SCALING UP IN SYRIA

Opportunities, Potential Pitfalls & Mitigation Measures

Briefing Paper

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A GLOBAL NGO NETWORK FOR PRINCIPLED AND EFFECTIVE HUMANITARIAN ACTION

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About ICVA

Founded in 1962, International Council of Voluntary Agencies (ICVA) is a global network of over 160 non-governmental organisations (NGOs) whose mission is to make humanitarian action more principled and effective by working collectively and independently to influence policy and practice. Historically based in Geneva, ICVA Secretariat has now presence in Africa, Asia, Latin America, and MENA.

ICVA members are humanitarian NGOs, large and small, national, and international, networks and consortiums, secular and faith-based, with an estimated income of over USD 20 billion. Almost half of our members have their HQs in Asia & the Pacific, Africa, Middle East, and Latin America. Through our members we have an outreach of over 8000 organisations. In addition to membership, ICVA has developed strong and diverse partnerships from local to global levels.

The ICVA 2030 Strategy adopted by the ICVA's General Assembly in 2021 sets the framework for the direction and focus of ICVA's work from 2022-2030, as we evolve and transform our network. Rooting us more deeply in our mission of principled and effective humanitarian action, this strategy sets our collective values, our ways of working and our aspirational transformations.

We work on Forced Migration, Humanitarian Coordination and Humanitarian Financing to best serve our members and the sector. Our added value is rooted in our work of explaining and analysing, convening, brokering, influencing & advocating, supporting, and collaborating.

Overview of ICVA's Role in the Syria Response

ICVA plays a pivotal role in strengthening coordination among NGOs in Syria by convening, connecting, and amplifying the voices of organisations working on the ground. ICVA enhances the advocacy efforts of NGO networks by providing tailored support to maximise effective engagement with donors, UN agencies and other key stakeholders, including corporations and foundations.

With its technical expertise, ICVA supports members in areas such as humanitarian coordination, durable solutions, the humanitarian-development-peace nexus, and localisation. By developing tools and sharing critical information, ICVA equips its members to adapt and respond effectively to rapidly evolving contexts.

As a key ally to local Syrian networks, ICVA facilitates connections with **global and regional platforms** and provides support to scale up joint advocacy initiatives. To promote learning, we facilitate conferences and exchanges between Syrian networks and other regional and global contexts, as well as from their counterparts and peer organisations.

ICVA also compiles and shares evidence-based resources that are widely used by our members to inform and strengthen collective advocacy efforts. Notable examples include <u>Adapting</u> <u>Humanitarian Coordination</u>, <u>Localisation in Humanitarian Leadership</u>, <u>Cracks in Coordination</u>, <u>Advancing the Nexus in MENA</u>, and the <u>MENA Localisation report</u>.

Executive Summary

After nearly 14 years of devastating civil war, which forcibly displaced over 12 million people and claimed more than 600,000 lives, ⁱ Syria stands at a pivotal moment of transition following the fall of the Assad regime. This juncture offers hope for recovery and stability, but it also brings complex challenges that require a coordinated, inclusive, and principled humanitarian response.

On 16 December 2024, the IASC Principals endorsed a <u>Systemwide Scale-up</u> to intensify humanitarian efforts, marking the third such activation in Syria's history.ⁱⁱ Central to the effectiveness of both the Scale-up and early recovery is Syria's vibrant civil society, which has demonstrated exceptional resilience, leadership, and operational capacity throughout the conflict. Their inclusion in decision-making and resource allocation is vital for both immediate relief and long-term recovery. Equally vital to success is the active engagement of the international community in fostering the enabling environment for a principled and effective humanitarian response and early recovery.

Drawing from learnings from previous Scale-ups and consultations with ICVA members and NGO networks, this paper identifies opportunities and potential pitfalls to the Scale-up. It also proposes mitigation measures to ensure a principled and effective response and early recovery for Syria.

Opportunities: The Stepping Stones to Stability

1. Advancing Locally Led Action

Syrian civil society has been a cornerstone of humanitarian efforts throughout the conflict. Strengthening local leadership through equitable partnerships will ensure sustainable recovery, foster resilience, and empower Syrian communities. A locally led response is both the ethical approach and the most effective way to ensure a sustainable recovery.

2. Facilitating Dignified & Voluntary Returns and Durable Solutions

As Syrian refugees consider returning home, the international community has an opportunity to achieve both strategic and humanitarian objectives. Investing in tailored recovery and stability interventions in Syria will support the conditions that enable voluntary returns. Until conditions are suitable, the international community must sustain its support to host countries that have been generously hosting millions of Syrians for over a decade.

3. Embedding Early Recovery into the Response

Early recovery must bridge the gap between emergency response and long-term development. By integrating early recovery strategies into all phases of planning and implementation, backed by inclusive and adaptive coordination mechanisms, the international community can support Syria's transition to resilience and stability.

The scale-up must avoid or navigate the following potential pitfalls:

1. Sidelining Syrian Civil Society

A top-down response approach risks marginalising local organisations. To mitigate this, humanitarian leaders must actively consult and include Syrian civil society in strategic planning and coordination mechanisms. Equitable partnerships and transparent processes are key.

2. The Sanctions Trap

Sanctions and overcompliance to sanctions hinder the flow of resources to affected populations, undermining effective and impartial response. Clear donor guidance and a review of sanctions are essential to ensure principled and effective response and early recovery.

3. Rushed Centralisation of Coordination Mechanisms

Hastily centralising coordination may alienate key actors and reduce operational effectiveness. Inclusive consultation, transparent decision-making, and consideration of regional dynamics are needed to adapt mechanisms to Syria's complex humanitarian landscape.

4. Uncoordinated Approaches to Humanitarian Access

Disjointed access negotiations risk undermining collective efforts. Coordinated, principled engagement informed by operational realities is essential to maintain access and ensure that humanitarian needs are met.

5. Insufficient and Inefficient Funding

Underfunding and rigid donor conditions threaten the response's effectiveness. Additional, flexible, and multi-year funding is critical to support locally led action, NGO coordination platforms, and operational needs. Resource reallocations that exacerbate other crises must be avoided. NGOs must collectively advocate to donors for flexible, multi-year, unearmarked, or softly earmarked funding.

6. Capacity-Based (Not Needs-Based) Performance Benchmarking

Performance monitoring is key, however, setting benchmarks that focus on agency performance rather than community needs risks neglecting critical gaps in response. Context-specific, needs-based benchmarks with real-time monitoring will ensure accountability and alignment with the priorities of affected populations.



"The stories we Syrians tell each other have changed completely overnight. The old narratives have been rewritten, even for humanitarians:

Before, we used to say, "We don't want 'Whole of Syria coordination'". Now we ask for 'Whole of Syria coordination.'

We used to say, "No early recovery strategy." It was too closely linked to the Assad regime. But now we say, "Early recovery strategy is vital."

We believe there will be inclusivity. As Syrian's, we're open towards working with each other. This is impressive to see on the ground - Syrians are working with each other. There is no discrimination against the minorities."

Syria Networks League representative



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Annex 1: Overview of NGO Coordination Architecture in Syria

Glossary

CSO	Civil Society Organisation				
DINGOs	Damascus INGOs				
ERC	Emergency Relief Chief				
HC	Humanitarian Coordinator				
НСТ	Humanitarian Country Team				
IAHE	Interagency Humanitarian Evaluation				
IASC	Interagency Standing Committee				
ICVA	International Council of Voluntary Agencies				
INGO	International nongovernmental organisation				
MENA	Middle East and North Africa				
NGO	Nongovernmental organisation				
NNGO	National nongovernmental organisation				
NES	Northeast Syria				
NWS	Northwest Syria				
SIRF	Syria INGO Regional Forum				
SNA	Syrian NGO Alliance				
SNL	Syrian Network League				
UNHCR	United Nations High Commissioner of Refugees				
WoS	Whole of Syria				

Introduction

After nearly 14 years of devastating civil war, during which at least 12 million people were forcibly displaced and 600,000 lost their lives,ⁱⁱⁱ Syria is experiencing a monumental transition following the fall of the Assad regime.

Throughout this brutal conflict, Syrian NGOs and CBOs, INGOs, and NGO networks and Fora, have demonstrated extraordinary leadership, courage, and expertise. Operating amid active conflict, including direct attacks and widespread human rights abuses, they have worked tirelessly to save lives, reduce suffering, and promote dignity.



"This historic moment signals the dawn of a new era rooted in citizenship, justice, and collective efforts to build a nation where justice and equality prevail."

<u>Statement from The White Helmets</u> to the Syrian People on the Collapse of the Regime



Civil society, in particular local CSOs, have shown remarkable commitment to co-leading and engaging in coordination structures amid the war. Local agencies have worked collaboratively with each other, as well as with UN agencies and INGOs, to address humanitarian needs both within and outside Syria. It is vital that they receive even greater support to continue driving the response, recovery, and rebuilding efforts in their country.

There is also **significant NGO Coordination capacity**, from local Syrian networks to the Syria INGO Regional Forum (SIRF), which links the NGO coordination platforms across Syria. These include the <u>Northeast Syria NGO Forum</u> in Hasakah, the Northwest NGO Forum in Gaziantep, the <u>Syrian NGO</u> <u>Alliance (SNA)</u>, the <u>Syrian Network League (SNL)</u> and the Damascus INGOs (DINGOs).

On 16 December, the IASC Principals endorsed a <u>System-wide Scale-up</u> – the third since the conflict began - to intensify humanitarian efforts for the people of Syria. System-wide scale-ups can mobilise critical financial and technical resources, <u>empower humanitarian leadership</u> and ensure <u>key procedures</u> are established. However, Inter-Agency Humanitarian Evaluations (IAHEs) underscore that recent Scale-ups faced substantial challenges, including a lack of agile and adaptive coordination, inadequate progress tracking, funding shortfalls and difficulties in timely deactivation. A persistent lack of financing and limited power shifts to local NGOs exacerbated these challenges and hindered their ability to contribute fully to the response.

To maximise the effectiveness of the third Syria Scale-up, it is imperative that humanitarian leaders systematically incorporate lessons learned from previous responses. This includes ensuring the inclusion and resourcing of Syrian civil society and INGOs in both the operational response and strategic decision-making. Equally vital to the success of the Syrian response is the active engagement of the international community in fostering the enabling environment for a principled and effective humanitarian response and early recovery.

This briefing paper outlines the opportunities for ensuring both a successful scale-up and effective early recovery. Its findings are based on consultations with Syrian civil society, ICVA members and NGO coordination platforms, research and public and private written contributions from members and partners. The paper also reflects on the potential pitfalls the scale-up might face and suggests mitigation measures.

Critical Humanitarian Issues

Displacement

Syria's civil war created one of the largest displacement crises of our times. As of 2024, more than 7 million^{iv} people have been internally displaced, and 5 million^v people have sought international protection. Since hostilities escalated on 27 November, an additional 1.1 million people^{vi} have been displaced by 11 December due to insecurity.

While the fall of the previous regime reduces the political risk of returning home, people returning might currently face immense risks and uncertainty. ICVA members have also raised concerns for minorities and for the thousands earlier forcibly displaced from Lebanon into Syria.

Several European governments¹ paused asylum decisions for Syrians^{vii} within days of the fall of Assad regime. UNHCR^{viii} does not consider that the requirements for cessation of refugee status for

people fleeing Syria have currently been met. UNHCR^{ix} continues to underline that those seeking protection can apply for asylum and their applications are timely and duly considered.

Humanitarian needs

At least 16 million people in Syria – 80% of the population – needed assistance before December 2024.[×] These numbers continue to rise. The lack of electricity and communications, widespread damage to civilian infrastructure and rapid increases in basic commodities costs due to supply shortages, are eroding coping and recovery strategies for affected people. They also make the operating environment deeply challenging for scaling up the response.

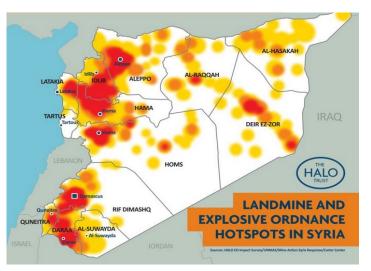


Figure 1 - Landmine and explosive ordnance hotspots in Syria (December 2024) <u>Source: The Halo Trust</u>

Continued insecurity

Despite feelings of excitement and hope, there are active military operations and ongoing conflict in multiple areas of the country. As ICVA's member International Blue Crescent notes, ongoing hostilities in some areas are hindering population and aid movements.^{xi} Humanitarians have underscored that de-escalation is urgently needed in both the South and the Northeast to reduce the violence and enable recovery. Additionally, the presence of explosive ordinance as outlined in Figure 1, puts thousands of civilians at major risk of life-changing injuries and death.

Protection issues, missing people, and detainees

An estimated 15.3 million people in Syria need protection assistance, ^{xii} with critical issues including gender-based violence, family separations, and child abuse. Additionally, targeted killings, arbitrary detentions, torture, and enforced disappearances particularly in areas previously under Assad's control were widespread. Some 157,000 people were arbitrarily detained, abducted or forcibly disappeared during the



"Amidst the sheer scale of issues facing Syria, a priority focus on disappeared persons may seem incongruent, yet it is essential to individual and family healing...and the foundation for a new Syria."

Leen Fouad, ODI Global



civil war.^{xiii} While thousands of political prisoners have now been released, at least 100,000 people are still missing.^{xiv} Detainees have suffered torture and deprivation. ICVA members have flagged that former detainees have been left without support. The disappearances and detentions, must be addressed to support healing and a sustainable transition.^{xv}

During the war, many marriages, divorces, birth and deaths were not registered. This lack of documentation undermines people's ability to access their inheritance and property, and ensure their children are legally recognised. This perpetuates cycles of vulnerability and exclusion.^{xvi}

¹ United Kingdom, the Netherlands, Germany, Austria, Norway, Sweden, Finland, Denmark, France, Belgium, and Italy (as of 13 December 2024).

Stepping Stones to Stability

ICVA's consultations with national and international NGOs and NGO coordination platforms have highlighted the following opportunities and concerns for the international community to consider while responding to the rapidly evolving context in Syria.

1: Advancing locally led action: To shift power and stand with the people of Syria and local Syrian CSOs

"This is the time for localisation." Syrian voices.

For more than a decade, Syrian civil society has played a critical role in driving the humanitarian response. Its contributions to life-saving aid, meaningful partnership with international actors, joint advocacy, protection and women's empowerment, and local governance underscore its indispensable role in Syria's future.^{xvii}

This is an opportunity for the international community to stand with those who have persevered against extraordinary challenges. Supporting local leadership through innovative and equitable partnerships is not just the right thing to do – it is also the most effective way to rebuild the country. Syrian civil voices must guide the strategies, decisions and support provided by the international community, shaping the path toward a brighter future. Their leadership will be increasingly vital in addressing the challenges ahead and fostering resilience and inclusion during this critical time.

There is substantial existing NGO capacity, both in terms of operational response and coordination: Local NGOs, civil society organisations, and INGOs - whose staff are predominantly nationals - have been the backbone and frontline of the Syrian humanitarian response. Throughout years of conflict and crises, including COVID-19, they have consistently demonstrated commendable leadership, agility, and deep contextual expertise that international actors cannot replicate alone. Their intimate understanding of local dynamics, community networks, and community needs, positions them not just as responders, but as genuine architects of community resilience and recovery.

Syria INGO Regional Forum (SIRF)	North- east Syria (NES) Forum	Syrian NGO Alliance (SNA)	Syrian Networks League (SNL)	Damascus INGOs (DINGOs)	Northwest NGO Fora	Partnership Coordination Group	Syrian Women Network (Shams)	Elaf
70 NNGOs & INGOs	25 INGOs	23 Syrian NGOs	185 Syrian CSOs	33 INGOs	100 NNGOs & INGOs	Mixed NGO forum	5 CBOs	14 CBOs

Table 1: Overview of NGO coordination platforms and members

The strength and scale of NGO-led coordination, summarised in Table 1, is also noteworthy.² Over the years, NGOs have developed a strong capacity for coordinated action, particularly in the northwest and northeast of Syria, where many local organisations have been active without a presence in Damascus.^{xviii}

NGO-led coordination platforms are already reviewing operations and coordination structures to reach people in areas that were previously inaccessible. SIRF in collaboration with 27 partners including REACH, NGOs and NGO Coordination platforms, conducted a joint needs assessment covering 1,018 communities.³

² See **Annex 1** for more details

³ See for example <u>REACH (Dec 2024) Northwest Syria_Factsheet_Dec_2024</u>; MdM (Dec 2024) <u>Rapid Need</u> <u>Assessment: Intentions of IDPs in Northwest Syria to Return to Their Hometowns</u>

The new possibility for organisations working in NES and NWS to establish offices in former government-controlled areas is expected to enhance coordination and response efficacy, making localisation an even more relevant factor to consider. In this changing context, existing coordination mechanism must be adapted to meaningfully include all actors in all governorates and cities to ensure their priorities and concerns are represented at the highest levels.

By funding and supporting Syrian civil society - including through pooled fund mechanisms donors have a unique opportunity both to improve response effectiveness and to fundamentally reshape humanitarian assistance paradigms. This is about more than providing aid; it is about recognising local agency, respecting local knowledge, promoting dignity, and creating sustainable pathways for community-led recovery rooted in Syrian expertise and leadership.

While the challenges ahead are immense and the future remains uncertain, the demonstrated agility and leadership of Syrian civil society is a major strength that must be reinforced by the international community. Syrian civil society must be central to this new phase of humanitarian response and early recovery efforts.

2: Facilitating dignified voluntary returns and durable solutions

"We should not be rushing people to go back. But people are rushing to get back," Syrian voices.

"We are waiting to hear from others about the situation in the country before deciding on next steps." Syrian Voices

In view of the many challenges facing Syria's population, including a large- scale humanitarian crisis, continued high levels of displacement, and widespread destruction and damage of homes and critical infrastructure...UNHCR is not promoting large-scale voluntary repatriation to Syria." UNHCR

The dynamics and perspectives surrounding the return of Syrian refugees are diverse and complex. Many refugees are eager to return to their homes, with 125,000 already crossing borders to begin rebuilding their lives.^{xx} UNHCR projects that a million refugees will return soon.^{xxi} However, others remain cautious or have established new lives outside of Syria, including an entire generation of Syrians who may never have been to Syria.

A recent NGO assessment of the intentions of internally displaced people in Northwest Syria to return to their hometowns also highlights the complexity faced by those even within the country. Nearly half (41%) of the community surveyed prefer to wait for full stability before returning, while 38% have no immediate intention of returning, reflecting significant uncertainty. A gradual return is anticipated by 18%, and only 3% plan to return immediately.^{xxii}

People have the right to return when they choose to do so, even if the conditions are not in place. However, hosting states should not equate the fall of the Assad government with the realisation of the necessary conditions for refugee returns.

People returning face significant challenges, including ongoing violence, political instability, damaged infrastructure, limited economic opportunities and high rates of poverty, and restricted access to essential services including healthcare and education. This will create competition for limited resources. The potential for disputes over housing, land and property (HLP) rights is high. Political factors, including those related to asylum policies of refugee hosting countries, anti-refugee rhetoric, or reduced funding to the regional refugee response plan, could add pressure for Syrians to return before they might be able to in a safe and dignified way.

Policies or environments that force refugees to return too soon risk undermining the success of their transition, eroding coping strategies, and threatening regional stability.^{xxiii} States must also ensure respect for the <u>principle of non-refoulement</u>.

Facilitating voluntary, dignified, and sustainable returns presents an opportunity for hosting countries to achieve both strategic and humanitarian objectives. Investing in tailored recovery and stability interventions in Syria that address the needs of the population and refugees will support the conditions that enable voluntary returns. Until conditions are suitable, the international community must sustain its support to host countries that have been generously hosting millions of Syrians for over a decade.

Once conditions permit, hosting countries could facilitate 'go and see' visits that allow refugees to visit their country of origin without losing their status, to assess the situation for themselves and make an informed decision on return. To ensure that protection safeguards are in place, host countries should coordinate with UNHCR, otherwise refugees may end up being placed at risk. It is essential that refugees receive up to date and reliable information on their country or region of origin to inform their decision making.

Durable solutions such as resettlement and local integration also remain important. The international community must champion and finance practical, dignified voluntary return and related policies that support sustainable reintegration for people returning and strengthen host communities.

Continued and increased funding for the <u>Regional Refugee and Resilience Plan (3RP</u>) should also be provided.

By supporting durable solutions and the conditions for voluntary returns, host countries can reinforce their international credibility, promote lasting peace and stability in Syria and the region, and meet their humanitarian obligations.

3. Embedding early recovery into the response

"We are grateful to donors and INGO partners who have stood by our side. Syrians are now ready to build Syria again: as a united Syria."

Over the past years, both national and international NGOs have repeatedly highlighted the need for a forward-thinking response that supports communities not just to survive, but to advance. As the dynamics in the country shift, this goal is more achievable, although caution is required.

This moment offers an opportunity to reexamine and integrate early recovery into the Syria response. Early recovery interventions foster long-term resilience. However, successful early recovery efforts require more than reconstructing physical infrastructure and providing access to services. There is also a need to support large-scale interventions in psychosocial care, gender, justice, and social cohesion to address the root causes of division and promote healing within the entire Syrian community.

For early recovery efforts to succeed, donors and development actors must prioritise coherence, collaboration, and the active engagement of Syrian civil society. Achieving this will require concerted and sustained efforts. Previous processes have been criticised by local agencies for their lack of inclusion and transparency in decision-making and strategic planning.^{xxiv}

Potential Pitfalls and Mitigation Measures

Recognising the increase in humanitarian needs and new opportunities for improving coverage of pre-existing humanitarian needs, the <u>IASC Principals</u> endorsed a System-wide Scale-up within days of the fall of Assad's regime. The scale-up aims to streamline internal emergency procedures and mobilise operational capacities to address the scale, complexity, and urgency of this crisis, in coordination with national and local partners.

evaluations, they also face several critical challenges. Furthermore, some NGOs have raised concerns about the

by the IASC Scale-up Learning Paper^{xxv} and recent IAHE's for Ethiopia and Afghanistan scale-up

System-wide Scale-ups can boost operational capacity and resources, however, as documented

purpose of the systemwide scale-up in Syria. It is important that leaders hear these concerns, and the lessons learned from previous scale-ups are applied. As the former Emergency Relief Chief (ERC) noted in the wake of the 2023 earthquake, Syrians have been let down by the international community before. XXVI These failures must not be repeated.

Potential Pitfall 1: Sidelining Syrian civil society

System-wide Scale-ups demand decisive action and grant

Humanitarian Coordinators (HCs) the authority to override the Humanitarian Country Team (HCT) if consensus cannot be reached. While this mechanism is designed to expedite decision-making in crisis contexts, it is crucial to recognise that Syria's situation is not a new emergency. Instead, it is the latest phase of over a decade of humanitarian response, during which extensive local capacity, knowledge and expertise have been cultivated.

While the humanitarian imperative to act swiftly is clear, a top-down approach risks sidelining Syrian civil society and undermining the hard-earned capacity and expertise of NGOs and CSOs.

To ensure a principled and effective response, response leaders must prioritise consulting, financing, and reinforcing civil society. This inclusive approach will help ensure that the needs of crisis-affected people are addressed in line with their priorities. It will also promote meaningful NGO and CSO engagement in coordination mechanisms.

The risk of sidelining Syrian civil society is substantial. Experience has repeatedly demonstrated that internationally led responses, including Scale-Ups, often exclude or marginalise the voices, needs, and priorities of local actors and affected populations.^{xxvii} As recognised by a recent IASC review, this risk is embedded into the Scale-Up protocols themselves: *"The protocols themselves make no specific mention of localisation, other than a recognition that local capacity might be lacking ... the System-Wide Scale-Up is a UN-centric mechanism that delivers additional operational capacity largely through UN agencies, in a top-down fashion."*

Furthermore, given the number of major emergencies and global funding cuts, it is also possible that this scale-up will also be impacted by "short surge deployments" and "a lag in building deep field-level capacity."^{xxix} This makes investment in local leadership an even more pressing issue.

Prior to the latest Scale-up, the poor engagement of Syrian voices was already recognised as a longstanding issue. Participants in the recent ICVA supported "Hear our Voices" Conference,^{xxx} highlighted that Syrian CSOs are excluded in multiple ways, including:

- **Tokenistic Consultations:** Civil society is often consulted only after key agendas are set, leaving little room for meaningful input.
- Limited Access to Decision-Makers: Syrian CSOs face challenges in accessing donor conferences, high-level meetings, and strategic planning discussions.
- **Exclusion of Marginalised Groups:** Significant gaps persist in the inclusion of women, youth, and persons with disabilities in decision-making processes related to funding and future response strategies.

"We have so far failed the people in northwest Syria. They rightly feel abandoned. Looking for international help that hasn't arrived. My duty and our obligation is to correct this failure as fast as we can."

> Martin Griffiths, Former ERC Social media post after the 2023 earthquake



"International humanitarians rely on local actors to deliver aid, but they do not localize by shifting authority over response to local actors...Impressive participation of Syrians in aid delivery was not matched by shifts in authority."



Khoury & Scott, 2024

• **Predefined Projects by UN Agencies:** UN agencies often design projects with limited input from local NGOs, leading to reduced accountability to affected populations and critical funding gaps for local organisations.

While efforts are being made to address this, these must be sustained and widened. Supporting the meaningful participation of local actors - particularly in the northeast and the former government-controlled areas - must be a priority. It is equally important to recognise the diversity within Syrian civil society and ensure that platforms facilitate both dialogue and representation.

Embedding Syrian voices at the heart of the humanitarian response will not only create a more principled and sustainable approach but also demonstrate genuine solidarity with the people of Syria. Strengthening locally led responses reinforces the capacity of Syrian civil society to lead and sustain humanitarian and recovery efforts while fostering greater alignment with the needs and priorities of affected communities.

Mitigation Measures

Humanitarian agencies should:

• Conduct frequent consultations and proactively listen to the people of Syria and adapt interventions to ensure their needs are met in line with their priorities. Clear expectations must be set, and information should be provided in local language and culturally relevant terms to ensure transparency and inclusivity.⁴ "Local NGOs are often excluded from donor meetings, limiting their influence. A cycle exists where local NGOs grow but are then seen as less relevant to grassroots needs, perpetuating their exclusion."

> Participants at Syria Hear Our Voices Conference 2024

 Prioritise deploying and employing Syrian nationals at all levels of the response. When surge capacity is necessary, expatriates should be paired with local staff to facilitate skills transfer and foster a sustainable and contextualised response.

Donors, the UN, and INGOs should:

- Enhance their engagement with Syrian civil society in strategy development, needs assessments and early recovery planning. This engagement must extend to women's organisations, people with disabilities, and other marginalised groups to ensure that diverse perspectives are included.
- Prioritise the inputs of organisations most closely connected to local populations, leveraging their knowledge and relationships to ensure a more effective and contextually appropriate response, rather than concentrating funding through a limited number of organisations.

Potential Pitfall 2: The sanctions trap

Syria and several Syrian groups, including Hayat Tahrir al-Sham (HTS) are on the UN sanctions list and also unilaterally designated by the <u>EU</u>, the <u>US</u>, the <u>UK</u>, Russia, and others.^{xxxi} These wide-ranging measures prevent bilateral assistance and technical support, ^{xxxii} the importation of goods and transfer of financial capital, among other issues. The sanctions have the following adverse impacts:

- **Restricted Scale-up:** The lack of access to international banking or legal money transfer systems to Syria is impeding effective response, as it is difficult to transfer the cash needed to scale-up.
- **Unmet Needs:** While the US has granted humanitarian exemptions, the general lack of clarity from donors on the application of sanctions can result in over-compliance due to fears of legal or reputational damage both among aid agencies and the financial and private sector. This 'chilling effect' results in unmet needs, particularly in areas under the control of listed entities.
- Increased Risk: The chilling effect of sanctions impedes humanitarians from confidently

⁴ For example, Arabic terms that correspond to the concepts of early recovery. ICVA member <u>Clear Global</u> can assist with this.

engaging with listed actors for humanitarian purposes. Engaging with all actors who are in effective control of a territory is a critical part of securing humanitarian access to people in need. Operating without engagement sews distrust of humanitarian actors and increases security risks.

- Humanitarian Trap: Donor restrictions in Northwest and Northeast Syria prevent medium to longterm projects. This approach runs counter to needs and dignity, obstructs recovery efforts and undermines social cohesion.^{xxxiii} It also risks exacerbating tensions and undermining stability.^{xxxiv}
- Aid Dependency: Sanctions adversely affect the private sector's ability to operate, limiting job creation and economic recovery. The restrictions on financial transactions and trade impede business activities, strain the economy, and drive up the cost of living. XXXV

While sanctions aim to exert pressure on regimes and listed entities for change, they often have profound negative consequences on civilians and humanitarian response, as seen in Afghanistan.^{xxxvi} While the Scale-up allowed UN agencies to inject cash into the Afghan economy, it came with the concern of "perpetuating aid-dependent systems."^{xxxvii} Sanctions heavily contributed to economic regression: the World Bank estimated that an equivalent of fifteen years of economic growth were lost within 10 months.^{xxxviii} Today, over half the Afghan population needs humanitarian assistance, ^{xxxix} women's well-being has significantly deteriorated, and humanitarian assistance is both underfunded and instrumentalised.

It is important that lessons are learned. A nuanced approach that considers the humanitarian and recovery implications is essential to ensure that aid reaches those in need without unnecessary obstacles and that the people of Syria can begin to rebuild their lives and country.

Mitigation Measures

The UN and governments should:

• **Review, and to the greatest extent possible, remove sanctions** that negatively impact civilians and humanitarian response. At a minimum ensure that sanctions do not impede the flow of funds for humanitarian aid or undermine economic and early recovery.

Donors should:

- **Provide clear guidance to prevent over-compliance.** This includes clarifying that NGOs will not be sanctioned for engaging with listed entities for humanitarian purposes.
- **Finance recovery and development, alongside humanitarian aid.** This allows humanitarians to focus on urgent needs, rather than becoming the substitute for basic service provision and dignified livelihoods.

Potential Pitfall 3: Rushed centralisation of coordination mechanisms

While there is a need - and desire- to streamline Syria's complex humanitarian coordination architecture, NGOs have flagged concerns about the rush to centralise coordination, as:

- The situation is fluid, and conflict is ongoing in some areas. Current operational hubs help ensure access is maintained.
- Given the sudden change in the context, there are gaps in leadership's understanding of the specific constraints faced by NGOs operating outside former government-controlled areas, notably those registered in Türkiye or with the Kurdish authorities. This raises concerns over any high-level engagement with the Salvation Government on behalf of the whole NGO community.
- Any agreement with the Salvation Government of a centralised mechanism will likely affect all
 organisations and hubs, irrespective of their areas of operations. Previously, hubs would take
 decisions that would only affect their respective constituents.
- Representation of NGOs in senior leadership structures remains limited, for example, the Damascus INGOs (DINGOs) are the only forum with a seat at the HCT.

Mitigation Measures

Response leaders should:

- Ensure coordination is redesigned around what is needed, not just what exists. Coordination structures must model inclusion and prioritise the engagement of Syrian voices. This will require all key actors across the region and Syria coming together and creating space for new ways of working.
- Develop a roadmap for transitioning the coordination structure, based on a phased approach. Each phase should have clearly defined objectives, with lessons learned assessed after achieving these objectives. Subsequently, transition to the next phase should integrate new objectives informed by prior learnings. Throughout this process, scenario planning and risk identification should be prioritised to ensure adaptive and effective implementation
- Coordination leaders should maintain inclusive consultation and transparent decision-making to ensure that NGO and CSO concerns are addressed. Consider the specific challenges of organisations in various hubs, especially the need for partial anonymisation of data, which is still required in certain cases (NGOs registered in Türkiye, for example).
- Encourage better information sharing between the hubs to ensure gaps and bottlenecks are quickly identified and addressed.

Potential Pitfall 4: Uncoordinated approaches to humanitarian access

NGOs continue to face humanitarian access constraints, including insecurity and <u>bureaucratic</u> <u>impediments</u> such as registration, visa, and movement restrictions. While humanitarian counterparts in Syrian authorities are changing, there is a risk that access constraints will persist or be replicated. This is particularly a risk if there is an absence of consultation of NGOs in high-level access negotiations, or if agencies take an individualistic approach to access negotiations, as seen in Ethiopia and Yemen:

- The access agreement in Ethiopia was negotiated by the HC on behalf of the collective without consultation or review by the HCT. The agreement negotiated was found to be "ineffective, if not counterproductive" to securing access for humanitarian response.^{xl}
- In Yemen, the lack of collective positions on the application of humanitarian principles among agencies emboldened authorities to "divide and conquer" NGOs. This was seen to contribute to reduced humanitarian access.^{xli}

Humanitarian access is critical to ensuring that affected people's needs are met in line with their priorities. It must remain a collective good. As access negotiations move forward, it is important that political-level negotiations are informed by, and consistent with, operational realities. Negotiations should be grounded in local needs, adhere to humanitarian norms, and be clearly communicated to field-level actors to ensure coherence and practicality.^{xlii}

Mitigation Measures

All humanitarian agencies should:

• Proactively engage with all parties to a conflict for humanitarian purposes. To ensure that counterparts are not overwhelmed or receive conflicting messages, humanitarian agencies must coordinate regularly with each other to plan engagements, appoint skilled negotiators, and identify key messages.

Humanitarian leaders should:

• **Develop guidance on principled engagement** with de facto authorities to ensure staff have clarity on procedures and red lines for engagement. Ensure that the guidance is developed in consultation with frontline staff to reflect operational realities and is widely disseminated.

- Ensure humanitarian access is negotiated for the collective and not just by individual agencies for their interventions. Given the scale and complexity of needs, a collective response is required.
- **Develop clear structures and processes for collective access negotiations**, including establishing interagency negotiation teams at multiple levels with strong connections and employing experienced negotiators.
- **Prioritise frequent communication with the humanitarian collective** to hear concerns and share progress updates to manage challenges. While communicating takes up valuable time, this will help build trust and support collective action.

Potential Pitfall 5: Insufficient and inefficient response financing

The Systemwide Scale-up faces significant challenges in securing adequate financing, reflecting a broader crisis in global humanitarian funding. In 2024, half of the world's humanitarian appeals were underfunded, and there are warnings of further reductions in international aid. For the people of Syria, the situation is particularly dire:

- The 2024 Syrian Humanitarian Response Plan received just 33% of the required funding a record low. XIII
- The Inter-Agency Emergency Appeal for the Influx from Lebanon to Syria received just 9.5% of the \$135.7 million required.^{xliv}

As funding becomes available for Syria, it is critical that this does not come at the expense of other humanitarian crises. Shifting resources from one crisis to another without increasing the overall funding pool is a short-term, unsustainable approach that exacerbates unmet needs in other contexts and contributes to forced migration. Instead, a concerted effort is needed to secure additional and dedicated funding for Syria, ensuring an impartial global humanitarian response.

Beyond the availability of sufficient financing, the type of funding available is as crucial as the amount. Flexible financing that prioritises the best-placed actor is essential for a timely and effective response. Syrian civil society and INGOs need to continue to be supported, as they are critical to the response.

Mitigation Measures

Donors should:

- Prioritise multi-year core support and flexible funding to Syrian civil society, INGOs, and the Red Cross movement. Move beyond project-specific funding to support the resilience and sustainability of local organisations.
- Provide consistent, long-term funding to NGO coordination platforms, ensuring they have the resources to represent, advocate, and share information, while also supporting direct local action with a risk-sharing approach to improve outreach and compliance.
- Prioritise pooled funding mechanisms, such as the Aid Fund for Northern Syria (AFNS) and Country Based Pooled Funds (CBPF), which support Syrian civil society organisations and INGOs.

NGOs should:

• Collectively advocate to donors for flexible, multi-year, unearmarked funding.

Potential Pitfall 6: Capacity-based (not needs-based) performance benchmarking

One of the requirements of a Systemwide Scale-up is the development of context-specific benchmarks. These benchmarks outline what the purpose of the Scale-up is and the key expected outcomes. They also provide a basis for monitoring progress.

Experiences from previous scale-ups highlight that scale-up benchmarks tend to focus on the performance of agencies at the output level rather than the coverage or quality of the response. While an agency's performance may be good, these indicators do not identify whether humanitarian needs are met in line with people's priorities or what gaps exist.^{xlvi}

Context-specific benchmarks that reflect the needs and priorities of affected people must be developed and regularly monitored.

Mitigation Measures

Donors and humanitarian leaders should:

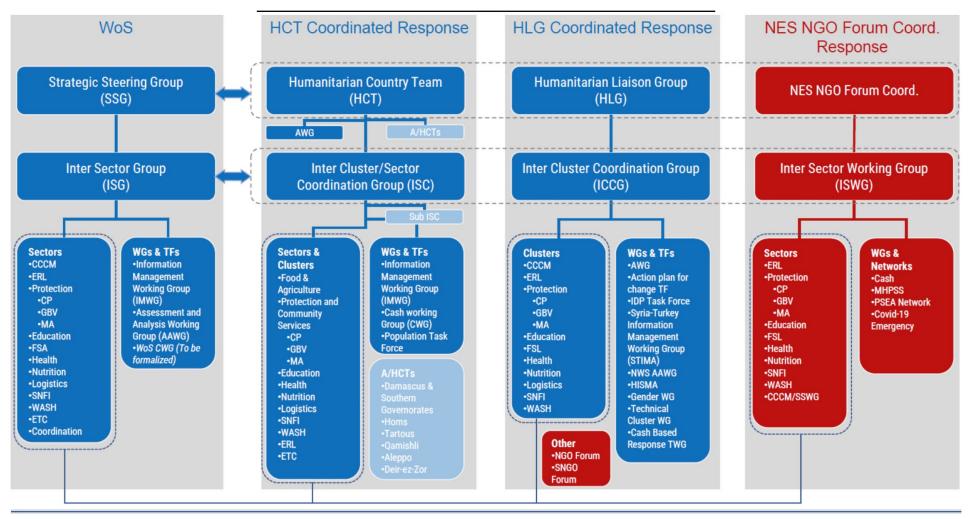
- Support the development of a country-wide needs overview and scenario planning.
- Ensure real-time monitoring of HC and HCT performance. This is essential for the timely identification and resolution of any emerging leadership or coordination deficits.
- Conduct an Operational Peer Review within the first 4 months of the Scale-up to help guide whether the Scale-up needs to continue and how the response should adapt.

Annex 1: Overview of NGO Coordination Architecture in Syria

The below table provides a non-exhaustive snapshot of NGO coordination platforms and networks. The number of member organisations listed may not be up to date.

Name	Established & Location	Membership*	Points of note
Syria INGO Regional Forum (SIRF)	nal Forum 2013,		 Represents members and hub fora in Syria and neighbouring refugee-hosting countries at IASC-led WOS structures. Links NGO Fora across Syria, including NES, NWS, Syrian Networks League & DINGOs.
<u>The Northeast</u> <u>Syria NGO Forum</u> (NES Forum)	2016, Hasakah	25 INGOs	 Provides inter-sector coordination, information management, access, advocacy, and liaison services. Publish sit reps. In the absence of UN presence in NES outside of government-controlled areas, NES provides the sectorial coordination services in-lieu of OCHA, with data and figures reported to the regional clusters in Amman. These services are provided to all NGOs, international and national.
<u>Syrian NGO</u> <u>Alliance (SNA)</u>	2014, Gaziantep	23 Syrian NGOs	 Respond to humanitarian needs in accordance with international standards and protocols. Provide guidance on how aid can be delivered to Syria. Engage in <u>advocacy</u>, research, capacity building, coordination and conveying the voices of Syrians
<u>Syrian Networks</u> League	Gaziantep	185 Syrian CSOs	 An umbrella for Syrian NGO Networks. Funded directly by EU and USAID. Exploring relocating from Gaziantep to Damascus or Aleppo.
Damascus INGOs (DINGOs)	Damascus	33 INGOs ^{xtvii}	 Represents the small number of INGOs that were able to maintain registration with the previous Syrian government. Currently, only INGO representation at the Damascus HCT.
Northwest Syria NGO Forum	2012, Gaziantep	100 NNGOs & INGOs	 Voluntary NGO platform actively engaged in leading cross-border

Name	Established & Location	Membership*	Points of note		
			humanitarian responses to the Syria crisis.		
			 Only mixed NGO coordination platform operating across border. 		
			 Members contributing to over 50% of operations (direct and indirect) inside Syria. 		
			 Main INGO representative to the HLG (HCT-equivalent for NWS cross-border operations, led by the DRHC). 		
Partnership Coordination Group	Lebanon	Mixed NGO forum	- Represents NGOs without official representation with the previous Government of Syria and operating cross-border into ex-government-controlled territories from Lebanon.		
<u>Syrian Women</u> <u>Network (Shams)</u>	2013, Turkey	5 CBOs	 Focuses on empowering women through training, capacity building, advocacy, and the defence of women's rights in the Syrian context. 		
Elaf for Relief and Development	2014, Gaziantep	14 CBOs	 Network of community-based organisations working in response to the Syria crisis. 		



Annex 2: Whole of Syria Coordination Architecture

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A GLOBAL NGO NETWORK FOR PRINCIPLED AND EFFECTIVE HUMANITARIAN ACTION

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