, while the IDF identified him as head of the Military Intelligence Desk in Hamas's Gaza Brigade.^[32]

25. INVESTIGATIVE SUMMARY: USAID Inspector General's Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>.

26. Statement by the Commissioner-General ad interim of UNRWA, Christian Saunders, UNRWA (June 11, 2026), <https://www.unrwa.org/newsroom/official-statements/statement-commissioner-general-ad-interim-unrwa-christian-saunders>, archive link: www.cdn.unwatch.org/archived-page/Statement%20by%20UNRWA%2C%20Christian%20Saunders.html.

27. Shocking messages: UNRWA lays off dozens of employees in Gaza, Al Jazeera (June 22, 2026), <https://www.aljazeera.net/politics/2026/6/22>, archive link: <https://archive.ph/0Dyjp>.

28. Schools in the Grip of Terror: How UNRWA Allowed Hamas Chiefs to Control its Education System, UN Watch (September 2025), <https://unwatch.org/wp-content/uploads/2025/09/Schools-in-the-Grip-of-Terror-UNRWA-Report.pdf>.

29. Teachers' Sector at UNRWA - Gaza City, Facebook (August 1, 2026), https://www.facebook.com/groups/283688619650658/permalink/1515400579812783/?rid=VSjjiNri5i7ewQ13Y&share_url=https%3A%2F%2Fwww.facebook.com%2Fshare%2Fp%2F1UbRvABDWS%2F#, archive link: <https://archive.ph/himlp>; IDF kills several terrorists in Gaza from Hamas, Palestinian Islamic Jihad, Army of Islam, Jerusalem Post (August 2, 2026), <https://www.jpost.com/israel-news/defense-news/article-904348>, archive link: <https://archive.ph/Cbmln>; @IDF Arabic, Telegram (August 2, 2026, 8:49 AM), <https://t.me/IDFSpokespersonArabic/13573>, archive link: <https://archive.ph/II2QP>.

30. @HillelNeuer, X (August 13, 2026, 7:07 PM), <https://x.com/HillelNeuer/status/2087934023251198301>.

31. @HillelNeuer, X (August 13, 2026, 7:44 PM), <https://x.com/HillelNeuer/status/2087943325345014227>.

32. UNRWA Health Department Staff Meeting, Facebook (July 22, 2026), <https://www.facebook.com/groups/Employee.un/permalink/37949440474640166>, archive link: <https://cdn.unwatch.org/archived-page/Health%20Department%20Staff%20Meeting.html>; Israel kills three Hamas members in Gaza, Shafaq News (July 25, 2026), <https://shafaq.com/en/Middle-East/Israel-kills-three-Hamas-members-in-Gaza>, archive link: <https://archive.ph/kWwgu>.

These are current, post-Colonna examples of serious terrorist affiliations among UNRWA personnel that UNRWA failed to address even as it reported near-completion of its neutrality reforms. They demonstrate that UNRWA's claimed reforms remain largely on paper and have failed to produce meaningful results in the field.

► *Neutrality of Installations*

The same pattern appears beyond staff vetting. UNRWA's standard installation-assessment regime still does not operate normally in Gaza, where the most serious allegations of tunnels, weapons and military infrastructure in or around UNRWA facilities have arisen.^[33] Training installation managers, conducting assessments and displaying posters affirming the civilian nature of facilities cannot compensate for the policing and security capabilities that Colonna itself acknowledged UNRWA lacks.

► *Problematic Educational Content*

In education, UNRWA has established textbook review procedures, teacher training, classroom inspections, a reporting hotline and digital learning initiatives. Yet IMPACT-se's examination of the 2025–2026 Palestinian Authority (PA) curriculum used in UNRWA schools continued to identify material glorifying terrorism and martyrdom, promoting violent jihad, and conveying antisemitic narratives.^[34] The relevant measure of reform is therefore not whether a review mechanism exists, but whether the prohibited material Colonna instructed UNRWA to stop using has actually disappeared.

► *Politicized Unions*

Staff unions provide another real-world test. Colonna identified politicized union elections, factional influence and resistance to neutrality-related discipline. UNRWA nevertheless declared all six union recommendations closed without adoption of the revised Staff Union Statute or implementation of independent union vetting.^[35] Within months, the Gaza Staff Union—still under unchanged leadership—mobilized against the dismissal of the 70 employees and demanded their reinstatement. It continued that campaign in July 2026.^[36]

33. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

34. Review of the 2025–2026 Palestinian Authority School Curriculum Grades 1–12 Selected Examples, IMPACT-se (November 2025), <https://www.impact-se.org/wp-content/uploads/Review-of-the-2025-2026-Palestinian-Authority-School-Curriculum-v2.pdf>, archive: <https://web.archive.org/web/20260831081346/https://www.impact-se.org/wp-content/uploads/Review-of-the-2025-2026-Palestinian-Authority-School-Curriculum-v2.pdf>.

35. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026–March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

36. Shocking messages: UNRWA lays off dozens of employees in Gaza, Al Jazeera (June 22, 2026), <https://www.aljazeera.net/politics/2026/6/22>, archive link: <https://archive.ph/0Dyjp>; UNRWA Health Department Staff Meeting, Facebook (July 22, 2026), <https://www.facebook.com/groups/Employee.un/permalink/37949440474640166>, archive link: <https://cdn.unwatch.org/archived-page/Health%20Department%20Staff%20Meeting.html>.

Across these areas, the same pattern recurs: UNRWA can demonstrate that it has created some mechanisms. However, it cannot demonstrate that those mechanisms have eliminated the conduct they were created to address.

► **Administrative Reform Cannot Resolve UNRWA's Role in Perpetuating the Conflict**

The failure of the Colonna reforms goes beyond implementation. The problem is structural. UNRWA is not merely a humanitarian service provider. Its structure and institutional role are bound up with preserving Palestinian refugee status and the claimed “right of return”—the demand that millions of Palestinians and their descendants ultimately be permitted to settle inside sovereign Israel. ^[37] Unlike the UN refugee agency (UNHCR), UNRWA has no mandate to pursue durable solutions such as resettlement or local integration. Instead, it perpetuates refugee status across generations while providing education, health care and other essential services ordinarily supplied by governments. ^[38] In doing so, UNRWA reinforces the expectation that Palestinians remain refugees pending an eventual “return” to Israel. The October 7 attacks demonstrated the consequences of perpetuating a national narrative in which dismantling Israel remains an overriding Palestinian objective.

That political identity is also embedded within UNRWA itself. The Agency employs more than 28,000 people, overwhelmingly locally recruited Palestinians, many of whom are themselves registered Palestine refugees, while only approximately 120 are international staff. ^[39] UNRWA is therefore both a custodian of Palestinian refugee status and the principal institution through which the refugee community is educated, employed, and provided essential services. Measures perceived as threatening refugee status, the “right of return,” or Palestinian national identity will inevitably face resistance from within—as reflected in the politicized staff unions and their opposition to neutrality-related discipline documented by Colonna itself. This is the contradiction the Colonna reforms cannot solve. Administrative controls can regulate procedures, but they cannot make politically neutral an institution whose mandate, workforce and role in Palestinian society are bound up with a political project whose ultimate objective—the mass “return” of Palestinians and their descendants—is the demographic undoing of Israel as a Jewish state.

37. EXPLAINER: UNRWA Exists to Promote the “Right of Return,” UN Watch (September 29, 2025), <https://unwatch.org/explainer-unrwa-exists-to-promote-the-right-of-return/>.

38. Frequently Asked Questions, UNRWA (Last visited August 24, 2026), <https://www.unrwa.org/who-we-are/frequently-asked-questions>.

39. Working at UNRWA, UNRWA (Last visited August 24, 2026), <https://www.unrwa.org/careers/working-unrwa>, archive link: www.cdn.unwatch.org/archived-page/Working%20at%20UNRWA.html.

CATEGORY 1: ENGAGEMENT WITH DONORS

► UNRWA's Claimed Progress

Across its progress reports spanning 2024 through Q2 2026, UNRWA claims to have significantly enhanced transparency and strengthened donor trust and strategic partnerships. The Agency asserts that it has built an institutionalized framework for regular, structured communication covering financial situations, neutrality protocols, oversight mechanisms, and operational priorities. UNRWA reports Recommendation 1 as fully implemented, reporting 100% completion as of Q3 2025.

[40]

The centerpiece of UNRWA's reported progress is the establishment of recurring "Integrity Briefings" delivered in New York and Geneva by senior leadership, including the Deputy Commissioner-General for Operational Support. These briefings—which reached four official sessions by May 2026—target Member States and Permanent Observers to report on neutrality reforms, staff conduct, and textbook reviews.^[41] UNRWA reports that these briefings are complemented by routine quarterly financial publishing on the International Aid Transparency Initiative (IATI) portal, dedicated working sessions during Advisory Commission (AdCom) and Sub-Committee (SubCom) meetings, and high-level bilateral diplomatic engagements.^[42]

SPECIFIC TECHNICAL ACTIONS AND REFORMS

- *Institutionalization of "Integrity Briefings"*: Established and conducted four official briefing sessions in New York and Geneva for Member States and donors (including the third briefing on November 24, 2025, in Geneva and the fourth briefing on May 21, 2026, in New York, attended by over 60 delegations).^[43]

40. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf

41. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf

42. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf

43. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf

- *Public Financial Transparency Integration*: Implemented quarterly financial and operational reporting via the IATI portal.^[44]
- *Formal AdCom & SubCom Reporting*: Provided dedicated progress updates through AdCom Working Group and SubCom meetings in 2025 and 2026.^[45]
- *Bilateral Donor Briefings*: Conducted separate bilateral briefings with individual donors on the margins of AdCom/SubCom meetings in 2025 and 2026.^[46]
- *Targeted Legislative Briefings*: Conducted specialized briefings for specific national political delegations, such as German parliamentarians in Q3 2025.^[47]
- *Executive Diplomatic Outreach*: Commissioner-General engagement with host countries and key donors, including a series of high-level engagements during Q1 2026.^[48]

► Analysis

UNRWA's claim of 100% completion on donor engagement rests on a fundamental substitution of process for substantive accountability. Recommendation 1 required UNRWA both to "increase the frequency" and "strengthen the transparency" of its communications with donors concerning its financial situation and "neutrality allegations and breaches."^[49] UNRWA points to "Integrity Briefings," AdCom/SubCom sessions, IATI reporting, and other communication channels as evidence of implementation. These measures demonstrate increased communication, but they do not establish that donors receive complete and meaningful

44. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025–September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf

45. Id. See also Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

46. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025–December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf; Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026–March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

47. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025–September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf

48. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026–March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

49. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

information about neutrality failures, investigations, disciplinary actions, or enforcement outcomes.

This distinction is particularly significant in light of UNRWA's handling of serious neutrality cases. When UNRWA terminated 70 employees following internal and external scrutiny, it provided little public information about the grounds for those dismissals or the neutrality violations involved, characterizing them instead as administrative measures taken "in the interest of the Organization."^[50] Nor does UNRWA's Q2 2026 progress report demonstrate that donors were provided with a fuller accounting of the allegations, findings, or disciplinary outcomes.^[51]

The same lack of transparency extends to major external allegations against UNRWA staff. The progress reports do not explain how such allegations were assessed or communicated to donors, including Israel's identification of approximately 1,500 employees with alleged ties to Hamas and PIJ,^[52] and the USAID OIG's identification of more than 100 current or former employees for suspension or debarment consideration based on evidence of participation in the October 7 attacks and/or affiliation with Hamas's military wing.^[53] By measuring the existence and frequency of communications rather than demonstrating the completeness of the information disclosed, UNRWA can declare Recommendation 1 fully implemented without showing that donors have received the transparent accounting of neutrality allegations and breaches that Colonna expressly required.

50. Statement by the Commissioner-General ad interim of UNRWA, Christian Saunders, UNRWA (June 11, 2026), <https://www.unrwa.org/newsroom/official-statements/statement-commissioner-general-ad-interim-unrwa-christian-saunders>, archive link: www.cdn.unwatch.org/archived-page/Statement%20by%20UNRWA%2C%20Christian%20Saunders.html.

51. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

52. The Connection Between UNRWA and Hamas in Gaza, GOVEXTRA (Last visited August 24, 2026), <https://govextra.gov.il/unrwa/unrwa>, archive link: <https://ghostarchive.org/archive/Y9OIg>.

53. INVESTIGATIVE SUMMARY: USAID Inspector General's Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>.

CATEGORY 2: GOVERNANCE

► UNRWA's Claimed Progress

Across its recent progress reports, UNRWA asserts that it has strengthened its intergovernmental governance framework by making neutrality and integrity a permanent, institutionalized focus of the AdCom. The Agency reports Recommendation 2 as completely fulfilled, highlighting the establishment of “neutrality and integrity” as a standing item on biannual AdCom agendas and the creation of a dedicated AdCom Working Group on Neutrality and Integrity.^[54]

UNRWA details the operationalization of this Working Group across four dedicated sessions spanning from September 2025 to May 2026. The Agency states that this body reviews evidence presented by UNRWA concerning implementation and recommends or endorses acknowledgement of the closure of Colonna recommendations. By Q2 2026, UNRWA notes that a total of 40 recommendations had been presented to the Working Group for formal closure endorsement.^[55]

UNRWA declares Recommendation 3 completed (as of Q1 2026) by linking its efforts to the UN Secretary-General’s Strategic Assessment. Specifically, UNRWA engaged with Scenario 4 (“Institutionalizing Collective Responsibility”), proposing to replace the AdCom with a formal Executive Board. On February 5, 2026, UNRWA formally submitted this governance proposal to AdCom Member States and subsequently marked the recommendation “closed” on the grounds that proposing the alternative model fulfills its obligation, noting that the final decision rests entirely with Member States.^[56]

54. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf

55. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

56. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

SPECIFIC TECHNICAL ACTIONS AND REFORMS

- *Standing Neutrality Agenda Item (Rec. 2(b))*: Maintained neutrality and integrity as a standing item on the AdCom’s biannual meeting agendas, including the June 17–18, 2026 meeting.^[57]
- *AdCom Working Group on Neutrality and Integrity (Rec. 2(c))*: Established and convened four dedicated sessions of the AdCom Working Group/Sub-Working Group on Neutrality and Integrity between September 2025 and May 2026.^[58]
- *Review of Colonna Implementation (Rec. 2(c))*: Used the Working Group to review evidence presented by UNRWA in support of closing Colonna recommendations, with 40 recommendations presented to the Working Group by Q2 2026.^[59]
- *Exploration of Alternative Governance Arrangements (Rec. 3)*: Participated in the Secretary-General’s Strategic Assessment process, including consideration of Scenario 4 (“Institutionalizing Collective Responsibility”), which proposed replacing the AdCom with an Executive Board.^[60]
- *Executive Board Proposal (Rec. 3)*: Formally submitted the governance proposal reflected in the Strategic Assessment to AdCom Member States on February 5, 2026, for consideration and guidance on possible next steps.^[61]
- *Administrative Closure of Recommendation 3*: Closed Rec. 3 in Q1 2026 after submitting the proposal, noting that the ultimate decision on UNRWA’s governance structure rests with Member States and that the Agency would continue engaging them on possible governance models.^[62]

► Analysis

UNRWA reports both Category 2 recommendations as completed, but its own reporting does not demonstrate that the governance deficiencies identified by Colonna have been resolved.

57. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

58. Id.

59. Id.

60. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026–March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

61. Id.

62. Id.

Recommendations were closed after procedural steps that produced no change in UNRWA's governance structure and key elements remain unimplemented.

► 1. UNRWA Has Not Demonstrated Completion of Recommendation 2

Recommendation 2 prescribed specific changes to strengthen the Advisory Commission's ability to address neutrality: convening annually at UN headquarters in New York at Permanent Representative level; making neutrality a standing item at its twice-yearly meetings; and creating a Working Group on neutrality and integrity issues that would invite host countries and Israel to present their concerns.^[63]

UNRWA reports Recommendation 2 as fully completed, but its own progress reports do not demonstrate implementation of all of these requirements. The Agency repeatedly cites neutrality as a standing AdCom agenda item and the establishment of the Working Group, but does not identify the annual New York meeting at Permanent Representative level required by Recommendation 2(a). Nor does it report that host countries and Israel were invited to present their concerns to the Working Group, as required by Recommendation 2(c).

► 2. The Working Group Does Not Perform the Function Colonna Envisioned

This is particularly significant because Colonna found that the AdCom had "frequently been reluctant to consider sensitive neutrality-related issues," including staff-union neutrality concerns.^[64] Yet UNRWA's progress reports principally describe the new Working Group as reviewing evidence presented by UNRWA itself to support closure of Colonna recommendations—40 recommendations by Q2 2026—rather than as a forum for scrutinizing sensitive neutrality concerns raised by outside parties.^[65]

Israeli input, expressly required by Recommendation 2(c), also cannot currently function. Following Israeli legislation restricting official interaction with UNRWA, there is no official contact between UNRWA and Israeli government officials.^[66] Israel therefore cannot present directly to the Working Group its intelligence and neutrality concerns regarding UNRWA personnel and facilities. UNRWA nevertheless counts Recommendation 2 as completed.

63. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, at p. 8, UN (April 20, 2024),

https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

64. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, at p. 7, UN (April 20, 2024),

https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

65. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026),

https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

66. Approved in final readings: Bill banning state authorities from maintaining any contact with UNRWA or a representative of the agency, Knesset News (October 29, 2024), <https://main.knesset.gov.il/en/news/pressreleases/pages/press291024w.aspx>, archive link: <https://ghostarchive.org/archive/f10Tk>.

The limitations on external scrutiny extend beyond the Working Group. According to the USAID OIG, the UN Office of Internal Oversight Services (OIOS) refused to provide unredacted investigative materials concerning UNRWA employees implicated in the October 7 attacks.^[67] The withholding of such evidence from an external government oversight body illustrates the weakness of a governance model that remains dependent on UN-controlled information and internal review.

► **3. Recommendation 3 Was Closed Without Any Change to UNRWA's Governance Structure**

Recommendation 3 called on UNRWA to “explore additional governance arrangements” to provide strategic direction and improve external communications.^[68] UNRWA did so through the Secretary-General's Strategic Assessment and, in February 2026, submitted to AdCom members a proposal contemplating replacement of the AdCom with an Executive Board.^[69]

This responds to the literal requirement to explore alternative arrangements, but does not amount to governance reform. No Executive Board has been established, the AdCom remains in place, and UNRWA acknowledges that any change rests with Member States. Indeed, its Q2 2026 report states that it remains available for further dialogue on the proposal “or any alternative governance model.”^[70] Thus, Recommendation 3 may be closed, but the governance deficiency that prompted Colonna to recommend alternative arrangements remains unchanged.

► **4. Administrative Closure Does Not Establish Effective Governance Reform**

Category 2's 2/2 completion figure obscures the distinction between administrative milestones and actual governance reform. Recommendation 2 is classified as complete even though UNRWA's reporting does not demonstrate implementation of all its express requirements, including the contemplated channel for Israeli input. Recommendation 3 is classified as complete because an alternative governance arrangement was explored and proposed, although no alternative governance structure has been established.

67. USAID's Gaza-related Oversight Work, at p. 1, USAID OIG (July 30, 2025), <https://oig.usaid.gov/sites/default/files/2025-08/USAID%20OIG%20-%20Gaza%20work%20073025.pdf>, archive link: <https://web.archive.org/web/20260312105337/https://oig.usaid.gov/sites/default/files/2025-08/USAID%20OIG%20-%20Gaza%20work%20073025.pdf>.

68. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, at p. 8, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

69. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

70. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

Colonna concluded that UNRWA's existing governance arrangements meant that the Agency "cannot rely on the needed political support to effectively address neutrality issues."^[71] Adding neutrality to an AdCom agenda, creating a Working Group principally described as reviewing UNRWA's own implementation evidence, and proposing to replace AdCom with an Executive Board do not establish that this underlying deficiency has been resolved. UNRWA's 100% completion rating thus measures the completion of administrative steps, not whether the substantive governance and oversight deficiencies identified by Colonna have actually been resolved.

71. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, at p. 7, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

CATEGORY 3: MANAGEMENT AND INTERNAL OVERSIGHT

► UNRWA's Claimed Progress

Across its progress reports spanning Q3 2025 through Q2 2026, UNRWA asserts significant progress in strengthening its internal oversight, ethics compliance, and accountability mechanisms, formally completing 13 out of 15 recommendations (87%) under Category 3.^[72] UNRWA highlights a broad set of administrative reforms centered on updating policy frameworks and embedding “neutrality and integrity” into daily managerial practices. Central to this reported progress is the expanded presence of the Ethics Office and the Department of Internal Oversight Services (DIOS), which operates a centralized Neutrality Investigations Unit^[73] and added an international P4 Quality Assurance Officer,^[74] additional investigative personnel, and surge support to strengthen oversight capacity and address case backlogs.^[75]

UNRWA also emphasizes its digital and training-based compliance measures. The Agency deployed a mandatory Ethics and Integrity e-course, reporting a 90.28% completion rate by June 2026,^[76] conducted awareness activities concerning its updated Code of Ethics, and implemented an Outside and Political Activities Policy under which annual staff declarations increased from approximately 1,000 in 2023 to around 3,000 in 2025.^[77] For project and risk management, UNRWA launched an online Project Transparency Portal, established a Neutrality Policy and Implementation Unit (NPIU) within the Executive Office, and developed a draft Strategic Risk Register incorporating neutrality as a strategic risk.^[78]

72. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

73. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

74. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

75. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

76. Id.

77. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

78. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf; Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

SPECIFIC TECHNICAL ACTIONS AND REFORMS

- *Internal Oversight Capacity (Rec. 4—Completed):* Strengthened DIOS and Ethics Office capacity through additional personnel and surge support to address investigative workloads and case backlogs.^[79]
- *Expanded Field Presence (Rec. 5—Completed):* Expanded the reach and presence of DIOS and the Ethics Office across UNRWA fields of operation, reporting Recommendation 5 as fully implemented by the end of 2024.^[80]
- *OIOS Cooperation (Rec. 6—Completed):* Continued cooperation between DIOS and OIOS on serious and high-risk allegations.^[81]
- *External DIOS Evaluation (Rec. 7—In Progress):* Finalized and secured ACIO approval of the Terms of Reference for an external peer review of DIOS's investigation function, with external reviews of the investigation and evaluation functions continuing through Q2 2026.^[82]
- *Centralized Neutrality Investigations Unit (Rec. 8—Completed):* Created a centralized Neutrality Investigations Unit with international staff reporting directly to DIOS, reporting Recommendation 8 as fully implemented by the end of 2024.^[83] In 2025, the Unit received 40 neutrality-related complaints, authorized 31 investigations, completed 22, and substantiated 13 allegations.^[84]

79. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

80. UNRWA Implementation of Colonna Report: Quarterly Report January 2025, UNRWA (January 23, 2025), https://www.unrwa.org/sites/default/files/content/resources/ist_012025_progressreport_01202025.pdf, archive link: https://unwatch.org/wp-content/uploads/ist_012025_progressreport_01202025.pdf.

81. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

82. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

83. UNRWA Implementation of Colonna Report: Quarterly Report January 2025, UNRWA (January 23, 2025), https://www.unrwa.org/sites/default/files/content/resources/ist_012025_progressreport_01202025.pdf, archive link: https://unwatch.org/wp-content/uploads/ist_012025_progressreport_01202025.pdf.

84. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

- *Code of Ethics and Training (Rec. 9—Completed)*: Rolled out the updated Code of Ethics through in-person outreach, awareness sessions, and mandatory Ethics and Integrity e-courses, reporting almost 23,000 course completions by 2025 and a 90.28% completion rate by June 2026.^[85]
- *Outside and Political Activities Policy (Rec. 10—Completed)*: Conducted Agency-wide awareness-raising on the policy and reported an increase in annual staff declarations from approximately 1,000 in 2023 to around 3,000 in 2025.^[86]
- *Neutrality as a Strategic Risk (Rec. 11—Completed)*: Established the Neutrality Policy and Implementation Unit (NPIU) within the Executive Office and developed a draft Strategic Risk Register incorporating neutrality as a strategic risk, accompanied by Agency-wide risk-management training.^[87]
- *Internationalization of Senior Management (Rec. 12—In Progress)*: Continued exploring options to further internationalize senior managerial area-staff positions, with implementation remaining contingent on additional funding.^[88]
- *Managerial Accountability (Rec. 13—Completed)*: Established an accountability framework for supervisors under the revised Neutrality Framework, issued as a Commissioner-General Bulletin on March 31, 2026, alongside mandatory training requirements and neutrality-related managerial training.^[89]
- *Gender Parity in Management (Rec. 14—Completed)*: Finalized Gender Parity Portfolios across Headquarters Departments and Field Offices to monitor and support increased female representation in management.^[90]

85. Id. See also Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

86. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

87. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

88. Id.

89. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

90. Id.

- *Supervisory and Leadership Training (Rec. 15—Completed)*: Delivered Supervisory Skills Training across Headquarters and Field Offices, reaching 189 supervisors in ten cohorts by Q4 2025 except in Gaza, with additional training in 2026 and the subsequent launch of the ACT Programme.^[91]
- *Project Management and Safeguards (Rec. 16—Completed)*: Rolled out the Project Procedures Manual in 2025, together with related training and capacity-building, and launched the Project Transparency Portal in April 2026.^[92]
- *Third-Party Monitoring (Rec. 17—Completed)*: Advanced preparations for the promulgation of a Technical Instruction on Third Party Monitoring, which remained underway as of Q2 2026.^[93]

► Analysis

UNRWA's claim that it has fortified its internal oversight and accountability mechanisms rests heavily on administrative outputs—new policies, training programmes, internal units, reporting systems, and management tools—rather than evidence that these measures are capable of detecting and preventing the serious neutrality violations that prompted the Colonna review in the first place. UNRWA reports 13 of 15 recommendations in this category completed, or 87 percent. Yet its own progress reports show that important structural reforms remain unfinished, while several recommendations have been closed based principally on the creation of processes whose effectiveness against deliberate terrorist infiltration remains unproven.

► 1. Training and Ethics Cannot Detect Deliberate Terrorist Infiltration (Recommendations 9, 10, 13, 15)

UNRWA repeatedly cites mandatory e-courses, an updated Code of Ethics, Outside and Political Activities declarations, Supervisory Skills Training (SST), and new managerial accountability

91. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025–December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf; Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

92. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025–September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf; Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026–March 2026, at p.3, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

93. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

among ordinary employees, but they are inherently incapable of determining whether staff are simultaneously affiliated with terrorist organizations or engaged in terrorist activity.

Indeed, UNRWA's Code of Ethics expressly permits staff to be members of political parties,^[94] while UNRWA separately states that it prohibits membership in militant or armed groups.^[95] In the case of Hamas, this distinction means that UNRWA's ethics and disclosure system does not treat Hamas membership itself as disqualifying, but instead depends on identifying prohibited military affiliation or activity. The increase in annual Outside and Political Activities declarations from approximately 1,000 to 3,000 therefore demonstrates only increased participation in an administrative process, but does not establish that staff are not members of armed or militant groups.

The inadequacy of treating the problem principally through ethics and compliance mechanisms is illustrated by cases uncovered through external investigation. The USAID OIG, for example, identified an UNRWA school principal as an operative of Hamas's East Jabaliya Battalion, ultimately resulting in his ten-year U.S. government-wide debarment.^[96]

UNRWA's closure of Recommendation 15 is particularly revealing. Colonna called on the Agency to "develop and implement" tailored management and oversight training for senior area staff serving as front-line managers and supervisors. Yet UNRWA closed the recommendation after training 189 supervisors across all Field Offices except Gaza—the field operation at the center of the neutrality crisis—while acknowledging that implementation there remained outstanding and would occur only "once conditions on the ground allow."^[97]

2. Limits of Internal Oversight Revealed by External Investigations (Recommendations 4, 5, 8)

UNRWA also points to the expansion of the DIOS, additional investigative personnel, a P4 Quality Assurance Officer, surge support to address case backlogs, and the centralized Neutrality Investigations Unit as evidence of strengthened internal accountability. In 2025, the Neutrality Investigations Unit received 40 neutrality-related complaints, authorized 31 investigations, completed 22, and substantiated 13 allegations, after which UNRWA says "proportional disciplinary measures" were imposed.^[98]

94. Code of Ethics, at p. 26, UNRWA (2023), https://www.unrwa.org/sites/default/files/content/resources/unrwa-code-of-ethics-v4-2023-english_1.pdf, archive link at https://unwatch.org/wp-content/uploads/unrwa-code-of-ethics-v4-2023-english_1.pdf.

95. Statement by UNRWA Commissioner-General ad interim Christian Saunders at the Pledging Conference, UNRWA (June 30, 2026), <https://www.unrwa.org/newsroom/official-statements/statement-unrwa-commissioner-general-ad-interim-christian-saunders>, archive link at www.cdn.unwatch.org/archived-page/Pledging%20conference%20Saunders.html.

96. INVESTIGATIVE SUMMARY: USAID Inspector General's Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>.

97. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025–December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf

98. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf

The scale of cases identified externally is significantly larger. By June 2026, USAID OIG reported that its independent investigation had resulted in 108 referrals of current or former UNRWA personnel for suspension or debarment consideration based on alleged Hamas affiliation and/or participation in the October 7 attacks.^[99] The individuals identified included school principals, teachers, security personnel, counselors, and medical professionals, including employees alleged to have held military positions within Hamas.

UNRWA does not explain whether the individuals identified by USAID OIG were among its 40 neutrality complaints, 31 authorized investigations, or 13 substantiated cases. Nor does it disclose the nature of the 13 substantiated violations or what “proportional disciplinary measures” were imposed. The scale of cases identified externally raises questions about whether UNRWA’s internal mechanisms can independently detect serious misconduct.

3. OIOS Cooperation Does Not Equal Transparent Accountability (Recommendation 6)

UNRWA further cites continued cooperation with the UN OIOS on “serious and high-risk allegations” as evidence of stronger oversight.^[100] Recommendation 6 called for greater interaction between DIOS and external UN oversight structures and, in cases of grave allegations, for the Commissioner-General to request that the Secretary-General refer the investigation to OIOS.^[101] UNRWA’s progress reports do not identify any such referral or otherwise demonstrate implementation of this component of the recommendation. At the same time, the handling of the October 7 investigations demonstrates the limitations of relying on OIOS as the principal external check within the Colonna framework.

In investigating allegations concerning UNRWA personnel, the USAID OIG sought information from both UNRWA and OIOS. OIOS permitted USAID OIG to review its investigation report only with the subjects’ names redacted, which USAID OIG said rendered the report unusable for its purposes.^[102] UNRWA also did not provide USAID OIG with the names of personnel whose appointments had been terminated following the October 7 allegations.^[103] As a result, the very mechanism UNRWA cites as evidence of strengthened oversight prevented an independent U.S. government oversight body from identifying the individuals investigated or meaningfully assessing UNRWA’s response.

99. INVESTIGATIVE SUMMARY: USAID Inspector General’s Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>.

100. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

101. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, at p. 16, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

102. INVESTIGATIVE SUMMARY: USAID OIG’s Investigative Work to Prevent UNRWA Staff Associated With Hamas From Circulating to Other U.S. Government-Funded Aid Organizations, USAID OIG (April 14, 2025), <https://oig.usaid.gov/node/7597>, archive link: <https://archive.ph/uGFPL>.

103. Id.

The subsequent leak^[104] of the confidential OIOS report^[105] exposes a second problem: the limitations of OIOS itself as a neutrality-accountability mechanism. The leaked report, which was never published by the UN or UNRWA, identifies the employees only as “subjects,” without their names—consistent with USAID OIG’s account. More importantly, OIOS expressly limited its mandate to determining whether the 19 employees were involved in the October 7 attacks and stated that it did not reach conclusions regarding their alleged membership in Hamas or other militant groups.^[106] Thus, a finding that the evidence was insufficient to establish participation in October 7 was not a finding that the employee had no terrorist affiliation.

The report also shows that OIOS relied in part on statements provided by the subjects themselves. In several cases, employees denied involvement in the attacks or affiliation with militant groups, and OIOS considered those denials while declining to treat Israeli intelligence—including Hamas membership records, military identification numbers, ranks, military training, or operational roles—as sufficient without independent authentication or corroboration.^[107]

The lack of transparency surrounding these investigations has also left victims without a clear accounting of how individual cases were resolved. This is illustrated by the case of Ayelet Samerano, whose son Yonatan was abducted on October 7 in an incident involving an UNRWA employee captured on CCTV.^[108] Although the leaked report provides some insight into OIOS’s findings, it still withholds the subjects’ identities. Moreover, this information became available only through an unauthorized leak rather than transparent disclosure by the UN or UNRWA. Victims, donors, and outside investigators should not have to rely on leaked confidential documents to understand how allegations of terrorist involvement by UNRWA personnel were investigated and resolved.

Accordingly, cooperation with OIOS does not itself establish independent or transparent accountability. The Colonna framework provides no mechanism outside the UNRWA/UN system to investigate serious neutrality breaches, test UNRWA’s findings against external evidence and intelligence, or ensure transparency about the results.

104. Exclusive: UN Is Actively Obstructing US Probe Into Links Between Its Gaza Relief Groups and Hamas, as Americans Warn UN To Divorce ‘Cancerous UNRWA,’ Washington Free Beacon (July 30, 2026), <https://freebeacon.com/israel/exclusive-un-is-actively-obstructing-us-probe-into-links-between-its-gaza-relief-groups-and-hamas-as-americans-warn-un-to-divorce-cancerous-unrwa/>, archive link <https://ghostarchive.org/archive/6SDy2>.

105. Investigation Report on Misconduct by Staff Members at the United Nations Relief and Works Agency for Palestine Refugees in the Near East, OIOS (July 31, 2024), <https://freebeacon.com/wp-content/uploads/2026/07/S-OIOS-Report-WFB.pdf>, archive link: <https://web.archive.org/web/20260801183237/https://freebeacon.com/wp-content/uploads/2026/07/S-OIOS-Report-WFB.pdf>.

106. Id. at p. 5.

107. Id. at pp. 1-2.

108. ‘Does the UN hold my son?’ mother of murdered hostage asks as families assail UNRWA, Times of Israel (February 21, 2024), <https://www.timesofisrael.com/does-the-un-hold-my-son-mother-of-murdered-hostage-tells-unrwa-to-clean-house/>, archive link: <https://archive.ph/Na7zP>.

► 4. Administrative Risk and Project Systems Do Not Establish Operational Neutrality (Recommendations 11, 14, 16)

The same limitation appears in UNRWA's broader management reforms. Under Recommendation 11, the Agency established a Neutrality Policy and Implementation Unit and incorporated neutrality into a draft Strategic Risk Register. These measures formalize institutional responsibility for neutrality but do not provide a mechanism for identifying terrorist affiliations, testing staff backgrounds against external intelligence, or detecting military activity within Agency operations. Similarly, UNRWA's Gender Parity Portfolios and efforts to increase women in senior management under Recommendation 14, while responsive to Colonna, provide no evidence that underlying neutrality risks have diminished.

UNRWA's project reforms under Recommendation 16 present the same problem. The Agency rolled out a Project Procedures Manual and launched a public Project Transparency Portal to improve transparency and traceability. These measures may improve project administration, but they do not establish that projects or facilities are protected from terrorist exploitation or provide an independent means of detecting such misuse.

► 5. The More Structural Reforms Remain Unfinished (Recommendations 7 & 12)

Most revealingly, the two recommendations that remain unfinished concern reforms less amenable to completion through policies, training, or administrative systems. Recommendation 7 requires periodic independent evaluations of DIOS. UNRWA acknowledges that reviews of both its investigation and evaluation functions remain underway, appropriately recognizing that initiating an external review is not the same as completing one.

Recommendation 12 likewise remains unfinished. Colonna called on UNRWA to "reinforce the internationalization of UNRWA's senior managerial area staff positions,"^[109] but further internationalization remains contingent on additional funding. Whatever the financial constraints, this structural reform has not been implemented.

This contrast exposes the weakness of UNRWA's 87% completion figure. The metric gives equal weight to administrative measures such as e-courses and policies as well as to more structural oversight reforms, allowing easier process requirements to be checked off while more consequential reforms remain unfinished. The resulting figure measures administrative completion more than whether UNRWA's underlying oversight and accountability failures have been resolved.

109. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

CATEGORY 4: NEUTRALITY OF STAFF

► UNRWA's Claimed Progress

Across its progress reports from Q3 2025 through Q2 2026, UNRWA claims to have substantially strengthened staff neutrality across the employee lifecycle, including recruitment, promotion and transfer, staff conduct, monitoring, and disciplinary action. UNRWA reports 90% completion under Category 4, closing nine of ten recommendations by Q2 2026 and leaving only Recommendation 28 in progress.^[110]

UNRWA's reported reforms include a revised Neutrality Framework, expanded neutrality training, revised procedures for handling neutrality allegations, enhanced recruitment and background screening, and new social media monitoring and commercial vetting initiatives.^[111] The Agency also digitalized its Background Verification Unit through ClearCheck 2.0 and strengthened whistleblower protections and disciplinary processes.^[112] Notably, UNRWA closed Recommendation 24 after completing a commercial vetting pilot and costed implementation plan, although phased implementation remained subject to funding.^[113] Recommendation 28 remains open because deployment of an international P3 Staff Care Specialist in each field depends on "predictable and sustainable funding."^[114]

110. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

111. Id.

112. Id. See also Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

113. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

114. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

SPECIFIC TECHNICAL ACTIONS AND REFORMS

- *Revised Neutrality Framework (Rec. 19—Completed)*: Issued an updated Neutrality Framework in March 2026 incorporating strengthened provisions on social media conduct and new technologies, and subsequently produced an official Arabic translation.^[115]
- *Regional Neutrality Workshop & ToT Rollout (Rec. 20—Completed)*: Conducted a Regional Neutrality Workshop in Amman (May 20–21, 2026) for 34 colleagues from Headquarters and all five fields of operation, serving as a Training of Trainers and supporting development of a Neutrality Training Handbook.^[116]
- *Standard Operating Procedures (SOPs) on Neutrality Allegations (Rec. 21—Completed)*: Revised the SOPs on neutrality allegations in June 2026 to clarify roles and responsibilities and reflect developments in the Agency’s approach to potential neutrality breaches.^[117]
- *Early-Stage Recruitment Screening (Rec. 22—Completed)*: Reported implementation of early-stage screening measures during staff recruitment.^[118]
- *Staff List Sharing (Rec. 23—Completed)*: Continued regular sharing of staff lists with Host Countries and Israel.^[119]
- *Commercial Vetting Pilot & Costed Plan (Rec. 24—Completed)*: Finalized a commercial vetting pilot and developed a fully costed implementation plan. UNRWA subsequently began exploring options for phased introduction, subject to funding.^[120]
- *Verification System Digitalization (Recs. 22 & 24—Completed)*: Adopted ClearCheck 2.0 and digitalized the Background Verification Unit’s screening and verification processes, including for new recruits, promotions, and transfers.^[121]

115. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

116. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

117. Id.

118. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

119. UNRWA Implementation of Colonna Report: Quarterly Report January 2025, UNRWA (January 23, 2025), https://www.unrwa.org/sites/default/files/content/resources/ist_012025_progressreport_01202025.pdf, archive link: https://unwatch.org/wp-content/uploads/ist_012025_progressreport_01202025.pdf.

120. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

121. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

- *Public Social Media Monitoring Tool (Rec. 25—Completed)*: Developed a tool to support the early detection of potential public social media breaches by staff.^[122]
- *Whistleblower & Anti-Retaliation Training (Rec. 26—Completed)*: Conducted whistleblower-protection awareness campaigns, bystander training and dialogue sessions, including training 70 middle managers on protection against retaliation.^[123]
- *Disciplinary Processes (Rec. 27—Completed)*: Finalized and circulated the 2023 Disciplinary Digest, conducted professional leadership trainings across fields, and reported that disciplinary processes had been ‘significantly strengthened.’^[124]
- *Staff Care Operations (Rec. 28—in progress)*: Delivered 4,425 group sessions and 542 individual counselling sessions between January and May 2026 through the P5-led Staff Care Division and additional field capacity.^[125]

► Analysis

UNRWA claims to have completed 90% of the Colonna recommendations on staff neutrality, closing nine of ten recommendations by Q2 2026.^[126] But this figure substantially overstates the significance of the reforms. UNRWA frequently treats the completion of an administrative deliverable—a revised policy, training program, pilot project, monitoring tool, or procedural reform—as equivalent to resolving the underlying neutrality problem. The relevant question is not simply whether UNRWA created new systems, but whether those systems are capable of

122. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025–December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf; Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026–March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

123. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025–December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

124. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025–September 2025, UNRWA (October 20, 2025), https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf; Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026–March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

125. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

126. Id.

identifying and addressing the extensive Hamas infiltration and support among UNRWA staff documented by independent investigations and other evidence.^[127]

► 1. UNRWA Counts Administrative Outputs as Completed Reforms (Recommendations 20, 24, 25)

Several of UNRWA's "completed" recommendations illustrate the weakness of its 90% figure. Most strikingly, UNRWA closed Recommendation 24 after completing a commercial vetting pilot, evaluation, and costed implementation plan.^[128] Yet in Q2 2026—after declaring the recommendation complete—UNRWA acknowledged that it was still "exploring options for the phased introduction of commercial vetting," subject to funding.^[129]

The same problem appears in Recommendations 20 and 25. UNRWA closed Recommendation 20 after institutionalizing a neutrality training plan and holding a May 2026 Training of Trainers workshop for 34 personnel, although the Neutrality Training Handbook remained under development.^[130] It closed Recommendation 25 after developing a tool to monitor public social media expressions, while subsequently reporting that its social media monitoring capabilities were still being refined.^[131]

These may be legitimate institutional improvements, but completing a pilot, mechanism, or training infrastructure does not establish a more neutral workforce. Indeed, while UNRWA was reporting near-completion of the Colonna reforms, USAID OIG identified extensive terrorism-related affiliations among current and former UNRWA personnel. In June 2026, USAID OIG referred 108 current or former UNRWA employees for suspension or debarment consideration based on participation in the October 7 attacks and/or affiliation with Hamas's military wing,

127. See, e.g., INVESTIGATIVE SUMMARY: USAID Inspector General's Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>; The Connection Between UNRWA and Hamas in Gaza, GOVEXTRA (Last visited August 24, 2026), <https://govextra.gov.il/unrwa/unrwa>, archive link: <https://ghostarchive.org/archive/Y9OIg>; Schools in the Grip of Terror: How UNRWA Allowed Hamas Chiefs to Control its Education System, UN Watch (September 2025), <https://unwatch.org/wp-content/uploads/2025/09/Schools-in-the-Grip-of-Terror-UNRWA-Report.pdf>; The Unholy Alliance: UNRWA, Hamas and Islamic Jihad, UN Watch (December 2024), <https://unwatch.org/wp-content/uploads/2025/01/UNW-129-%E2%80%94The-Unholy-Alliance-%E2%80%942025-01-09-%E2%80%94Web-%E2%80%94Singles.pdf>.

128. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

129. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

130. Id.

131. Id. See also Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf

including school principals, deputy principals, teachers, security personnel, counselors, and medical staff.^[132]

► 2. UNRWA's Vetting System Does Not Screen for the Core Affiliation Problem (Recommendations 22-24)

Recommendations 22–24 seek to strengthen staff screening and vetting, but none of the mechanisms UNRWA identifies has been shown to systematically screen out Hamas membership. UNRWA screens against the UN Security Council Consolidated Sanctions List,^[133] which does not designate Hamas or PIJ. ClearCheck 2.0, digitalized background verification, and expanded screening at recruitment, promotion, and transfer do not close this gap. Nor has UNRWA shown that its proposed commercial vetting would screen for Hamas membership. Despite closing Recommendation 24, it had completed only a pilot and costed implementation plan, with rollout still subject to funding.^[134]

UNRWA's own rules create an additional limitation. Staff may hold personal political views and belong to political parties subject to restrictions on political activity,^[135] while membership in militant or armed groups is prohibited.^[136] Thus, Hamas affiliation itself does not trigger exclusion unless UNRWA can establish prohibited military affiliation or activity. Yet identifying such affiliation requires precisely the kind of intelligence UNRWA acknowledges it does not possess: the Agency states that it has no police or intelligence capacities and depends on Member States for such information.^[137]

External investigations illustrate the consequences. In June 2026, USAID OIG identified UNRWA personnel simultaneously occupying significant military positions with Hamas, including a deputy school principal serving as a deputy company commander and squad leader, as well as

132. INVESTIGATIVE SUMMARY: USAID Inspector General's Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>.

133. UNRWA: Claims Versus Facts, UNRWA (February 2025), https://www.unrwa.org/sites/default/files/unrwa_claims_vs_facts_feb_2025_16.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_claims_vs_facts_feb_2025_16.pdf; Statement by Philippe Lazzarini, UNRWA Commissioner-General at the Meeting of the Advisory Commission (AdCom), UNRWA (June 25, 2025), <https://www.unrwa.org/newsroom/official-statements/statement-philippe-lazzarini-unrwa-commissioner-general-meeting-0>, archive link: www.cdn.unwatch.org/archived-page/Philippe%20Lazzarini%20%28AdCom%29.html.

134. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

135. Code of Ethics, UNRWA (2023), https://www.unrwa.org/sites/default/files/content/resources/unrwa-code-of-ethics-v4-2023-english_1.pdf, archive link at https://unwatch.org/wp-content/uploads/unrwa-code-of-ethics-v4-2023-english_1.pdf.

136. Statement by UNRWA Commissioner-General ad interim Christian Saunders at the Pledging Conference, UNRWA (June 30, 2026), <https://www.unrwa.org/newsroom/official-statements/statement-unrwa-commissioner-general-ad-interim-christian-saunders>, archive link at www.cdn.unwatch.org/archived-page/Pledging%20conference%20Saunders.html.

137. Statement by the Commissioner-General ad interim of UNRWA, Christian Saunders, UNRWA (June 11, 2026), <https://www.unrwa.org/newsroom/official-statements/statement-commissioner-general-ad-interim-unrwa-christian-saunders>, archive link: www.cdn.unwatch.org/archived-page/Statement%20by%20UNRWA%2C%20Christian%20Saunders.html.

other educators and staff serving in military and intelligence functions.^[138] Israel has likewise published evidence identifying UNRWA employees whom it says held positions in Hamas and PIJ.^[139] UNRWA school principal Emad Yousef Al-Samhoury provides a concrete example: after he was killed by Israel, Hamas eulogized him in a martyr video as a Hamas operative and platoon commander in the Rafah Brigade,^[140] while UNRWA mourned him as an employee killed in the conflict.^[141] A further example emerged in July 2026, when UNRWA teacher Nabhan Mohammed Nabhan Al-Amsi was killed in an Israeli strike. The Gaza Staff Union mourned Al-Amsi as an UNRWA teacher,^[142] while the IDF identified him as head of the Military Intelligence Desk in Hamas's Gaza Brigade.^[143]

Recommendation 23 suffers from a separate problem. It relies on sharing staff information with Israel and host authorities for external cross-checking. Israel states that meaningful cross-checking became possible only after UNRWA provided a digital Gaza staff list containing identification numbers in February 2024.^[144] But the mechanism can no longer operate as contemplated with Israel. Legislation that entered into force in January 2025 prohibits Israeli government authorities from maintaining contact with UNRWA or its representatives.^[145] UNRWA nevertheless continues to count Recommendation 23 as completed.

Thus, UNRWA's screening reforms have not been shown to systematically screen for Hamas membership; the Agency lacks independent intelligence capabilities to identify military affiliation; and a principal external cross-checking mechanism envisioned by Colonna is no longer operational.

► 3. Social Media Monitoring Cannot Ensure Staff Neutrality (Recommendation 25)

UNRWA closed Recommendation 25 after developing a tool to monitor potential neutrality breaches in staff members' public social media activity.^[146] Such monitoring can identify public

138. INVESTIGATIVE SUMMARY: USAID Inspector General's Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>.

139. The Connection Between UNRWA and Hamas in Gaza, GOVEXTRA (Last visited August 24, 2026), <https://govextra.gov.il/unrwa/unrwa>, archive link: <https://ghostarchive.org/archive/Y9OIg>.

140. @HillelNeuer, X (August 13, 2026, 7:07 PM), <https://x.com/HillelNeuer/status/2087934023251198301>.

141. @HillelNeuer, X (August 13, 2026, 7:44 PM), <https://x.com/HillelNeuer/status/2087943325345014227>.

142. UNRWA Health Department Staff Meeting, Facebook (July 22, 2026), <https://www.facebook.com/groups/Employee.un/permalink/37949440474640166>, archive link: <https://cdn.unwatch.org/archived-page/Health%20Department%20Staff%20Meeting.html>.

143. Israel kills three Hamas members in Gaza, Shafaq News (July 25, 2026), <https://shafaq.com/en/Middle-East/Israel-kills-three-Hamas-members-in-Gaza>, archive link: <https://archive.ph/kVWwgu>.

144. Dismantling UNRWA Chief Lazzarini's Falsehoods, GOVEXTRA (January 2025), <https://govextra.gov.il/mda/dismantling-philippe-lazzarini-s-falsehoods/january-2025/>, archive link: <https://ghostarchive.org/archive/8WSrN>.

145. Approved in final readings: Bill banning state authorities from maintaining any contact with UNRWA or a representative of the agency, Knesset News (October 29, 2024), <https://main.knesset.gov.il/en/news/pressreleases/pages/press291024w.aspx>, archive link: <https://ghostarchive.org/archive/fIOTk>.

146. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025–December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

violations, but it cannot detect activity through private profiles, closed groups, or private communications on platforms such as WhatsApp and Telegram, nor conduct expressed offline.

UN Watch has documented years of UNRWA employees publicly praising Hamas, glorifying terrorism, and promoting antisemitism.^[147] Following October 7, UN Watch documented a Telegram group of approximately 3,000 UNRWA Gaza teachers and other staff in which members celebrated the attacks, praised the terrorists, and shared Hamas-related content.^[148] Such monitoring also depends on the conduct remaining visible. Employees can avoid detection by deleting posts, restricting profiles, moving communications to closed groups, or simply ceasing to express such views publicly. None of these changes establishes that the employee has become more neutral.

The problem also extends beyond individual social media activity. UNRWA staff unions have repeatedly mobilized in support of employees disciplined for neutrality violations. In 2011, the Gaza Staff Union conducted months of protests after UNRWA suspended principal Suhail Al-Hindi over Hamas-related activities;^[149] in 2023, the Lebanon Staff Union organized weeks of protests after teacher Riad Nimr was suspended for social media posts supporting terrorism;^[150] and in 2024, the Union organized prolonged protests and school strikes in support of Fateh Sharif after his suspension.^[151] Hamas subsequently acknowledged Sharif as its leader in Lebanon after he was killed in a targeted Israeli strike.^[152]

These cases reflect a broader institutional challenge in which pro-Hamas and nationalist sentiment conflicts with UN neutrality requirements and segments of UNRWA's workforce have resisted their enforcement. Public social media monitoring may detect some violations, but it does not address the underlying attitudes, affiliations, or conduct.

► 4. UNRWA Bypassed Its “Strengthened” Disciplinary System in the 70 Gaza Cases (Recommendations 21 & 27)

UNRWA counts Recommendations 21 and 27 as completed based on strengthened procedures for investigating and disciplining neutrality violations, including revised SOPs and reforms to its

147. UNRWA Report, UN Watch (Last visited August 24, 2026), <https://unwatch.org/tag/unrwa-report/>, archive link: <https://ghostarchive.org/archive/qwjhe>.

148. Group of 3,000 UNRWA teachers celebrates Hamas massacre and rape, UN Watch (January 10, 2024), <https://unwatch.org/group-of-3000-unrwa-teachers-celebrates-hamas-massacre-and-rape/>; see also UNRWA's Terrorgram, UN Watch (January 10, 2024), <https://unwatch.org/unrwa-terrorgram/>.

149. Schools in the Grip of Terror: How UNRWA Allowed Hamas Chiefs to Control its Education System, UN Watch (September 2025), <https://unwatch.org/wp-content/uploads/2025/09/Schools-in-the-Grip-of-Terror-UNRWA-Report.pdf>.

150. Striking UNRWA Staff Protest Suspension of Teacher Who Incited Terrorism, UN Watch (March 22, 2023), <https://unwatch.org/hamas-unrwa-staff-slam-suspension-of-teacher-who-promotes-terrorism/>.

151. Schools in the Grip of Terror: How UNRWA Allowed Hamas Chiefs to Control its Education System, UN Watch (September 2025), <https://unwatch.org/wp-content/uploads/2025/09/Schools-in-the-Grip-of-Terror-UNRWA-Report.pdf>.

152. Id.

disciplinary processes.^[153] Yet its handling of the most serious recent allegations against its staff raises questions about the effectiveness of those systems.

On June 11, 2026, UNRWA terminated 70 Gaza employees with immediate effect following a safety and security assessment, while expressly stating that the dismissals were “not part of a disciplinary process” and did not validate the underlying allegations.^[154] UNRWA said it had repeatedly sought supporting evidence from Israel and emphasized that it lacks police or intelligence capacities.^[155]

Yet information concerning at least some of these employees was already publicly available. UN Watch had documented public evidence concerning several UNRWA employees with ties to Hamas, including social media support for Hamas and terrorism and Arabic-language reporting on alleged Hamas activities.^[156] One was Mohammad Juma Shuwaideh, an UNRWA school principal and Gaza Union official who was also a Hamas commander^[157] and was among the 70 employees dismissed in June 2026.^[158] Another, Muhammad Abd Al-Nasser Al-Khatib, was a commander in Hamas’s Maghazi Battalion.^[159] After his death in an Israeli strike, the Gaza Staff Union confirmed that he was among the 70 employees and mourned him as a colleague dismissed over what it called “false and unsubstantiated allegations.”^[160] Separately, USAID OIG referred more than 100 current or former UNRWA personnel for suspension or debarment

153. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf; Q1 Progress Report: Implementing the

Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

154. Statement by the Commissioner-General ad interim of UNRWA, Christian Saunders, UNRWA (June 11, 2026), <https://www.unrwa.org/newsroom/official-statements/statement-commissioner-general-ad-interim-unrwa-christian-saunders>, archive link: www.cdn.unwatch.org/archived-page/Statement%20by%20UNRWA%2C%20Christian%20Saunders.html.

155. Id.

156. Fired UNRWA Staff Claim Innocence While Praising Hamas Terrorists and Suicide Bombers, UN Watch (June 16, 2026), <https://unwatch.org/fired-unrwa-employees-cry-injustice-but-publicly-support-suicide-bombings-showcase-weapons-and-are-tied-to-hamas/>; see also Schools in the Grip of Terror: How UNRWA Allowed Hamas Chiefs to Control its Education System, UN Watch (September 2025), <https://unwatch.org/wp-content/uploads/2025/09/Schools-in-the-Grip-of-Terror-UNRWA-Report.pdf>.

157. Id.

158. Shocking messages: UNRWA lays off dozens of employees in Gaza, Al Jazeera (June 22, 2026), <https://www.aljazeera.net/politics/2026/6/22>, archive link: <https://archive.ph/0Dyjp>.

159. Teachers’ Sector at UNRWA - Gaza City, Facebook (August 1, 2026), https://www.facebook.com/groups/283688619650658/permalink/1515400579812783/?rclid=VSjjNri5i7ewQ13Y&share_url=https%3A%2F%2Fwww.facebook.com%2Fshare%2Fp%2F1UbRVaBDWS%2F#, archive link: <https://archive.ph/him1p>; IDF kills several terrorists in Gaza from Hamas, Palestinian Islamic Jihad, Army of Islam, Jerusalem Post (August 2, 2026), <https://www.jpost.com/israel-news/defense-news/article-904348>, archive link: <https://archive.ph/Cbmln>; @IDF Arabic, Telegram (August 2, 2026, 8:49 AM), <https://t.me/IDFSpokespersonArabic/13573>, archive link: <https://archive.ph/II2QP>.

160. Teachers’ Sector at UNRWA - Gaza City, Facebook (August 1, 2026), https://www.facebook.com/groups/283688619650658/permalink/1515400579812783/?rclid=iKZogIqdISk3BtE3&share_url=https%3A%2F%2Fwww.facebook.com%2Fshare%2Fp%2F1UbRVaBDWS%2F#, archive link: <https://archive.ph/him1p>.

161. INVESTIGATIVE SUMMARY: USAID Inspector General’s Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>.

UNRWA thus closed recommendations intended to strengthen investigation and discipline, yet bypassed that framework when confronting dozens of terrorism-related cases and expressly declined to determine whether the underlying allegations were true.

► 5. Training and Whistleblower Protections Cannot Address the Underlying Neutrality Problem (Recommendations 20 & 26)

UNRWA cites expanded neutrality training and whistleblower protections as evidence of reform. More than 8,500 employees completed a mandatory humanitarian principles e-learning course under Recommendation 18,^[162] under Recommendation 20, UNRWA institutionalized neutrality training through a Training of Trainers model,^[163] and under Recommendation 26, it conducted whistleblower awareness, bystander, and anti-retaliation training, including for 70 middle managers.^[164]

These measures address knowledge of neutrality rules and mechanisms for reporting violations. They do not address employees who knowingly maintain prohibited affiliations or activities. USAID OIG, for example, identified educators and other UNRWA personnel allegedly holding simultaneous roles within Hamas's military structure—conduct that cannot plausibly be attributed to a failure to understand humanitarian principles.^[165]

Formal whistleblower protections also cannot by themselves overcome an environment in which employees have repeatedly rallied behind colleagues accused of Hamas-related or other serious neutrality violations. UNRWA staff unions have organized protests, strikes, and pressure campaigns on behalf of disciplined employees,^[166] a pattern that continued after Colonna. Following UNRWA's June 2026 dismissal of 70 Gaza employees over terrorism-related allegations, the Gaza Staff Union organized a large-scale sit-in demanding their reinstatement and pledged continued action until the dismissals were reversed.^[167]

162. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf.

163. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

164. Id.

165. INVESTIGATIVE SUMMARY: USAID Inspector General's Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>.

166. Schools in the Grip of Terror: How UNRWA Allowed Hamas Chiefs to Control its Education System, UN Watch (September 2025), <https://unwatch.org/wp-content/uploads/2025/09/Schools-in-the-Grip-of-Terror-UNRWA-Report.pdf>.

167. UNRWA Health Department Staff Meeting, Facebook (July 21, 2026), <https://www.facebook.com/groups/Employee.un/permalink/37297901746460712>, archive link: <https://archive.ph/udKyC>.

► **6. Staff Care Is Important, but It Does Not Address the Neutrality Problem (Recommendation 28)**

Recommendation 28—the sole recommendation UNRWA still classifies as incomplete—calls for an international Staff Care Specialist in each of UNRWA’s five fields.^[168] UNRWA reports substantial demand for staff care services but states that recruitment of the five specialists remains dependent on predictable funding.^[169]

Staff wellbeing is a legitimate concern, particularly for personnel working under extraordinarily difficult conditions. But counseling for stress and trauma cannot address Hamas affiliation or support among UNRWA personnel, nor substitute for effective screening, investigation, and accountability.

Including staff care among the ten recommendations used to measure progress on “Neutrality of Staff” also illustrates the weakness of UNRWA’s claimed reform success rate. Even full implementation of Recommendation 28 would only expand employee wellbeing services, not establish that UNRWA’s workforce is free from terrorist affiliation or systemic neutrality violations.

168. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024),

https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

169. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

CATEGORY 5: NEUTRALITY OF INSTALLATIONS

► UNRWA's Claimed Progress

Across its progress reports from 2025 through Q2 2026, UNRWA claims steady progress in protecting the civilian nature of its installations through staff training, community engagement, and strengthened monitoring. UNRWA reports 40% completion for Category 5, having closed Recommendations 29 and 30, with the remaining three in progress.^[170]

UNRWA expanded staff and community awareness initiatives, replacing previous neutrality modules with a mandatory humanitarian principles e-course, training installation managers, and conducting community outreach across several fields.^[171] Notably, UNRWA closed Recommendation 30 in Q4 2025 despite acknowledging that implementation in Gaza and the West Bank remained constrained by the political and security context.^[172]

UNRWA also strengthened facility monitoring through quarterly “Integrated Assessments,” updated SOPs and questionnaires designed to capture potential military misuse.^[173] By March 2026, it reported assessing 85% of installations outside Gaza,^[174] while Gaza remained outside the standard assessment process because of security and access restrictions.^[175] UNRWA initially reported engagement with host countries and Israel concerning facility misuse,^[176] but subsequent reports refer only to host countries or Member States.^[177] Regular Integrated Assessment Reports for Member States remained under development as of Q2 2026, and UNRWA states that sustaining the assessment system requires continued donor funding and dedicated protection staff.^[178]

170. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

171. Id.

172. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

173. Id.

174. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

175. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

176. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf.

177. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

178. Id.

SPECIFIC TECHNICAL ACTIONS AND REFORMS

- *Mandatory Humanitarian Principles E-Course (Rec. 29—Completed)*: Replaced older training modules with a new mandatory e-learning course, reaching more than 15,000 staff by June 2026.^[179]
- *Installation Manager Training (Rec. 29—Completed)*: Delivered targeted, in-person training to more than 2,000 installation managers on safeguarding the civilian nature of UNRWA facilities.^[180]
- *Community Awareness Campaigns (Rec. 30—Completed)*: Executed community outreach including 29 awareness sessions in Lebanon and Syria, school-based activities in Jordan, and the distribution of more than 6,000 awareness posters promoting the civilian nature of UNRWA installations.^[181]
- *Updated Assessment Questionnaires & SOPs (Rec. 31—In Progress)*: Revised the SOPs and questionnaires used during facility visits to systematically capture incidents involving potential military misuse.^[182]
- *Quarterly Integrated Assessments (Rec. 31—In Progress)*: Conducted quarterly Integrated Assessments, including 599 in Q2 2026 and assessments covering 85% of installations outside Gaza by March 2026. Gaza remained outside the standard assessment process and was subject to an ‘adapted monitoring approach’ because of security and access restrictions.^[183]

179. Id.

180. Id.

181. Id. See also Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

182. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf

183. See also Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf; Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

- *Issuance of Formal Protest Letters (Rec. 32—In Progress)*: Issued formal protest letters and conducted bilateral follow-up concerning reported incidents of facility misuse. Earlier progress reporting referred to engagement with host countries and Israel, while subsequent reports refer to host countries or Member States without identifying continued engagement with Israel.^[184]
- *Integrated Assessment Reporting (Rec. 33—In Progress)*: Continued work to finalize regular Integrated Assessment Reports for Member States concerning neutrality and inviolability breaches affecting UNRWA installations.^[185]

► Analysis

UNRWA reports significant progress in protecting the civilian nature of its installations, including completion of Recommendations 29 and 30 and continuing implementation of Recommendations 31–33. Yet the fundamental weakness of this category lies partly in the Colonna recommendations themselves. The prescribed measures—training staff, educating communities, conducting administrative assessments, communicating with authorities, and reporting violations—may improve awareness and documentation of installation misuse, but they do not give UNRWA the physical security or investigative capacity necessary to prevent or reliably detect deliberate military exploitation of its facilities.

► 1. Training and Awareness Cannot Prevent Deliberate Military Misuse (Recommendations 29 and 30)

UNRWA closed Recommendation 29 after introducing training on the civilian nature of its installations and subsequently reported that more than 2,000 installation managers had received in-person training. It closed Recommendation 30 after community outreach through awareness sessions, school activities, murals, and posters. These measures may reinforce humanitarian principles, but they cannot prevent deliberate military exploitation by an armed organization.

184. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025–September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf; Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.
 185. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

Extensive evidence indicates that Hamas deliberately embeds military activities and infrastructure within civilian environments.^[186]

The limitation is particularly acute where those responsible for safeguarding UNRWA installations are themselves affiliated with an armed group. USAID OIG has identified UNRWA school principals and other senior educators simultaneously serving in Hamas military roles.^[187] Israel identified UNRWA school principal Mohammad Juma Shuwaideh as a Hamas squad commander in the Gaza Brigade,^[188] and UN Watch reports that UNRWA subsequently placed him in charge of one of its shelters during the war.^[189] UNRWA ultimately dismissed him in June 2026 as one of 70 Gaza employees terminated following terrorism-related allegations.^[190] Training an installation manager on the civilian character of a facility provides little safeguard if that manager is himself affiliated with the armed organization whose misuse the system is intended to prevent.

UNRWA's closure of Recommendation 30 also illustrates the weakness of its completion methodology. UNRWA declared the recommendation complete in Q4 2025 while acknowledging that implementation in Gaza and the West Bank remained constrained by the political and security context.^[191] 'Completion' therefore did not mean that the prescribed community-awareness measures had been fully implemented across all five fields.

► 2. The Inspection System Is Weakest Where the Threat Is Greatest (Recommendation 31)

Recommendation 31 calls for additional capacity to "increase the frequency and widen the scope" of installation visits to include military misuse, after Colonna found existing quarterly inspections "insufficient" and daily monitoring inadequate.^[192] UNRWA reports that its

186. Hamas's Human Shield Strategy in Gaza, Henry Jackson Society (April 2025), <https://henryjacksonsociety.org/wp-content/uploads/2025/05/HJS-Hamass-Human-Shield-Strategy-in-Gaza-Report-WEB.pdf>, archive: <https://web.archive.org/web/20260904201134/https://henryjacksonsociety.org/wp-content/uploads/2025/05/HJS-Hamass-Human-Shield-Strategy-in-Gaza-Report-WEB.pdf>.

187. INVESTIGATIVE SUMMARY: USAID Inspector General's Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>.

188. Senior UNRWA Educators in Gaza Involved in Terrorism, GOVEXTRA (Last visited August 24, 2026), <https://govextra.gov.il/mda/unrwa-educators/unrwa-educators-and-their-involvement-in-terrorism/>, archive link: <https://ghostarchive.org/archive/3O9MK>.

189. Schools in the Grip of Terror: How UNRWA Allowed Hamas Chiefs to Control its Education System, UN Watch (September 2025), <https://unwatch.org/wp-content/uploads/2025/09/Schools-in-the-Grip-of-Terror-UNRWA-Report.pdf>; See also Al-Jazeera Palestine, Facebook (October 20, 2023), <https://www.facebook.com/AJA.Palestine/posts/657408209862942/>, archive link: <https://ghostarchive.org/archive/XnMB5>.

190. Shocking messages: UNRWA lays off dozens of employees in Gaza, Al Jazeera (June 22, 2026), <https://www.aljazeera.net/politics/2026/6/22>, archive link: <https://archive.ph/0Dyjp>.

191. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025–December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

192. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

Integrated Assessments now use updated questionnaires and SOPs to capture potential military misuse, but the assessments remain quarterly and the standard regime does not operate in Gaza. In Q1 2026, UNRWA assessed 85 percent of installations outside Gaza.^[193] In Q2, it conducted 599 assessments across all fields except Gaza, where security and access restrictions require an “adapted monitoring approach.”^[194]

Gaza is not a peripheral exception. It is the field where the most serious evidence and allegations of military misuse have arisen, including tunnels and shafts beneath or adjacent to facilities, weapons and military infrastructure at UNRWA sites, and personnel allegedly holding Hamas military roles.^[195] The standard inspection system is therefore absent where detecting military misuse is most consequential.

More fundamentally, the inspection regime is structurally incapable of detecting and addressing the most serious forms of military misuse. Colonna acknowledged that UNRWA lacks the “policing, military or wider investigative capacities or competencies required to detect” critical breaches such as weapons, military activity, or tunnels.^[196] Acting Commissioner-General Christian Saunders reiterated this limitation in June 2026, stating that UNRWA “does not have police or intelligence capacities” and depends on Member States for information concerning serious allegations.^[197]

► 3. Cooperation with Israel Cannot Operate as Colonna Envisaged (Recommendation 32)

Recommendation 32 contemplated strengthened cooperation with host countries and Israel concerning misuse of UNRWA installations, including possible joint visits. Earlier UNRWA reports cite bilateral engagement with Israel and host countries and formal protest letters. Later reports refer only to host countries or Member States, without identifying continued engagement with Israel.

193. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

194. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

195. Hamas's Human Shield Strategy in Gaza, Henry Jackson Society (April 2025), <https://henryjacksonsociety.org/wp-content/uploads/2025/05/HJS-Hamass-Human-Shield-Strategy-in-Gaza-Report-WEB.pdf>, archive: <https://web.archive.org/web/20260904201134/https://henryjacksonsociety.org/wp-content/uploads/2025/05/HJS-Hamass-Human-Shield-Strategy-in-Gaza-Report-WEB.pdf>; UPDATED: Evidence Of UNRWA Aid To Hamas On And After October 7th, UN Watch (July 12, 2024), <https://unwatch.org/evidence-of-unrwa-aid-to-hamas-on-and-after-october-7th/>; Senior UNRWA Educators in Gaza Involved in Terrorism, GOVEXTRA (Last visited August 24, 2026), <https://govextra.gov.il/mda/unrwa-educators/unrwa-educators-and-their-involvement-in-terrorism/>, archive link: <https://ghostarchive.org/archive/3O9MK>.

196. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

197. Statement by the Commissioner-General ad interim of UNRWA, Christian Saunders, UNRWA (June 11, 2026), <https://www.unrwa.org/newsroom/official-statements/statement-commissioner-general-ad-interim-unrwa-christian-saunders>, archive link: www.cdn.unwatch.org/archived-page/Statement%20by%20UNRWA%2C%20Christian%20Saunders.html.

An essential component of the recommendation can no longer operate as envisaged. Israeli legislation adopted in October 2024 prohibits Israeli government agencies and representatives from maintaining contact with UNRWA or its representatives,^[198] precluding substantive coordination or joint visits that could provide external verification of alleged misuse.

Formal protest letters do not fill that gap. They may document UNRWA's objection after an incident, but cannot independently verify an installation, identify concealed military infrastructure, or remove military assets. UNRWA may therefore continue administrative elements of Recommendation 32 through letters and engagement with other authorities, but the cooperation with Israel expressly contemplated by Colonna cannot currently function.

► 4. Reporting Violations Is Reactive, Not Preventive (Recommendation 33)

Recommendation 33 calls for transparent reporting to Member States on violations of the neutrality and inviolability of UNRWA installations.^[199] UNRWA is developing regular Integrated Assessment Reports and continues to classify the recommendation as in progress.^[200] Such reporting is inherently reactive: it does not prevent military exploitation of an installation, detect concealed infrastructure, or address involvement by UNRWA personnel.

UNRWA has also repeatedly framed this reporting in terms of breaches by “external actors.”^[201] Yet USAID OIG,^[202] Israel,^[203] and UN Watch^[204] have identified UNRWA employees—including school principals, educators, security personnel, and other staff—who simultaneously held positions within Hamas or PIJ. Meaningful reporting must therefore examine not only which external actor misused an installation, but whether UNRWA personnel facilitated, participated in, knew of, or failed to report the misuse.

198. Approved in final readings: Bill banning state authorities from maintaining any contact with UNRWA or a representative of the agency, Knesset News (October 29, 2024), <https://main.knesset.gov.il/en/news/pressreleases/pages/press291024w.aspx>, archive link: <https://ghostarchive.org/archive/fI0Tk>.

199. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

200. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

201. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf; Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

202. INVESTIGATIVE SUMMARY: USAID Inspector General's Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>.

203. Senior UNRWA Educators in Gaza Involved in Terrorism, GOVEXTRA (Last visited August 24, 2026), <https://govextra.gov.il/mda/unrwa-educators/unrwa-educators-and-their-involvement-in-terrorism/>, archive link: <https://ghostarchive.org/archive/3O9MK>.

204. Schools in the Grip of Terror: How UNRWA Allowed Hamas Chiefs to Control its Education System, UN Watch (September 2025), <https://unwatch.org/wp-content/uploads/2025/09/Schools-in-the-Grip-of-Terror-UNRWA-Report.pdf>.

Recommendation 33 remains unfinished more than two years after the Colonna Report, with successive progress reports still describing efforts to strengthen or finalize reporting to Member States. Given the extensive evidence of military activity in and around UNRWA facilities since October 7,^[205] such reporting should identify the circumstances of each incident, the actor involved, whether civilians were present, whether the facility was functioning as a civilian installation, and any evidence of involvement or knowledge by UNRWA personnel. Without that transparency, the reporting mechanism cannot provide a meaningful account of installation misuse or help identify how it can be prevented.

205. Hamas's Human Shield Strategy in Gaza, Henry Jackson Society (April 2025), <https://henryjacksonsociety.org/wp-content/uploads/2025/05/HJS-Hamass-Human-Shield-Strategy-in-Gaza-Report-WEB.pdf>, archive: <https://web.archive.org/web/20260904201134/https://henryjacksonsociety.org/wp-content/uploads/2025/05/HJS-Hamass-Human-Shield-Strategy-in-Gaza-Report-WEB.pdf>; UPDATED: Evidence Of UNRWA Aid To Hamas On And After October 7th, UN Watch (July 12, 2024), <https://unwatch.org/evidence-of-unrwa-aid-to-hamas-on-and-after-october-7th/>.

CATEGORY 6: EDUCATION

► UNRWA's Claimed Progress

Across its progress reports from Q3 2025 through Q2 2026, UNRWA asserts that it has strengthened neutrality across its education system through textbook review, classroom oversight, teacher training, and other education reforms aligned with UN values and United Nations Educational, Scientific and Cultural Organization (UNESCO) standards. The Agency claims 63% completion under Category 6, having closed five of eight recommendations (Recommendations 34, 37, 38, 39, and 41), while Recommendations 35, 36, and 40 remain in progress.^[206]

UNRWA's reported implementation centers on systematic review of host-country textbooks and supplements, mechanisms for addressing problematic teaching content, randomized classroom inspections, neutrality and humanitarian principles training, and increased representation of women in education leadership. It also reports continued engagement with UNESCO, teacher support through its Community of Practice, and expansion of its Digital Learning Platform and ICT infrastructure. The specific measures UNRWA cites in support of these implementation claims are summarized below.

SPECIFIC TECHNICAL ACTIONS AND REFORMS

- *Systematic Textbook Content Reviews (Rec. 34—Completed):* Completed systematic reviews of textbooks and supplements for which UNRWA is responsible against UN values and UNESCO standards, with mechanisms for sharing findings with relevant authorities upon request.^[207]

206. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

207. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf

- *Teacher Community of Practice (Rec. 34—Completed)*: Maintained a Community of Practice, referred to as Tamkeen and Manara in UNRWA's reports, providing teachers with practical guidance, peer learning opportunities, digital teaching resources, and support for integrating textbook review findings into classroom practice.^[208]
- *Policy Prohibiting Problematic Educational Content (Rec. 35—In Progress)*: Maintained internal regulations and policies prohibiting hate speech, incitement to violence, and antisemitic content in classrooms.^[209]
- *UNESCO Engagement (Rec. 36—In Progress)*: Continued engagement with UNESCO under the 2023 Recommendation on Education for Peace, Human Rights, and Sustainable Development, including dialogue on textbook review methodologies and broader education reforms. Separately, UNRWA delivered a dedicated education deep-dive during the AdCom Working Group on Neutrality and Integrity meeting in March 2026.^[210]
- *Dedicated Content Reporting Hotline (Rec. 38—Completed)*: Established a dedicated DIOS hotline to facilitate timely reporting of potentially problematic teaching content.^[211]
- *Randomized Classroom Inspections (Rec. 39—Completed)*: Introduced and continued conducting randomized classroom observations and teaching inspections into education quality assurance mechanisms to strengthen oversight of classroom practices.^[212]
- *Humanitarian Principles & Neutrality Training (Rec. 41—Completed)*: Institutionalized regular training for teachers and principals on neutrality, human rights, and humanitarian principles, including dedicated training for 300 TVET teachers and staff in Syria in Q1 and Q2 2026.^[213]
- *Gender Parity in Educational Leadership (Rec. 37—Completed)*: Continued implementing the Gender Strategy, Gender Parity Action Plan, and Gender Parity Portfolio following closure of the recommendation, with women holding 56% of leadership positions within the Education Programme by Q2 2026.^[214]

208. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf; Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

209. Id.

210. Id.

211. Id.

212. Id.

213. Id.

214. Id.

- *Digital Learning Platform & ICT Expansion (Rec. 40—In Progress)*: Continued enhancing the Digital Learning Platform and expanding ICT infrastructure across schools and vocational training centres to centralize educational resources and support education during emergencies, including the production of self-learning materials for Grade 1 students in Gaza.^[215]

► Analysis

UNRWA's reported progress under Category 6 largely measures the creation or completion of administrative processes—textbook reviews, reporting channels, classroom inspections, teacher training, and digital tools—rather than whether the underlying neutrality problems in its education system have been resolved. Most importantly, UNRWA has not demonstrated that educational content inconsistent with UN values has actually been eliminated from its classrooms.

► 1. Reviewing Problematic Textbooks Does Not Remove Problematic Content (Recommendations 34 and 35)

UNRWA closed Recommendation 34 after determining that it had completed all actions “within its control,” principally by systematically reviewing host-country textbooks against UN values and UNESCO standards and establishing mechanisms to share its findings with relevant authorities upon request.^[216] Yet Recommendation 34 called for reviewing “all textbooks and supplements with host countries, Israel and the Palestinian Authority,” not merely conducting an internal review and sharing findings upon request.^[217] Nor does reviewing textbooks remove the problematic content identified. UNRWA continues to use host-country curricula, while acknowledging that additional UNRWA-owned materials aligned with UN values and UNESCO standards would require substantial resources and have therefore been deferred.

This is particularly important because Recommendation 35 requires UNRWA to ban hate speech, incitement to violence, and antisemitic references from educational materials and directs it, “[i]n

215. Id.

216. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025–December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf

217. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

218. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

content in classrooms.^[219] Yet, the education watchdog, IMPACT-se, found that the 2025–2026 PA curriculum used in UNRWA schools in Gaza and the West Bank continued to contain material promoting jihad, glorifying violence and terrorism, and conveying antisemitic narratives.^[220]

IMPACT-se identifies, among other examples, a Grade 5 Arabic lesson presenting militant figures as heroic role models and referring to Dalal Mughrabi, perpetrator of the 1978 Coastal Road massacre in which 38 Israelis, including 13 children, were killed. A Grade 9 Islamic Education lesson presents violent jihad against non-Muslims as religiously mandated and potentially applicable beyond its historical context, while a Grade 8 chapter teaches the concepts of the mujahid and martyr and presents jihad and death in battle positively.^[221]

Recommendation 34 also cannot readily be treated as a completed task because host-country curricula continue to change. IMPACT-se reports that the PA, Jordan, and Syria introduced new or revised materials after UNRWA's initial reviews, with no publicly available evidence that UNRWA subsequently reviewed all of them.^[222] Institutionalizing a review mechanism does not make the task complete where the curricula continue to change and newly introduced materials require ongoing review.

► 2. UNRWA's "Completion" Methodology Measures Administrative Milestones, Not Substantive Implementation (Recommendations 38, 39 and 41)

UNRWA's education completion claims must be understood in light of the "Minimum Viable Product" (MVP) methodology introduced in June 2025.^[223] Under this approach, a recommendation may be classified as completed once its "core functional objective" has been achieved, even where further measures remain necessary for full institutionalization. Following its introduction, UNRWA's overall number of completed Colonna recommendations increased from five in April 2025 to 20 by June.^[224]

219. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

220. Analyzing UNRWA's Response to the UN Independent Review (Colonna Report), IMPACT-se (July 2026), <https://impact-se.org/wp-content/uploads/2026/07/Analyzing-UNRWAs-Response-Impact-1.pdf>, archive: <https://archive.ph/OvwBI>; see also Review of the 2025-2026 Palestinian Authority School Curriculum Grades 1-12 Selected Examples, IMPACT-se (November 2025), <https://www.impact-se.org/wp-content/uploads/Review-of-the-2025-2026-Palestinian-Authority-School-Curriculum-v2.pdf>, archive: <https://archive.ph/Qltso>.

221. Id.

222. Analyzing UNRWA's Response to the UN Independent Review (Colonna Report), IMPACT-se (July 2026), <https://impact-se.org/wp-content/uploads/2026/07/Analyzing-UNRWAs-Response-Impact-1.pdf>, archive: <https://web.archive.org/web/20260709162304/https://impact-se.org/wp-content/uploads/2026/07/Analyzing-UNRWAs-Response-Impact-1.pdf>.

223. One Year On: Implementing the Colonna Report at UNRWA: Annual Report June 2024-June 2025, UNRWA (August 5, 2025), https://www.unrwa.org/sites/default/files/content/resources/ist_082025_annualreport_final.pdf, archive link: https://unwatch.org/wp-content/uploads/ist_082025_annualreport_final.pdf.

224. See also UNRWA Implementation of Colonna Report April 2025, UNRWA (April 23, 2025), https://www.unrwa.org/sites/default/files/content/resources/ist_05_2025_quarterlyreport.pdf, archive link: https://unwatch.org/wp-content/uploads/ist_05_2025_quarterlyreport.pdf; Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf.

Category 6 illustrates the problem. UNRWA closed Recommendation 38 after establishing a hotline for reporting problematic teaching content, Recommendation 39 after institutionalizing randomized classroom inspections, and Recommendation 41 after establishing regular neutrality and humanitarian principles training for teachers and principals.^[225] These may be useful oversight mechanisms, but UNRWA provides little information on their results, including serious neutrality violations detected, corrective action taken, or measurable improvements in classroom neutrality.

This concern is particularly significant given the composition of the education workforce itself. UN Watch has documented senior UNRWA educators—including school principals and other education officials—with Hamas affiliations or military roles.^[226] The effectiveness of internal reporting and classroom oversight ultimately depends on the neutrality of the personnel implementing and responding to these mechanisms.

UNRWA's own funding estimates further illustrate the gap between technical “completion” and implementation. IMPACT-se reports that UNRWA sought approximately \$800,000 for Recommendation 38 and \$23 million for Recommendation 41, yet subsequently classified both as completed.^[227] Recommendations can therefore be closed under the MVP methodology while substantial resources remain necessary to operationalize or institutionalize the underlying reforms.

UNRWA's reliance on teacher training also warrants caution. Its Critical Thinking Approach, intended to help teachers address problematic content in host-country textbooks, predated Colonna and was already operating when the Review identified continuing educational-neutrality concerns. Expanding a methodology already in place when those deficiencies were identified does not demonstrate its effectiveness in correcting them.^[228]

► 3. Digitalization Does Not Equal Transparency or Curriculum Reform (Recommendation 40)

UNRWA presents expansion of its Digital Learning Platform (DLP) as a means of centralizing educational resources, increasing transparency, and supporting education during emergencies. Although Recommendation 40 specifically links continued digitalization to increased transparency, expanding digital access does not establish transparency over the curriculum actually taught in UNRWA classrooms.

225. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf.

226. Schools in the Grip of Terror: How UNRWA Allowed Hamas Chiefs to Control its Education System, UN Watch (September 2025), <https://unwatch.org/wp-content/uploads/2025/09/Schools-in-the-Grip-of-Terror-UNRWA-Report.pdf>.

227. Analyzing UNRWA's Response to the UN Independent Review (Colonna Report), IMPACT-se (July 2026), <https://impact-se.org/wp-content/uploads/2026/07/Analyzing-UNRWAs-Response-Impact-1.pdf>, archive: <https://web.archive.org/web/20260709162304/https://impact-se.org/wp-content/uploads/2026/07/Analyzing-UNRWAs-Response-Impact-1.pdf>.

228. Id.

IMPACT-se reports that the DLP functions primarily as an emergency remote-learning tool, while students continue to rely on hard-copy PA textbooks. It also found that key subjects, including Islamic education and social studies, were unavailable on the platform.^[229] Even a fully functioning DLP therefore would not provide transparency over the full curriculum taught to students.

This limitation is significant because IMPACT-se's separate review of 290 textbooks and 71 teacher guides in the 2025–2026 PA curriculum found problematic content across numerous subjects.^[230] Expanding digital infrastructure and making selected materials available online does not establish that such content has been removed from the underlying curriculum or that material taught in UNRWA classrooms conforms to UN standards.

► 4. Engagement with UNESCO Is Not Evidence of Compliance with UNESCO Standards (Recommendation 36)

UNRWA cites its continuing engagement with UNESCO under the 2023 Recommendation on Education for Peace, Human Rights, and Sustainable Development as evidence of progress under Recommendation 36.^[231] But Recommendation 36 does not merely call for engagement with UNESCO; it requires a yearly review of all textbooks and supplements used in UNRWA schools together with UNESCO.^[232] UNRWA's progress reports describe continuing engagement and dialogue on textbook review methodologies, but do not report completion of such a yearly joint review.

The relevant question is whether the educational content received by students actually conforms to UN standards. IMPACT-se's 2025–2026 curriculum review found that antisemitic narratives, glorification of terrorism, incitement to violence, and other problematic material remained in textbooks used in UNRWA schools despite UNRWA's engagement with UNESCO.^[233]

UNRWA should therefore be assessed on substantive alignment with UNESCO standards, not the existence of a dialogue about those standards.

229. Analyzing UNRWA's Response to the UN Independent Review (Colonna Report), IMPACT-se (July 2026), <https://impact-se.org/wp-content/uploads/2026/07/Analyzing-UNRWAs-Response-Impact-1.pdf>, archive: <https://archive.ph/OvwBI>.

230. Review of the 2025-2026 Palestinian Authority School Curriculum Grades 1-12 Selected Examples, IMPACT-se (November 2025), <https://www.impact-se.org/wp-content/uploads/Review-of-the-2025-2026-Palestinian-Authority-School-Curriculum-v2.pdf>, archive: <https://web.archive.org/web/20260831081346/https://www.impact-se.org/wp-content/uploads/Review-of-the-2025-2026-Palestinian-Authority-School-Curriculum-v2.pdf>; see also Review of the 2025-2026 Palestinian Authority School Curriculum Grades 1-12 Selected Examples, IMPACT-se (November 2025), <https://www.impact-se.org/wp-content/uploads/Review-of-the-2025-2026-Palestinian-Authority-School-Curriculum-v2.pdf>, archive: <https://archive.ph/QItso>.

231. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

232. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

233. Review of the 2025-2026 Palestinian Authority School Curriculum Grades 1-12 Selected Examples, IMPACT-se (November 2025), <https://www.impact-se.org/wp-content/uploads/Review-of-the-2025-2026-Palestinian-Authority-School-Curriculum-v2.pdf>, archive: <https://archive.ph/QItso>.

► 5. Gender Parity Does Not Measure Education Neutrality (Recommendation 37)

UNRWA also counts Recommendation 37, concerning women's representation in educational management, among the five completed recommendations underlying its 63% Category 6 completion rate. UNRWA subsequently reported that women held 56% of leadership positions within its Education Programme by Q2 2026.^[234]

Increasing women's representation in educational leadership may be a legitimate institutional objective, but it does not demonstrate progress on the neutrality problems at the center of Category 6, such as problematic textbooks, teacher conduct, classroom incitement, or Hamas influence within the education workforce.

Its inclusion also highlights a broader weakness in UNRWA's 63% completion figure, which gives equivalent numerical weight to fundamentally different measures: achieving gender representation targets, establishing a reporting hotline, reviewing textbooks, conducting classroom inspections, and training teachers. The percentage measures completion of prescribed actions, not substantive neutrality in UNRWA's education system.

234. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

CATEGORY 7: NEUTRALITY OF UNIONS

► UNRWA's Claimed Progress

Across its progress reports from late 2025 through Q2 2026, UNRWA moved from reporting no completed recommendations under Category 7 to declaring all six closed as of Q1 2026—five as completed and one as unimplementable.^[235] UNRWA's reported reforms address staff union governance, representativity, neutrality vetting, and pay-setting.

On union governance, UNRWA commissioned an independent review and drafted a revised Area Staff Union Statute intended to align union structures with broader UN standards.^[236] The draft was transmitted to union leadership, after which UNRWA closed Recommendations 42 and 47 despite acknowledging that adoption rests with the unions.^[237] UNRWA likewise closed Recommendations 44 and 45 after developing a costed plan for periodic and post-election vetting of union representatives, although implementation remains contingent on future funding.^[238]

UNRWA closed Recommendation 43 after measures to promote women's participation in staff representation, including a gender analysis and capacity-building program.^[239] Recommendation 46, which called for outsourcing pay-setting functions to an independent entity such as the International Civil Service Commission (ICSC) or International Labour Organization (ILO), was closed as “unimplementable” after UNRWA reported unsuccessful outreach to UN system bodies and private consultancies.^[240]

235. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

236. Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf; Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

237. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

238. Id.

239. Id. See also Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

240. Id.

SPECIFIC TECHNICAL ACTIONS AND REFORMS

- *Staff Union Statute Review and Revision (Rec. 42—Completed)*: Hired an independent expert consultant in November 2025 to conduct a comparative review of UN system union statutes and developed a revised Area Staff Union Statute featuring one-year term limits, gender quotas, reduced union membership size, and streamlined governance structures. ^[241] UNRWA classifies Recommendation 42 as completed.
- *Statute Transmission to Union Leadership (Rec. 42 & 47—Completed)*: Transmitted the final draft of the revised Staff Union Statute to the Chair of the Inter-Staff Union Conference (ISUC) for consideration and review by union members. ^[242] UNRWA classifies Recommendations 42 and 47 completed.
- *Women's Participation in Staff Representation (Rec. 43—Completed)*: Expanded the Women's Advisory Forum's activities to increase women's participation in staff representation, including completion of the Rapid Gender Analysis on Power and Participation and implementation of a five-phase capacity-building and coaching program. ^[243] UNRWA classified Recommendation 43 as completed in Q4 2025.
- *Formulation of Vetting Plans (Rec. 44 & 45—Completed)*: Created a costed plan for periodic and post-election neutrality vetting of staff union representatives based on lessons from the commercial vetting pilot. ^[244] UNRWA classifies Recommendations 44 and 45 as completed.

241. Id.

242. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

243. Id. See also Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025-December 2025, UNRWA (February 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf; Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

244. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

- *Outreach on Pay-Setting and Closure of Recommendation 46:* Conducted outreach to the IICSC, ILO, UN Secretariat (OneHR), and regional and international private-sector consultancies regarding outsourcing salary-setting functions, before closing Recommendation 46 as “unimplementable” after concluding that no UN system or private-sector entity approached was able or willing to assume these functions.^[245]

► Analysis

UNRWA reports all six recommendations in Category 7 as closed. Yet its own progress reports show that several of the structural reforms prescribed by Colonna have not actually been implemented. The 6/6 closure figure therefore misrepresents the true picture.

Colonna had identified staff unions as a significant neutrality risk, citing “long-standing concerns over politicization and interlinkages with Palestinian political factions,” politicized union elections, and resistance to disciplinary actions “including on neutrality.” The Independent Review concluded that “an urgent modernization of the union statute and operational structures is needed.”^[246] Yet events after UNRWA declared Category 7 fully closed—including the Gaza Staff Union’s mobilization against the June 2026 dismissal of 70 employees following allegations of links to armed organizations—show that the structural problems identified by Colonna remain unresolved.^[247]

► 1. Drafting a Revised Statute Does Not Reform the Existing Union Structure (Recommendation 42)

Recommendation 42 called on UNRWA to “Reform the 6 November 1990 Statute of the Union of Area Staff of UNRWA to align it with UN system Staff Union Statutes and Regulations,” particularly regarding union elections.^[248] UNRWA closed the recommendation after commissioning an independent review, preparing a revised statute, and transmitting it to the Inter-Staff Union Conference. The proposed statute reportedly includes gender quotas, one-year

245. Id. See also Q4 Progress Report: Implementing the Colonna Report at UNRWA October 2025–December 2025, UNRWA (February 2, 2026),

https://www.unrwa.org/sites/default/files/content/resources/colonna_q4_2025_progress_report_final.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q4_2025_progress_report_final.pdf.

246. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024),

https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

247. UNRWA Health Department Staff Meeting, Facebook (July 21, 2026),

<https://www.facebook.com/groups/Employee.un/permalink/37297901746460712>, archive link: <https://archive.ph/udKyC>.

248. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024),

https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

term limits, reduced union membership, and other governance reforms.^[249]

But the revised statute has not been adopted. As of Q2 2026, UNRWA continued to state that responsibility for “considering and formally adopting” it rests with the staff unions.^[250] The 1990 statute identified by Colonna as requiring modernization therefore remains in place.

This is particularly significant given Colonna’s findings that union elections were politicized, Palestinian political forces could use the unions to pressure UNRWA leadership, and staff unions had resisted disciplinary action, including on neutrality.^[251] UN Watch has also documented senior union officials with Hamas affiliations, including former Gaza Staff Union chairman Suhail al-Hindi and former Lebanon Teachers Union head Fateh Sharif.^[252]

Yet the problem persisted even after UNRWA declared all six Category 7 recommendations closed. Three months later, the Gaza Staff Union mobilized against the dismissal of 70 employees and demanded their reinstatement.^[253] Union secretary Shuwaideh also stated that the union had sought abolition of the provision granting the Commissioner-General broad authority to dismiss employees.^[254]

Against this background, closing Recommendation 42 before adoption of the revised statute treats completion of UNRWA’s preparatory work as implementation of the structural reform that Colonna prescribed.

► 2. Women’s Representation Does Not Address the Underlying Neutrality Problem (Recommendation 43)

Recommendation 43 called for increased women’s representation in staff unions. UNRWA closed the recommendation based on activities through its Women’s Advisory Forum, including a gender analysis and capacity-building initiatives, but its progress reports do not demonstrate a corresponding increase in women actually serving as union representatives. The proposed

249. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

250. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

251. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024), https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

252. Schools in the Grip of Terror: How UNRWA Allowed Hamas Chiefs to Control its Education System, UN Watch (September 2025), <https://unwatch.org/wp-content/uploads/2025/09/Schools-in-the-Grip-of-Terror-UNRWA-Report.pdf>.

253. UNRWA Health Department Staff Meeting, Facebook (July 21, 2026), <https://www.facebook.com/groups/Employee.un/permalink/37297901746460712>, archive link: <https://archive.ph/udKyC>.

254. Shocking messages: UNRWA lays off dozens of employees in Gaza, Al Jazeera (June 22, 2026), <https://www.aljazeera.net/politics/2026/6/22>, archive link: <https://archive.ph/0Dyjp>.

gender quota also remains part of the revised Staff Union Statute, which has not been adopted.^[255]

More fundamentally, increasing women's representation does not address the neutrality concerns that prompted Colonna's staff-union reforms: politicization, links with Palestinian political factions, politicized elections, and resistance to neutrality-related disciplinary action. Even full implementation of Recommendation 43 would therefore say little about whether those underlying problems have been addressed.

► 3. A Funding-Dependent Vetting Plan Is Not Neutrality Vetting (Recommendations 44–45)

Recommendations 44 and 45 directly addressed the neutrality risks identified by Colonna. Recommendation 44 called on UNRWA to request, through an independent entity, “dedicated neutrality vetting for every staff union representative, beginning with the most senior,” while Recommendation 45 required UNRWA vetting procedures when representatives are elected.^[256]

UNRWA nevertheless closed both recommendations in Q1 2026 after developing a costed plan for periodic and post-election vetting, while acknowledging that implementation remains contingent on “sustainable and predictable funding.”^[257] A funding-dependent plan for future vetting does not establish that the neutrality vetting required by Colonna is actually taking place.

The continuing relevance of this requirement is evident in Gaza. As of summer 2026, no new union bureau elections had occurred and Mustafa Al-Ghoul remained in charge. In June, Al-Ghoul acknowledged that UNRWA had described the allegations against the 70 dismissed employees as involving affiliation with Palestinian political factions, specifically Hamas, while demanding that the dismissals be reversed.^[258] Shuwaideh simultaneously held a senior union role and was among those dismissed following allegations of links to armed organizations.^[259] UN Watch had previously identified him in its September 2025 investigation, *Schools in the Grip of Terror*.^[260] These developments underscore why Colonna called for actual independent neutrality vetting of union representatives rather than merely a plan for future vetting.

255. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026–June 2026, UNRWA (August 2, 2026),

https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link:

https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

256. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024),

https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link:

https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

257. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026–March 2026, UNRWA (May 11, 2026),

https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link:

https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

258. Shocking messages: UNRWA lays off dozens of employees in Gaza, Al Jazeera (June 22, 2026),

<https://www.aljazeera.net/politics/2026/6/22>, archive link: <https://archive.ph/0Dyjp>.

259. Id. See also Fired UNRWA Staff Claim Innocence While Praising Hamas Terrorists and Suicide Bombers, UN Watch (June 16, 2026), <https://unwatch.org/fired-unrwa-employees-cry-injustice-but-publicly-support-suicide-bombings-showcase-weapons-and-are-tied-to-hamas/>.

260. *Schools in the Grip of Terror: How UNRWA Allowed Hamas Chiefs to Control its Education System*, UN Watch (September 2025), <https://unwatch.org/wp-content/uploads/2025/09/Schools-in-the-Grip-of-Terror-UNRWA-Report.pdf>.

► 4. “Unimplementable” Does Not Mean Implemented (Recommendation 46)

Recommendation 46 directed UNRWA to “[o]utsource all issues related to the setting of pay and pay-related benefits to an independent entity comparable to the International Civil Service Commission.” Colonna identified the unions’ role in salary negotiations as a source of potential “undue influence” over UNRWA activities, noting repeated strikes and protests over pay, including a nearly 100-day union action in the West Bank in 2023.^[261] Outsourcing pay-setting would remove this source of union leverage from the management-union relationship.

UNRWA did not implement the recommendation. After approaching the ICSC, UN Secretariat, ILO, and private-sector consultancies without finding an entity willing or able to assume the function, UNRWA closed Recommendation 46 in Q1 2026 as “unimplementable.”^[262] The underlying problem therefore remains. UNRWA’s conclusion that a structural reform deemed necessary by Colonna is “unimplementable” also underscores a central weakness of the entire reform project: some of the problems Colonna identified cannot be remedied within UNRWA’s existing structure.

► 5. Category 7 Provides a Real-World Test of UNRWA’s Closure Claims

Category 7 illustrates the weakness of UNRWA’s closure methodology. Recommendation 42 was closed despite the revised statute remaining unadopted; Recommendations 44 and 45 were closed despite implementation of the vetting system remaining funding-dependent; and Recommendation 46 was closed despite being expressly deemed “unimplementable.” In each case, closure is treated as a measure of progress even though the structural reform prescribed by Colonna has not been—or cannot be—implemented.

The underlying union problems nevertheless persisted after closure. Within months, the Gaza union—under unchanged leadership—mobilized against the dismissal of 70 employees following allegations of links to armed organizations, including its own union secretary, and demanded their reinstatement.^[263] The union continued to challenge the dismissals in July, characterizing them as based on allegations and imposed without proper legal procedures, and demanding that UNRWA review the measures taken against employees.^[264] Thus, despite all six recommendations being closed, the staff-union neutrality problems identified by Colonna remain unresolved.

261. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024),

https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

262. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

263. UNRWA Health Department Staff Meeting, Facebook (July 21, 2026), <https://www.facebook.com/groups/Employee.un/permalink/37297901746460712>, archive link: <https://archive.ph/udKyC>.

264. Arab Employees Union in Gaza, Facebook (July 22, 2026), <https://www.facebook.com/groups/Employee.un/permalink/37949440474640166>, archive link: <https://archive.ph/aYwtc>.

CATEGORY 8: ENHANCED COOPERATION

► UNRWA's Claimed Progress

Across its progress reports extending through Q2 2026, UNRWA reports 100% completion in Category 8 (Enhanced Cooperation),^[265] with all three recommendations completed as of Q3 2025.^[266] The Agency's narrative focuses on deepening its integration into the broader UN humanitarian coordination architecture and strengthening its role within inter-agency mechanisms at the country, regional, and global levels. UNRWA also describes an internal cultural shift toward more proactive engagement, joint planning, information-sharing, and collective response.

To support this integration, UNRWA secured a new P-5 Senior Humanitarian Affairs Officer post through the UN Regular Budget to lead strategic engagement with the humanitarian system, with recruitment subsequently reported as underway.^[267] UNRWA cites sustained and systematized participation in UN Country Teams (UNCTs), Humanitarian Country Teams (HCTs), regional emergency preparedness platforms, and sectoral clusters, including education, health, protection, shelter, and water, sanitation and hygiene (WASH).^[268] UNRWA also reports formalizing partnerships with WFP, UNFPA, and IOM, alongside longstanding partnerships with WHO, UNESCO, UNICEF, and other humanitarian actors, and expanding staff training on pooled funding and inter-agency coordination.^[269]

SPECIFIC TECHNICAL ACTIONS AND REFORMS

- *Humanitarian Coordination Capacity (Rec. 49—Completed):* Secured a new P-5 Senior Humanitarian Affairs Officer post through the UN Regular Budget to lead strategic inter-agency engagement, with recruitment subsequently reported as underway; expanded staff training on pooled funding, partnerships, and inter-agency coordination.^[270]

265. Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

266. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf

267. Id.

268. Id.

269. Id.

270. Id.

- *Participation in Coordination Architecture (Rec. 49—Completed)*: Sustained and systematized participation in UNCTs, HCTs, sectoral clusters, and regional emergency preparedness platforms.^[271] UNRWA classifies Recommendation 49 as completed.
- *Internal Cultural Shift (Rec. 50—Completed)*: Reported increased engagement in joint planning, information sharing, collective response and a more proactive institutional approach to the wider humanitarian community.^[272]
- *Inter-Agency Partnerships (Broader Category 8)*: Formalized partnerships with WFP, UNFPA, and IOM, alongside longstanding partnerships with WHO, UNESCO, UNICEF, and other humanitarian actors.^[273]
- *Inter-Agency Standing Committee (IASC) Engagement (Rec. 48—Completed)*: Reported participation in IASC mechanisms.^[274]

► Analysis

UNRWA reports all three recommendations in Category 8 as completed, citing increased participation in humanitarian coordination mechanisms, new partnerships, additional staffing, and an internal “cultural shift.” These measures provide evidence of increased inter-agency engagement, particularly under Recommendation 49. But UNRWA’s 100% completion claim overstates the extent of the reform. Much of the cooperation it cites predates Colonna, while the “cultural shift” required by Recommendation 50 was still described as “underway” when the category was declared complete.^[275]

271. Id.

272. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf.

273. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf.

274. Q1 Progress Report: Implementing the Colonna Report at UNRWA: January 2026-March 2026, UNRWA (May 11, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q1_2026_progressreport_final-30april2026.pdf; archive link: https://unwatch.org/wp-content/uploads/colonna_q1_2026_progressreport_final-30april2026.pdf; Q2 Progress Report: Implementing the Colonna Report at UNRWA: April 2026-June 2026, UNRWA (August 2, 2026), https://www.unrwa.org/sites/default/files/content/resources/colonna_q2_2026_progress_report_final.pdf archive link: https://unwatch.org/wp-content/uploads/colonna_q2_2026_progress_report_final.pdf.

275. Q3 Progress Report: Implementing the Colonna Report at UNRWA July 2025-September 2025, UNRWA (October 20, 2025) https://www.unrwa.org/sites/default/files/content/resources/colonna_q3_progress_report_final_h.pdf, archive link: https://unwatch.org/wp-content/uploads/colonna_q3_progress_report_final_h.pdf.

► 1. Much of UNRWA's Claimed "Enhanced Cooperation" Predates Colonna (Recommendations 49–50)

UNRWA cites expanded partnerships and participation in humanitarian coordination mechanisms as evidence of reform. Yet Colonna itself emphasized that UNRWA already had a "long history of partnerships" before the Independent Review, including decades of embedded WHO expertise, numerous field-level partnerships, and existing cooperation with IOM, WFP, UNICEF, and other humanitarian organizations. The Review described UNRWA as already engaged in a "plethora of cross-agency partnerships."^[276]

UNRWA has taken some new steps that respond more directly to Recommendation 49, including securing a P-5 Senior Humanitarian Affairs Officer post, expanding staff training, and systematizing participation in cluster mechanisms. But longstanding or expanded partnerships are not themselves evidence of implementation of the specific changes prescribed by Colonna, and UNRWA declared the category complete while recruitment for the new P-5 position was still underway.

Israeli restrictions on official interaction with UNRWA and on its operations also constrain inter-agency cooperation where humanitarian activities require access, security coordination, movement of personnel or supplies, or engagement with Israeli authorities. Greater participation in coordination structures does not remove those constraints.

► 2. UNRWA Declared a "Cultural Shift" Complete While Describing It as Still Underway (Recommendation 50)

Recommendation 50 required UNRWA to "drive an internal cultural shift" in redefining its relationship with the wider humanitarian community and its role within the coordination architecture, particularly the clusters.^[277] Yet in the same reporting in which UNRWA declared all three Category 8 recommendations completed, it described this cultural shift as still "underway."^[278] A reform UNRWA itself describes as ongoing cannot simultaneously serve as evidence of completed implementation.

Colonna also documented institutional resistance to such a shift. The Commissioner-General's 2022 partnership initiative was abandoned after host governments and staff associations

276. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024),

https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link:

https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

277. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024),

https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link:

https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

278. One Year On: Implementing the Colonna Report at UNRWA: Annual Report June 2024–June 2025, UNRWA (August 5, 2025),

https://www.unrwa.org/sites/default/files/content/resources/ist_082025_annualreport_final.pdf, archive link:

https://unwatch.org/wp-content/uploads/ist_082025_annualreport_final.pdf.

UNRWA.^[279] At the same time, UN Watch's The Unholy Alliance documented longstanding engagement between senior UNRWA officials and Hamas, PIJ, and other factions, including meetings described in terms of "partnership," "cooperation," and "coordination," and instances in which these groups pressured UNRWA over its decisions.^[280]

Serious neutrality problems also persisted after UNRWA declared the cultural shift complete. In June 2026, USAID OIG reported referrals involving 108 current or former UNRWA employees based on evidence of participation in the October 7 attacks and/or affiliation with Hamas's military wing.^[281] Days later, UNRWA dismissed 70 Gaza employees following a safety and security assessment, while expressly stating that the dismissals were not disciplinary and did not validate the underlying allegations.^[282] The scale of serious neutrality cases identified by an external U.S. oversight body, even after UNRWA declared the cultural shift complete, calls into question what substantive change that claimed shift had produced.

► 3. Enhanced Cooperation Preserves Rather Than Tests UNRWA's "Irreplaceable" Role

Category 8 also illustrates a fundamental limitation of the Colonna reform project. Faced with operational constraints and neutrality concerns at UNRWA, the Review could have examined whether greater responsibility should be transferred to other UN agencies and humanitarian organizations. Instead, Colonna expressly reaffirmed UNRWA's "central and irreplaceable role" and framed enhanced cooperation around preserving it. Recommendation 48 called on other humanitarian organizations to "sustain and scale up support to UNRWA's humanitarian operations in Gaza," while emphasizing that partnerships should operate "in full respect of UNRWA's mandate."^[283]

The resulting model may improve humanitarian coordination, but it assumes UNRWA should remain at the center of the system rather than asking whether its functions could be replaced by other humanitarian actors in light of its repeated neutrality failures.

279. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024),

https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.

280. The Unholy Alliance: UNRWA, Hamas and Islamic Jihad, UN Watch (December 2024), <https://unwatch.org/wp-content/uploads/2025/01/UNW-129-%E2%80%94-The-Unholy-Alliance-%E2%80%94-2025-01-09-%E2%80%94-Web-%E2%80%94-Singles.pdf>.

281. INVESTIGATIVE SUMMARY: USAID Inspector General's Continuing Investigation Leads to Referral of Over 100 Current and Former UNRWA Staff Linked to Hamas for Suspension/Debarment, USAID OIG (June 5, 2026), <https://oig.usaid.gov/node/8155>, archive link: <https://ghostarchive.org/archive/QAAuv>.

282. Statement by the Commissioner-General ad interim of UNRWA, Christian Saunders, UNRWA (June 11, 2026), <https://www.unrwa.org/newsroom/official-statements/statement-commissioner-general-ad-interim-unrwa-christian-saunders>, archive link: www.cdn.unwatch.org/archived-page/Statement%20by%20UNRWA%2C%20Christian%20Saunders.html.

283. Independent Review of Mechanisms and Procedures to Ensure Adherence by UNRWA to the Humanitarian Principle of Neutrality, UN (April 20, 2024),

https://www.unrwa.org/sites/default/files/content/resources/unrwa_independent_review_on_neutrality.pdf, archive link: https://unwatch.org/wp-content/uploads/unrwa_independent_review_on_neutrality.pdf.