



Ministry of Foreign Affairs

# IOB Evaluation

## Review of the monitoring systems of three projects in Syria

AJACS, White Helmets and NLA

IOB Evaluation | Review of the monitoring systems of three projects in Syria | AJACS, White Helmets and NLA | IOB Evaluation | Review of the monitoring



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August 2018

## Preface

Implementing assistance programmes in situations of conflict and in warzones is challenging in the extreme. In Syria, where it is virtually impossible for outside experts to be present on the ground, different and more flexible arrangements have to be made to ensure that project implementation is as effective as possible. In a highly constrained environment with fluctuating power configurations and logistical barriers, monitoring project activities becomes an equally daunting task. Yet, for various reasons, it is key that donors, implementing partners and beneficiaries keep each other informed on progress and bottlenecks and that feedback loops are in order.

This study looks into the robustness of monitoring systems that are used in the context of Syria. It examines the monitoring systems for three Dutch-funded programmes to assess whether these provide sufficient guarantees to detect flaws and risks, and how to remedy these. This study does not examine actual progress made by the different projects, nor does it assess their outputs and impact.

Some factors posed limitations to the research. The evolving situation in Syria meant that it had to be carried out in a short time period and, for security reasons, had to rely on remote monitoring rather than field visits to Syria.

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The study was undertaken by IOB researchers. Hence, solely IOB is responsible for the findings and conclusions.

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## List of abbreviations

ASI	Adam Smith International
AJACS	Access to Justice and Community Services
CSI	Computer Services, Inc.
DAM	North Africa and Middle East Department
DSH	Department for Stabilisation and Humanitarian Aid
DJZ	Legal Affairs Department
DVB	Security Policy Department
FCO	Foreign & Commonwealth Office
FSA	Free Syrian Army
FSP	Free Syrian Police
ICSP	Integrated Community Security Programme in Syria
M&E	Monitoring and Evaluation
NLA	Non-Lethal Assistance
OECD	Organisation for Economic Cooperation and Development
RAM	Risk Analysis and Management
TOC	Theory of Change
TPM	Third Party Monitor
UXO	Unexploded Ordnance
WH	White Helmets

# Introduction

At the request of DSH and DAM, IOB has analysed the monitoring systems of three stabilisation programmes in Syria: Access to Justice and Community Services (AJACS), White Helmets (WH) and Non-Lethal Assistance (NLA). The request followed in response to allegations made in the BBC’s Panorama documentary “*Jihadi’s You Pay For*” (aired on 4 December 2017) that the AJACS programme (in)directly would have contributed to extremist organisations. These accusations were investigated by the implementer, donors and an independent Third Party Monitor (TPM), and they were considered invalid or appropriately dealt with by AJACS at the time they arose.

In this MFA internal report, IOB examines to what extent the monitoring systems of the three programmes provide sufficient safeguards to detect irregularities during implementation, such as diversion, misappropriation, or influence or co-optation by non-acceptable groups. The findings are based on an analysis of the project documents and conversations with partners involved (donors, implementers, monitors, beneficiaries) in The Hague, Istanbul and Amman. A study of best practices for monitoring risk in complex environments commissioned to the Conflict Research Unit of the Clingendael Institute of International Relations provides a yard stick to examine the three programmes’ monitoring systems.<sup>1</sup> This report deliberately does not examine their relevance, effectiveness or impact.

Reading Guide	
This report starts by presenting the <b>conclusions</b> of the review.	Read this for a quick understanding of the main findings.
<b>Section one</b> operationalises programmatic risks and monitoring systems of programmes implemented in conflict environments, and presents a framework for assessing the monitoring systems of the three programmes in Syria.	Read this section for a better understanding of the methodology and best practices for monitoring risks in general.
<b>Section two</b> examines the programmes AJACS, WH and NLA North and NLA South <sup>2</sup> .	Read this section for a more detailed explanation of the findings in the summary and conclusions.
<b>Section three</b> discusses general findings relevant for all projects.	Read this section for a more detailed explanation of the findings in the summary and conclusions.
The <b>annexes</b> provide a detailed review of the project.	Read this for a the full assessments of the programmes, including concrete examples.

<sup>1</sup> Clingendael (2018). *Between a Rock and a Hard Place*.

<sup>2</sup> Due to differences in the nature and context of the programmes, NLA in the north and in the south of Syria are examined separately.

# Summary and conclusions



Monitoring systems refer to paper and practice; this study includes an analysis of both the monitoring tools and mechanisms put in place by the three programmes and the uptake and usage of the information gathered. Building on the paper *'Between a Rock and a Hard Place'* by Clingendael, this paper formulates 15 relevant requirements for setting up effective remote monitoring systems. The research team has used these as a yardstick to measure the quality of the monitoring systems of all three programmes. Table 1 presents the assessment of the 15 requirements for AJACS, the White Helmets and the NLA programmes (an explanation of the scores can be found in the annexes).

		AJACS	WH	NLA North	NLA South
1	The general risks of implementing the particular programme in the context of conflict have been considered and accepted by the MFA;	+/-	+	+	+/-
2	On-the-ground networks to enable accountability are developed. Accountability networks and relationships with stakeholders are essential for effective monitoring and triangulation;	+	+/-	+	+/-
3	Transparency and timeliness of information sharing by implementing organisations to both donors and beneficiaries are in place to allow for fast reaction in situations of crisis and misinformation, and aid activities contain incentives to encourage this;	--	-	+/-	+/-
4	Procedures are in place to prevent and react on irregularities and misappropriation, such as internal anti-corruption policies, codes of conduct, whistle blowing policies, and vetting and compliance procedures;	+	+	+	+
5	Specific monitoring capacity is available that is separated from, but working closely with the programme; this ensures consistent monitoring and mainstreaming M&E procedures across the programme;	+	+/-	+	+/-
6	There are investments in research and analysis software, ICTs and other modern technologies, with the aim of adopting and streamlining it across programmes;	+	+	+	++
7	TPM is used to independently monitor progress and risks;	++	--	--	--
8	The TPM is used as a complement rather than as a substitute;	++	n/a	n/a	n/a
9	The TPM has a clear and agreed upon role and mandate, and there are adequate resources to fulfil this role;	-	n/a	n/a	n/a
10	Monitoring and evaluation is incorporated into the programme framework already in the planning phase, not developed as an afterthought;	-	-	+/-	+/-

11	There is a minimum standard of a baseline and a theory of change, including simple indicators, and the monitoring system has several layers of checks and filters for continuous verification;	+/-	-	+	+
12	M&E in place is relevant for learning and continuous improvement;	+/-	-	+	+
13	The monitoring tools (project reports by staff, implementing partners, financial reports, technological approaches) are appropriate given the indicators;	+/-	+/-	+/-	+
14	Project documents and monitoring reports are available and accessible for all relevant actors;	+/-	-	+/-	+/-
15	There is a management structure in place that regularly reviews all monitoring information and meets frequently enough to respond adequately in times of acute crisis.	+	+/-	++	+/-

Overall, this IOB study arrives at the following conclusions:

- Given the situation on the ground in Syria – where on-site monitoring takes place under very fluctuating and sometimes unsafe conditions – all three programmes have built-in auxiliary measures to account for results and financial transactions, and to monitor risk. Overall, IOB finds that while some projects have more thorough monitoring systems in place than others, **these systems contribute to detecting irregularities and acting on them.**
- Implementing a programme remotely in a conflict zone such as Syria is inherently accompanied by risks of irregularities and/or misappropriation. **It is impossible to design a remote monitoring system that guarantees detecting all irregularities.**
- However, **inadequacies were observed that put the quality, completeness and objectivity of risk reporting under pressure.** The quality of the theories of change (ToC), log frames and indicators are unsatisfactory, which impacts the ability to learn and adapt the programmes, as well as the capacity to monitor and deal with risk.
- Yet, **systems alone cannot guarantee complete and objective reporting of risks and timely action.** The adequate use of the monitoring systems in place depends on factors such as organisational culture, relations between partners and organisational interests, all of which influence the speed, transparency and objectivity of reporting.
- **The safeguards provided by vetting against international watch lists is limited.** All projects use vetting of beneficiaries against various systems and databases as a safeguard against extremist organisations influencing programme implementation. In practice, vetting rarely leads to red-flagging potential beneficiaries. Due to capacity limitations, in all three programmes the vetting is restricted to the leadership of the beneficiaries and to those directly handling money. As a result, vetting alone cannot exclude extremist organisations from becoming beneficiaries.

- **Financing programmes through a lead donor can inhibit the MFA's information position.** It should not be assumed that the lead donor will always be forthcoming with information. The lead donor may also take unilateral decisions that negatively impact the MFA's ability to monitor and manage risks.
- **Project documents and reports are not centrally available and archived.** As a result, information is difficult to retrieve or is lost, thus limiting the MFA's ability to respond to new developments and crisis situations.
- **The use of Hawala-networks to transfer money into Syria is not without risk.** Both AJACS and the White Helmets use this *Hawala*-system. Transactions cannot be viewed in isolation, but are part of a wider system. The risk of diversion of funds by armed groups exists; the existing system does not provide insight into who receives payments and taxes along the way or how the money is used. In addition, by using the wider system, organisations may indirectly facilitate harmful or illicit trade.
- With regard to **AJACS**, the review finds the monitoring system to be adequate. It is elaborate, especially on paper. The use of TPM 'Integrity' also has a clear added value. There are, however, also some important limitations in AJACS' monitoring and reporting. Evidently, there are inherent risks involved in supporting the Free Syrian Police (FSP) in opposition areas, especially after the programme's second year, when it faced shrinking operational space and increased pressure by armed groups. Donors are reluctant to fully accept the political reality of the programme. It is, for example, very likely that pragmatic communication takes place between the FSP and extremist organisations on a regular base, thus crossing donors' 'red lines'. However, since it is known that donors generally hold or stop payments when their 'red lines' are crossed, this negatively affects the transparency of reporting risks, results and irregularities by the FSP and AJACS in.
- For the **White Helmets**, the review finds the monitoring system to be below adequate, although developments do indicate that the system is progressively improving. The research team observed that the Netherlands and other donors perceive their programmes as providing neutral, humanitarian support in response to crises that warrant higher risks than those taken in 'normal' contexts of development cooperation. While the M&E capacity of the White Helmets has improved, crucial limitations in their monitoring system remain. One important shortcoming is the absence of independent verification of programme results and risks. Information on implementation relies on self-reporting by the beneficiaries in the field; external parties are contracted to support M&E but do not *independently* verify risks or results; also, there is no independent programme evaluation. In addition, there is an overall lack of organisational transparency. The implementer (Mayday) and the beneficiary (White Helmets) are highly intertwined, thereby potentially undermining full disclosure of risk reporting. As a result of diverging donor-specific reporting, donors have very little oversight in overall programme results or in who finances what.

- As to the **NLA**, the report distinguishes between NLA in the North and in the South. For both areas, the research team finds that monitoring is relatively straight-forward given the nature of the activities: procurement and delivery of equipment goods and training (in the South). For **NLA in the North**, the review finds the monitoring system to be adequate. The implementing parties employ field officers to verify the delivery of goods and the presence of equipment using photo and video footage, often with GPS and time-stamps. The project's risk of goods falling into the hands of extremist organisations after delivery to the beneficiaries is considered and accepted at the political level, and it is monitored by site visits.
- For **NLA in the South**, the review finds the monitoring system to be adequate. The project's risks are higher than in the North because the equipment provided can be used as auxiliary material in military operations. It also includes the provision of mobile health equipment and training of beneficiaries on border patrol. As such, the consequences of any diversions of equipment are much larger, and there exist risks of human rights violations. Due to a lack of access to the South, modern technologies are applied to complement self-reporting by beneficiaries. It remains difficult, however, to monitor human rights violations, given the negative incentives of reporting by beneficiaries. An extra limitation for NLA in the South is that the Netherlands does not have complete access to the relevant documentation because the MFA supports the programme through another donor.

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# Operationalisation and methodology

This section draws on a study of best practices for monitoring commissioned by IOB to the Clingendael Institute.<sup>3</sup> The full paper is also available separately, and we highly recommend its use by policy makers for assessing the quality of remote monitoring in future project proposals.

First, programmatic risks and remote monitoring in crisis situations are operationalised. Second, a framework for assessing monitoring systems is presented. Finally, the methodology and limitations of the review are discussed.

## 1.1 Risk

The OECD differentiates three overlapping categories of risk that aid interventions in fragile situations need to consider and monitor: contextual, programmatic and institutional risks. Contextual risks are factors over which external actors have limited control – like the risk of state failure, progress/failure of peace process, military interventions and humanitarian crises. Programmatic risks are risks related to the failure of programmes to achieve their aims and objectives, and the risks of causing harm through intervention. Institutional risks are risks to the aid provider that arise mostly out of programmatic risks. These are typically expressed in terms of (in)security, fiduciary failure, reputational loss, domestic political damage, etc.<sup>4</sup>

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For this study, we focus specifically on the monitoring of programmatic risks, as these can be addressed most directly in programming designs. There is no standard framework or checklist for programmatic risks in conflict settings. For example, activities with a lot of material goods involved, such as constructing a police station or delivering food aid, run a high risk of diversion of funds and equipment. Projects without significant funds and materials, for instance dialogue or training programmes, can face corruption and diversions in the form of corrupt selection processes for event invites. Given these differences, table 2 below provides an overview of the most common programmatic risk categories along with specific risks.

<sup>3</sup> Clingendael (2018). *Between a Rock and a Hard Place*.

<sup>4</sup> OECD (2012). *Managing Risks in Fragile and Transitional Contexts: The Price of Success?*

Table 2 Programmatic risks donors and implementing organizations encounter in conflict settings	
Risk category	Specific risks involved
Diversion of funds	<ul style="list-style-type: none"> <li>• Ransom</li> <li>• Checkpoint payments</li> <li>• Informal taxes</li> <li>• Corruption</li> </ul>
Diversion of equipment	<ul style="list-style-type: none"> <li>• Appropriation by armed groups</li> <li>• Unauthorised sale</li> <li>• Theft</li> </ul>
Diversion of activity	<ul style="list-style-type: none"> <li>• Corrupt selection processes for event and training invites</li> </ul>
Co-optation of counterpart	<ul style="list-style-type: none"> <li>• Use aid activity as front for other activities</li> <li>• Infiltration by replacing key staff with stakeholders in conflict</li> </ul>
Non-delivery of outputs but claiming funds nonetheless	<ul style="list-style-type: none"> <li>• Forged paperwork proving delivery</li> <li>• Delivering a minor part without ability to monitor the whole</li> </ul>
Partner is unknowingly affiliated with reputationally damaging groups	<ul style="list-style-type: none"> <li>• A local partner (individual or group) is somehow affiliated with an internationally designated terrorist or other blacklisted group</li> </ul>

## 1.2 Monitoring

Monitoring involves more than data collection alone; it includes a strategy for the analysis and use of the information collected, as well as mechanisms to allow programme adjustments where necessary. The OECD defines monitoring as “a continuing function that uses systematic collection of data on specified indicators to provide management and the main stakeholders of an on-going development intervention with indicators of the extent of progress and achievement of objectives and progress in the use of allocated funds.”<sup>6</sup> It is an ongoing process in which the data collected must be used not only for accountability purposes, but also for informing programming decisions and improving programme implementation in real-time. Effective monitoring plays a crucial role in making programmes flexible and adaptable to changing contexts, which is particularly relevant in complex and volatile situations of conflict and violence.<sup>7</sup>

For this reason, monitoring programme implementation progress in situations of conflict goes beyond simply reporting on planned versus actual activities and results on the basis of indicators. A monitoring plan should include a variety of processes, such as monitoring of conflict; implementation and quality; theories of change and assumptions; risks; value for

<sup>5</sup> Clingendael (2018). *Between a Rock and a Hard Place*, p. 5.

<sup>6</sup> OECD (2010). *Glossary of Key Terms in Evaluation and Results Based Management*, pp. 27–28

<sup>7</sup> OECD (2012). *Evaluating Peacebuilding Activities in Settings of Conflict and Fragility – Improving learning for results*, p. 30.

money; and monitoring for learning.<sup>8</sup> If programme log frames, indicators, and M&E plans are not updated regularly to address the changing dynamics of a conflict and to trigger activity adjustment, they are not appropriate for guiding monitoring efforts and for informing effective decision-making.<sup>9</sup>

In conflict settings where security challenges are so severe that donors cannot be physically present with staff, there are roughly speaking three options to monitor programme implementation progress:

- **(Self)-monitoring conducted by (local) implementing partners.** In conflict situations, many implementing organisations rely on their local partners for monitoring. Naturally, this begs the question if there is enough critical 'distance' between the partners to critically assess the implementation process and the results obtained. Implementing partners may have an incentive not to report all irregularities and donors may weigh the humanitarian necessities against the risks of diversion.
- **Third-party monitoring (TPM).**<sup>10</sup> This is a common approach to complement remote monitoring, in which donors contract external third parties to collect and/or verify monitoring data. TPM has several advantages: it provides independent eyes and ears on the ground, allows for the validation of monitoring data from implementing partners where confidence in partner reporting is lacking, and it can sometimes allow for more cost-efficient field monitoring and therefore more frequent missions. It is typically most useful for verifying quantitative and physical outputs of aid projects.
- **Monitoring via modern technology.** New developments in technology allow for remote monitoring of projects without staff present, such as GPS tracking or mobile technology. Yet, technology in conflict settings faces several constraints and needs, for example, to be able to function without constant electricity supply, across large distances, and without advanced computing skills.

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### 1.3 Towards a framework for assessing the quality of remote monitoring

There are many guidance documents and toolboxes that provide overviews of different tools and best practices to monitor programme implementation in fragile and conflict-affected settings, but there is no standard framework.

<sup>8</sup> Corlazzoli, White (2013). *Back to Basics – A Compilation of Best Practices in Design, Monitoring & Evaluation in Fragile and Conflict-affected Environments*, p. 34.

<sup>9</sup> Corlazzoli, White (2013). *Back to Basics – A Compilation of Best Practices in Design, Monitoring & Evaluation in Fragile and Conflict-affected Environments*, p. 34.

<sup>10</sup> It is important to note that TPM – which is focused on monitoring and conducts data collection and analysis independently and throughout the programme – is distinct from external evaluations – which is focused on evaluation, may include own data collection but also draws on available programme data and is engaged for a specific period. TPM is also distinct from contracting third parties for a certain part of the internal M&E system, for instance to conduct a perception survey.



Building on the work by Clingendael, we have formulated the following requirements that are relevant for effective monitoring systems for the three projects in Syria: Access to Justice and Community Services (AJACS), White Helmets (WH) and Non-Lethal Assistance (NLA):

**General: Mandate**

1. The general risks of implementing the particular programme in the context of conflict have been considered and accepted by the MFA;

**Good practices: Implementing partners**

2. On-the-ground networks to enable accountability are developed. Accountability networks and relationships with stakeholders are essential for effective monitoring and triangulation;
3. Transparency and timeliness of information sharing by implementing organisations to both donors and beneficiaries is in place to allow for fast reaction in situations of crisis and misinformation, and aid activities contain incentives to encourage this;
4. Procedures are in place to prevent and react on irregularities and misappropriation, such as internal anti-corruption policies, codes of conduct, whistle blowing policies, and vetting and compliance procedures;
5. Specific monitoring capacity is available that is separated from, but working closely with the programme; this ensures consistent monitoring and mainstreaming M&E procedures across the programme;
6. There are investments in research and analysis software, ICTs and other modern technologies, with the aim of adopting and streamlining it across programmes;

**Good practices: Third Party Monitors**

7. TPM is used to independently monitor progress and risks;
8. The TPM is used as a complement rather than as a substitute;
9. The TPM has a clear and agreed upon role and mandate, and adequate resources to fulfil this role;

**Monitoring tools**

10. Monitoring and evaluation is incorporated into the programme framework already in the planning phase; it is not developed as an afterthought;
11. There is a minimum standard of a baseline and a theory of change including simple indicators, and the monitoring system has several layers of checks and filters for continuous verification;
12. M&E is relevant for learning and continuous improvement;
13. The monitoring tools (project reports by staff, implementing partners, financial reports, technological approaches) are appropriate given the indicators;

**Monitoring usage**

14. Project documents and monitoring reports are available and accessible for all relevant actors;
15. There is a management structure in place that regularly reviews all monitoring information and meets frequently enough to respond adequately in times of acute crisis.

## 1.4 Methodology and limitations

This review was conducted by IOB between April and July 2018. Between 15 and 22 May, the research team visited Istanbul and Amman to conduct interviews with all relevant partners involved (donors, implementers, monitors, beneficiaries). Further conversations with partners were held in The Hague and via phone and videoconference. In total, the research team interviewed 39 direct stakeholders. Since all interviews were confidential, interviewees will neither be named nor quoted. All project documents made available to IOB were reviewed.

All data collected were used in the analysis for this review. In a first phase, each of the three IOB researchers individually and independently scored the three programmes along the lines of the 15 requirements for good monitoring presented above, based on their own analysis of the project documentation available, the interviews and conversations with the actors involved and on their other observations.<sup>11</sup> Subsequently, the authors compared these individual scores, discussed the results and reached a consensus on the final score. The following section presents the key findings for each project. The full review, including various examples and more elaborate descriptions, can be found in the annexes.

This report draws entirely on the evidence gathered during the research period. For security reasons, the research team could not visit the programmes' implementation sites nor its beneficiaries in Syria. It also faced time constraints and limitations in access to the relevant documentation, because systematic archiving practices were missing. Nonetheless, IOB is confident about the findings and conclusions presented here, which focus on the MFA's information about, and oversight of the programmes' progress and risks.

<sup>11</sup> Possible scores are: --, -, +/-, +, ++.

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## Key findings for the three projects

This section presents the findings on the AJACS, White Helmets, NLA North and NLA South programmes,<sup>12</sup> using the framework presented earlier as a yardstick.

## 2.1 AJACS

The AJACS programme was developed at the request of the Free Syrian Police (FSP), with the overall goal of enhancing community security by improving the provision of legitimate security and justice in areas in Syria under control of the moderate opposition. The programme started in 2015, building on its predecessor, the Integrated Community Security Programme in Syria (ICSP). The FSP are provided with stipends, station support, equipment and trainings to enhance their ability to provide non-contentious security services to their communities. Total Dutch contributions to the programme between 2015 and 2018 amount to almost EUR 18 mln.

The programme had a complicated implementation structure, with a programme management consisting of two implementers – Adam Smith International (ASI) and Creative. ASI is contracted by the UK and Creative by the US. The Netherlands, Denmark, Germany and Canada have MoUs with the UK and support AJACS through ASI under the UK contract. There is a Steering Board, consisting of representatives from donor headquarters that meets several times a year to determine broader policies. However, day-to-day activities are managed by the Secretariat, which consists of donor representatives in Istanbul. The donors are actively involved in the daily management of the AJACS programme, mainly through the secretariat.

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With regards to AJACS, the review finds the monitoring system to be adequate. There are inherent and evident programmatic risks in supporting the Free Syrian Police (FSP), and donors and implementers have set up systems that monitor most of these risks. Overall, these monitoring tools can be characterised as very elaborate, thorough and costly, taking a relatively high amount of staff time and share of available funds. However, due to the way these tools are used, they have limitations. Donors are reluctant to fully accept the political reality of the programme. At the same time, there is an interest on the side of implementers and beneficiaries to hamper the complete and timely sharing of information with the donors.

### General

Donors are aware of the main risks involved, including the risk of diversion of funds, of extremist organisations unduly influencing beneficiary stations and of human rights violations, and these are constantly monitored by the implementers. Nonetheless, there is a reluctance among donors to fully accept the political reality of the AJACS programme. Beneficiaries are required to adhere to engagement criteria and red lines that are not always realistic in Syria's complex and ever-changing context, in which alliances change quickly

<sup>12</sup> Due to the different nature of the programmes and context between NLA in the north and south of Syria, these are examined separately.

and territorial control by different groups is constantly in flux. In reality, (regular) pragmatic communication between the FSP and extremist organisations is likely to take place.

### *Implementing partners*

AJACS has an extensive network enabling flows of information and accountability. An important element in its internal knowledge management system are its 60 field officers, who facilitate a constant flow of information between the police stations and operating communities in Syria and the AJACS staff in Amman. These strong connections between field officers and their local communities are both a strength (in terms of access) and a weakness (in terms of objectivity). An additional flow of information is provided by the M&E and research departments. These operate separately from the implementing staff, and they constantly check, update and triangulate the evidence gathered from the field with information from various other sources, such as social media.

AJACS has systems in place that measure compliance, amongst others for procurement, due diligence and vetting. An important safeguard against misappropriation of funds by and influence of extremist organisations is the procedure of vetting the project staff and beneficiaries using the American and British systems. Due to a lack of capacity, it is only the FSP-commanders and the beneficiaries directly handling the money that are actually vetted. The nearly 4,000 police officers active in the project are not individually screened. As a result, there is a risk that beneficiary police officers are under the influence of extremist organisations.

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The AJACS programme involves a particularly large number of actors.<sup>13</sup> This enables the use of multiple sources of information, and donors and implementing partners also utilise external sources of information (e.g. information from other projects and programmes, military sources, etc.). However, such external channels generally do not provide detailed information regarding irregularities and misappropriation, but mainly provide contextual knowledge. In addition, information flows are hampered by diverging interests among the multiple actors involved.

Despite regular contact with donors and extensive and frequent reporting, the transparency provided by AJACS and the FSP is below par. AJACS spends a relatively large amount of time and resources on donor management, and it has developed a management culture in which there is a tendency to tell a polished story, at the expense of full transparency towards donors. Both the FSP and AJACS have an interest in not exercising full and speedy information disclosure and sharing, because donors may withhold funding when engagement criteria are not met and when 'red lines' are crossed. It is quite possible that this negative incentive weighed more heavily when the areas where the FSP operates were coming under increasing pressure, and the financing of the programme was under discussion. AJACS and the FSP have been reluctant in reporting back incidents to donors.

<sup>13</sup> Donor representatives in Amman, Istanbul and donor capitals, AJACS management (made up of Adam Smith International and Creative combined), AJACS field officers, FSP commanders, local FSP police posts, and Integrity field officers.

There are several cases known where AJACS has not reported fast enough (i.e. within the 48 hours required). For example, in the case of so-called 'ghost stations', where stations had been suspended but remained operational and officers continued to receive stipends on the payrolls of stations where they had formally been reassigned to.

### *Third party monitoring*

Integrity, the TPM, fulfils a crucial role in the AJACS monitoring system, and acts as an additional and independent safeguard against abuses and misappropriation. The organisation's added value is evident, and it has been able to report on various incidents where AJACS has not.

At the same time, its role and mandate are multiple and not always clear. With three teams of two field officers, its capacity is limited, allowing it to examine only a small selection of supported communities for each reporting period. Another limitation concerns the degree to which Integrity can actually operate independently. For security and logistical reasons, it cannot visit police stations unannounced. It has to notify AJACS and the FSP field officers a week in advance, allowing FSP stations to prepare these monitoring visit. This may well affect the validity of its findings.

The fact that Integrity is hired directly by the UK's Foreign & Commonwealth Office (FCO) limits the influence of the Netherlands (and other donors) on the mandate and resources for TPM. In the past, the FCO unilaterally decided to cut expenditure to Integrity, forcing the organisation to reduce its capacity by letting three of its international staff go.

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### *Monitoring tools*

M&E has been part of the programme since its inception, but a lot of pressure at the start to accelerate activities and payment of FSP stipends has negatively affected the quality of monitoring progress and the risks. The M&E plan was only finalised 12 months after the start of the project (whereas the requirement was within two weeks). IOB's analysis indicates that the quality of its theory of change (ToC), of the log frames and of the indicators remained unsatisfactory. As a result, there are now serious limitations regarding the valid reporting of results and, as a consequence, of the quality of internal learning.

Reports by AJACS with regard to the context, programme results and risks are detailed and are produced regularly.<sup>14</sup> However, this guarantee neither their completeness nor objectivity. AJACS appears to have an unrealistic confidence in the quality of information provided by the field officers, who at times have an interest in withholding (timely) information. Furthermore, the financial reports lack disaggregated data on the operational costs at the FSP station level.

### *Monitoring usage*

The Donor Steering Board at headquarters level (with operations handled by the Secretariat in Istanbul) reviews the monitoring information and has decision-making powers.

<sup>14</sup> AJACS produces weekly atmospheric reports and bi-weekly, quarterly and yearly progress reports.

However, as the owners of the contract with ASI and Integrity, the British have also taken unilateral decisions. The Dutch MFA has access to most, but not all relevant information and project documents. The absence within the MFA of a central information hub for archiving project documentation is also problematic, since this hampers quick access to, and usage of key reports.

## 2.2 White Helmets

For the White Helmets, this review finds the monitoring system to be below adequate. The White Helmets are a community driven response to the Syrian conflict, comprising almost 4,000 volunteers and staff operating throughout Syria. They are known for their widely reported civilian rescue operations after aerial bombardments. The majority of their activities however include public awareness raising, traffic control, fire response, road and infrastructure rehabilitation and UXO clearance.

The White Helmets are formally an independent organisation registered in Turkey, but in practice they are closely tied to Stichting Mayday Rescue Foundation (Mayday), the implementing partner for the majority of the White Helmets' donors. Both organisations have their headquarters in the same office building. The White Helmets are supported by the governments of the UK, Denmark, the Netherlands, Canada, Germany, New Zealand and the US. Most donors provide support through Mayday, whereas the US provide support through the US contractor Chemonics. According to Mayday, between 2014 and 2018 the programme funds totalled USD 127 mln., of which USD 19 mln. comes from private parties. The Netherlands has contributed almost EUR 10 mln. during this period.

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The Dutch MFA perceives White Helmets' activities as low risk, which it considers acceptable. While their M&E capacity has improved, there remain crucial limitations in the M&E system. These include a ToC and a results framework of poor quality, and an absence of independent programme results and risks verification. Support to the White Helmets lacks donor coordination, resulting in limited donor insight into who finances which parts of the entire joint project.

### *General*

Given the absence of other service deliverers, donors perceive support to the White Helmets as neutral support to the Syrian civil society, and as humanitarian response after airstrikes. This explains why they may well be willing to accept more risks than for regular development projects. The implementing organisation, Mayday, and the White Helmets have formulated an elaborate risk matrix, including an assessment of risks and potential mitigation measures. This matrix is, and should be, a live document that is constantly adjusted to the ever changing realities on the ground.

### *Implementing partners*

Monitoring capacity at the White Helmets was very low during the initial stages of the project. During the project's implementation, Mayday actively trained White Helmets' staff

and invested in M&E capacity. At present, there is an M&E department that is operating separately from the daily implementation. While Mayday could do more to step up M&E capacity at the White Helmets, it explicitly aims to minimise the project's running costs in order to maximize White Helmets' funding in Syria; as a result, only 0.9% of all donor contributions is now spent on M&E.<sup>15</sup>

The M&E staff at the White Helmets is not actively involved in data collection, and information from the field is gathered mainly through self-reporting by White Helmets inside Syria. Moreover, there is no separate flow of information about the project and there are few on-the-ground networks to enable information gathering from the wider community. Additional information is provided by two organisations contracted by Mayday to support with monitoring the payment of stipends and with conducting perception surveys amongst the population. Thus, there is a lack of independent monitoring of the project's activities and results. In addition, there has not been an external evaluation of the programme that validates the White Helmet's proclaimed relevance, efficiency or effectiveness. IOB also considers it problematic that the amounts of money transferred through *Hawala* or cash payments are not systematically monitored.

Mayday and the White Helmets are closely intertwined and many donors have difficulties understanding their joint and separate responsibilities. At the same time, linkages between Mayday and the donor group are less close. Due to its proximity to the project's implementation and its direct interest in the White Helmet's reputation, Mayday may well be perceived as lacking transparent risk monitoring and reporting mechanisms. On the other hand, there are several clear procedures in place to prevent irregularities and misappropriations of funds, such as codes-of-conduct for all volunteers and regular vetting of White Helmets against a US database. It must be noted, however, that due to capacity issues the large majority of the volunteers is not actually vetted. At the individual volunteer level, information on vetting and on stipends and activities is gathered and analysed in a rather sophisticated online knowledge management system. Yet the quality of this system entirely depends on the quality of the information derived from the M&E systems in place.

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### *Third party monitoring*

TPM is not employed by the implementing organisation, the MFA or other donors.

### *Monitoring Tools*

Problems with results reporting are exacerbated by the insufficient quality of the latest version of the overarching ToC, as formulated in the 2018/19 Consolidated Programme plan.<sup>16</sup> The ToC (which is essentially a log frame) mainly focuses on institutional capacity building and does not follow a logical or causal pathway from the implemented activities towards the Helmet's desired impact. In addition, the operationalisation of various indicators often does not capture the outputs and outcomes, thus further hampering valid result reporting.

<sup>15</sup> White Helmets (2018), *White Helmets in 2020*, p. 11.

<sup>16</sup> White Helmets, *FY 2018-19 Consolidated Batal Programme Plan*, pp. 13-17.



### *Monitoring usage*

The IST-Syria team in Istanbul is regularly updated on overall activities of the White Helmets. However, the parallel financial flows that fund Mayday pose a major constraint to effective monitoring and reporting. Since most donors individually fund the programme, Mayday produces separate project proposals and final financial and narrative reports for each individual donor. As a consequence, results are reported using separate log frames and accommodating individual donor requirements. These donors, in turn, also require individual audits. These separate reporting requirements and schemes not only cast a heavy burden on the Helmet's already limited M&E capacity, they also restrict insight into the Helmet's overall achievements. Reports only include progress on activities directly funded by the separate donors, and donors seem to have little insight into who else finances which other parts of the project. In addition, there is little donor coordination and sharing of even important information. To tackle some of these shortcomings, Mayday has formulated a consolidated programme plan for 2018/19. However, the organisation still had to write separate proposals for the different donors.

## 2.3 NLA – North

NLA in the North consists of the provision of non-lethal assistance to moderate armed opposition forces in Syria and their communities. The support includes food baskets, uniforms, communication equipment and vehicles. The objective is to improve the position and legitimacy of these forces, and thereby also their negotiation position in peace talks.

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NLA in the North is implemented through two separate implementing organisations, which are responsible for the assessment of groups' needs, procurement, transportation and distribution of goods. Between 2015 and 2018 the Netherlands supported EUR 13.2 mln. through the main implementer. Another contractor provided NLA worth EUR 3.6 mln. between 2016 and 2018.

For NLA in the North, the review finds the monitoring system to be adequate. NLA in the North consist of the procurement and delivery of goods only, making project monitoring relatively straightforward. The main risk is that these goods may fall into the wrong hands. Measures are taken to minimise risks, and given the nature of most goods provided, their loss will have relatively limited potential consequences. The risk of goods falling into the hands of extremist organisations once they are in the hands of the beneficiary groups has been accepted at the political level, and is monitored by site visits.

### *General*

Among donors, there is an awareness of the main risks of the NLA programme in the North, including the possible risks of misappropriation of support by extremist organisations and commitment of human rights violations by beneficiary groups. DJZ and DVB are involved in monitoring that the type of goods provided do not violate the prohibition on the use of force nor the non-intervention principle.

### *Implementing partners*

Both implementers are in direct contact with beneficiary groups, and employ Syrian staff who have direct contacts with the Free Syrian Army (FSA). The implementers employ separate field officers to monitor the provision of equipment and goods. They use photo and video footage – often with GPS and time-stamps – to verify their presence and delivery. Specialized consultancy organisations were employed to conduct independent evaluations, but these only concerned activities implemented in 2016.

Target groups are generally transparent about their use of support received. Continued support usually serves as a carrot to maintaining transparency in future. However, since exposing human rights violations committed by (members of) beneficiary groups may endanger support, there is a negative incentive to report such abuses. Constant monitoring is impossible in a warzone context, and commanders sometimes actually restrict access for the staff of implementing organisations.

Different implementers use different vetting systems. The US employ their RAM vetting system. The CSI Watchdog Elite vetting system draws on US, Canadian and European watch lists. Only the commander level is vetted through these systems; lower level officers responsible for operations are not vetted.

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### *Third party monitoring*

TPM is not employed by the MFA, nor by the implementing organisations.

### *Monitoring tools*

M&E is conducted by field officers who verify the delivery and use of equipment. Both needs assessments and perception surveys of support provided are conducted. Commanders are also in direct contact with MFA representatives in Istanbul, and the relevance of support is verified. The monitoring instruments and indicators are appropriate for the type of support provided, but there are no clear mechanisms to control for bias of the implementers and beneficiaries, nor is there an explicit results framework. Human rights violations are more difficult to assess.

### *Monitoring usage*

The IST-Syria team in Istanbul is regularly updated on progress and has the mandate to (temporarily) put the programme on hold when needed. A limiting factor is that the different donors involved in NLA are not open about their support. While the Dutch contribution was coordinated with the US, there is no wider donor coordination regarding the type and amount of support given, nor any exchange of information.

## 2.4 NLA – South

NLA in the South consists of support to groups along the southern border for border protection, to prevent the smuggling of weapons and drugs and to avoid border crossings by extremist organisations. The support provided includes equipment and vehicles to

enhance border protection capabilities, training, and the establishment of medical and surgical units. These units support both members of the border patrol and community members.

The Netherlands supports NLA in the South through a lead donor, which holds the contract with the implementer. The Netherlands has contributed almost EUR 9 mln. between 2016 and 2018.

For NLA in the South, this review finds the monitoring system to be adequate. Given the type of activities, monitoring of the project is relatively straightforward. However, the risks are higher compared to NLA in the North, given the nature of some of the equipment and the training provided. This includes training on border patrol, which means that the risk of human rights violations is also higher. Furthermore, as the Netherlands MFA provides support through another lead donor, it has no full access to information.

#### *General*

Donors are aware of the main risks of the NLA programme in the South, including the risk of misappropriation of support by extremist organisations and possible human rights violations by beneficiary groups. Measures are taken to minimize such risks. DJZ and DVB are involved in monitoring that the goods provided do not violate the prohibition on the use of force nor the non-intervention principle. Human rights violations are considered a red line, but according to the implementer this is difficult to monitor without field presence, especially since there is a negative incentive for the beneficiaries to report such violations.

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#### *Implementing partners*

The implementer does not have direct access to the area; it depends on information provided by the beneficiaries. Modern technologies partially correct this problem by providing additional monitoring data. GPS tracking of vehicles is used to monitor beneficiaries' activity and presence, as well as possible diversion of vehicles. Body cams are used to verify whether beneficiaries adopt the operational procedures and techniques they were trained on. Beneficiaries are vetted by several donor systems.

#### *Third party monitoring*

TPM is not employed by the MFA or by the implementing organisations.

#### *Monitoring tools*

Monitoring of groups is done through routine procedures and mapping by the implementer, drawing on GPS information, data from beneficiary groups, spot reports, body cam footage, and social media. Overall, the monitoring tools and indicators are appropriate given the type of programme and the context in which it is implemented. However, more efforts could be taken to formally assess the effect of trainings provided.

### *Monitoring usage*

The MFA has good contact with the lead donor and implementer, participates in monthly meetings and receives quarterly reports. However, the MFA does not receive the weekly reports on progress, incidents and risks which are being shared with the lead donor. Where both implementer and lead donor expressed their willingness to share information more frequently and on a regular basis, the implementer said to have been asked by the lead donor not to share all information directly with the MFA. The lead donor holds responsibility for monitoring information and responding when necessary, and the role of the MFA is limited to the activities funded directly.

# 3

## General findings

This section discusses findings that are not programme-specific, but apply to monitoring and managing risk of programmes in Syria in general. These findings are related to the *Hawala*-networks used by programmes to transfer money into Syria, and the information position of the MFA.

### 3.1 Information position MFA

When implementing high-risk programmes in contexts such as the Syrian, accurate and up to date information is key for minimising and managing risk. It is furthermore essential that all involved departments and experts of the MFA have access to the same information, and are able to respond to new developments and crisis situations drawing on an institutional memory. IOB found two factors that negatively impact the information position of the MFA:

1. ***The Netherlands is put in a dependent position in projects where another donor is in the lead.***  
This negatively affects the information position of the Netherlands. In the case of AJACS, the FCO holds the contract of the TPM and unilaterally decided to decrease its funding, thereby limiting TPM and the information it can provide regarding progress and risks. As the owner of the contract, the FCO did not share all the documents with the Netherlands. A similar pattern is visible with NLA South, where the implementer was requested by the lead donor to channel certain reports through them and not to share these directly with the Netherlands.
2. ***There is no central place in the MFA where all project documents are available and archived. In addition, it is not clear who is responsible for archiving project documentation.*** As a result, several key project documents took much time to locate, or could not be located at all. This severely impacts the ability of the MFA to respond to new developments and crisis situations in a timely and efficient manner.

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Donors and implementers of programmes alike often claimed that the information provided by other programmes, implementing partners and other government agencies was used to triangulate the information obtained through their own monitoring systems. While such sources are very useful for building and maintaining an accurate and up to date understanding of the overall programme context, they should not be considered as a safeguard measure. There is no evidence that such sources have provided information regarding possible irregularities and/or misappropriation.

### 3.2 *Hawala* networks

The financial system in areas controlled by the opposition in Syria has entirely shut down. The only way to transfer money into these areas is by using informal money transferring systems like *Hawala* ('transfer' in Arabic). This is an informal method of debt settlement, built on mutual trust of each party to the transaction. In practice, there are various

techniques to settle the debt. The *Hawala* system relies on personal connections between various agents in different locations and in different countries. Because the various agents manage cash pools in these different locations, there is no need for physical border crossings. Transactions therefore cannot be viewed in isolation, but are part of the wider system. Single transactions are managed by various layers of agents, and because the system is based on trust, it does not leave a paper trail.

The large majority of humanitarian aid provided to Syria, including by the UN, is transferred through this system. At the moment, this is the only method available to organisations such as AJACS or White Helmets for transferring cash inside opposition held areas. Nonetheless, there are several risks associated with its use. There exists a risk of diversion of funds by armed groups, since it does not provide insight into who receives payments and taxes along the way or how the money is used. In addition, by using the wider system, organisations may indirectly facilitate harmful or illicit trade.

In 2015, Beechwood International prepared an elaborate technical assessment of the humanitarian use of the *Hawala* system in Syria for aid agencies active in cross border operations in Syria.<sup>17</sup> The report calls for a more enhanced due diligence system and a more conflict-sensitive approach in using the system in Syria. Current practice, also deployed by the White Helmets and AJACS, does not go beyond automated screening of *Hawala* agents. This does not adequately detect links to terrorism, because red-flagged individuals are known to use false personal information or non-sanctioned individuals to manage their business. In addition, it is impossible to screen all agents involved in this multi-layered system. The report mentions several risk mitigation measures that could be taken to address the diversion of funds or the facilitation of harmful or illicit trade.<sup>18</sup> These measures are not applied by the investigated programmes.

<sup>17</sup> Beechwood International (2015). *Humanitarian Use of Hawala in Syria*. available at:

<http://www.cashlearning.org/downloads/beechwood-technical-assessment-syria-31-july-15.pdf>.

<sup>18</sup> Some of the mitigation measures mentioned in the report include: conduct due diligence to check the providers' (a) beneficial ownership and affiliations, (b) obligation or pressure to pay informal taxes, (c) witting acceptance of goods from a source controlled by a warring party, and (d) liquidity supply; record serial numbers and conduct spot checks with beneficiaries on the notes received to avoid laundering of someone else's cash; reduce visibility of the distributions/pick-up by staggering the payments, changing location and timing; spot monitor the beneficiaries' (a) obligation to pay informal taxes to armed groups, and (b) voluntary donations to support armed groups; establish clear and quick reporting mechanism for non-compliance; analyse supply chains that interact with your markets.

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# Annexes

## Annex 1 Assessment AJACS

Assessment AJACS	
General: Mandate	
1. The general risks of implementing the particular programme in the context of conflict have been considered and accepted by the MFA.	
Assessment	+/-
Commentary	<p>There are inherent and evident programmatic risks of supporting the Free Syrian Police (FSP), and the most pressing risks are constantly being monitored by AJACS. A very elaborate monitoring system has been set up to this end.</p> <p>At the same time there is a reluctance to fully accept the political reality of the programme, as beneficiaries are required to adhere to engagement criteria and red lines that cannot always be considered realistic in the complex and ever-changing context of Syria. It is very likely that (regular) pragmatic communication and coordination takes place between the FSP and extremist organisations, such as Nour al-Din al-Zenki or HTS.</p> <p>Diversification of funds can also not be ruled out, as there is no specification for the use of operational costs of police stations provided in monitoring reports, and the provided amount is not tied to specific activities or size of the station.</p> <p>Finally, IOB signals many inherent risks with getting money into Syria, especially using the <i>Hawala</i> system. There is no paper trail and there are few safeguards. While there is no alternative, there is a risk that funding through the <i>Hawala</i> system is not aligned with the red lines and engagement criteria of the donors.</p> <p>The programme has not undergone major strategic changes and the main response to the changing context has been to close down or open stations, depending on the conflict context and influence of extremist organisations/state actors. When the project started, it was perceived as an interim solution that would provide stabilisation until the moderate opposition would take over. With the opposition steadily having lost ground, there is an increasing disconnect between some aspects of the programme (e.g. institutional capacity building) and the overall operating context. While the programme and many of its areas of operation have come increasingly under pressure, no real exit strategy has been developed.</p>

Assessment AJACS	
Good practices: Implementing partners	
2. On-the-ground networks to enable accountability are developed. Accountability networks and relationships with stakeholders are essential for effective monitoring and triangulation.	
Assessment	+
Commentary	<p>AJACS has an extensive network to enable flows of information and accountability. An important element in the internal knowledge management system are the 60 field officers of AJACS, who facilitate a constant flow of information between the police stations and operating communities in Syria and the AJACS staff in Amman. Field officers generally have good relationships with the FSP as they come from the same region. They report financial data – such as FSP officer stipends and station operating costs – programme progress and results, situational changes and possible violations of donor ‘red lines’.</p> <p>The strong connection of field officers to their local communities is both a strength (in terms of access) and weakness (in terms of objectivity). An additional flow of information is provided by M&amp;E field officers, who report independently to the M&amp;E department of the programme. Their task is to monitor programme progress and results. The collected information is aggregated, analysed and reported by AJACS. The research team of AJACS constantly checks, updates and triangulates the gathered evidence from the field with information from social media, an important data source in Syria.</p> <p>The AJACS programme includes a particularly large number of actors involved; donor representatives in Amman, Istanbul and donor capitals, AJACS management (made up of Adam Smith International and Creative combined), AJACS field officers, FSP commanders, local FSP police posts, and Integrity field officers. This enables multiple sources of information, and donors and implementing partners also utilise external sources of information (e.g. information from other projects and programmes, military sources, etc.). Although these external sources of information generally do not provide detailed information regarding irregularities and misappropriation, they do improve understanding of the conflict’s dynamics and context. The involvement of such a large number of actors is also a limitation, as different actors sometimes have diverging interests, which affects the flows of information.</p>

Assessment AJACS	
<b>3. Transparency and timeliness of information sharing by implementing organisations to both donors and beneficiaries are in place to allow for fast reaction in situations of crisis and misinformation, and aid activities contain incentives to encourage this.</b>	
Assessment	--
Commentary	<p>Despite the regular contact and large amount of reporting, the transparency provided by AJACS and the FSP is below par. AJACS, spends a relatively large amount of time and resources on donor management, and has developed a management culture in which there is a tendency to tell a polished story. This is at the expense of full transparency towards donors. Both the FSP and AJACS have an interest in not exercising full disclosure or speed of information sharing due to the fact that donors hold or stop payments when engagement criteria are (possibly) not met and ‘red lines’ are crossed. It is quite possible that this negative incentive weighs more heavily now that the areas where the FSP operates are coming under increasing pressure, and the financing of the program is under discussion. AJACS and the Free Syrian Police (FSP) have been reluctant with reporting back incidents.</p> <p>There are several cases known where AJACS has not reported fast enough (the agreement is within 48 hours), such as with no longer operating police stations, so-called ‘ghost stations’. In these cases, officers continued to work in no-go areas and still received their AJACS reimbursements via payrolls of other stations. Often the police officers choose to continue operating in suspended areas simply because this is where they live. It is likely that this happens more often, but with the current set up of the monitoring system (no GPS tracking of delivered police vehicles and reluctance of the FSP to report) it is impossible to determine how many times. There are also instances where FSP station commanders were not aware of red lines (such as not being allowed to engage with certain courts) until being told by the TPM, indicating the FSP leadership does not always clearly convey red lines down the chain of command.</p>
<b>4. Procedures are in place to prevent and react on irregularities and misappropriation, such as internal anti-corruption policies, codes of conduct, whistle blowing policies, and vetting and compliance procedures.</b>	
Assessment	+
Commentary	<p>AJACS has systems and standards of compliance in place, amongst others for procurement, due diligence and vetting. An important safeguard to prevent misappropriation of funds and influence by extremist organisations is vetting the project staff and beneficiaries against American and British systems. In practice, vetting only very rarely leads to individuals being flagged. Due to lacking capacity, only the FSP-commanders and beneficiaries directly handling money are vetted. This means that the nearly 4,000 police officers active in the project are not individually screened. As a result, there is a risk that beneficiary police officers are under the influence of extremist organisations such as HTS or <i>Daesh</i>. Additionally, the strength of these systems depends entirely on how they are used (see point 3 above). In one case, the proposed police commander did not pass Jordanian vetting, and was allocated a position in the CDCC under the project.</p>

Assessment AJACS	
<b>5. Specific monitoring capacity is available that is separated from, but working closely with the programme; this ensures consistent monitoring and mainstreaming M&amp;E procedures across the programme.</b>	
Assessment	+
Commentary	AJACS has M&E and research departments, that operate separately from the implementing staff. M&E field officers report directly to the M&E department at headquarters where data is cross-checked with other information sources (from field staff, social media, etc.). A limitation to risk monitoring is that the M&E staff is tasked with monitoring progress indicators but is not explicitly mandated to monitor risk factors. Such information is therefore not proactively targeted by M&E staff, and only provided incidentally.
<b>6. There are investments in research and analysis software, ICTs and other modern technologies, with the aim of adopting and streamlining it across programmes.</b>	
Assessment	+
Commentary	AJACS has developed a specific Knowledge Management System (KMS). This is an elaborate tool that allows for digital storage and monitoring of programming information, including work plans, monitoring reports, vetting history per agent, stipend payments, equipment tracking, and activities at station level. While the tool itself is elaborate, the quality of the risk information depends entirely on the quality collected by the field officers and M&E officers. Other than its KMS platform and the tracking and analysis of social media, AJACS does not employ modern technologies. GPS tracking of vehicles could be used to monitor both vehicles and activity of FSP stations. AJACS' objections against GPS tracking are centred around the argument of security of staff, but it is technically possible to do so safely.
<b>Good practices: Third Party Monitors</b>	
<b>7. TPM is used to independently monitor progress and risks.</b>	
Assessment	++
Commentary	Integrity fulfils an important role in the AJACS monitoring system as TPM. In total, there are 6 field officers monitoring the project in Syria. Integrity was also the TPM of the predecessor of the AJACS programme and has been involved throughout the duration of the current project.
<b>8. The TPM is used as a complement rather than as a substitute.</b>	
Assessment	++
Commentary	The organisation has been hired by FCO as an additional safeguard to identify abuses and misappropriation and exists independent and on top of AJACS' own monitoring. The added value of Integrity is evident, and the organisation has been able to report on various incidents where AJACS had not.

Assessment AJACS	
<b>9. The TPM has a clear and agreed upon role and mandate, and there are adequate resources to fulfil this role.</b>	
<i>Assessment</i>	–
<i>Commentary</i>	<p>The role and mandate of Integrity has not always been completely clear, and the fact that it is hired directly by FCO limits the influence of the Netherlands (and other donors) on the mandate and resources for the TPM. In the past, FCO unilaterally decided to cut expenditure to Integrity, forcing the organisation to reduce its capacity by letting three of the international staff go.</p> <p>Over the course of time, Integrity has fulfilled different roles, putting a lot of strain on the available capacity: monitoring output, outcome and impact; formulating of risk analyses; giving updates about the local context and providing recommendations for improvement of the programme. For a long period there was no clarity about the role and responsibilities of Integrity. Furthermore, its capacity is limited and it currently employs three teams of only two field monitors. Therefore, it cannot provide full geographical coverage and can only examine a small selection of supported communities for each reporting period.</p> <p>Integrity also has not always been fully aware of the specifics of project implementation. This has undermined the quality of its monitoring missions. Another limitation of its capacity as independent TPM is that for security and logistical reasons, it cannot visit police stations unannounced. The organisation is forced to notify AJACS and the FSP field officers a week in advance, which allows the FSP stations to prepare the monitoring visit, possibly affecting the validity of the findings.</p>
<b>Monitoring tools</b>	
<b>10. Monitoring and evaluation is incorporated into the programme framework already in the planning phase, not as an afterthought.</b>	
<i>Assessment</i>	–
<i>Commentary</i>	<p>M&amp;E has been part of the programme since its inception; an M&amp;E plan was a requirement for proposals in the tender document, an M&amp;E department has been part of the programme design. However, despite numerous attempts, IOB has not been able to receive the programme proposal to verify the extent to which the M&amp;E-plan was elaborated in the proposal. In reality, the M&amp;E plan was only finalised 12 months after the start of the project (the requirement was within 2 weeks). Multiple sources indicated that there was a lot of pressure at the beginning of the programme to quickly start the activities and the payment of FSP stipends, and there was less attention to monitoring and risk assessment.</p>

<b>Assessment AJACS</b>	
<b>11. There is a minimum standard of a baseline and a theory of change, including simple indicators, and the monitoring system has several layers of checks and filters for continuous verification.</b>	
Assessment	+/-
Commentary	While the monitoring system has different independent sources of information and checks and filters for continuous verification (see also point 6 above), the quality of the Theory of Change (ToC) and logframes underlying the project are below par. The terminology output and outcome are used incorrectly, the ToC is hardly substantiated, and causal relationships and contribution/attribution of the project remain unclear. The ToC, log frame and indicators were revised and improved in 2017, but they remain unsatisfactory.
<b>12. M&amp;E in place is relevant for learning and continuous improvement.</b>	
Assessment	+/-
Commentary	While the risk matrix is elaborate and describes various mitigation actions, the ToC, log frame and related indicators are of poor quality. As a result the M&E system has primarily been used for accounting purposes, and only recently have indicators been operationalised to allow for learning and improving the project. Also, no external evaluation has been undertaken to establish the effects of the programme and to formulate recommendations for improvement.
<b>13. The monitoring tools (project reports by staff, implementing partners, financial reports, technological approaches) are appropriate given the indicators.</b>	
Assessment	+/-
Commentary	The weekly atmospheric reports and bi-weekly, quarterly and yearly reports of AJACS on the context, program results and risks are detailed. However, this does not guarantee the completeness or objectivity of the reports. All donors indicated that the information provided by the FSP field officers is of lesser quality and is less reliable than the data gathered by TPM Integrity. AJACS appears to have an unrealistic confidence about the quality of the information provided by the field officers, who at times have an interest to refrain from complete and timely provision of information (see point 4 above). Furthermore, the financial reports do not specify the operational costs at the FSP station level.
<b>Monitoring usage</b>	
<b>14. Project documents and monitoring reports are available and accessible for all relevant actors.</b>	
Assessment	+/-
Commentary	AJACS shares all but the very detailed documents with the Secretariat for concurrence or approval. The Netherlands does have access to most, but it does not receive all relevant information and project documents. There are indications that the British – who are the lead organisation in direct contact with AJACS and Integrity – do not always pass through all available information. The absence of a central point within the MFA for archiving all project documentation, including AJACS and Integrity reports, is also problematic. As a result, several project documents requested for the purpose of this report could not be provided.



Assessment AJACS	
15. There is a management structure in place that regularly reviews all monitoring information and meets frequently enough to respond adequately in times of acute crisis.	
Assessment	+
Commentary	<p>There is a Steering Board, consisting of representatives from donor headquarters that meets several times a year to determine broader policies, but day-to-day activities are managed by the Secretariat, which consists of donor representatives in Istanbul. The donors, mainly through the secretariat, are actively involved in the AJACS programme. The secretariat meets (at least) bi-weekly to discuss the progress and to review the situation on the ground and the risks of implanting the project with AJACS staff. The secretariat has substantial decision making powers. However, as owner of the contract with ASI, the British have also taken decisions unilaterally, such as the decision to suspend support after the accusations by the BBC, and the decision to cut funds for Integrity. The frequent and active direct involvement of donors in the project has been characterised as micromanagement, but is also considered as necessary given the risks involved by donors and implementers alike. The functioning of the Secretariat has been limited by a lot of staff turnover, and different donors and individuals have approached their role in the Secretariat very differently. In general, the Netherlands has played quite an active role within the Secretariat. The Dutch seat in the secretariat could benefit from stronger support from The Hague.</p>

## Annex 2 Assessment White Helmets

Assessment White Helmets	
<b>General: Mandate</b>	
<b>1. The general risks of implementing the particular programme in the context of conflict have been considered and accepted by the MFA.</b>	
Assessment	+
Commentary	<p>Although its opponents have politicised the project, donors continue to <u>perceive</u> it as a form of neutral support to civil society and a humanitarian response to disaster. As a result, the political risks of supporting the project are acceptable <u>for the donors</u>. However, this does not mean there are no risks for donors involved.</p> <ul style="list-style-type: none"> <li>• The movement of money into Syria is the largest risk. Diversion of stipends may occur, especially given the shrinking operational space for the opposition. There are no transparent ways of getting stipends to beneficiaries. Currently, this is done by moving cash across the border and by using the <i>Hawala</i> system. It is problematic that Mayday does not possess information about the amount of money being transferred into Syria using the <i>Hawala</i> vs. the amount of money being transferred into the country using cash.</li> <li>• There is a certain risk of diversion of equipment by armed or extremist groups. This is considered acceptable to donors, especially since the materials can mainly be used to save human lives or repair damaged buildings.</li> <li>• White Helmets are also active in areas controlled by (non-acceptable) armed groups. Sometimes, therefore, communication between the White Helmets and, for example, representatives of local councils is needed. This is unlikely to change given the shrinking space for the opposition.</li> <li>• Another risk is the shrinking space for the opposition. It has become clear that the White Helmets are not able to work in areas controlled by the government and cannot transcend the conflict. Another related risk is co-optation or other sorts of influence exerted by extremist groups or by armed groups on White Helmets. The new consolidated plan (2018-19) incorporates an elaborate risk-matrix including an assessment of the likelihood of the various risks and potential mitigation measures. Mayday and the White Helmets regard this risk matrix as a live document that requires constant adjustment to changing reality.</li> </ul>
<b>Good practices: Implementing partners</b>	
<b>2. On-the-ground networks to enable accountability are developed. Accountability networks and relationships with stakeholders are essential for effective monitoring and triangulation.</b>	
Assessment	+/-
Commentary	<p>The White Helmets themselves are the primary source of information from implementation sites and all information about activities is based on self-reporting. There is only little triangulation with other sources of information on the ground. SREO and RMTeam are hired consultants to collect data on perceptions and stipends from the field, and are therefore not part of an actual on-the ground network.</p>

Assessment White Helmets	
<b>3. Transparency and timeliness of information sharing by implementing organisations to both donors and beneficiaries are in place to allow for fast reaction in situations of crisis and misinformation, and aid activities contain incentives to encourage this.</b>	
<i>Assessment</i>	-
<i>Commentary</i>	<p>Mayday and the White Helmets are two separate entities on paper. In reality, however, their responsibilities overlap. Until last year, the two organisations shared their M&amp;E desk in the past and many White Helmets have completed traineeships with Mayday. At present, the organisations continue to share the same building but are now working from separate floors. Staff from both organisations continue to sit in on each other's meetings; Mayday refers to this mode of implementation as the 'proximity model'.</p> <p>Donors indicated that it is difficult to distinguish one from the other and don't always understand where the responsibility of the one ends and of the other starts. This is not without risk. Due to its proximity to the implementation of the project, Mayday is very directly and intrinsically linked to the project, and it has a direct interest in downplaying problems with its monitoring or implementation of . At the same time, the relationship between Mayday and the donors is not as open.</p>
<b>4. Procedures are in place to prevent and respond to irregularities and misappropriation, such as internal anti-corruption policies, codes of conduct, whistle blowing policies, and vetting and compliance procedures.</b>	
<i>Assessment</i>	+
<i>Commentary</i>	<p>There are several procedures in place to prevent irregularities and misappropriation of funds. The White Helmets have their own due diligence system for volunteers at the local level. All beneficiaries have to agree to a code-of-conduct. Not acting in according to these codes can lead to demotion, disciplinary action or dismissal. At the leadership level, White Helmets and everybody who touches money (including <i>Hawala</i> agents) are vetted against the US database every six months – this is a group of approximately 400 people.<sup>19</sup> Thus, not all ordinary volunteers are vetted. The information collected is used to mitigate the risk of individuals under the influence of extremist groups joining the White Helmets. In reality it happens only very rarely that US vetting leads to incriminating information about beneficiaries. A possible explanation for this is that the stipends paid to the White Helmets (USD 150) are quite modest compared to the amounts paid to armed fighters.</p>
<b>5. Specific monitoring capacity is available that is separated from, but working closely with the programme; this ensures consistent monitoring and mainstreaming M&amp;E procedures across the programme.</b>	
<i>Assessment</i>	+/-
<i>Commentary</i>	<p>The White Helmets have a separate M&amp;E department that is not directly involved in project implementation. Their monitoring capacity was initially weak. Mayday invested in improving their M&amp;E capacity and as a result there is now a functioning M&amp;E department (including an M&amp;E director, M&amp;E officers and data analysts). The M&amp;E staff of the White Helmets, however, only process and analyse the data provided by the White Helmets and by hired consultants on the ground. They do not collect data themselves.</p>

<sup>19</sup> Depending on US vetting is not an automatic safeguard and lies beyond the Dutch sphere of influence, because it remains unclear whether the Mayday and the White Helmets can continue using these systems; the US are not likely to pay stipends to White Helmets in the future.

Assessment White Helmets	
<b>6. There are investments in research and analysis software, ICTs and other modern technologies, with the aim of adopting and streamlining it across programmes.</b>	
Assessment	+
Commentary	<p>The White Helmets work with a very advanced real time conflict and activity monitoring system that combines and triangulates information about airstrikes and responses from various sources. The software has been of great use for learning for improving the effectiveness of the project and its activities.</p> <p>At the individual volunteer level, information on vetting and on stipends and activities is gathered and analysed in a rather sophisticated online knowledge management system. The quality of this information, however, entirely depends on the quality of the information input. The system, therefore, largely depends on self-reported data.</p>
Good practices: Third Party Monitors	
<b>7. TPM is used to independently monitor progress and risks.</b>	
Assessment	--
Commentary	<p>On paper, Mayday and the White Helmets are working with RMTeam and SREO, which are presented as a TPMs for the project. In practice, however, the organisations rather function as sub-contractors within the internal M&amp;E system of the project. RMTeam and SREO are commissioned by Mayday and White Helmets to perform pre-defined surveys in the field. The data collected is used by the M&amp;E department of the White Helmets for their reporting. As such, both organisations are closely connected to the project implementers and beneficiaries and cannot be regarded as independent third party monitors that validate findings and aim to complement the monitoring information collected by the implementer.</p>
<b>8. The TPM is used as a complement rather than as a substitute.</b>	
Assessment	n/a
Commentary	
<b>9. The TPM has a clear and agreed upon role and mandate, and there are adequate resources to fulfil this role.</b>	
Assessment	n/a
Commentary	

Assessment White Helmets	
Monitoring tools	
<b>10. Monitoring and evaluation is incorporated into the programme framework already in the planning phase, not as an afterthought.</b>	
Assessment	–
Commentary	<p>M&amp;E capacity at the White Helmets was very weak in the beginning of the project and was developed only during the project (see point 5). M&amp;E practices and the project's result chain and indicators have been altered during its implementation.</p> <p>Most of the capacity of the M&amp;E department is used for writing up separate reports for the respective donors, for undergoing individual donor audits and for writing spot reports on incidents, both for donors and for the media.</p> <p>Rather than reporting in a unified and overarching result chain, Mayday reports to the donors bases on the separate logframes and only for the budget and the specific years of funding provided by that donor. There is little capacity for more strategic and effective monitoring at the project level.</p> <p>The capacity problems are exacerbated by Mayday reducing the running costs of the project wherever possible in order to maximize the amount of money it can allocate to the White Helmets inside Syria. As a result, only 0.9% of all donor contributions are actually spent on M&amp;E.</p>
<b>11. There is a minimum standard of a baseline and a theory of change, including simple indicators, and the monitoring system has several layers of checks and filters for continuous verification.</b>	
Assessment	–
Commentary	<p>There are different logframes for reporting to different donors. Moreover, there is an overarching Theory of Change. The ToC's of the programme have been updated several times. The latest version of the ToC (which is essentially a logframe) focusses on institutional capacity building of the White Helmets and does not follow a logical or causal pathway from the implemented activities towards the desired impact. The two outcomes formulated are:</p> <ol style="list-style-type: none"> <li>1. The White Helmets and essential services are sustained in areas where they operate</li> <li>2. The White Helmets are an independent and sustainable NGO</li> </ol> <p>Both are not 'outcomes' in accepted evaluation terminology. It furthermore remains unclear <u>how</u> these outcomes will lead to the desired impact:</p> <ul style="list-style-type: none"> <li>• Communities in areas where the White Helmets operate are resilient, better able to prepare for, reduce the impact of, and recover from the effects of shocks and stresses.</li> </ul> <p>In addition, the operationalisation of various indicators often does not capture the outputs and outcomes, thereby hampering valid results reporting.</p>

Assessment White Helmets	
12. M&E in place is relevant for learning and continuous improvement.	
Assessment	–
Commentary	<p>To date, there has not been an independent evaluation of the White Helmets and, therefore, no independent recommendations about improving the relevance/efficiency/effectiveness of the project have been formulated. It is in the best interest of all parties involved that an independent evaluation is performed shortly.</p> <p>In addition, the unclear and fragmented monitoring system does not allow for learning and improvement of the project as a whole.</p>
13. The monitoring tools (project reports by staff, implementing partners, financial reports, technological approaches) are appropriate given the indicators.	
Assessment	+/-
Commentary	<p>Overall progress of the programme and incidents are reported on a frequent basis: Mayday sends spot reports on incidents to the donors and shares weekly updates from the White Helmets, reporting on the number of attacks, deaths, wounded, non-conflict ambulances and other service operations provided by the SCD.</p> <p>The indicators as formulated in the 2018/19 Consolidated Programme Plan do not validly capture the outputs and outcomes (see point 11). In addition, Mayday continues to report back separately about the progress of the project to the respective donors and writes separate proposals for separate parts of the project. As a result, donors have little insight in how their funds activities relate to activities funded by other donors. Even auditors have had difficulties in understanding who exactly funded what.</p> <p>The absence of a unified result chain (see point 11) seriously undermines the transparency of the project. In general, the donors only see the progress report that has been formulated for them and there is little insight in the overall progress.</p>
Monitoring usage	
14. Project documents and monitoring reports are available and accessible for all relevant actors.	
Assessment	–
Commentary	<p>All donors have access to the regular updates provided by Mayday on the total progress and activities. Most donors, including the Netherlands, have signed individual contracts with Mayday, financing a ‘package’ of the total project. At the Netherlands MFA, therefore, there is little insight in the overall progress of the project. The final (narrative and financial) reports only include the progress on the activities directly funded by the Netherlands. In practice, donors have little insight in who finances what and what the results of the project are beyond their own funding. There is little coordination amongst the donors and important information is not shared; reviews from the British CSSF and the Danish have not been shared with other donors or with Mayday/White Helmets. For the Vision 2020 report, an annex was prepared solely for the British and that information has not been shared with other donors.</p>

Assessment White Helmets	
<b>15. There is a management structure in place that regularly reviews all monitoring information and meets frequently enough to respond adequately in times of acute crisis.</b>	
Assessment	+/-
Commentary	The IST-Syria team in Istanbul is regularly updated on the progress, risks and activities of the White Helmets. In general, however, donors have an individual contract with Mayday and there appears to be little donor coordination. Donors have no insight in each other's progress reports. When donors do talk to each other it is on an ad hoc basis. The recent evacuation of White Helmets from the South of Syria reveals that the donors are able to respond adequately in times of acute crisis.

## Annex 3 Assessment NLA – North

Assessment NLA – North	
<b>General: Mandate</b>	
<b>1. The general risks of implementing the particular programme in the context of conflict have been considered and accepted by the MFA.</b>	
Assessment	+
Commentary	There is awareness and acceptance of the main risks of the NLA programme in the north, including the risk of misappropriation of support by extremist organisations and commitment of human rights violations by beneficiary groups. This risk is relatively low, because beneficiaries have an intrinsic motivation to ensure they remain control over the support that is provided, the risks during the hand-over of goods are manageable, and because part of the support consists of consumable items. DJZ and DVB are involved in monitoring that the type of goods provided do not violate the prohibition on the use of force or the non-intervention principle. There is less emphasis on the risk that supported groups may commit human rights violations.
<b>Good practices: Implementing partners</b>	
<b>2. On-the-ground networks to enable accountability are developed. Accountability networks and relationships with stakeholders are essential for effective monitoring and triangulation.</b>	
Assessment	+
Commentary	Both implementers are in direct contact with beneficiary groups, and employ Syrian staff with direct contacts – or even a background – with the Free Syrian Army. Verification of goods provided is solely done by the implementer with the beneficiaries themselves (usually through the chain of command) with testimonies and photographic evidence. There is no independent verification.
<b>3. Transparency and timeliness of information sharing by implementing organisations to both donors and beneficiaries are in place to allow for fast reaction in situations of crisis and misinformation, and aid activities contain incentives to encourage this.</b>	
Assessment	+/-
Commentary	Supported groups are generally transparent about the use of support that they receive. There is no constant monitoring possible given the context of a warzone, and at times commanders do restrict access to staff of implementing organizations. The continuation of support is a carrot to promote transparency of beneficiaries. However, as exposure of human rights violations committed by (members of) beneficiary groups may risk ending support, there is a negative incentive to report this.



<b>Assessment NLA – North</b>	
<b>4. Procedures are in place to prevent and react on irregularities and misappropriation, such as internal anti-corruption policies, codes of conduct, whistle blowing policies, and vetting and compliance procedures.</b>	
Assessment	+
Commentary	The different implementers use different systems for vetting; the US RAM vetting & CSI Watchdog Elite, which draws on US, Canadian and European watch lists. Only commander level is vetted through these systems, and not all beneficiaries (also lower level officers responsible for operations are not vetted). Procedures are in place for procurement, payment, transport and delivery of goods.
<b>5. Specific monitoring capacity is available that is separated from, but working closely with the programme; this ensures consistent monitoring and mainstreaming M&amp;E procedures across the programme.</b>	
Assessment	+
Commentary	Both implementers employ field officers to conduct monitoring of equipment and goods provided, although these field officers are not necessarily independent or different from the implementing staff responsible for the provision of goods. Both implementers employed specialized consultancy organisations to conduct independent evaluations, although these were limited to the activities implemented in 2016.
<b>6. There are investments in research and analysis software, ICTs and other modern technologies, with the aim of adopting and streamlining it across programmes.</b>	
Assessment	+
Commentary	Both implementers use photo and video footage – often with GPS and time-stamps – to verify the delivery goods and presence of equipment. There is no use of other modern technologies, such as GPS. Discussions with implementers show that beneficiaries have varying perceptions of use of modern technologies, with some being very open and sharing pictures themselves on social media and others being much more restrained for fear of potential security risks involved.
<b>Good practices: Third Party Monitors</b>	
<b>7. TPM is used to independently monitor progress and risks.</b>	
Assessment	--
Commentary	TPM is not employed by the MFA or by the implementing organisations. Independent evaluation – which is used, see point 5 above – is distinct from independent third party monitoring.
<b>8. The TPM is used as a complement rather than as a substitute.</b>	
Assessment	N/A
Commentary	-
<b>9. The TPM has a clear and agreed upon role and mandate, and there are adequate resources to fulfil this role.</b>	
Assessment	N/A
Commentary	-

<b>Assessment NLA – North</b>	
<b>Monitoring tools</b>	
<b>10. Monitoring and evaluation is incorporated into the programme framework already in the planning phase, not as an afterthought.</b>	
Assessment	+/-
Commentary	The monitoring of the provided goods is an integral element of the programme, however, a clear results framework is missing and there are no provisions for regular independent evaluations.
<b>11. There is a minimum standard of a baseline and a theory of change, including simple indicators, and the monitoring system has several layers of checks and filters for continuous verification.</b>	
Assessment	+
Commentary	M&E is conducted by field officers who verify delivery and use of equipment. Both needs assessments and perception surveys of support provided are conducted. Commanders are also in direct contact with MFA and relevance of support is verified.
<b>12. M&amp;E in place is relevant for learning and continuous improvement.</b>	
Assessment	+
Commentary	M&E for learning is not extensive, but does investigate the extent to which provided goods have been useful for beneficiaries, with the aim of improving possible future support.
<b>13. The monitoring tools (project reports by staff, implementing partners, financial reports, technological approaches) are appropriate given the indicators.</b>	
Assessment	+/-
Commentary	Given the type of programme – procurement and delivery of goods – the monitoring tools are appropriate given the indicators, except that more structural external evaluations could be adopted. An evaluation of one of the implementers concluded early 2017 that there were fundamental weaknesses in the M&E systems. It is not clear to what extent these issues have been addressed. The extent to which goods provided comply with the needs of the rank and file is more difficult to assess. Also possible human rights violations are difficult to assess. There are no clear mechanisms to control for bias in the result reporting by implementers and beneficiaries.
<b>Monitoring usage</b>	
<b>14. Project documents and monitoring reports are available and accessible for all relevant actors.</b>	
Assessment	+/-
Commentary	As far as IOB could assess, all project documentation and monitoring reports are available to the MFA. Different donors involved in NLA are not open about their support. While the Dutch contribution was coordinated with the US, there is no wider donor coordination regarding type and amount of support given or exchange of information.
<b>15. There is a management structure in place that regularly reviews all monitoring information and meets frequently enough to respond adequately in times of acute crisis.</b>	
Assessment	++
Commentary	The project is managed by IST-Syria and DAM, who review all monitoring information. The classification of the programme provides additional red tape which impacts effective monitoring. IST-Syria team is regularly updated on progress and has the ability to hold the programme when needed.

## Annex 4 Assessment NLA – South

Assessment NLA – South	
<b>General: Mandate</b>	
<b>1. The general risks of implementing the particular programme in the context of conflict have been considered and accepted by the MFA.</b>	
Assessment	+/-
Commentary	There is awareness and acceptance of the main risks of the NLA programme in the South, including the risk of misappropriation of support by extremist organisations and of human rights violations by beneficiary groups. Measures are taken to minimise these risks. DJZ and DVB are involved in monitoring that the type of goods provided do not violate the prohibition on the use of force or the non-intervention principle, as is the case with one of the implementers for NLA North. Human rights violations are considered a red line, but according to the implementer this is difficult to monitor.
<b>Good practices: Implementing partners</b>	
<b>2. On-the-ground networks to enable accountability are developed. Accountability networks and relationships with stakeholders are essential for effective monitoring and triangulation.</b>	
Assessment	+/-
Commentary	The implementer does not have direct access to the area and depends on information provided by the beneficiaries. While this is a weakness, it is partly redressed by measures for remote monitoring (see point 7 below)
<b>3. Transparency and timeliness of information sharing by implementing organisations to both donors and beneficiaries are in place to allow for fast reaction in situations of crisis and misinformation, and aid activities contain incentives to encourage this.</b>	
Assessment	+/-
Commentary	Supported groups are generally transparent about the use of support that they receive. There is no constant monitoring possible given the warzone context. Monitoring of human rights violations is difficult, and beneficiaries have a negative incentive to report these. The implementing agency is very open about monitoring, also towards beneficiaries. Problematic for the MFA is that the contract is held by another donor, and the implementing agency is not always allowed to directly report to the Netherlands.
<b>4. Procedures are in place to prevent and react on irregularities and misappropriation, such as internal anti-corruption policies, codes of conduct, whistle blowing policies, and vetting and compliance procedures.</b>	
Assessment	+
Commentary	Beneficiaries are vetted by different donor systems. They are trained on the appropriate use of weapons and proper procedures for conducting border control operations, which may contribute to the prevention of human rights violations. There are no known procedures in place to deal with human rights violations or other misconduct.

Assessment NLA – South	
<b>5. Specific monitoring capacity is available that is separated from, but working closely with the programme; this ensures consistent monitoring and mainstreaming M&amp;E procedures across the programme.</b>	
Assessment	+/-
Commentary	There is no specific monitoring capacity, and monitoring is conducted by the implementing staff. There have not been any external evaluations.
<b>6. There are investments in research and analysis software, ICTs and other modern technologies, with the aim of adopting and streamlining it across programmes.</b>	
Assessment	++
Commentary	The vehicles provided by the programme have GPS trackers, allowing real-time monitoring. Beneficiaries have been informed of the trackers, and commanders can track the vehicles under their command themselves as well. GPS-tracking functions well; two vehicles have been stolen and have been tracked since (one is still being tracked, and the other believed to have been destroyed). Body cams used to monitor whether the beneficiaries are conducting their work, as well as to what extent beneficiaries are adopting techniques they have been trained on.
<b>Good practices: Third Party Monitors</b>	
<b>7. TPM is used to independently monitor progress and risks.</b>	
Assessment	--
Commentary	There is no TPM involved due to the sensitivity of the project
<b>8. The TPM is used as a complement rather than as a substitute.</b>	
Assessment	N/A
Commentary	-
<b>9. The TPM has a clear and agreed upon role and mandate, and there are adequate resources to fulfil this role.</b>	
Assessment	N/A
Commentary	-
<b>Monitoring tools</b>	
<b>10. Monitoring and evaluation is incorporated into the programme framework already in the planning phase, not as an afterthought.</b>	
Assessment	+/-
Commentary	Monitoring of the goods provided is an integral element of the programme. However, there are no provisions for regular independent evaluations.
<b>11. There is a minimum standard of a baseline and a theory of change, including simple indicators, and the monitoring system has several layers of checks and filters for continuous verification.</b>	
Assessment	+
Commentary	Indicators for delivery of goods is very straightforward. Monitoring of training is not formally conducted. Monitoring of groups is done through routine monitoring and mapping by the implementer, drawing on GPS information, data from beneficiary groups, US spot reports, body cam footage, and social media.

<b>Assessment NLA – South</b>	
<b>12. M&amp;E in place is relevant for learning and continuous improvement.</b>	
<i>Assessment</i>	+
<i>Commentary</i>	M&E for learning is not extensive, but does investigate the extent to which provided goods have been useful for beneficiaries, with the aim of improving possible future support. Videos used to monitor the uptake of trainings, and to determine the focus of follow-up trainings
<b>13. The monitoring tools (project reports by staff, implementing partners, financial reports, technological approaches) are appropriate given the indicators.</b>	
<i>Assessment</i>	+
<i>Commentary</i>	Given the type of programme and the context in which it is implemented, the monitoring tools are appropriate given the indicators, although more effort could be taken to monitor the effect of trainings provided.
<b>Monitoring usage</b>	
<b>14. Project documents and monitoring reports are available and accessible for all relevant actors.</b>	
<i>Assessment</i>	+/-
<i>Commentary</i>	The Netherlands has access to quarterly reports and there is a monthly meeting with the lead donor on programme progress and developments on the ground regarding context and risks. It does not receive the weekly reports on progress, incidents and risks that are shared with the lead donor. While e both implementer and lead donors said to be willing to share more information on a regular basis, the implementer said to have been asked by the lead donor not to share all information directly with The Netherlands.
<b>15. There is a management structure in place that regularly reviews all monitoring information and meets frequently enough to respond adequately in times of acute crisis.</b>	
<i>Assessment</i>	+/-
<i>Commentary</i>	There is regular contact of the IST-Syria team, both with the lead donor and the implementing organisation. The lead donor has the responsibility for monitoring information and responding when necessary. Given the position of the Netherlands, the decision-making power of the MFA is limited to activities directly funded.

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Cover photo: Smoke rises in Syria after an airstrike, as people watch from the top of a hill at the Turkish-Syrian border | Giannis Papanikos/Shutterstock.com.

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