



Brussels, 28.11.2019
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COMMISSION IMPLEMENTING DECISION

of 28.11.2019

on the Special Measure in favour of the Syrian population for 2019

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THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018] on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012¹, and in particular Article 110 thereof,

Having regard to Regulation (EU) No 236/2014 of the European Parliament and of the Council of 11 March 2014 laying down common rules and procedures for the implementation of the Union's instruments for financing external action², and in particular Article 2(1) thereof,

Whereas:

- (1) In order to ensure the implementation of the Special Measure in favour of the Syrian Population, it is necessary to adopt an annual financing Decision, which constitutes the annual work programme, for 2019. Article 110 of Regulation (EU, Euratom) 2018/1046 establishes detailed rules on financing Decisions.
- (2) The envisaged assistance is deemed to follow the conditions and procedures set out by the restrictive measures adopted pursuant to Article 215 TFEU³.
- (3) In light of the ongoing repression and restrictive measures taken by the Council of the European Union, the Commission has suspended its cooperation with the Syrian Government since May 2011. Since then, normal programming for Syria has not been possible due to the ongoing conflict but direct support to the affected population in Syria and in the neighbouring countries has been maintained under the European Neighbourhood Instrument⁴ (ENI) through various special measures in complementary to humanitarian assistance in sectors such as education, livelihoods and civil society. Taking into account the crisis situation and the need to respond to the increasing needs, a declaration of crisis was issued in February 2012. Since then, the declaration has been annually extended due to the deteriorating situation. The most recent prolongation was issued in July 2018 and will be valid until June 2020. This special

⁽¹⁾ OJ L 193, 30.7.2018, p.1.

⁽²⁾ OJ L 77, 15.3.2014, p. 95.

⁽³⁾ www.sanctionsmap.eu Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

⁽⁴⁾ Regulation (EU) No 232/2014 of the European Parliament and of the Council of 11 March 2014 establishing a European Neighbourhood Instrument (OJ L 77, 15.3.2014, p. 27).

measure falls under the Joint Communication to the European Parliament and the Council ‘Elements for an EU strategy for Syria’⁵.

- (4) The action entitled ‘Promoting Prospects for Peace (3P)’ seeks to maintain space for Syrian Non State Actors (NSA) inside and outside Syria in addressing grievances, protect rights and empower women, youth and other key segments of society affected by the conflict, in line with EU Council Conclusions of 16 April 2018 and the outcomes of the Brussels III Conference on the Future of Syria and the Region (March 2019). The entry points identified empower individuals and Non State Actors.
- (5) The Commission should authorise the eligibility of costs as of a date preceding that of submission of a grant application, which is prior to the date of adoption of this Decision, for reasons of extreme urgency in crisis management aid or in other exceptional and duly substantiated emergencies, whereby an early engagement by the Union would be of major importance.
- (6) Pursuant to Article 4(7) of Regulation (EU) No 236/2014, indirect management is to be used for the implementation of the programme.
- (7) The Commission is to ensure a level of protection of the financial interests of the Union with regards to entities and persons entrusted with the implementation of Union funds by indirect management as provided for in Article 154(3) of the Financial Regulation. To this end, such entities and persons are to be subject to an assessment of their systems and procedures in accordance with Article 154(4) of Regulation (EU, Euratom) 2018/1046 and, if necessary, to appropriate supervisory measures in accordance with Article 154(5) of Regulation (EU, Euratom 2018/1046) before a contribution agreement can be signed.
- (8) It is necessary to allow for the payment of interest due for late payment on the basis of Article 116(5) of Regulation (EU, Euratom) 2018/1046.
- (9) In order to allow for flexibility in the implementation of the measure, it is appropriate to allow changes which should not be considered substantial for the purposes of Article 110(5) of Regulation (EU, Euratom) 2018/1046.
- (10) The measure provided for in this Decision is in accordance with the opinion of the European Neighbourhood Instrument Committee established under Article 15 of the financing instrument referred to in recital 3.

HAS DECIDED AS FOLLOWS:

Article 1⁶
The measure

The Special Measure in favour of the Syrian population for 2019, as set out in the Annex, is adopted.

The measure shall include the following action: Promoting Prospects for Peace (3P) Programme.

⁽⁵⁾ Joint communication of the European Commission and the High Representative to the European Parliament and the Council ‘Elements for an EU strategy for Syria’. JOIN (2017)11 of 14/03/2017.

⁽⁶⁾ For multiannual financing Decisions, Article 1 is only used for the first year, when adopting the programme.

Article 2
Union contribution

The maximum Union contribution for the implementation of the measure for 2019 is set at EUR 15,000,000 and shall be financed from the appropriations entered in the following line of the general budget of the Union:

budget line 22.040103 of the general budget of the Union for 2019: EUR 15,000,000.

The appropriations provided for in the first paragraph may also cover interest due for late payment.

Article 3
Methods of implementation and entrusted entities or persons

The implementation of the actions carried out by way of indirect management, as set out in the Annex, may be entrusted to the entities or persons referred to or selected in accordance with the criteria laid down in point 5 of the Annex.

Article 4
Flexibility clause

Increases or decreases of up to EUR 10 million not exceeding 20% of the contribution set in the first paragraph of Article 2, or cumulated changes to the allocations of specific actions not exceeding 20% of that contribution, as well as extensions of the implementation period shall not be considered substantial within the meaning of Article 110(5) of Regulation (EU, Euratom) 2018/1046, where these changes do not significantly affect the nature and objectives of the actions.

The authorising officer responsible may apply the changes referred to in the first paragraph. Those changes shall be applied in accordance with the principles of sound financial management and proportionality.

Article 5
Grants

The eligibility of costs prior to the submission of grant applications and which is prior to the date of adoption of this Decision shall be authorised as of the date set out in Annexe.

Done at Brussels, 28.11.2019

For the Commission
Johannes HAHN
Member of the Commission



ANNEX

of the Commission Implementing Decision on the Special Measure in favour of the Syrian population for 2019

Action Document — Promoting Prospects for Peace (3P) Programme

ANNUAL PROGRAMME/MEASURE

This document constitutes the annual work programme in the sense of Article 110(2) of the Financial Regulation and action programme/measure in the sense of Articles 2 and 3 of Regulation N° 236/2014.

1. Title/basic act/ CRIS number	Promoting Prospects for Peace (3P) Programme CRIS number: ENI/2019/041-986 financed under the European Neighbourhood Instrument		
2. Zone benefiting from the action/location	The action shall be carried out at the following location: Syria with some activities taking place in neighbouring countries		
3. Programming document	N.A.		
4. Sustainable Development Goals (SDGs)	SDG 16 “Peace, Justice and Strong Institutions” SDG 10 “Reduced Inequalities” SDG 5 “Achieve Gender Equality and Empower all Women and Girls”		
5. Sector of intervention/ thematic area	Conflict and Violence Prevention and Support to Non State Actors	DEV. Assistance: YES	
6. Amounts concerned	Total estimated cost: EUR 15.7 million Total amount of European Union (EU) contribution EUR 15 million		
7. Aid modality(ies) and implementation modality(ies)	Project Modality Direct management through Grants and Procurement Indirect management with the entrusted entities to be selected in accordance with the criteria set out in section 5.3.4.		
8 a) DAC code(s)	15220 Civilian Peace-Building, Conflict Prevention and Resolution 15150 Democratic Participation and Civil Society 15180 Ending Violence Against Women and Girls 16050 Multisector Aid for Basic Social Services		
b) Main Delivery Channel	Non-Governmental Organisations (NGOs) and Civil Society (DAC Channel Code 20,000) Multilateral Organisations (DAC Channel Code 40,000) University, college or other teaching institution, research institute or think-tank (DAC Channel Code 51,000) Private Sector Institution (DAC Channel Code 60,000)		
9. Markers	General policy objective	Not	Significant Principal

(from CRIS DAC form)		targeted	objective	objective
	Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	X
	Aid to environment	X	<input type="checkbox"/>	<input type="checkbox"/>
	Gender equality and Women's and Girl's Empowerment	<input type="checkbox"/>	X	<input type="checkbox"/>
	Trade Development	X	<input type="checkbox"/>	<input type="checkbox"/>
	Reproductive, Maternal, New born and child health	X	<input type="checkbox"/>	<input type="checkbox"/>
	RIO Convention markers	Not targeted	Significant objective	Principal objective
	Biological diversity	X	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification	X	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation	X	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation	X	<input type="checkbox"/>	<input type="checkbox"/>
10. Global Public Goods and Challenges (GPGC) thematic flagships	Not Applicable			

SUMMARY

After eight years of conflict, Syria faces challenges of fragmented identity, a weakened social fabric, widespread violence and trauma, abject poverty and economic exclusion, and shrinking space for Non State Actors (NSAs)¹ In line with EU Council Conclusions of 16 April 2018 and the outcomes of the Brussels III Conference on the Future of Syria and the Region (March 2019), **the overall objective of the “Promoting Prospects for Peace” (3P) Programme** is to seek to maintain space for Syrian NSAs inside and outside Syria in addressing grievances, protect rights and empower women, youth and other key segments of society affected by the conflict. The entry points identified empower individuals and NSAs, in order that they are able to voice opinions and participate in decision-making at all levels.

The 3P Programme is in line with the *Joint Communication on Elements for an EU Strategy for Syria*² and aims at translating the strategy into a conflict-sensitive, politically relevant and operationally viable assistance programme. As such, the action will exclusively target Syrian right-holders, communities and Non State Actors, and avoid benefits accruing to unwarranted entities.

The EU will closely monitor developments on the ground and constantly assess risks and opportunities, in order to avoid interference or legitimisation of any unwarranted entity. In particular, EU support will only be maintained if:

- There is space for implementing partners to work without endangering their lives/freedom;
- Needs can be assessed and assistance can be provided without unwarranted interference by state

¹ For the purpose of this Action, the EU considers as Non-State Actors all non-armed civic actors (i.e. individuals, groups, networks or structures through which people organise themselves) that offer an alternative to State- or to non-legitimate governance structures as sources of information, services and influence. Operating on a local, national or regional level, these actors comprise individuals (such as youth, women active as civic actors, elders, religious leaders) or groupings thereof.

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52017JC0011>

institutions, armed factions or regional actors that may aim to steer or change the focus of interventions under the umbrella of this programme influencing the selection of target locations, beneficiaries or modes of implementation;

- Assistance is geared towards empowering local communities and legitimate NSAs whilst avoiding contributing to further fragmentation and/or political engineering;
- Access and capacity to monitor is maintained;
- Full compliance with EU Restrictive Measures is ensured

In line with the EU Council Conclusions of 16 April 2018, the EU will not assist in reconstruction efforts until a comprehensive, genuine and inclusive political transition is firmly under way.

1 CONTEXT ANALYSIS

1.1 Context Description

The brutal military reaction of the Syrian regime to the peaceful popular uprising in 2011 has led to a protracted civil war supported and exacerbated by a number of external actors. The length and the magnitude of the war created a patchwork of regions under the effective authority of different local and regional actors. In the course of 2018 and early 2019, the Syrian regime steadily expanded its military, territorial and administrative control over key areas, while the geographic space occupied by anti-government, opposition and other actors has been sizably reduced.

In spite of successive United Nations (UN) sponsored peace talk rounds, the Geneva Communiqué of 2012, United Nations Security Council Resolution (UNSCR) 2254, and the efforts of the International Syria Support Group (SSG) and its working groups, no agreement has been reached to put an end to the war through peaceful means. A new UN special envoy has been appointed and is seeking to promote a Syrian led and Syrian owned process, with EU support.

The North of the country —stretching from al-Hassake and al-Raqqa governorates in the North-East to Idlib governorate and parts of rural Aleppo in the North-West— currently remains outside regime control. The Syrian army has been preparing a phased military offensive to recapture Idlib governorate. In the meantime, Hayat Tahrir Al Sham (HTS) consolidated its positions allowing its affiliated Syrian Salvation Government (SSG) to expand and tighten its control over local administration structures with the objective of unifying the local administration under its authority. In the North-East, the political arm of the United States (US)-backed Syrian Democratic Council (SDC) —a political wing of the Kurdish dominated Syrian Democratic Forces (SDF)— reportedly resumed negotiations with the Syrian regime on future arrangements based on a degree of autonomy while the Islamic State lost its last territorial foothold in the first quarter of 2019. The US announced the withdrawal of its troops in December 2018, which has not fully happened yet.

Overall, the situation for human rights in Syria is considered egregiously poor. In 2018, government and non-government forces used a combination of unlawful tactics, including chemical weapons, deliberate attacks on civilian infrastructure, restrictions on humanitarian aid, arbitrary detention, abduction and enforced

disappearances, sexual and gender-based violence, and restrictions on property rights and freedom of movement, resulting in excess casualties and mass displacement.

The unwillingness of the Syrian regime to engage in a genuine and comprehensive political process is likely to cause more instability in the long-term. Discontent is growing amongst large sections of the population previously supportive of the regime due to the worsening socio-economic conditions and the depletion of State assets.

Diverse and interlinked protection needs continue to be widespread throughout Syria and acute in some areas. They are driven by the impact of ongoing localised conflict and new and recurrent displacements and returns, increasing the stress on already overburdened communities. According to the UN Humanitarian Needs Overview (HNO) 2019³, the environment continues to require a sustained response by humanitarian actors. The most severe needs across multiple sectors are concentrated in areas of ongoing conflict or areas with large numbers of internally displaced persons (IDPs). Of the estimated 23 million Syrians, 11.7 million people inside Syria are in need of multi-sectorial humanitarian assistance and 5 million people are experiencing acute need.

The Syrian economy has been severely affected by the conflict. Inside Syria, 83% of the population lives below the poverty line and one in three is food insecure. Gross Domestic Product (GDP) contracted by 63% between 2010 and 2016 and economic and human development achievements have been reversed by 40 years. The war economy and reinforcement of regime patronage structures have also had far reaching consequences on vulnerable groups, notably due to disruption of community networks, essential services and safety nets. At household level, coping strategies have been exhausted forcing individuals and communities to resort to unsustainable and unsafe means of survival, including forced, early and/or temporary marriage, child labour, child recruitment and survival sex.

Some NSAs have, during the course of the conflict, built up capacities and acted as influencers beyond regime control. They have retained the potential to act in certain areas and in certain sectors in this manner, and therefore to offer alternative sources of information, services and influence to the regime or to terrorist organisations.

1.2 Policy Framework (Global, EU)

The 3P Programme is framed by the Council Conclusions adopted by the Foreign Affairs Council (FAC) on 3 April 2017, which endorsed the EU Strategy on Syria and its objectives in six key areas. This document remains the guiding framework for engagement in Syria. As confirmed in the Council Conclusions adopted by the Foreign Affairs Council (FAC) of 16 April 2018, a lasting peace in Syria is the ultimate objective of the EU. Syria's destiny lies in peace, democracy, equal citizenship and the rule of law. As such, the Council Conclusions set out as a primary objective to support work with Syrian civil society, as essential stakeholders in an inclusive process, to promote democracy and human rights in support of peace and stability in Syria.

³ https://www.ochaopt.org/sites/default/files/humanitarian_needs_overview_2019.pdf

The 3P Programme is also in line with the approaches and principles as set out in the following documents:

- The co-chairs Declaration from the Third Brussels Conference “Supporting the Future of Syria and the Region” which took place on 12-14 March 2019
- The New European Consensus on Development — “Our World, Our Dignity, Our Future”
- The Commission Communication “Agenda for Change” — COM(2011/637) of 13 October 2011
- The Global Strategy for the EU’s Foreign and Security Policy — “Shared Vision, Common Action: A Stronger Europe” June 2016
- The OECD/DAC Principles of Good International Engagement in Fragile States and the related 2007 EU Communication towards an EU response to situations of fragility including a “Do No Harm approach”
- The Joint Communication “A Strategic Approach to Resilience in the EU's External Action” of 7 June 2017, & the Action Plan for Resilience in Crisis Prone Countries 2013-2020 of 15 June 2013
- The Operational Guidelines on the Preparation and Implementation of EU Financed Actions Specific to Countering Terrorism and Violent Extremism in Third Countries
- The renewed 2018 EU Global Approach for UNSCRs 1325 & 1820
- The EU Comprehensive approach to external conflicts and crises (JOIN(2013)30 of 11.12.2013)
- EU Guidelines on Children and Armed Conflict
- EU Guidelines on violence and discrimination against women and girls (2008)
- EU Guidelines on the inclusion of People with Disabilities
- EU Guidelines to promote and protect the enjoyment of all human rights by lesbian, gay, bisexual, transgender and intersex (LGBTI) persons (2013)
- Communication from the Commission to the European Parliament, The Council, The European Economic and Social Committee and The Committee of the Regions “Lives in Dignity: from Aid-dependence to Self-reliance”. Forced Displacement and Development, SWD (2016)⁴.
- Article 1.2 of the Communication on the participation of Non-State Actors in development policy as well as Article 24.2 of the Development Co-operation Instrument (DCI) and Article 10 of the European Instrument for Democracy and Human Rights (EIDHR)
- The European Union Gender Profile for Syria 2019

⁴ http://ec.europa.eu/echo/files/policies/refugees-idp/Communication_Forced_Displacement_Development_2016.pdf

Further, the 3P Programme addresses several objectives laid out in the EU Action Plan on Human Rights and Democracy (2015-2019), notably chapter III on ensuring a comprehensive human rights approach to conflicts and crises. The 3P Programme also remains true to the spirit of the Grand Bargain⁵ as well as EU commitments to engage in nexus programming in crisis contexts. So far, the EU has played a major role as a humanitarian donor in Syria whilst avoiding broader, longer-term engagement through development assistance and reconstruction support. However, the lingering political ramifications of conflict and displacement now require long-term and strategic solutions that cannot be provided by humanitarian efforts alone.

1.3 Public Policy Analysis of the Partner Country/Region

On 23 May 2011, the EU suspended its co-operation with the Syrian regime under the European Neighbourhood Policy together with steps towards the signature of an Association Agreement. As such, the current programme is developed irrespective of relevant policies enacted by the Syrian regime. In particular, the EU, in full respect of the EU Council Conclusions of 16 April 2018, will not assist in reconstruction efforts until a comprehensive, genuine and inclusive political transition is firmly under way.

1.4 Stakeholder Analysis

Identified actors that could have a stake in the action:

Stakeholders	Level of engagement with the action
Syrian rights holders with due regard for gender and vulnerability markers (conflict-affected, missing and their families, displaced, returnees, PWDs, VoW, children etc.) Syrian Youth ⁶	Primary reference/target group. Extensive involvement foreseen in participatory consultations and project design, prioritisation of interventions, implementation and - where feasible - monitoring and evaluation. Recipient of empowerment, capacity building and training activities and primary actor in advocacy, awareness raising and campaign.
Syrian Non State Actors (Community-Based Organisations, grassroots organisations, civil society and diaspora organisations, women's groups, youth groups, civic actors, non-formal networks of professionals, elders, religious leaders, local NGOs, etc.)	Primary reference/target group to be further defined at inception phase through a dedicated mapping and identification exercise. Extensive involvement foreseen in participatory project design, implementation and - where feasible - monitoring and evaluation. Recipient of empowerment, capacity building and training activities and primary actor in advocacy, awareness raising and campaign.
International NGOs, UN Agencies and EU Member States Agencies and other international organisations	Primary role in formulation, participatory, implementation, monitoring and evaluation, field-level co-ordination.

⁵ <https://www.agendaforhumanity.org/initiatives/3861>

⁶ The UN, for statistical consistency across regions, defines 'youth', as those persons between the ages of 15 and 24 years. All UN statistics on youth are based on this definition. Source: <http://www.unesco.org/new/en/social-and-human-sciences/themes/youth/youth-definition/>

1.5 Problem Analysis / Priority Areas for Support

There is overwhelming agreement among donors on the importance to **maintain and nurture civic space**, reduce fragmentation and ensure that community based and civilian-led actors receive adequate and sustainable support to increase prospects for an inclusive peace and prevent a return to a *status quo ex ante*. This has also been clearly confirmed at the multiple rounds of the Brussels Conference on Syria, the latest one having taken place in March 2019 – with the Day of Dialogue session offering a strong voice to diverse Syrian non-state actors calling for continued empowerment. This requires sizeable investments in support to nascent NSAs platforms, networks, grass-root and civic organisations and/or professionals, with a view to increasing capacities and promoting spaces for civic engagement, empowering community actors and leaders at the local level with an independent mind-set rooted in principles of participation, leadership and inclusion. Special attention will be paid to women and youth as leaders and agents of change. The proposed programme identifies the following priority areas of work where the EU sees a high potential for non-state actors to demonstrate a key added value; a brief problem analysis around the said areas of work is provided below.

A. Non State Actors and their role in addressing the rights and grievances of conflict-affected, marginalised and/or disempowered individuals and communities, notably with a focus on the families of the disappeared (i.e. ‘missing persons’), as well as people living with disabilities (PWDs) and victims of war (VoW). While the role of NSAs in these areas of work has remained relatively nascent inside Syria to date, the depth and breadth of challenges faced in promoting and protecting Syrians’ rights in these two areas of work is staggering, and offers fertile ground for supporting civic actors aimed at addressing Syrians’ conflict—related grievances.

Indeed it is currently difficult to estimate precisely the number of missing persons caused by the war in Syria. The volume of cases has expanded exponentially since the beginning of the conflict. Estimates of about 100,000 missing may be regarded as conservative, as people may have disappeared as a direct result of the violence, through arbitrary and incommunicado detention by the Syrian regime and other belligerents, or during displacement inside Syria, or in the region and beyond. The Brussels III Conference on *Supporting the Future of Syria and the Region* (12-14 March 2019) recalled the European Union’s commitment to transitional justice and accountability and that accounting for the missing constitutes a pivotal element of the future of Syria.

Similarly, with regards to disability, about 1.5 million people in Syria are now living with permanent impairments because of the conflict, including 86,000 people who have lost limbs (UNICEF). Other surveys, however, put the number of PWDs at a 3 million⁷. The HNO 2019 further reports that a recent assessment on disability among adults in western Aleppo, Idleb and Ar-Raqqa governorates indicated an average rate of 30 percent - double the global average – with an average of 45 percent of surveyed persons injured during the Syria crisis expected to sustain a permanent impairment

⁷

This is corroborated by similar estimates among Syrian refugees in Jordan and Lebanon, where an estimated one in 5 refugees (22.8%) has a disability.

(e.g. amputation, spinal cord injury, brain injury). PWDs are among the most vulnerable and hence also require specialised treatment and services, adapted facilities and products, and access to self-reliant opportunities. Children with disabilities face a very real risk of exclusion, neglect and stigmatisation, and for all needs are long-term. Local activists in many areas have introduced initiatives to support people with disabilities by providing them with medical treatment and reintegrating them into the society. However, support needs to be scaled up and a change of attitude is needed in society to address problem in a comprehensive way.

B. Non State Actors and their role in promoting the empowerment of Syrian youth and women to act as catalysts of positive change through the roll out of effective violence prevention and response strategies and multi-sector protection programmes, including but not limited to improving access to entrepreneurial and life skills training, non-formal education, technical and vocational education and training (TVET), and employment/livelihood opportunities.

The impact of the crisis on social cohesion and local level coping capacities has been dramatic, stretching resourcefulness to its absolute limits; at household level, the engagement in high risk and exploitative activities has increased exposing in particular children, youth and women. With limited individual and household ability to withstand shocks, the role of civic actors in mobilising, protecting and servicing communities is playing an important role, and increasingly so. The role of education, employment and upward mobility in the promotion of **social cohesion and prevention of violent extremism** is well evidenced by extensive literature and it is a prerequisite for durable solutions and large-scale returns that are safe, voluntary, and dignified. Moreover, the European Union has considerable experience in supporting interventions drawing youth and vulnerable groups away from marginalisation and exclusion in order to prevent further upsurges of violent conflict. Given the country's downward spiral in such vital spheres as livelihoods and provision of basic services, further investments, particularly through Non State Actors, are necessary to consolidate the gains of previous interventions. Special attention will be paid to **women and youth** as leaders and agents of change.

The situation of Syria's **children and youth** is particularly desperate. It is estimated that 60% of the country's population is aged 24 and below. An estimated 2.8 million children in Syria are currently displaced with 2.1 million of these currently out of school. Protection concerns are multiple, from child marriage and family separation, trafficking and sale of children, to child labour, protection of orphaned and vulnerable children, recruitment and use of children in armed conflict, abduction and sexual violence against children, to name but a few. Displacement, lack of access to education at all levels —primary and secondary education and technical education and vocational training— unemployment and violent trauma are having a devastating impact on Syria's future generations, leaving a generation of children and youth unprotected, disconnected and often unable to access their right to learn. Linked to this, the mental health and psycho-social support (MHPSS) needs are massive and ever growing. Inside Syria, there are only a few properly trained practitioners and the dire situation is exacerbated by the fact that psycho-social support (PSS), factored into the humanitarian response, has mainly been serviced by short-term, limited basic services. Building Non State Actor capacity to deliver interventions to prevent and respond to violence, trauma and addiction is a fundamental component of an

individual and societal healing process and key to individual and community empowerment - notably of children, youth and women. Specific interventions, also in the area of Sexual Gender Based Violence (SGBV), are required to enhance the prevention and protection of vulnerable populations, as per regular case management according to agreed protocols and referrals.

C. Non State Actors and their role in upgrading the skills, knowledge and capacities of civic actors including strengthened partnerships and interactions with diaspora networks through a strategy encompassing needs assessments, technical assistance, training and increased use of digital means and e-learning tools.

With a view to increasing capacities and promoting spaces for civic engagement, empowering community actors and leaders at the local level with an independent mind-set rooted in principles of participation, leadership and inclusion, further investments in Syrian NSAs of all forms and shapes — from small initiatives and processes, to new or nascent platforms, networks, grass-root and civic organisations and/or non-formal networks of professionals – will serve the EU’s medium term political interests in Syria. In this regard, Non State Actors also have an important role to play in linking individuals, communities and networks within Syria, as well as within refugee communities and diaspora groups based outside Syria, to reduce the social fragmentation and polarisation and re-create a sense of identity and shared purpose regarding the future of the country.

Indeed with limited physical access into and across the various geographies of Syria, the use of digital tools can provide an opportunity to re-build social cohesion, educate, impart skills, and empower civil society. However, there is a wide acknowledgement that such tools have been underutilised to date. IT-enabled social enterprises can contribute to the prospects of an inclusive transition and socio-economic growth. There is a large segment of Syrian youth inside Syria and abroad that lack digital skills and is at risk of missing out on the benefits of IT-enabled opportunities, notably in the field of education, vocational training and employment. Improving the digital skills of Syrian youth can empower them to contribute to economic growth and post-conflict recovery in its widest sense. On the other hand, encouraged by donors, business communities from the Syrian diaspora could explore collaborative opportunities and entry points for engagement, enabled by the digital space. Bringing together technology, entrepreneurial skill and seed-funding under the umbrella of a socially responsible/principled approach is rooted in the Grand Bargain principle of ‘localisation’.

D. Non State Actors and their role in producing robust diagnosis and monitoring of stakeholders, trends and interventions in Syria, especially as independent actors that can capitalise on their networks and access to communities to collect, observe and verify trends linked to social dynamics as well as programme interventions. With the EU’s ability to assure monitoring and field presence in Syria unlikely to improve over the course of 2019-2020, NSAs important role in both third party monitoring, but also in developing people-centred analysis and research, cannot be underestimated.

2 RISKS AND ASSUMPTIONS

Risks	Risk level H/M/L	Mitigating measures
<p>Deterioration of the security situation</p> <p>A military solution to the conflict prevails in the short-term resulting in an uptick of violent conflict thus directly impacting operational partners</p>	<p>H</p>	<p>International Partners (IPs) undertake periodic assessments of the operational context in order to respond to changes</p> <p>Flexibility is built into the project design to allow for necessary adaptation which may include—but is not be limited to—adjustment of activities and/or geographical relocation where it remains feasible and relevant</p>
<p>Increased control on operational and/or political space and resources by the Syrian regime and other parties to the conflict.</p> <p>In areas falling under regime control, local civic actors suffer reprisals, interference and shrinking operational space</p>	<p>H</p>	<p>EU assistance is specifically designed to counter-weight such dynamics by empowering Civil Society Organisations (CSOs) to withstand the pressure exerted by parties.</p> <p>Syrian CSOs advocate that there is sufficient space to operate and are willing to take a calculated political/physical risk (as already throughout the conflict and pre-2011)</p> <p>EU-CSO partnerships are sufficiently strong to raise ‘red flags’ at an early stage and address project-specific operational and political risks. When required, the EU will reassess the nature, scope and timing of activities; relocate activities and/or re-assess possible partnerships where viable and relevant</p> <p>In addition, Third Part Monitoring (TPM) and other analytical resources can be leveraged to provide additional analysis and help minimise risks</p> <p>Where interference persists, the protection of the civic actors is put at risk, the reputational risk for the EU is deemed too high, and/or the intervention logic of the action is severely compromised, the EU may partially or fully suspend activities or even terminate them in justified cases.</p> <p>The medium-term political/opportunity costs of EU non-engagement are weighted. It may prove exceedingly</p>

		difficult to regain a protected space for civil society and/or to counter narratives to parties to the conflict if engagement is not sustained. Dialogue with key actors including EU Member States at field level may guide the process.
<p>The collective donor phasing out of larger scale non-humanitarian livelihoods, education and health projects in Syria combined with an unanimous surge of non-state/civic actors programmes combined with public political statements of support to CSOs contains three main risk components:</p> <p>i) de facto inclusion of civic space and civic actor liberties in the political negotiations and international diplomatic game by Damascus while triggering a short term reaction of more strongly confining that space in Syria in order to have more "negotiation mass".</p> <p>ii) Alerted by singular donor attention on CSO actors Damascus will more than before feel threatened by such initiatives and block any local efforts currently led by UN and other actors to discretely work on protecting and widening such space.</p> <p>iii) In the short term: Increasing commercialisation of CSO and community work and gradual corruption of community actors considered integer by their constituents. In the longer term: discreditation of community and CSO activities by the population as considered externally driven and financially corrupted.</p>	H	<p>i) EU public statements and diplomatic exchanges need to avoid singling out CSOs and CSO support and civic space need to maintain a holistic description of grievances in Syria.</p> <p>ii) Mitigation might be possible by enhanced donor co-ordination on CSO support, assessment of financial absorption capacity of individual partners, the need to identify new partners. External communication of such support needs to be carefully drafted.</p> <p>iii) Enhanced analysis of the environment in which local actors operate to avoid creating local hegemony and enhanced Monitoring and Evaluation (M&E) and TPM to ensure that implementation at the local level happens in accordance with the objectives. Finally, enhanced donor co-ordination on CSO support will ensure that double funding of the same local partners is avoided as well as proper assessment of financial absorption capacity of individual actors.</p>
EU assistance legitimises actors targeted by EU Restrictive Measures	H	A clause on compliance with EU Restrictive Measures is inserted in all contracts signed. Such clause is enforced through regular checks and independent analysis by TPM as well as by triangulation of information
Activities aimed at promoting dialogue between potential agents of change across geographical areas carries protection or reputational risks for participating stakeholders	M	<p>Dialogue is organised in a neutral environment in order to reduce risks</p> <p>TPM and other analytical resources are leveraged to provide detailed conflict and stakeholder analysis, identify risks</p>

		and risk management strategies
Activities outside Syria are negatively impacted by visa restrictions impeding travel of Syrian stakeholders	H	The EU Delegation engages relevant authorities in a timely manner to ensure that visas are granted to targeted participants.
EU access to Syria is restricted by visa issues and movement inside Syria remains limited	M	The EU Delegation engages relevant authorities in a timely manner in co-ordination with EU Member States
Remote management increases risks of aid diversion and renders channelling of funds difficult	M	IPs have robust compliance systems and well established internal monitoring and financial management capacity Due diligence checks, supervision and frequent reporting are already contractual requirements TPM and other analytical resources are regularly leveraged to provide detailed risk analysis
UNSCR 2449/2018 allowing cross-border operations is not renewed	H	E-learning, digital and/or IT-enabled support will be leveraged to address physical constraints in the event of non-extension of UNSCR 2449/2018
<p>Assumptions Security conditions allow movement of staff and beneficiaries Local institutions, community, and armed groups remain open to external project interventions that alleviate the conditions in which the civilian population lives. Reliable local partners can be identified and secure ways to channel funds to them established Equipment and supplies necessary for implementation are available in local/regional markets.</p>		

3 LESSONS LEARNED AND COMPLEMENTARITY

3.1 Lessons learned

Past programmes but also the multiple rounds of the Brussels Conference on Syria have demonstrated that addressing the **rights and grievances of conflict-affected, marginalised and/or disempowered individuals and communities** requires a comprehensive and inclusive approach to sustainable solutions that also protect the prospects for peace. Syrians have become victims of a multitude of actors and violations. However, while the victimhood of Syrians may at first seem divisive, the fact that by now almost every Syrian has been affected by 8 years of protracted conflict is also a common denominator that has the potential to unite Syrians in their claim for justice. This potential must be seized in order to achieve meaningful and sustainable results. There is scope to work bottom-up with non state actors and there is sufficient space available. The current EU portfolio in support to Syrian NSAs comprises three types of support: i) CSO incubation; ii) community cohesion

activities and iii) support to independent media (production of audio-visual media content and a media content dissemination platform). Past experience of projects implemented under EU funding have confirmed that Syrians can be effectively supported in promoting the prospects for peace at the local level. For example, the training of one single Syrian community trainer in agricultural extension services has had the effect of 200 farmers in the community being able not only to achieve better harvests due to better knowledge about pest control, agricultural cycles and planning, etc., but also to be exposed and appropriate the principles of grassroots mobilisation and participatory decision-making at village-level. In another case a doctors' initiative was able to ensure that medical doctors and staff share the latest knowledge on treating conflict-related diseases while at the same time integrating social cohesion into the peer to peer trainings. Women groups have been set up where women through the joint production of handicrafts find safe spaces which allow them to share information and nurture their psychological well-being. In other cases, women have been empowered and are now elected members of local councils and participate in the decision-making processes of a community. Youth centres have effectively created safe spaces for marginalised youth, providing them with a sense of community, home and (life) skills, thus effectively providing alternatives to drug-addiction or tendencies towards violent extremism.

While it is well-known that **youth and women** as a demographic group are key to promote change and social cohesion, in the case of Syria, their potential has not yet been fully reaped. Capacity building endeavours targeting youth have stopped at traditional TVET programmes where no new or innovative ways to deliver other programmes have been identified. The importance of promoting entrepreneurship and soft skills amongst this group has been overlooked, while it is key in enhancing the chances for sustained livelihoods for that group while serving also as an instrument to counter violent extremism or radical tendencies fed by idleness and the perceived lack of economic and social futures. With regard to women, a key lessons learned from implementation has been that gender-based violence is a major barrier to women participation in political, economic and social life. Women in Syria have shown incredible resilience resisting violence and enhancing their participation in local level decision-making and public affairs. Whilst previous programmes explicitly targeted SGBV from the perspective of transitional justice and political empowerment, additional investments are required to strengthen women's roles in their respective communities, through comprehensive protection approaches aimed at their empowerment as community actors and catalysts for positive change.

With regard to complementary **violence prevention and response strategy**, a key lesson learned in the Syrian context is that cultural and religious value systems play an important role in the perception and understanding of psychological and social problems and the choice of methods for treatment. For implementing partners, it is important to understand and explore cultural adaptations, expectations and coping strategies. A study documenting lessons learned from child protection activities in Syria similarly points out to the need for long-term support and resources for child protection programming to sustain these services over time and counter high staff

turnover within international and Syrian organisations⁸. As Syrian partners continue to grow, international actors should ensure that technical and organisational capacity-building efforts are sustained and remain an explicit objective of programmes and partnerships.

Donor support to Syrian NSAs and diaspora networks, moving forward, must be more strategic and better aligned to agreed-upon principles for donor engagement. The EU can play a vital role in co-ordination, provided EU-funded efforts can be sustained. This is all the more important in a context in which the international community has been relying on a network of relatively few partners, with the risk of unduly exposing them and over-burdening them in terms of absorption and implementation capacity. There is hence a need to diversify and spread the support across a wider spectrum of possible NSA partners, in order to create a critical mass of stakeholders less vulnerable to pressures and restrictions. Building capacity across specific areas of work that require a particular capacity and competence e.g.: disability, MHPSS etc. also offers key opportunities to (re)create technical as well as professional networks within a more technical sphere – which should be capitalised upon more adopting a long term approach.

Programmatic evidence is emerging showing that where **investments in civic actors** and community resilience has been sustained, with empowered local actors that carry legitimacy vis-à-vis their communities and agency over their present and futures, Syrian-led and locally grown modalities of civic engagement that is able to express resistance to corruption, repression and to demand rights political opposition is strong. Communities in North West Syria, for example, have shown strong signs of political resistance against the HTS-take over, notably in locations where investments in civic processes coupled to service delivery have been sustained over time. Similarly, voices of discontent continue to grow in regime-held areas, often reflecting previous international investments in NSAs. Analysts speak of cracks within the regime apparatus that offer the potential and space to engage with civic actors. There is scope to explore what space exists to leverage local demand/potential for change (increasing popular demands for accountability/transparency of local decision-making, against corruption etc.) and for civic engagement. A close dialogue and a long-term perspective in relationships are essential.

In Syria, forms of **violent extremism** have developed and been sustained because political and legal grievances have not been addressed and because of dire socio-economic prospects (still today in many parts of Syria joining an extremist militia is the only available source of revenue to feed a family for a young Syrian male). A programmatic focus on strengthening the civic space with enhanced prospects for people to make themselves heard at the local level, enabling ways to address their grievances, will be a powerful tool to counter violent extremism.

Donors and international implementers have learned to navigate a complex security environment including significant language barriers and information gaps. Nevertheless, the Syrian conflict and its dynamics are inherently uncertain. Through

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ODI Paper, Fostering Local Partnerships in Remote Management and High-Threat Settings: Emerging Lessons from Child Protection Programming in Syria, July 2018

several cycles of implementation, it has become apparent that funding and implementing agencies alike must ensure that projects can be easily adapted to changing political and contextual circumstances. Since 2017, **Monitoring and Evaluation (M&E)** is for the most part done remotely and information is regularly triangulated using a multitude of reliable sources, including TPM contractors. The EU Delegation to Syria now draws on a variety of resources including a dedicated service contract, which provides invaluable insight with regards to implementing partners, parameters for engagement, activities implemented and outcomes. Continuous support to a wide range of analytical services looking at trends and dynamics must be ensured and can further be broadened to key topical issues such as the monitoring of returns—a programmatic area that may gain momentum in the future and would already warrant forward planning.

3.2 Complementarity, Synergy and Donor Co-ordination

All financing instruments should be framed under the umbrella of the Joint Humanitarian Development Framework (JHDF) in a joint effort towards nexus programming. The EU Delegation to Syria aims to ensure complementarity between humanitarian, stabilisation and development assistance through regular meetings with the relevant services at local (Beirut), regional (Damascus, Amman, Gaziantep) and the EU's headquarters in Brussels level. Regular interaction with European Commission services such as the European Civil Protection and Humanitarian Aid Operation (DG ECHO) and the Foreign Policy Instruments service (FPI) have already strengthened operational co-ordination by providing a platform to share needs assessments and guide the identification of strategic priorities for multi-pronged assistance to Syria.

However, in the case of Syria, the application of the JHDF framework is significantly constrained given the political objectives of the European Commission's work inside Syria and the broader parameters for EU engagement. The design of this programme has been co-ordinated with ECHO, FPI and the EEAS so as to ensure synergies and complementarities, including an improved division of labour amongst the services. For instance, while interventions increasing capacities and promoting the space for civic engagement leverage lessons learned in the implementation of actions funded under the European Instrument for Democracy and Human Rights (EIDHR) and the Thematic Programme for Civil Society Organisations and Local Authorities, synergies are also increasingly being sought with the EU Instrument contributing for Stability and Peace-funded Syria Peace Process Support Initiative (SPPSI). SPPSI works with various Syrian CSOs, particularly in areas such as human rights and democracy, giving a voice to civil society groups in search for a political solution to the Syrian conflict and hence addressing more generally tracks I, II, and III dialogues, whilst ENI provide a wider support to civil society in terms of capacity building and networking. Further, actions countering the effects of violence on women and youth violence, and addressing the needs of young Syrians build on previous interventions in support to social and civic engagement, resilience and livelihoods funded under the IcSP and PRO-Resilience Action (PRO-ACT) financed under the Development Co-operation Instrument (DCI), through which innovative cross-border pilot approaches have been piloted. With regard to support within the Transitional Justice dimension, ENI support is highly complementary to FPI's

ongoing structural support to the International, Impartial and Independent Mechanism (IIIM) as well as the International Commission on Missing Persons (ICMP).

More in general, donor co-ordination meetings at field level are driven and organised by the EU Delegation to Syria and take place in Lebanon, Jordan or Turkey. Regular meetings offer an opportunity to exchange views on operational priorities, lessons learned and challenges amongst development partners, and to create synergies among donors' interventions inside Syria from a thematic and (increasingly less) geographic perspective. Closer donor co-ordination on CSO support in Syria, including on Women Rights Defenders and women groups, is planned in 2019 in conjunction with the launch of a mapping and needs assessment' exercise that should result in a more strategic framework of donors' support.

4 DESCRIPTION OF THE ACTION

4.1 Overall Objective, Specific Objective(s), Expected Outputs and Indicative Activities

In line with EU Council Conclusions of 16 April 2018, the overall objective of the "*Promoting Prospects for Peace*" (3P) programme is to **promote the prospects for an inclusive post-conflict Syria**.

The programme's **specific objective is:**

SO1. To **nurture the space for civic engagement**.

By strengthening technical programmes, management, networking, monitoring, mentoring and peer learning capacities of Syrian NSAs inside and outside Syria, EU support will seek to *address key grievances and protect the rights of conflict-affected, marginalised individuals and communities*, and counter and/or prevent specific forms of violence, with a focus on *empowering women and youth as catalysts of change*. The programme is further articulated around **four Expected Results and related indicative activities:**

R1 Rights and grievances of conflict-affected, marginalised and/or disempowered individuals and communities are effectively addressed, with a focus on the families of the disappeared, persons affected by displacement (PADs), people living with disabilities (PWDs) and Disabled Persons Organisations (DPOs) and in particular —but not exclusively— victims of war (VoW).

Activities in relation to the above result area may include, but are not limited to, the following:

A1.1 — Design and roll out of analysis and effective protection and advocacy strategies to support collection and management of cases, avail legal, material and psychosocial support to the families of **missing persons**, and provide technical assistance to ensure the '**right to know**'. Links with ongoing actions in the field of accountability and transitional justice will be ensured, in particular with the EU's ongoing support to the IIIM and the work of ICMP.

A1.2 — Design and roll out of a similar package of services for **PWDs and VoW** focusing on rehabilitation and exploring —where feasible and relevant— individuals' and/or organisations' capacity to claim collective rights and to articulate demands (including financial compensations) from duty holders.

R2 Syrian youth and women are empowered to act as catalysts for positive change through improved access to entrepreneurial and life skill training, soft skills, non-formal education, technical and vocational education and training (TVET), and employment/livelihood opportunities, and through the roll out of effective violence prevention and response strategies, with a priority to areas outside the Syrian regime's control, as long as the operational context allows.

Activities in relation to the above result area may include, but are not limited to, the following:

A 2.1 — Design and roll out of effective **violence prevention and response strategies** — individually and/or in the framework of integrated programmatic approaches— and notably including targeted actions to address specific forms of violence and exposure to trauma and addiction, as well as broader child protection issues (violence, exploitation, abuse, trafficking, etc.) through case management, legal assistance, community-based mental health and psycho-social rehabilitation.

A2.2 — **Educate and empower Syrian women and youth** through entrepreneurial and life skills training (including soft skills), non-formal education, TVET and employment facilitation, also with a view to target and curb violent extremism.

R3 Upgraded skills, knowledge and capacities of Syrian NSAs and strengthened partnerships and interaction with diaspora networks through a strategy encompassing needs assessments, technical assistance, training and increased use of digital means and e-learning tools, with a priority to areas outside the Syrian regime's control, as long as the operational context allows.

Activities in relation to the above result area may include, but are not limited to, the following:

A3.1 — Capacity building of Syrian NSAs and **establishment of linkages and networks amongst Syrians** from different parts of Syria and/or with Syrians based out of the country through exchange of know how in various fields (such as nursing entrepreneurship), technical assistance, cross-border, Information and Communication Technology (ICT)-enabled or in-country training, financial support, sub-granting facilities and incubation of existing and/or new organisations and platforms, drawing strength —where relevant—from organised diaspora networks.

R4 Robust diagnoses and monitoring of stakeholders and interventions timely produced.

Activities in relation to the above result area may include, but are not limited to, the following:

A4.1— Continued support to **third party monitoring and assessments, risk analysis and other diagnostic** including support to results-based monitoring of stakeholders, on-going interventions leveraging the skills and know-how of various partners active in this field

A4.2 — Independent **analysis and people-centred research** to enhance collective understandings of in-country dynamics (e.g. returns), conflict drivers and spoilers, to inform targeted protection measures, safe returns, alternatives and effective responses.

Under Result Areas 2 and 3, innovative methods and approaches will be explored with the aim to integrate the **use of digital tools** in the delivery of entrepreneurial and life skill training, non-formal education and TVET, and in the roll out of capacity building to enhance technical, management, networking, mentoring and peer learning skills of Syrian NSAs so as to ensure the delivery of project activities across multiple geographies. More specifically, EU assistance could potentially encompass the following:

- *Innovative approaches in the delivery of non-formal education, TVET and employment facilitation for women and youth* through the use of digital tools and technology-based products. Implementing partners with expertise in this field have already developed software and applications that enable the delivery of e-learning contents, education and training through digital means. This will reduce the need for in-country presence. Web-based education and training will make it possible to reach out to some youth and children and provide them with opportunities to participate in education and in the labour market, support active citizenship and social inclusion, and prevent radicalisation leading to violent extremism. Whilst TVET cannot be replaced in full by ICT and digital means, there is room to explore specific areas of TVET that could leverage ICT and e-learning methodologies;
- *Entrepreneurial/life-skills development and training* through digital means and through interventions connecting Syrian youth inside Syria with Syrian diasporic communities with a view to foster entrepreneurship, investment and knowledge transfers. This could be done through distance learning and peer-to-peer support or exchange in various professional fields such as entrepreneurship and livelihoods.
- The use of new technologies and digital platforms to enable *support to Syrian NSAs, networks of professionals and CSOs*. Peer-to-peer contacts across the country and beyond will be promoted as vectors to foster dialogue and promote technical capacity and knowledge exchange. This may include strategic partnerships between non-formal networks of professionals to develop initiatives addressing one or more fields of education and training, and/or fostering exchange of experience and know-how between different types of professional networks (e.g. medical, midwifery and/or nursing, community health workers, and/or health practitioners, lawyers and/or judges, journalists', etc.). Mobility activities may also be supported in so far as they contribute to the design and delivery of training curricula and programmes and teaching and training methodologies, drawing on evidence of trends in the specific sector and skills needed in order to perform in one or more professional fields. Options to explore the recognition and equivalence of qualifications earned in country or abroad may also be explored;
- *ICT-enabled knowledge alliances* between local entrepreneurs and Syrian diasporic communities with a view to foster peer learning, innovation, entrepreneurship, creativity, employability, knowledge exchange, and/or public-private partnerships in various sectors including health with a view to optimise the limited resources available. IT support platforms offering spaces for virtual collaboration, databases, communities of practice and other online services for professionals and practitioners will be developed to assist collaborative partnerships.

With the aim of ensuring coherence and effectiveness of EU financing, the Commission decides to extend the eligibility of this action to: Iraq, Jordan, Lebanon, Tunisia and Turkey in particular in as far as activities foreseen under Result Area 3 and more specifically to enable peer-to-peer exchange between different types of non-formal networks of professionals inside Syria and their counterparts in the region through mobility and other means with the aim to contribute to capacity building in one or more professional fields.

4.2 Intervention Logic

After eight years of conflict, Syria faces challenges of fragmented identity, a weakened social fabric, widespread violence and trauma, abject poverty and economic exclusion, and a shrinking space for NSAs⁹ engagement. In order to contribute to the overall objective of promoting the prospects for an inclusive post-conflict Syria, the 3P Programme will nurture the space for civic engagement by strengthening technical programmes, management, networking, monitoring, mentoring and peer learning capacities of **Syrian NSAs inside and outside Syria**. The action rests on the assumption that meaningful engagement in Syria requires a long-term approach that builds on endogenous processes aimed at addressing marginalisation and participation— while anticipating the needs of a possible post-conflict transition.

The proposed package of support recognises that capacity building, empowerment and networking of NSAs may allow them to act as counterweights to State power as well as prevent possible future eruptions of violence. This set of interventions will contribute towards creating bottom-up processes and dynamics aiming to contribute to addressing fundamentally asymmetric power relations pre-dating the conflict (including deep-seated patronage systems) while providing entry points for post-conflict engagement in recovery and development efforts, if and when political conditions are met. The demand for change and political inclusion is not geographically driven and thus not only found in opposition areas, but a nation-wide demand shared by Syrians irrespective of their location.

Non State Actors must be given the means to retain legitimacy, validity and accountability towards their communities and constituencies; best practice shows that this is best done, by supporting areas of work whereby non-state actors can provide a service, are able to build their own capacity and relevance, and with this, agency over decisions but also their future as well as those they aim to represent and/or serve. The rationale is underpinned by the notion that supporting Syrian Non State Actors can only be meaningful if and when Syrians are also offered the means, space and support to recover from the deep psychological wounds of the war: the proposed programme also includes defined areas of work that aim to **address grievances, protect rights and empower women, youth and other key segments of society affected by the conflict**.

Promoting the psychosocial well-being and resilience of women and youth, including children, enables these target groups to heal and to rebuild meaningful social relationships and networks. Support to MHPSS, psychosocial rehabilitation, comprehensive protection and livelihood opportunities are all critical elements along a **continuum of empowerment that helps changing individuals from passive victims into active survivors able to support the right to voice opinions and participate in decision-making at all levels**. It also acknowledges the importance of

9 NSAs are here intended to include Community-Based Organisations (CBOs), grassroots organisations, civil society and diaspora organisations, women's groups, youth groups, civic actors, non-formal networks of professionals, elders, religious leaders, etc.

victims' agency in advocating and claiming rights, as well as addressing their inclusion into local communities and ability to participate in public life.

Recognising this, the proposed action will seek to support **NSAs where they demonstrate a capacity to offer an alternative to the regime or to other non-legitimate governance structure (f.ex. in the North East)**. This approach aims to sow the seeds of active/equal citizenship, democratic participation and inclusion, across Syria.

The action is in line with the *Joint Communication on Elements for an EU Strategy for Syria* and aims at translating the strategy into a conflict-sensitive, politically relevant and operationally efficient assistance programme. As such, the action will exclusively target Syrian right-holders, communities and Non State Actors and avoid accruing benefits to any unwarranted entity.

4.3 Mainstreaming

Gender — Gender and elimination of all forms of discrimination based on gender will be mainstreamed throughout the programme and in particular, but not exclusively, in interventions addressing the grievances of conflict-affected, marginalised and/or disempowered individuals and communities and preventing and countering violence and trauma. Parties to the conflict resort to sexual violence as a tool to instil fear, humiliate and punish or, in the case of terrorist groups, as part of their enforced social order. While the immense suffering induced by these practices impacts Syrians from all backgrounds, women and girls have been disproportionately affected, victimised on multiple grounds, irrespective of perpetrator or geographical area. Government forces and associated militias have perpetrated rape and sexual abuse of women and girls and occasionally men during ground operations, house raids to arrest protestors and perceived opposition supporters, and at checkpoints. The Gender Profile for Syria has recently been updated and will guide the choice of main entry points to address changing power relations taking into account the rights and needs of women, men, girls and boys as well as Lesbian Gender Bisexual Transgender Questioning Intersex (LGBTQI). Further, programmatic indicators will be gender disaggregated to ensure a structured approach to inclusivity for all interventions planned under the umbrella of this programme.

State Fragility and Conflict Sensitivity —Particular attention will be paid to Fragile States Principles (FSPs) and especially the “Do No Harm” (DNH) approach and its operationalisation to ensure that EU assistance minimises risks of aggravating conflict dynamics. Syria faces unique circumstances that have limited the spread of DNH, including fragmentation along different fault lines (socio-economic, religious, sectarian, tribal and class divides, rural-urban dynamics, intersections and juxtapositions between regime and non-regime controlled areas, specificities of Turkish occupation in North West and North East Syria, diasporic versus local identities, and the general population's alienation from their leadership and institutions) and logistical challenges arising from extreme insecurity. A DNH analytical framework of ‘dividers’ and ‘connectors’ will be developed to identify how EU assistance may contribute to fragmentation along different fault lines. Fragmentation is reversible: joint values are still strong and Syrian NSAs are an important connector. A checklist of questions may be developed to ensure that interventions and partnerships truly embrace a DNH approach.

Human Rights — A rights-based approach is mainstreamed throughout the 3P Programme. The action explicitly supports rights holders with a particular focus on conflict-affected, marginalised and/or disempowered individuals and communities and in particular victims of violence, the families of the disappeared, youth, women, children and people living with disabilities (PWDs). Support to Syrian NSAs is designed to be complementary to efforts countering violent extremism whilst anticipating the needs of a possible post-conflict transition.

The EU provides core support to the Syria Office of the High Commissioner for Human Rights (OHCHR) which has recently strengthened its capacity to support Syrian non-state actors involving also technical co-operation, capacity-building and seed-funding. This approach will allow for more effective mainstreaming of human rights relevant knowledge and activities in the work of a broad range of Syrian non-state actors, not only the ones having a human rights focus. Collaboration and synergies between EU funded programmes and UN OHCHR Syria's work will be sought and forged. OHCHR is also in an excellent position to co-ordinate and nurture linkages between victims organisations inside Syria and outside Syria.

4.4 Contribution to SDGs

This intervention is relevant for the 2030 Agenda. It contributes primarily to the progressive achievement of SDG 16 “Peace, Justice and Strong Institutions” (Targets 16.1 Significantly reduce all forms of violence and related death rates everywhere; and 16.2 End abuse, exploitation, trafficking and all forms of violence against and torture of children); SDG 10 “Reduced Inequalities” (Target 10.2 By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status), and SDG 5 "Achieve gender equality and empower all women and girls" (Targets 5.1 End all forms of discrimination against all women and girls everywhere; 5.2 Eliminate all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation; 5.3 Eliminate all harmful practices, such as child, early and forced marriage and female genital mutilation).

5 IMPLEMENTATION

5.1 Financing Agreement

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

5.2 Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 4 will be carried out and the corresponding contracts and agreements implemented, is 60 months from the date of adoption by the Commission of this financing Decision.

Extensions of the implementation period may be agreed by the Commission’s responsible authorising officer by amending this Decision and the relevant contracts and agreements.

5.3 Implementation Modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU Restrictive Measures¹⁰.

Considering the complexities and uncertainties this context presents, a mix of implementation modalities (call for proposals/direct grants under crisis declaration and indirect management with EU Member States and/or International Organisations) will allow coherent and effective support to the emerging needs of the stakeholders and beneficiaries identified, combined with a more rapid and flexible delivery. The proposed mix is based on the relatively successful implementation of similar actions in the past and on the need to provide both rapid and sustainable delivery, with particular focus on specific grants and funding instruments that will allow addressing the main streams of work described above. Additionally, this will enable rapid release of assistance while promoting coherence and co-ordination with other funding flows and mechanisms.

5.3.1 Grants: (Direct Management)

a) Purpose of the Grant(s)

The grants shall contribute to achieving Result Areas 1, 2, 3 and 4.

b) Type of Applicants Targeted

In order to be eligible for a grant, the applicants must:

- be a legal entity; and
- be non-profit-making; and
- be a specific type of organisation such as: a non-governmental organisation, a foundation or a public sector operator (including a development agency of a Member State of the European Union) or an international (inter-governmental) organisation as defined by Article 156 of the EU Financial Regulation.

c) Exception to the Non-Retroactivity of Costs

The Commission authorises that the costs incurred may be recognised as eligible as of 1 August 2019 in view of the political urgency of empowering Syrian youth and women to act as catalysts for positive change, addressing specific forms of violence and related traumas, providing opportunities and platforms for meaningful NSA capacity building, engagement and interaction, and/or produce timely analysis, as outlined in this action document.

5.3.2 Procurement (Direct Management)

The purpose of the procurement is to contribute to achieving Result Area 4.

¹⁰

www.sanctionsmap.eu Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

5.3.3 Indirect Management

A part of this Action may be implemented in indirect management with entities which will be selected by the Commission's services using the following criteria:

- Financial and operational capacity;
- Previous experience in any of the fields relevant for the three results areas concerned (child protection, SGBV, MHPSS, delivery of non-formal education, TVET and employment facilitation for women and youth, entrepreneurial/life-skills development and training; support to NSAs through sub-granting facilities and/or and seed-funding amongst others);
- Demonstrated capacity to deliver project results in a conflict and gender-sensitive manner

The implementation by this entity entails to achieve part of the activities foreseen under Result Area 1, 2 and 3.

Exception to the Non-Retroactivity of Costs:

The Commission authorises that the costs incurred may be recognised as eligible as of 1 August 2019 in view of the political urgency of empowering Syrian youth and women to act as catalysts for positive change, addressing specific forms of violence and related trauma, and/or providing opportunities and platforms for meaningful NSA capacity building, engagement and interaction, as outlined in this action document.

5.4 Scope of Geographical Eligibility for Procurement and Grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions:

The Commission's Authorising Officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of products and services in the markets of the countries concerned, or in other duly substantiated cases where the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

5.5 Indicative Budget

Component	EU contribution (million EUR)	Indicative third party contribution (million EUR)
5.3 Result Area 1 — Protecting Rights and Addressing Grievances of Conflict-Affected Individuals and Communities (Indirect Management / Grants)	3.0	N/A
5.3 Result Area 2 — Empowering Syrian Youth and Women to Act as Catalysts for Positive Change (Indirect Management / Grants)	7.0	N/A
5.3 Result Area 3 — Upgrading Skills, Knowledge and Capacities of Syrian NSAs and Strengthening Partnerships and Interaction with Diaspora Networks (Indirect Management / Grants)	3.8	N/A
5.3 Result Area 4 — Diagnoses and Monitoring Grant / Procurement	1	N/A

5.10 — Communication and Visibility	0.2	N/A
Contingencies	0	N/A
Total	15.0	N/A

5.6 Organisational Set-Up and Responsibilities

Considering the political sensitivity of any action in Syria, the EU Delegation will maintain close steering and monitoring of all projects, regardless of management modalities. The EU Delegation to Syria will provide oversight on projects implementation through the establishment of steering committees for specific interventions foreseen under the action and through regular monitoring and evaluation.

In view of the suspension of bilateral co-operation, no role is foreseen for the Syrian authorities in the organisational set-up of the action. Instead, in order to pursue mutual accountability objectives, the EU Delegation to Syria will ensure adequate participation from Syrian civil society leveraging existing and new mechanisms, including online/digital platforms and tools to engage a wide variety of Syrian NSAs in dialogue and review processes. Periodic consultations will increase transparency and promote an unbiased assessment on progress.

5.7 Performance and Results Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (e.g. not less than annual/every trimester) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (outputs and direct outcomes) as measured by corresponding indicators, using as reference the Logframe matrix (for project modality).

SDGs indicators and, if applicable, any jointly agreed indicators as for instance per Joint Programming document should be taken into account.

The report shall be laid out in such a way as to allow monitoring of the means envisaged and employed and of the budget details for the action. The final report, narrative and financial, will cover the entire period of the action implementation.

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews). Where necessary, use will be made of independent monitoring and evidence gathering mechanisms.

5.8 Evaluation

Having regard to the nature of the action, but also considering that substantial investment is and will continue to be made in results-based monitoring of stakeholders, in-country dynamics, interventions, conflict drivers, spoilers, needs and risks —as described under Result Area 3— no evaluation will be carried out for this action or its components.

5.9 Audit

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

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

5.10 Communication and Visibility

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

This action shall contain communication and visibility measures which shall be based on a specific Communication and Visibility Plan of the Action, to be elaborated at the start of implementation.

In terms of legal obligations on communication and visibility, the measures shall be implemented by the Commission, the partner country (for instance, concerning the reforms supported through budget support), contractors, grant beneficiaries and/or entrusted entities. Appropriate contractual obligations shall be included in, respectively, the financing agreement, procurement and grant contracts, and delegation agreements.

The Communication and Visibility Requirements for European Union External Action (or any succeeding document) shall be used to establish the Communication and Visibility Plan of the Action and the appropriate contractual obligations.

Because of political sensitivities attached to EU-funded actions in Syria and related risks for implementing partners and beneficiaries, some interventions financed under the framework of this programme may be exempted from visibility requirements. Nonetheless, where compliance does not imply particular risks—for instance, in case of activities implemented in the region or via ICT-enabled platforms—implementing partners will consult the EU Delegation to Syria with a view to define appropriate visibility requirements and activities.

It is foreseen that a service contract to implement communication and visibility activities may be contracted via Framework Contract. The total worth of the contract is EUR 200,000 as indicated under section 5.5.

6 PRE-CONDITIONS

The EU will closely monitor developments on the ground and constantly assess risks and opportunities on a case-by-case basis. In order to avoid interference or legitimisation of any unwarranted entity, EU support can only be maintained if the following pre-conditions are met:

- There is space for implementing partners to work without endangering their lives/freedom. The safety of EU partners will be a key pre-condition together with the ability to perform critical quality control/monitoring activities;
- Assistance can be provided without unwarranted interference by state institutions, armed factions or regional actors that may aim to steer or change

the focus of interventions under the umbrella of this programme influencing the selection of target locations, beneficiaries or modes of implementation;

- Assistance is geared towards empowering local communities and legitimate NSAs whilst avoiding contributing to further fragmentation and/or political engineering;
- Access and capacity to monitor is maintained;
- Full compliance with EU Restrictive Measures is ensured.

APPENDIX - INDICATIVE LOG-FRAME MATRIX

	Results chain: Main expected results (maximum 10)	Indicators (at least one indicator per expected result)	Sources of data	Assumptions
Impact (Overall Objective)	To preserve the prospects for an inclusive post-conflict Syria	-	-	<i>Not Applicable</i>
Outcome(s) (Specific Objective(s))	SO1. To nurture the space for civic engagement by strengthening technical programmes, management, networking, monitoring, mentoring and peer learning capacities of Syrian NSAs inside and outside Syria.	<p># NSAs improving their internal governance standards, transparency and accountability towards their own constituencies</p> <p># of individual NSAs and NSA networks or platforms with demonstrable management, leadership advocacy, negotiation capacity</p> <p># of Syrian individuals and/or CSOs involved in cross-community dialogue or training activities</p> <p>Degree of inclusion of community and civil society voices in post-conflict recovery processes measured through surveys</p> <p>Proportion of conflict-affected caseload assisted with protection and advocacy strategies and specific support from NSAs</p>	International statistics, project-specific reports and surveys, HNO Syria	<p>Broader peace and security conditions do not hinder implementation</p> <p>There is space for implementing partners to work without endangering their lives/freedom</p> <p>Assistance can be provided without unwarranted interference by regime entities, armed factions or regional actors that may aim to steer or change the focus of interventions under the umbrella of this programme (e.g. by influencing the selection of target locations, beneficiaries or modes of implementation)</p> <p>Assistance is geared towards empowering local communities, NSAs and civilians</p>
Outputs	<p>R1 Rights and grievances of conflict-affected, marginalised and/or disempowered individuals and communities effectively are addressed, with a focus on the families of the disappeared, persons affected by displacement (PADs), people living with disabilities (PWDs) and Disabled Persons Organisations (DPOs) and in particular —but not exclusively— victims of war (VoW).</p> <p>R2 Syrian youth and women are empowered to act as catalysts for positive change through improved access to entrepreneurial and life skill training, soft skills, non-formal education, technical and vocational education and</p>	<p># measures/mechanisms put in place to address these forms of discrimination/violence in a more sustainable way</p> <p># tracing cases closed positively (subject located or fate established)</p> <p># of missing people reunited with their families</p> <p># persons affected by displacement informed about conditions for eventual return</p> <p># PWDs, PDOs and/or VoW rehabilitated, empowered and enabled to claim rights</p>	As above	<p>Stakeholders share a common understanding of priorities</p> <p>Implementation is adequately sequenced and proceeds at a reasonable pace</p> <p>Expectations are adequately managed</p> <p>Local ownership principles are honoured through processes of validation by a wide cross-section of stakeholders</p> <p>Blueprint approaches are avoided Plans and proposals are realistic and</p>

	<p>training (TVET), and employment/livelihood opportunities, and through the roll out of effective violence prevention and response strategies</p> <p>R3 Upgraded skills, knowledge and capacities of Syrian NSAs and strengthened partnerships and interaction with diaspora networks through a strategy encompassing needs assessments, technical assistance, training and increased use of digital means and e-learning tools.</p> <p>R4 Robust diagnoses and monitoring of stakeholders and interventions timely produced</p>	<p>% of women and youth serviced with response programmes that promote inclusive and locally-led processes.</p> <p>% of beneficiaries targeted who experience more exposure or participation in civic initiatives at local level</p> <p># of youth/women benefitting from training, jobs creation and livelihoods who experience an improvement in their livelihoods and/or have abandoned negative coping strategies</p> <p>Proportion of the target population below the international poverty line, by sex, age, employment status and geographical location (urban/rural) (SDG 1.1.1)</p> <p>Proportion of the target population (youth and women) living below 50 per cent of median income, by age, sex and persons with disabilities (SDG 10.2.1)</p> <p>Increase in % of population with access to digital platforms and/or receiving capacity building through digital means</p> <p># of TPM analyses and reports timely produced</p>		<p>feasible and the 'politics of implementation' is duly taken into account</p> <p>The safety of EU partners remains a key pre-condition when performing critical quality control/monitoring activities</p>
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