



Evaluation of European Union's humanitarian assistance in Syria, 2016-2018

Final Evaluation Report

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(with support from Jouri)
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Final Evaluation Report

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Table of Contents

Acronyms	iv
Evaluation purpose, scope and objectives	vi
Overview of the humanitarian context and DG ECHO response	vi
The evaluation methods and ethics	vii
Evaluation findings	viii
Conclusions	ix
Recommendations	x
1. Introduction	1
1.1. Evaluation background	1
1.2. Evaluation purpose, scope, objectives and evaluation questions	1
1.3. An overview of the context for humanitarian actors and DG ECHO response	3
1.3.1. Humanitarian context in Syria	3
1.3.2. Overall humanitarian needs and response by the humanitarian agencies	6
1.3.3. DG ECHO's response in Syria	9
2. Evaluation approach and methods	13
2.1. The evaluation process and framework	13
2.2. Methods and sampling	15
2.3. Data mapping and analysis	16
2.4. Evaluation ethics and data protection	17
2.5. Limitations of the evaluation	17
3. Evaluation findings	19
3.1. Relevance	19
3.1.1. Needs assessment and vulnerability-based targeting	19
3.1.2. Beneficiary consultation and accountability to affected population	21
3.1.3. Adapting to context	22
3.1.4. Operational modalities	25
3.2. Coherence	28
3.2.1. Adherence to relevant policies and Humanitarian Principles	28
3.2.2. Coordination with other donors and advocacy	31
3.2.3. Nexus and complementarity with other EU instruments	32
3.3. EU added value	33
3.4. Effectiveness	33
3.4.1. Multi-sectoral assistance	34
3.4.2. Major factors affecting response effectiveness	39
3.4.3. Humanitarian advocacy and coordination	41
3.4.4. M&E and results tracking	42

3.5. Efficiency	45
3.5.1. Efficiency and cost effectiveness	45
3.5.2. Size of budget and proportionality	48
3.5.3. Humanitarian access and fund absorption	49
3.6. Sustainability	49
4. Conclusions and recommendations	51
4.1. Overall Conclusions	51
4.2. Lessons and good practices	53
4.3. Recommendations	54

List of Figures

Figure 1: Syria Map.....	iii
Figure 2: Map of Syria showing all operational hubs	9
Figure 3: Relational distribution of sectoral consumption.....	11
Figure 4: Intervention logic, DG ECHO Syria humanitarian actions	14
Figure 6: No. of modification requests and related crises events.....	25
Figure 7 Results indicators' level of achievement (%).....	44

List of Tables

Table 1 Scale of humanitarian needs in Syria, 2016-2019 (<i>Source: All HRP data obtained from OCHA HRPs for corresponding years and FTS for 2016-2020</i>)	7
Table 2: Breakdown of HRP requirements, 2016-2018 (US\$). (<i>Source: OCHA. HRP 2016, 2017, 2018</i>)	8
Table 3 HRP requirements and DG ECHO funding, 2016-2018 (<i>Source: Syria Humanitarian Response Plans 2016-2018, Financial Tracking Service, UNOCHA. Data checked 22/04/20</i>)	10
Table 4: Distribution of HIP allocations per modality, 2016 & 2018 HIP (<i>Source: DG ECHO (2019). Note to File – Allocation of funds HIP Syria regional crisis 2018, 11 March 2019; DG ECHO (2016). Note to File – Allocation of funds HIP Syria regional crisis 2016, 18 August 2016</i>)	11
Table 5: HIP actual consumption data for different partner categories (2017-2018) (<i>Source: DG ECHO (2019). HIP Actual Consumption, 2016-2018</i>)	12
Table 6: Distribution of allocations as per modality, 2016-2018 (<i>Source: 2016-2018 grant allocation data derived from DG ECHO Syria project list</i>).	12
Table 7 breakdown of key informant interviews (<i>Source: Compiled by the ET based on KKIs held</i>).....	15
Table 8: Breakdown of beneficiary survey (<i>Source: Beneficiary survey data</i>)	16
Table 9: Overall grants allocation (per cent) during 2018-2020 (<i>Source: Data obtained from DG ECHO Beirut office, September 2020</i>)	24
Table 10 ECHO contribution vis-a-vis overall HRP, 2016-2018 (€ million)	48

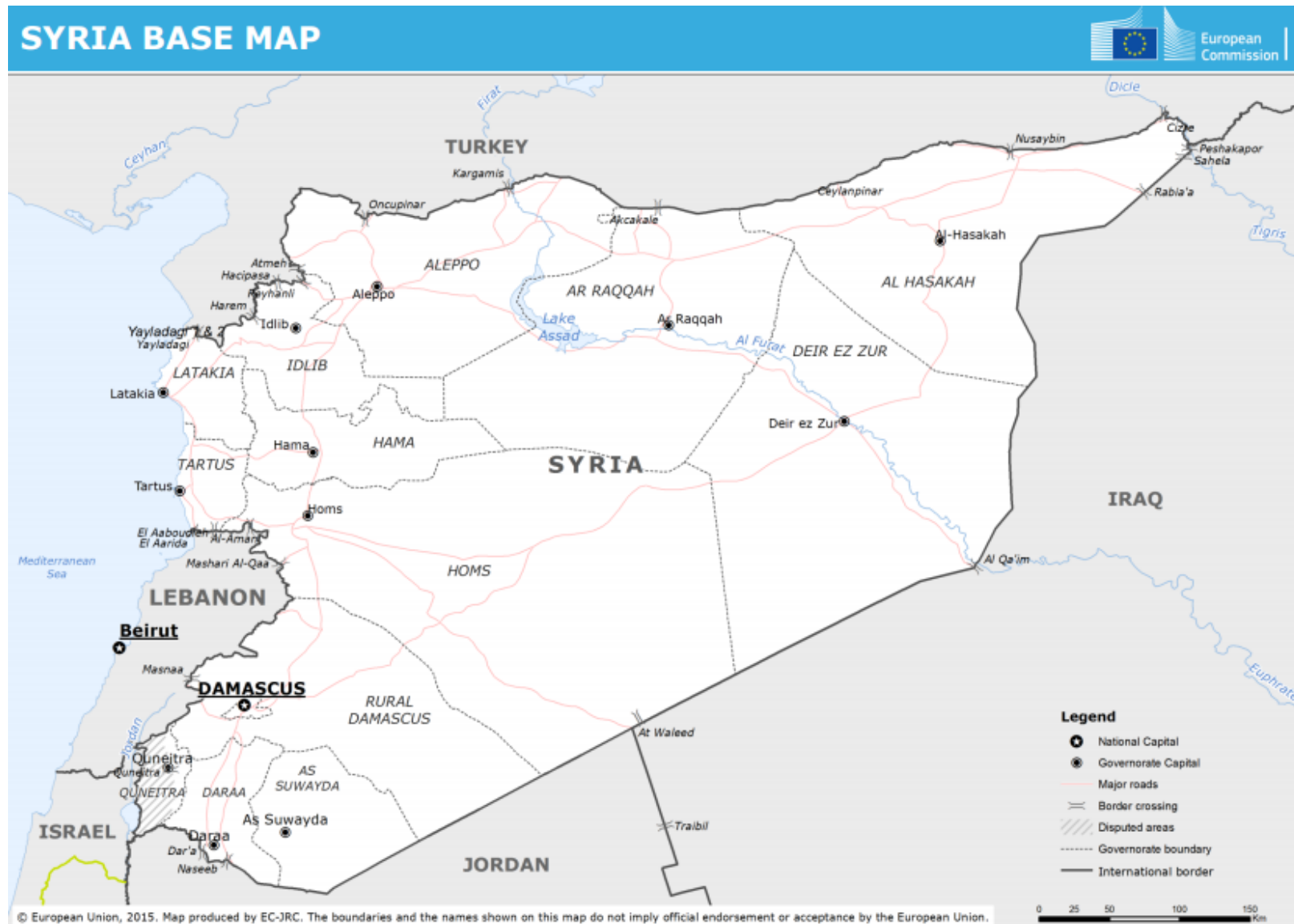


Figure 1: Syria Map

Acronyms

AAP	Accountability to Affected Population
ANSA	Armed Non-State Actor
AOG	Armed Opposition Group
CBI	Cash-based Intervention
CRM	Complaints & Response Mechanism
CSO	Civil Society Organisation
CW	Conventional Weapons
DG ECHO	Directorate-General for European Civil Protection and Humanitarian Aid
EEOC	Extreme Exceptional Operational Circumstances
EiE	Education in Emergencies
EQ	Evaluation Question
ERW	Explosive Remnants of War
ET	Evaluation Team
EU	European Union
FLER	First Line Emergency Response
FPI	Foreign Policy Instruments
FSAL	Food Security, Agriculture and Livelihoods
FTS	Financial Tracking Service
GBV	Gender Based Violence
GCA	Government Controlled Area
GoS	Government of Syria
GTP	Gaziantep
HAR	Humanitarian Aid Regulation
HAT	Humanitarian Access Team
HC	Humanitarian Coordinator
HCT	Humanitarian Coordination Team
HIP	Humanitarian Implementation Plan
HLP	Housing, Land and Property
HNAP	Humanitarian Needs Assessment Project
HNO	Humanitarian Needs Overview
HRP	Humanitarian Response Plan
HTR	Hard to Reach
IASC	Interagency Standing Committee
IC	International Consultant
ICRC	International Committee of the Red Cross
IcSP	Instrument contributing to Stability and Peace.
IDP	Internally Displaced People
IHL	International Humanitarian Law
IHRL	International Human Rights Law
INFORM	Index for Risk Management
IO	International Organisations (ICRC, International Federation of the Red Cross & Red Crescent Societies, and National Red Cross/Red Crescents)
IP	Implementing Partner
MPCA	Multi-Purpose Cash Assistance
MR	Modification Request
NES	North-East Syria
NFE	Non-formal Education
NFI	Non-Food Item

NWS	North-West Syria
OHCHR	Office of the High Commissioner for Human Rights
OPRR	Operational Platform for Rapid Response
PA	Programme Assistant
PDM	Post Distribution Monitoring
SADD	Sex, Age and Disability Disaggregated
SARC	Syrian Arab Red Crescent
SF	Single Form
SGBV	Sexual and Gender Based Violence
RH	Reproductive Health
SRH	Sexual and Reproductive Health
SRHS	Sexual and Reproductive Health Services
TA	Technical Assistant
ToR	Terms of Reference
TPM	Third Party Monitoring
UN	United Nations
UNSC	United Nations Security Council
WASH	Water, Sanitation and Hygiene
WoS	Whole-of-Syria
XB	Cross-Border
XL	Cross-Line

Glossary

Cooperating partner: These are usually local NGOs or civil society organisations inside Syria which have been contacted by IPs to undertake humanitarian response on the latter's behalf, mostly in areas the IPs are unable to access.

FichOp: The FichOp is a DG ECHO internal file with all observations, comments, and initial appraisals, report of monitoring and final decision from Field and Desk staff on a project funded by DG ECHO.

Implementing partner (IP): Humanitarian Agencies (UN, INGOs and Red Cross/Red Crescent) with which DG ECHO has an agreed grant contract. Unless otherwise qualified, the phrase 'partners' has also been used as a short for IPs.

Executive Summary

The Directorate General for European Civil Protection and Humanitarian Aid (DG ECHO) of the European Union (EU) has been responding to the Syria crisis since the start of the conflict. DG ECHO provides humanitarian assistance through its annual Humanitarian Implementation Plans (HIP) which define the expected humanitarian response in the country based on Humanitarian Aid Regulation (HAR) No. EC 1257/96 and the European Consensus on Humanitarian Aid. DG ECHO commissioned Landell Mills International to undertake an independent evaluation of its humanitarian assistance inside Syria for the HIP period 2016–2018. The evaluation was undertaken between January and December 2020. The following is a summary of the evaluation and its findings.

Evaluation purpose, scope and objectives

The overall purpose of the evaluation was to provide an external, impartial and independent evidence-based assessment of performance of the DG ECHO's portfolio of funded actions in Syria. The scope of the evaluation covered humanitarian actions inside Syria under the HIPs for 2016 to 2018¹. The evaluation sought to understand the extent to which support provided by DG ECHO contributed to meeting the needs of the most vulnerable groups caught up in the ongoing conflict inside Syria. In doing so, the evaluation covered actions in the areas of protection; food; basic needs; education; healthcare; cash transfers; shelter; water, sanitation and hygiene (WASH), as well as in the areas of coordination, support to operations and logistics.

The evaluation had three objectives²:

1. Examine the intervention logic of DG ECHO's portfolio of actions in Syria and analyse the portfolio of actions for the 2016-2018 HIP period.
2. Assess performance with regard to DG ECHO humanitarian actions, including identifying internal and external enabling factors, and limiting factors in delivery of its mandate in relation to assistance and protection to people affected by the conflict.
3. Capture lessons, good practices and innovations that are improving humanitarian action and analyse their potential for more general application by DG ECHO.

The evaluation assessed DG ECHO's strategy and priorities in Syria, taking into consideration internal and external enabling factors, using the following evaluation criteria: relevance, coherence, EU added-value, effectiveness, efficiency and sustainability. The primary users of the evaluation include DG ECHO staff at the headquarters (HQ), regional and country level staff, other EU actors, implementing partners (IP) and other humanitarian donors, including EU Member States and agencies. Secondary stakeholders include all other humanitarian agencies, EU citizens and any other persons and organisations who may be interested in or may find lessons emerging from this evaluation of direct or indirect interest.

Overview of the humanitarian context and DG ECHO response

With the conflict into its tenth year, both the severity and complexity of humanitarian needs of Syrians remain widespread. The escalation in violence in the latter part of 2019 further exacerbated existing humanitarian needs and vulnerability, and the crisis continues to cause civilian deaths and strain the socio-economic foundations of Syrian people. The acute

¹ Implementation of some of the actions from HIP 2018 continued well into late-2019/early 2020 and these were also included in the evaluation.

² DG ECHO (2019). Terms of Reference for the evaluation of the European Union's humanitarian assistance in Syria, 2016-2018

humanitarian needs, recurrent displacement and continuous violence have deepened poverty, increased insecurity and weakened communities' resilience to cope with internal and external shocks. The impact of current and past hostilities on civilians remains the principal driver of humanitarian needs in Syria. The divided territorial control between different warring sides has impacted access and shaped humanitarian response in the country since the onset of the conflict.

Ongoing hostilities in parts of the country expose civilian populations to continuing violence and threats to their lives, particularly in the North-West,³ raising complex protection issues. The threat of explosive hazards, the effects of hostilities, forced and protracted displacement, lack or loss of civil documentation, barriers to claims on housing, land and property rights and lack of freedom of movement remain the main protection issues in Syria. Gender-based violence (GBV) continues to affect the lives of women and girls, with adolescent girls, women-headed households - especially those divorced and widowed - bearing the brunt of the crisis. Elderly people and persons living with disabilities are also among the most vulnerable requiring protection⁴.

The protracted nature of the crisis and the prolonged displacement of millions of people has destroyed livelihoods, eroded safety nets and generated harmful coping mechanisms such as early marriage, child labour, and other forms of exploitation among a large section of the population. Unemployment is at 55 percent⁵. Over two-fifths of school infrastructure has been damaged or destroyed. Basic water and sanitation services are lacking. The prevalence of life-threatening diseases has increased, with children, pregnant and lactating women, disabled people, and the elderly at increased risk.

The humanitarian community is responding to the needs of the affected population by providing food and shelter assistance as well as health, education, nutrition, protection, and WASH services. The international humanitarian response during the evaluation period has been coordinated under the framework of the UN-led Whole of Syria (WoS) approach, which brings together internally and externally coordinated operations under a single umbrella. DG ECHO was one of the largest humanitarian donors in the Syria response: between 2016 and 2018, it was consistently the fourth largest donor to the Syria Crisis, providing between 7% and 12% of the total appeal funding, with an overall spend of €442,392,821 during the period.

The evaluation methods and ethics

The evaluation used a mixed-methods approach combining desk research, key informant interviews (KIIs) and beneficiary/community interviews. The mixed methods involved gathering primary and secondary data from a representative sample of projects supported through the HIPs. During the desk review phase, the evaluation team (ET) reviewed various policy and thematic documents and project files related to actions supported during the evaluation period. The selection of key informants (DG ECHO and IP staff, other humanitarian partners) was done in a way that ensured that the ET covered the humanitarian response in all the three hubs/sub-regions (North-East, North-West and Central/South-Central) inside Syria. In total, 78 KIIs were conducted with staff from 26 IPs, seven humanitarian donor agencies and the EU. A beneficiary survey of ECHO-assisted activities implemented by a sample of IPs was conducted. Additionally, a team of enumerators administered a survey to frontline staff/volunteers (working directly with communities) of local NGOs/organisations that are *cooperating partners* of the IPs and to a number of local council members/community leaders. In total, 470 beneficiaries/community members who received assistance and 41 frontline staff responded to the survey.

³ OCHA (2019). Humanitarian Response. Syrian Arab Republic: Humanitarian Response plan Monitoring Report, January-May 2019

⁴ Extracted from the Humanitarian Needs Overview for the years 2017 and 2018.

⁵ OCHA (2019). Humanitarian Needs Overview 2019, Syrian Arab Republic, March 2019

The evaluation adhered to ethical principles of independence and impartiality of the evaluators; avoiding harm to participants; voluntary participation; informed consent of participants; ensuring confidentiality.

A limitation of the evaluation was that due to the Covid-19 pandemic, core members of the ET were unable to visit Syria, and hence most of the data collection was undertaken remotely through phone interviews and desk reviews, except for a part of the beneficiary survey and frontline staff survey undertaken by a team of local enumerators. Most of the beneficiary survey was also undertaken remotely to minimise any risks to participants due to the pandemic. This lack of direct observation which is normally possible during field visits was counterbalanced to a significant extent by the extensive number of KIIs, beneficiary survey and interviews with frontline staff involved in delivery of humanitarian response at community level.

Evaluation findings

Relevance of DG ECHO Actions

DG ECHO is recognised for its flexible approach in humanitarian programming and support to partners to provide timely and appropriate response, encouraging partners to undertake continuous review of needs and adjust funds within projects as needs emerge. DG ECHO used a range of operational modalities and operating procedures to enable access in hard-to-reach populations for providing life-saving aid. Targeting the most vulnerable people has received strong attention in DG ECHO monitoring of IP actions and, where necessary, partners were encouraged to take remedial action based on a continuous review of needs. Given that direct and regular interactions with communities for most IPs had been challenged by access issues, agencies have put in place some form of complaints response mechanism (CRM), though their use and effectiveness have varied.

Coherence of DG ECHO Actions to Humanitarian Principles and Thematic Policies

DG ECHO monitoring placed a strong emphasis on the criticality of needs-based response and primacy of humanitarian principles and risks of aid-diversion, with a strong advocacy on humanitarian principles and their operationalisation and adherence to do-no-harm principles. Balancing access and upholding humanitarian principles in high-threat environments require agencies to have strong capacity to monitor their response and have open dialogue with all stakeholders. Some of the IPs particularly face this challenge as they use the remote management modality because of their limited direct access to the areas of interventions. The application of the EU redline with regard to operations inside the government-controlled areas may have on occasions challenged DG ECHO in ensuring adequate access capacity which sometimes created the perception that a principled humanitarian response could not be ensured. DG ECHO often leads humanitarian donor coordination and acts as a bridge between a number of IPs and several donors as DG ECHO's has been able to share its knowledge and understanding of ground realities in Syria. On nexus, DG ECHO has attempted to encourage other EU institutions to deal with livelihoods and WASH needs in the North-East Syria to the extent possible.

EU added value

The EU has the advantage of being less closely identified with the political and foreign policy posturing of its member governments and this potentially enables DG ECHO to position itself as an independent humanitarian donor. The EU instruments as a collective have the potential to leverage significant influence which no single Member State could have by working on its own. This was evident in the EU's ability to bring together a diverse range of actors on humanitarian response, stabilisation, peacebuilding, and development in the annual Brussels conference⁶. This could potentially give DG ECHO greater space for dialogue and engagement on humanitarian situation in the country, had the EU red line not constrained DG ECHO in having a permanent

⁶ Since 2016, DG ECHO co-organises, together with the European External Action Service (EEAS) and DG NEAR, the Brussels conference which brings together donors, IPs, UN agencies, World Bank and several major private financial institutions to discuss the Syria situation. The donor group has its own meetings twice a year, including a special meeting during the annual Brussels conference.

presence in Damascus for regular field visits, identification of opportunities, challenges and risks related to humanitarian issues.

Effectiveness of DG ECHO Actions

Achievement of results has been strongly influenced by three major factors, namely: (i) flexibility and adaptability to use different modalities and hubs to launch a rapid response; (ii) DG ECHO's ability to identify a range of partners who collectively can access all areas of the country, working closely with either international/local NGOs, local institutions; and (iii) contribution to strengthening the humanitarian ecosystem. DG ECHO ensured that IPs used a range of modalities to ensure vulnerability-based targeting. DG ECHO has been at the forefront of promoting cash-based interventions which several IPs are adopting in their response. There was a strong focus on protection through protection monitoring, support for victims of GBV and sexual-and-gender-based violence (SGBV), psychosocial support and related interventions. On the health response, DG ECHO's diverse range of partners collectively have access to all areas of the country where they have provided basic, primary and secondary healthcare in trauma care, GBV treatment, sexual and reproductive health, psychosocial support/mental health care, treatment of chronic and acute diseases, and treatment of malnutrition. The WASH response included short-term response (water trucking) and rehabilitation of community-managed systems. Non-formal education, remedial classes and school safety targeting children has constituted DG ECHO's response on education in emergencies.

DG ECHO has been at the forefront of advocacy and coordination at different levels to make the humanitarian response more effective and to ensure standards and quality in response delivery. However, there appears to be poor coordination among some agencies at the field level in selection of cooperating partners for frontline delivery. Monitoring data and results reporting varied depending on the extent of access by the IPs, capacity of their downstream partners or quality of third-party monitoring (TPM) and the IPs' own capacity.

Efficiency of DG ECHO Operations

DG ECHO deployed several innovative tools and adapted its structure within the WoS framework to have access to all hotspots inside Syria from different entry points to provide a timely response. These tools and DG ECHO's investment in preparedness (pre-positioning of supplies, for example) have brought about significant gains across a range of inputs, including material costs, transport, storage, and salaries. Though the flexible structure enhanced its access ability and some of the tools and systems deployed were appropriate, protracted grants approval and procurement procedures sometimes affected the timely delivery of response. There is no explicit cost-effectiveness framework by means of which projects are appraised, monitored and assessed. However, evidence shows that DG ECHO staff have a good analysis and understanding of what constitutes efficient and cost-effective response and have used several sophisticated principles and parameters to ensure cost-effectiveness in its actions.

Sustainability of DG ECHO Actions

Sustainability of humanitarian actions is difficult to achieve in a context where life-saving humanitarian needs are continuously increasing, and the state has receded from its primary role of protection and provision of services. DG ECHO project appraisals and monitoring reflect good attempts to explore the limited opportunities that exist.

Conclusions

DG ECHO positioning and relevance: DG ECHO has positioned itself as the only major humanitarian donor able to operate in all parts of the country through its wide network of IPs, its set-up and its own field staff who are able to access, directly or indirectly, all hotspots to provide need-based response. DG ECHO's unique contribution to strengthening humanitarian footprint across the country and improving coverage of response in hard-to-reach and besieged areas are widely recognised by other donors and humanitarian organisations.

Coherence: DG ECHO was able to leverage its humanitarian footprint to strengthen coordination among key humanitarian actors and engage in humanitarian diplomacy with other donors, including EU Member States. DG ECHO's response in Syria was in strong alignment with the humanitarian principles enshrined in the EU Consensus, the HAR and DG ECHO's thematic

policies. There were also challenges faced in operationalising humanitarian principles in case of IPs who relied solely on local partners due to lack of direct access.

EU added-value: DG ECHO played a lead role in donor coordination on the Syria response, acting as a bridge between IPs and donors as the majority of the donors could not visit government-controlled areas (GCA). DG ECHO is proactively engaging with other EU Institutions to pursue humanitarian-resilience nexus, where feasible. Individual EU Member States rely heavily on the eyes and ears of DG ECHO on the ground.

Effectiveness: In line with the HAR and HIP objectives, DG ECHO's multi-sectoral response integrating protection and assistance for meeting basic needs of the conflict-affected populations reached all parts of the country and enabled the strengthening of the capacity of the humanitarian system to deliver a coordinated response. IDPs and host populations affected by the ongoing conflict have come to depend on food, non-food items (NFIs), water and shelter provided by humanitarian agencies, and DG ECHO's assistance has played a significant part in this in the immediate aftermath of displacement. DG ECHO's move to cash-based interventions (CBIs) enables communities to prioritise their own essential needs. The extensive scale and range of health interventions that DG ECHO has supported have enabled primary healthcare providers to continue to function and deliver healthcare, including trauma-care to deal with the war-wounded and mental health issues, as well as treatment of sexual and reproductive health issues, including sexual and gender-based violence.

At the humanitarian system level, DG ECHO's ongoing support for humanitarian coordination, strengthening humanitarian access strategies in a highly volatile environment with frequently shifting control of territories, advocacy on human rights violations, humanitarian principles and engagement of the donor community are acknowledged by all key stakeholders. However, inadequate coordination at the point of delivery of response in some instances may have caused duplication of efforts and undermined effectiveness as several IPs used the same local organisations. The capacity of implementing partners (IP) to adequately monitor and quality-assure these cooperating partners' adherence to humanitarian principles and do-no harm principles remain unclear as the IPs sometimes have limited direct access. TPM is not always able to flag these complex issues.

Efficiency: Efficiency in humanitarian response involves several elements, of which the most important are: (a) timeliness, (b) economy (cost per unit of input is minimized), (c) cost-effectiveness (cost per output is optimized). DG ECHO operations reflect a good understanding of what an efficient and cost-effective response should look like in the Syrian context.

Sustainability: In an environment where humanitarian needs continue growing and development interventions remain frozen, sustainability will continue to be a challenge, though in the past two years DG ECHO has made substantial efforts to move toward life-sustaining actions with its limited funds and facilitated other EU institutions to step in, where feasible.

Recommendations

- R1:** Develop a regular communication and advocacy message for engagement with other EU institutions and Member States at policy level on DG ECHO's humanitarian imperative and humanitarian principles in accordance with the HAR (*linked to finding F5 – application of red lines challenging principled humanitarian action*).
- R2:** DG ECHO needs to explore the feasibility of setting up a continuous international presence in Damascus to be able to enhance its humanitarian access and engage proactively on humanitarian issues in which it is currently constrained in GCAs due to the visa restrictions (*linked to finding F6 – limited presence in Damascus affecting capacity and space for technical dialogue*).
- R3:** As most of the response in the GCAs and North-West Syria are delivered through local cooperating partners of DG ECHO partners, DG ECHO needs to ensure that all implementing partners, while selecting cooperating partners, follow a standard set of criteria which include their understanding of and experience in operationalising

humanitarian principles, and this needs to be reinforced with periodic training (by implementing partners) and review (*linked to finding F7 – good understanding and strong monitoring of operationalisation of humanitarian principles, especially where response is highly dependent on local partners*).

- R4:** DG ECHO needs to work with other humanitarian donors and IPs to develop a harmonised set of standards and protocols for the TPM mechanism which will continue to remain a critical tool in monitoring humanitarian action (*linked to finding F18 – inadequate quality of monitoring data and results reporting*).
- R5:** Continue to advocate with all humanitarian agencies and donors for increasing cash response, wherever feasible, instead of in-kind response (*linked to F11 – DG ECHO leading on cash response*).
- R6:** DG ECHO needs to conduct an in-depth audit of its protracted grant processing mechanism for Syria to assess its appropriateness for humanitarian response and explore room for improvement (*linked to finding F19 – protracted grants approval and procurement procedures affecting timely response*).
- R7:** In order to have a shared understanding of efficiency and cost-effectiveness across the organisation, DG ECHO could consider the feasibility of developing a set of operational guidelines for use during grant appraisals, monitoring and reporting for Syria operations. This needs to be based on a construct of efficiency which is context-specific and integrates (a) timeliness, (b) economy (cost per unit of input minimised) and (c) cost-effectiveness (cost per output optimised) (*linked to finding F21 – no explicit cost-effectiveness framework*).

1. Introduction

1.1. Evaluation background

The Directorate General for European Civil Protection and Humanitarian Aid (DG ECHO) of the European Union (EU) has been responding to the Syria crisis since the start of the conflict. The period beginning 2016 saw progressive escalation in intensity of the conflict leading to major humanitarian crises both inside the country and in its immediate region. DG ECHO provides humanitarian assistance through its annual Humanitarian Implementation Plans (HIP) which define the expected humanitarian response in the country and are based on Humanitarian Aid Regulation (HAR) No. EC 1257/96 and the European Consensus on Humanitarian Aid (the Consensus). DG ECHO previously commissioned an evaluation of the ECHO response to the Syrian crisis for the period 2012-2014 and commissioned Landell Mills International, to undertake an independent evaluation of its humanitarian assistance inside Syria for the HIP period 2016-2018. The evaluation was undertaken between January and December 2020. This report brings together the findings, conclusions and recommendations from the various processes of the evaluation.

1.2. Evaluation purpose, scope, objectives and evaluation questions

The overall purpose of this evaluation was to provide an external, impartial and independent evidence-based assessment of performance of the DG ECHO's portfolio of funded actions in Syria over the HIP period 2016-2018. It focused on humanitarian actions in Syria,⁷ taking account of the shifting territorial control during the period under evaluation, and the efforts to address restricted humanitarian access. The scope of the evaluation covered interventions implemented under the HIPs for 2016 to 2018⁸ (see Table 1, section 1.3.2). This evaluation sought to understand the extent to which support provided by DG ECHO contributed to meeting the needs of the most vulnerable groups caught up in ongoing conflict inside Syria, and covered actions in the areas of protection, food, basic needs, education, healthcare, cash transfers, shelter, water, sanitation & hygiene (WASH), as well as in the areas of coordination, support to operations and logistics. DG ECHO's humanitarian assistance is coordinated under the Whole of Syria (WoS) approach, with operational hubs in Amman, Beirut,⁹ Gaziantep and Erbil.

DG ECHO's humanitarian actions are founded on the European Consensus on Humanitarian Aid ("Consensus") which emphasises commitment to the fundamental principles of humanitarian aid and the respect of International Humanitarian Law (IHL). It provides clear definitions of the humanitarian principles of humanity, neutrality, impartiality and independence.¹⁰ The evaluation therefore has an *accountability* function, based on Article 18 of the Council regulation, to verify that DG ECHO supported humanitarian actions in the complex context of Syria were in accordance with humanitarian principles and DG ECHO's thematic policies. There is also a *learning* function to gain insights and draw lessons for the future.

⁷ This evaluation does not cover Syrian refugee response in the region and confines itself to operations inside Syria only.

⁸ Implementation of some of the actions from HIP 2018 continued well into late-2019/early 2020 and these were also included in the evaluation.

⁹ Amman has remained the main coordination hub for the WoS response of the United Nations system; DG ECHO regional experts also operate out of Amman, while most of operations are coordinated from Beirut where the DG ECHO Head of Office for Syria is located.

¹⁰ European Commission (2016). Strategic Plan 2016-2020, Directorate-General Humanitarian Aid and Civil Protection – ECHO.

The evaluation had three objectives¹¹:

1. Examine the intervention logic of DG ECHO's portfolio of actions in Syria and analyse the portfolio of actions for the 2016-2018 HIP period;
2. Assess performance with regard to DG ECHO humanitarian actions in Syria, including identifying internal and external enabling factors, as well as limiting factors in delivery of its mandate in relation to assistance and protection to people affected by the conflict in Syria;
3. Capture lessons, good practices and innovations that are improving humanitarian action and analyse their potential for more general application by DG ECHO.

The evaluation assessed DG ECHO's strategy and priorities in Syria, taking into consideration internal and external enabling factors, using the following evaluation criteria:

- i. *relevance* to the needs of the most vulnerable population groups and individuals, to the specificities of the context, and the evolving needs;
- ii. *coherence* with humanitarian principles, the 'Do No Harm' approach and DG ECHO's thematic/sector policies, the response of other humanitarian donors (including Member States of the EU), alignment with Humanitarian Response Plans (HRP) and humanitarian-development nexus approaches;
- iii. *EU added-value* compared to Member States and other donors acting alone;
- iv. *effectiveness* in relation to the general goals of the HAR and Consensus, the specific goals of the HIPs, as well as advocacy and communication activities which are of crucial importance in this context;
- v. *efficiency*, in terms of cost-effectiveness, and appropriate and proportionate budget allocation;
- vi. *sustainability* in terms of longer-term planning, nexus linkages, exit strategies and resilience building.

The evaluation assessed the Syria response using the following (Box 1) 11 evaluation questions (EQ). The Terms of Reference (ToR, attached as Annex 1) outlined 12 EQs. However, as two of the 12 questions were overlapping each other, the EQs were slightly amended and 11 EQs were finally agreed with DG ECHO during the inception phase.

Box 1: Evaluation Questions (EQs)

Relevance

1. To what extent were beneficiaries appropriately consulted in the design and implementation of DG ECHO-funded projects? To what extent did DG ECHO-funded actions consider the needs of the most vulnerable people affected, particularly women, children, elderly and disabled persons?
2. To what extent were DG ECHO and its partners successful in adapting the approaches and aid modalities to evolving needs of beneficiaries during the period under evaluation? What modifications are needed for the future?

Coherence

3. To what extent was DG ECHO's response aligned with: (a) the humanitarian principles; (b) the 'do no harm' approach; and (c) DG ECHO's relevant thematic/sector policies?
4. To what extent was DG ECHO successful in coordinating its response with that of other donors in the country, including EU Member States, and by that avoiding overlaps and ensuring complementarities?
5. In the context of the Nexus and humanitarian-development coordination instruments, to what extent and by which measures did DG ECHO ensure that its actions were coherent with, and complementary to related actions of other EU actors?

EU Added value

¹¹ DG ECHO (2019). Terms of Reference for the evaluation of the European Union's humanitarian assistance in Syria, 2016-2018

6. What has shown to be the EU added value of the actions examined (i.e. the added value of EU intervention, compared to leaving the initiative to other actors, including the EU Member States)?

Effectiveness

7. To what extent were DG ECHO's objectives (as defined in the HAR, the Consensus and the specific HIPs) achieved? What concrete results were achieved? What critical success factors can be distinguished?

8. How successful was DG ECHO through its advocacy and communication measures in influencing other actors by direct and indirect advocacy on issues like humanitarian access and space, respect for IHL, addressing gaps in response, applying good practice, and carrying out follow-up actions of DG ECHO's interventions? How could DG ECHO improve in this respect?

Efficiency

9. To what extent did DG ECHO achieve cost-effectiveness in its response? What factors affected the cost-effectiveness of the response?

10. Was the size of the budget allocated by DG ECHO to Syria appropriate and proportionate to what the actions were meant to achieve? To what extent did restricted humanitarian access put limits to the absorption potential of EU funding?

Sustainability

11. To what extent did DG ECHO manage to achieve sustainable results of its interventions? To what extent were appropriate exit strategies put in place and implemented? What could be further done (enabling factors, tools, mechanisms, change of strategy, etc.) to promote sustainability, build resilience and strengthen links to interventions by development actors?

The primary users of the evaluation include DG ECHO staff at the headquarters (HQ), regional- and country-level, other EU actors, implementing partners (IP) and other humanitarian donors including EU Member States and agencies. Secondary stakeholders include all partners, other humanitarian agencies and individuals who may find lessons emerging from this evaluation of direct or indirect interest.

1.3. An overview of the context for humanitarian actors and DG ECHO response

1.3.1. Humanitarian context in Syria

Syria is ranked ninth in the list of 'very high risk' countries in the EU Risk Index 2020.¹² The United Nations (UN) has described Syria as one of the worst humanitarian crises of the twenty-first century. With the conflict well into its tenth year, both the severity and complexity of humanitarian needs of Syrians remain widespread. During the period covered by the evaluation, the total population in need remained at a staggeringly high level, between 11.7 million (December 2018) and 13.5 million (December 2016)¹³, which equates to 70 to 80 percent of the total population of the country. At the beginning 2020, an estimated 11.7 million people were in need of various forms of humanitarian assistance,¹⁴ including 6.2 million who were internally displaced and 6.8 million refugees who left the country, mostly to neighbouring Lebanon, Turkey and Jordan.¹⁵ Since December 2019, escalating hostilities in North-West Syria.

¹² <https://drmkc.jrc.ec.europa.eu/inform-index/INFORM-Risk/Results-and-data/moduleId/1782/id/386/controller/Admin/action/Results#inline-nav-4>

¹³ Source: OCHA, <https://hno-syria.org/#key-figures>

¹⁴ OCHA (2019). "2019 Humanitarian Needs Overview: Syrian Arab Republic"

¹⁵ <https://www.acaps.org/country/syria/crisis/conflict>

(NWS) has displaced more than 950,000 people¹⁶. This followed intense hostilities in April-August 2019 that had already left 2.7 million people dependent on humanitarian assistance. In North-East Syria (NES), increased conflict since October 2019 has also resulted in widespread displacement. This has been compounded by runaway inflation and devaluation of the Syrian pound, leading to escalation in food prices and daily necessities by 200-300 per cent since the summer of 2019, not to mention the devastating effect of the COVID-19 Virus. The number of food insecure people increased from 7.9 million people to 9.3 million during the first semester of 2020.

This is still a significant reduction compared to 2016 which saw a peak in the level of need, with 13.5 million people in dire humanitarian need, including 6.3 million internally displaced people (IDP) and 4.9 million people in besieged and hard-to-reach (HTR) areas. Although besieged areas have now reduced, with over 70 percent of the country's territory having been wrested by the government from the opposition groups, there are still pockets involving various opposition groups, Government of Syria troops, US, Turkish and Russian forces which continue to witness large-scale fighting and destruction.

The escalation of violence in the later part of 2019 and early 2020 further exacerbated existing humanitarian needs and vulnerability for the estimated 3 million people caught in conflict in the north-western parts of the country.¹⁷ The crisis continues to cause civilian deaths and strain the socio-economic foundations of Syrian people, thereby affecting their ability to sustain adequate standards of living, seek decent livelihood opportunities, and access essential infrastructure and services. The acute humanitarian needs, recurrent displacement and continuous violence have deepened poverty, increased insecurity and weakened communities' resilience to cope with internal and external shocks. The World Bank reclassified Syria as a Low-Income Country in 2018. The Gross National Income per capita had fallen below US\$ 996.¹⁸

The impact of current and past hostilities on civilians remains the principal driver of humanitarian needs in Syria. During the HIP period 2016-2018, one of the key conflict drivers was the increase in Russian military support to the Government of Syria (GoS) which led to the fall of the Aleppo opposition-controlled area. With Russian military support over the last four years, the GoS took back control of many areas previously held by opposition forces. The indiscriminate bombardment and violence resulted in considerable civilian deaths, destruction of assets, human suffering and a large-scale humanitarian crisis. The government military operations continue in Idlib and parts of Aleppo in NWS, leading to massive displacement and continuous need for humanitarian assistance. The second driver was the increase during 2017-2019 in efforts of the International coalition led by the USA with participation of local militia groups in NES in the fight against the Islamic State Group. Though this has led to the recapture of all territories previously controlled by the terrorist group, the price was the destruction of Raqqa city and massive humanitarian consequences. The last driver has been the beginning of Turkish military intervention on the ground, with the Turkish-backed militias in both the NES and NWS. North-Syria has been deeply affected by the offensive in Idlib governorate by the GoS forces and its allies against non-state armed groups. The fights from December 2019 to March 2020 displaced more than a million people in an area which 50% of its population were already IDPs.

The divided territorial control has impacted access and shaped humanitarian response in the country since the onset of the conflict. Humanitarian actors have delivered aid in Syria's opposition-held areas directly or via national organisations (cooperating partners) through cross-

¹⁶ <https://www.unocha.org/syrian-arab-republic/about-ocha-syria> (accessed 19 October 2020)

¹⁷ OCHA (2019). Syrian Arab Republic - Recent Developments in North-western Syria Situation Report No. 11 - as of 6 September 2019

¹⁸ World Bank (2018). "New country classifications by income level: 2018-2019". <https://blogs.worldbank.org/opendata/new-country-classifications-income-level-2018-2019> (Accessed 27th of January 2020)

border operations from Turkey, Iraq and Jordan. The cross-border aid delivery is authorised by the UN Security Council's annually renewable resolution 2165(2014).¹⁹ Aid was also delivered in governmental controlled areas (GCA) by UN agencies, International Non-Government Organisations (INGOs) and the Red Cross and Crescent movement based in Damascus, working mainly through the Syrian Arab Red Crescent (SARC).

Protracted conflict and deteriorating protection environment: By the end of 2018, 1.2 million people still lived in HTR areas where they were exposed to grave protection threats, compared to 2.4 million persons in HTR areas at the end of 2017. Ongoing hostilities in parts of the country still expose civilian populations to violence and threats to their lives, particularly in the North-West,²⁰ raising complex protection issues. The threat of explosive hazards remains a major protection concern with more than 10 million people estimated to live in contaminated areas.²¹ The effects of hostilities, forced and protracted displacement, lack or loss of civil documentation, barriers to claims on housing, land and property (HLP) rights and lack of freedom of movement remain the main protection issues in Syria. Gender-based violence (GBV) continues to affect the lives of women and girls. Adolescent girls and women-headed households, especially those divorced and widowed, are bearing the brunt of the crisis. Elderly people and persons living with disabilities are also among the most vulnerable.

Life-threatening needs of the most vulnerable: Besides the destruction of livelihoods, trade and businesses over the years, the rapid decline of the Syrian Pound (SYP) against the US dollar by over 100 per cent over the past year,²² has led to erosion of people's purchasing power, making access to essential goods and services difficult, further aggravating vulnerability, poverty levels, and negative coping mechanisms²³. Syria is also currently subject to international sanctions²⁴ put in place by the EU, US and the UK, with some exceptions in relation to provision of humanitarian aid for its civilian population. Unemployment was estimated at 55 percent in 2019²⁵, this figure is likely to be far higher in the last quarter of 2020, considering the economic effect of COVID-19. A UN Office for the Coordination of Humanitarian Affairs (OCHA) report noted that the protracted nature of the crisis and the prolonged displacement of millions of people has eroded safety nets and generated harmful coping mechanisms such as early marriage, child labour, and other forms of exploitation²⁶. Over two-fifths of school infrastructure has been damaged or destroyed. Basic water and sanitation services are also lacking, with estimates suggesting that wastewater treatment covers only an estimated 9% of the population. In the worst affected governorates, fewer than 20% of people have piped water access.

The Humanitarian Needs Overview (HNO) identifies population groups which generally face the most acute needs, including: (i) people living in HTR or newly accessible

¹⁹ The Council decided that aid will continue to be delivered through Bab al-Salam and Bab al-Hawa crossings in Turkey only — excluding Al Yarubiyah and Al-Ramtha on Syria's borders with Iraq and Jordan, through which deliveries took place since 2014: United Nations Meetings coverages (2020), "Avoiding Midnight Deadline, Security Council Extends Authorisation of Cross-Border Aid Delivery to Syria, Adopting Resolution 2504 (2020) by Recorded Vote". <https://reliefweb.int/report/syrian-arab-republic/avoiding-midnight-deadline-security-council-extends-authorisation-cross>

²⁰ OCHA (2019). Humanitarian Response. Syrian Arab Republic: Humanitarian Response plan Monitoring Report, January-May 2019

²¹ OCHA (2019). Humanitarian Response. Syrian Arab Republic: Humanitarian Response plan Monitoring Report, January-May 2019

²² One dollar buying 495 SYP in December 2018 and upwards of SYP 1,000 in August 2020.

²³ OCHA (2019). Humanitarian Update – Syrian Arab Republic, Issue 07, 23 December 2019

²⁴ UK Government (2013): 'Financial Sanctions Syria': <https://www.gov.uk/government/publications/financial-sanctions-syria>; COUNCIL DECISION 2013/255/CFSP.

²⁵ OCHA (2019). Humanitarian Needs Overview 2019, Syrian Arab Republic, March 2019

²⁶ OCHA (2019). Humanitarian Response. Syrian Arab Republic: Humanitarian Response plan Monitoring Report, January-May 2019

areas; (ii) people exposed to high intensity conflict; (iii) IDPs in last resort camps/centres; (iv) newly displaced people; (v) self-organised returnees; and (vi) 'overburdened communities' with a high concentration of IDPs/returnees. The prevalence of life-threatening diseases such as measles, acute bloody diarrhoea, typhoid fever and leishmaniasis has increased. Children, pregnant and lactating women, disabled people, the elderly and people with diminished coping mechanisms, are all at increased risk. Approximately 45 percent of people injured in the conflict are expected to sustain permanent impairments, and the disability rate in northern governorates is thought to have doubled. An estimated 46 percent of health facilities are partially functional or not functional as a direct result of the conflict.²⁷

Territorial control of Syria evolved significantly between 2016 and 2018,²⁸ and has continued to evolve in 2019. Currently, **there are at least four broad zones of control, each with different humanitarian needs and access constraints**, thus requiring different modalities of assistance: the Government-controlled areas, NES, NWS; areas in the NES and NWS that have come under de facto control of Turkey following military operations named Euphrates Shield (led to the control of Azaz and other northern towns) and Olive Branch (resulted in the control of Afrin) and more recently, in October 2019, Peace Spring Operation. Access to the NES region is through the cross-border operations via Iraq and from Turkey for a part of the territory following the Peace Spring Operation of October 2019. The North-West hub has been the key humanitarian operational platform for cross-border aid delivery into non-government-controlled areas in Syria. The southern city of Gaziantep in Turkey has become a hub for the humanitarian actors operating in opposition areas since 2013.²⁹ It also hosts many aid implementers including the OCHA based in Gaziantep. Southern Turkey has two key border crossings into Syria: Bab El Salam and Bab el Hawa. The South and central of Syria include: the capital city of Damascus, Sweida, Homs and Dara'a; currently under government control, except for a small region in the south-east that is controlled by the US-backed anti-government opposition (Rukban). The Jordan hub was used for access in South Syria and is the seat of the WoS coordination. In 2016, one million people were considered as under siege in South and central of Syria and in Deir Ezzor.³⁰ In April 2018, the shift under GoS control of eastern Ghouta, where almost 400,000 people lived under siege and in desperate need of essential and life-saving humanitarian aid,³¹ marked the fall of one of the last important besieged areas in Syria. The region hosted HTR communities and was, until 2018, one of the most difficult places to access for aid delivery.

1.3.2. Overall humanitarian needs and response by the humanitarian agencies

The humanitarian community is responding to the needs of the affected population by providing food and shelter assistance as well as health, education, nutrition, protection, and water and sanitation services. However, efforts to provide relief to Syrian civilians are heavily restricted due to escalating armed conflict which remains a deeply politicised theatre of proxy wars staged by global and regional powers. As humanitarian needs increase, the already stretched humanitarian response risks being overwhelmed, particularly if the violence continues or further escalates.

²⁷ OCHA (2019). Syria Humanitarian Needs Overview 2019 Syrian Arab Republic, March 2019

²⁸ Source: <https://upload.wikimedia.org/wikipedia/commons/5/5e/SyrianWarAnimation2011-2019.gif>

²⁹ The regulatory environment in southeast Turkey became much harder in 2017 onwards, and provoked difficulties for a number of even quite large NGO's, who have to withdraw personnel or restrict operations because of it. The Turkish government also refused to renew the registration of some NGO's operating cross-border into Syria.

³⁰ Pax & The Syria Institute (2016-2018), Siege Watch, quarterly reports.

³¹ OCHA (2017). "Syria: Humanitarian aid reaches 40,000 people in besieged eastern Ghouta". <https://www.unocha.org/story/syria-humanitarian-aid-reaches-40000-people-besieged-eastern-ghouta> (Accessed 27th of January 2020)

An overview of humanitarian needs across the country is provided in the UN-coordinated HRP for each year. Table 1 summarises the scale of need over the period 2016-2019, based on humanitarian needs overview for each year compiled by OCHA in Syria.

	2016 ³²	2017	2018	2019
People in need of humanitarian assistance	13.5 million	13.5 million	13.1 million	11.7 million
People targeted by HRP	13.5 million	9 million	10.5 million	9 million
Total request (US\$)	3.18 billion	3.4 billion	3.5 billion	3.3 billion
Total mobilized (US\$)	1.75 billion	1.91 billion	2.1 billion	2.14 billion
Largest sectors of (planned) assistance (decreasing order of funding request)	Food; Shelter & NFI; Health; WASH; Education; Protection	Food; Shelter & NFI; Health; Protection; Education; WASH; Early recovery & livelihoods	Food; Shelter & NFI; Health; Protection; Education; WASH; Early recovery & livelihoods	Food; Shelter & NFI; Health; Protection; WASH; Education; Early recovery & livelihoods

Table 1 Scale of humanitarian needs in Syria, 2016-2019 (Source: All HRP data obtained from OCHA HRPs for corresponding years and FTS for 2016-2020)

The UN appealed to donors for \$3.3 billion in 2019. In March 2020 it mobilized \$2.14 billion. The EU (Commission and Member States combined) is the largest contributor of humanitarian assistance in the Syrian crisis, both inside Syria and in the region. The European Union and its Member States provided more than €17 billion in aid (humanitarian and development assistance) since the beginning of the conflict up to the year 2019 to help those who have fled the war, both within and outside Syria.³³

The USA, Germany, the UK, Norway, Canada, Japan, Qatar, Australia and Switzerland, among others, have also provided significant support to Syria³⁴. **The largest portion of the UN-coordinated Syria HRP during the period 2016-2018 went into food security and agriculture (US\$1.2-1.3 billion every year),** followed by shelter & non-food items (US\$475-523 million every year) and health (US\$437-459 million per year). Other major interventions by the global humanitarian aid system have been in the areas of WASH, education and protection (Table 2).

³² Source: OCHA (2015). Humanitarian Response Plan, Syria 2016

³³ European Commission (2019). Syria crisis: EU mobilises renewed international support, record overall pledge of €8.3 billion for 2019 and beyond, 14-03-2019

³⁴ FTS data

Sector	HRP appeal 2016	HRP appeal 2017	HRP appeal 2018 ³⁵
Food security & Agriculture	1.2 billion	1.34 billion	1.34 billion
Shelter & non-food item	523.1 million	475.5 million	475.5 million
Health	437.2 million	459.25 million	459.25 million
Protection	235.9 million	294.6 million	294.6 million
Education	200.2 million	265.45 million	265.45 million
WASH	250 million	219.4 million	219.4 million
Early recovery & livelihood	148.4 million	173.48 million	173.48 million
Nutrition	51.1 million	70.09 million	70.09 million
Other sectors ³⁶	100.3 million	104.17 million	104.17 million
Total	3.2 billion	3.4 billion	3.4 billion

Table 2: Breakdown of HRP requirements, 2016-2018 (US\$). (Source: OCHA. HRP 2016, 2017, 2018)

The international humanitarian response during the evaluation period has been coordinated under the framework of the UN-led Whole of Syria (WoS) approach, which brings together internally and externally coordinated operations under a single umbrella. This complex system has enabled delivery of humanitarian aid to millions of people from regional hubs (Figure 2) in Iraq (Erbil), Lebanon (Beirut), Turkey (Gaziantep) and Jordan (Amman), and local hubs in Damascus, Homs, Tartous, Aleppo, Qamishli and As-Sweida.

The delivery of humanitarian assistance inside Syria has been hindered significantly throughout the war. In GCAs, the UN agencies had better access than INGOs.³⁷ Throughout the evaluation period, 12 UN agencies and the Red Cross and Red Crescent movement were authorised to operate inside Syria. In 2015, 14 INGOs and 124 national NGOs were operating with the authorisation of the government, and by 2018 this increased to 27 INGOs and several hundred national organisations. Areas outside government control have been primarily served by INGOs operating cross-border from hubs in the regions and their Syrian NGO/Civil Society Organisation (CSO) partners (cooperating partners) operating cross-line between different territories of Syria. By the end of 2018, around 50 INGOs and 150 national NGOs were operating from Turkey to provide assistance in areas outside GCAs and 27 organisations serving in the North-East, either from inside Syria or from Iraq.³⁸ Since 2016, following the military coup in Turkey and subsequent Turkish incursions into the NWS in 2018 and 2019, cross-border operations have been beset with challenges of bureaucratic impediments and a highly restrictive regulatory environment for INGOs.

³⁵ The 2018 HRP financial requirements were kept at the same level as that of 2017. The HRP 2018 document (p11) stated that as humanitarian needs in Syria remain similar in scale and severity to those of last year, the 2018 response strategy builds on the 2017 response and efforts deployed to date)

³⁶ Includes: Coordination, camp coordination and management, logistics, emergency telecommunications, and coordination.

³⁷ DG ECHO HIP Syria 2016, vers. 3 (page 14)

³⁸ Data on numbers of active humanitarian organisations from obtained HNOs 2016, 2017, 2018, 2019.

Syria humanitarian hubs

Hubs locations






-  Syria Hub (Damascus) for GoS controlled areas
-  Turkey hub (Gaziantep) for NWS
-  Jordan hub (Amman) for WoS and south interventions
-  Iraq hub (Erbil, KRG) for NES
-  Lebanon (Beirut) non official hub for south and central Syria.



Figure 2: Map of Syria showing all operational hubs

1.3.3. DG ECHO's response in Syria

By the end of 2018, the European Commission (EC) had dedicated more than EUR 920 million to humanitarian assistance inside Syria since 2011³⁹. DG ECHO was at the forefront of the EU's response to the crises. Table 3 below uses financial data extracted from UN OCHA's financial tracking service (FTS)⁴⁰ to compare the DG ECHO contribution to identified funding needs and total international funding for humanitarian assistance⁴¹. **This analysis shows that between 2016 and 2018, DG ECHO was consistently the fourth largest donor to the Syria Crisis**, providing between 7% and 12%. DG ECHO's total funding to the HRP for Syria during the 2016-2018 period was €442,392,821 (US\$ 501,673,000), an annual average of US\$167,224,333.

³⁹ DG ECHO (2019). Terms of Reference for the evaluation of the European Union's humanitarian assistance in Syria, 2016-2018

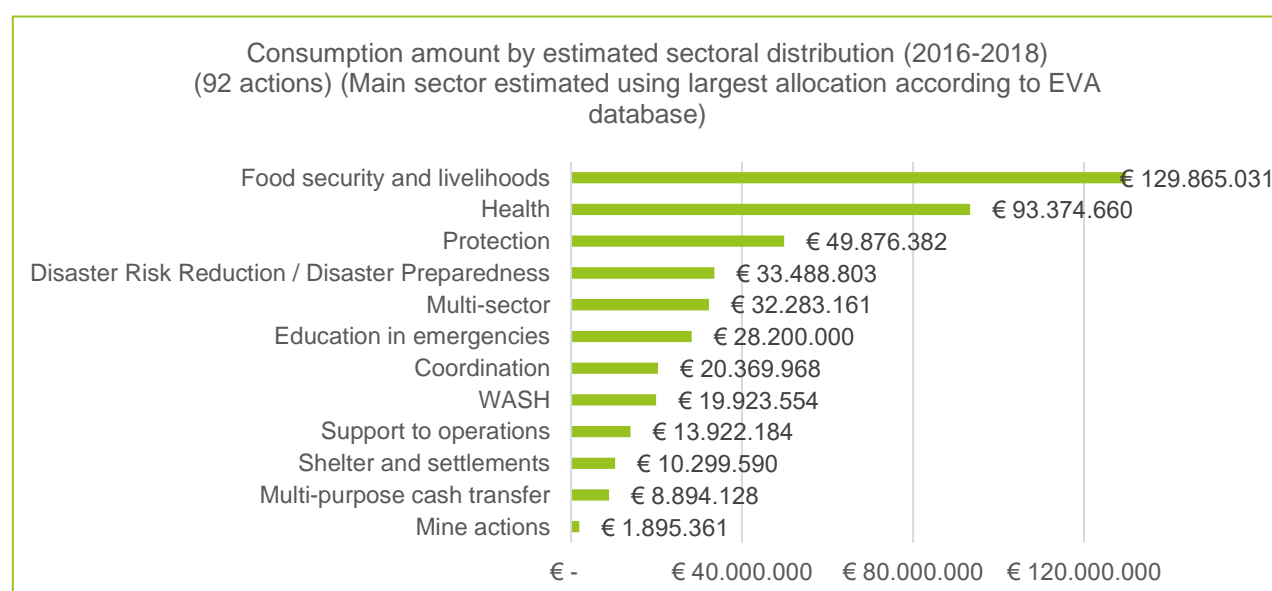
⁴⁰ It may be noted that FTS information may often be divergent from DG ECHO's own data as there is a time-lag between Agencies' internal reports on allocations and their reporting to OCHA FTS.

⁴¹ DG ECHO (2018). 2018 Annual Activity Report Directorate-General for European Civil Protection and Humanitarian Aid Operations

Year	HRP requirements (US\$)	HRP incoming funding (US\$)	DG ECHO funding (US\$) ⁴²	DG ECHO share of HRP funding (%)
2016	3,193,669,810	1,747,530,642	209,288,000	12%
2017	3,351,303,574	1,907,238,998	134,207,000	7%
2018	3,364,410,629	2,104,011,394	159,470,000	7.6%

Table 3 HRP requirements and DG ECHO funding, 2016-2018 (Source: Syria Humanitarian Response Plans 2016-2018, Financial Tracking Service, UNOCHA. Data checked 22/04/20)

Using the EVA database⁴³ of actual consumption during 2016-2018, the evaluation team attempted to construct a pattern of sectoral distribution. It needs to be noted that this is only an approximation as precise data on sectoral allocation/consumption for each project is difficult to obtain for EVA/HOPE database since most of the grants have components of multiple sectors, with one or two main sectors and other sub-sectors. For the purpose of analysis, only the main sector for each project on the EVA database has been taken into account. This analysis (Figure 3) shows that **food security and livelihoods (FSL) accounted for 31% of all 'consumption', followed by health (22%) and protection (12%).**



⁴² DG ECHO funding has been taken from DG ECHO database of 'actual consumption' for the HIPs 2016-2018, and is at variance with FTS data which usually is not up-to-date. Currency conversion rate (€:\$) as per Oanda rate on 1 July of each calendar year.

⁴³ In the EVA action database, Actions are linked to a main sector, and one or more sub-sectors. However, EVA Actions list does not provide figures by sub-sector. Therefore, these figures are registered at the main sector level only, the proportion of each sub-sector per result is not known and not included in these figures.

Figure 3: Relational distribution of sectoral consumption

The bulk of work inside the country is carried out by INGOs and Syrian organisations, in particular, in NWS. In 2018, the HIP was implemented through 36 partners,⁴⁴ with collective presence in all the hubs. The WoS coordination approach provided access to all areas that enabled identification of gaps in response to the onset of crises in different regions, e.g., sudden escalations of hostilities and internal displacements. Cross-border (XB) operations from Jordan and Lebanon were mainly focused on South of Syria/Eastern Ghouta (and NWS for a small number of IPs); XB operations from Iraq targeted NES and XB operations from Turkey concentrated on NWS. DG ECHO's First Line Emergency Response (FLER)⁴⁵ approach responded to such gaps by providing in-built flexibility to address emerging needs, including access strategies, contingency planning, severity scales and response triggers and multi-sectoral emergency response capacity. During 2016 and 2018, DG ECHO's allocation for delivery through Damascus and Iraq hubs increased significantly while delivery through Jordan and Lebanon hubs declined (Table 4 below) as territorial control over Eastern Ghouta and South of Syria changed, and cross-border (XB) operations from Turkey remained slightly above a quarter of all allocations.

	Damascus %	Cross-border Turkey %	Cross-border Iraq %	Cross-border Jordan %	Cross-border Lebanon %
2016 Percent	41.2	28.4 ⁴⁶	4.4	17.6	8.4
2018 Percent	52.7	26.9	18.0	2.1	0.3

Table 4: Distribution of HIP allocations per modality, 2016 & 2018 HIP (Source: DG ECHO (2019). Note to File – Allocation of funds HIP Syria regional crisis 2018, 11 March 2019; DG ECHO (2016). Note to File – Allocation of funds HIP Syria regional crisis 2016, 18 August 2016)

In line with the WoS approach, DG ECHO-funded actions are spread across the country and respond to needs as they arise. **Portfolio analysis shows that Aleppo, Idlib and Rural Damascus (including Ghouta) were targeted by the largest number of Actions during the period**, reflecting a needs-based response in areas with large numbers of IDPs, high population density, exposure to hostilities and besiegement. During 2019-20, developments in NWS meant that the XB response from Turkey (Gaziantep hub) has increased significantly and is likely to reach €70-€80 million.

DG ECHO worked with up to a total of 40 IPs during the 2016-2018 HIP period, as the project list for the period shows. Actual HIP 'consumption' data shows that between 2016 and 2018, the INGOs implemented about 37-51% of actions, with the UN agencies and International Committee of the Red Cross (ICRC) combined accounting for 49-63% of actions (Table 5). The bulk of actions in NES and NWS were implemented by INGOs in partnership with Syrian civil society organisations (CSO) as the cooperating partners.

⁴⁴ DG ECHO (2019). Note to File – Allocation of funds HIP Syria regional crisis 2018, 11 March 2019

⁴⁵ DG-ECHO put the FLER mechanism⁴⁵ in place in 2016, with three main objectives: to facilitate flexible and rapid response, improve operational coordination through the WoS approach and improve humanitarian outreach, mainly in besieged and hard-to-reach areas.

⁴⁶ In 2016 some assistance to NES was still channelled through actors based in Turkey; as such these actions may appear under cross border Turkey

	HIP 2016	HIP 217	HIP 2018
INGOs	€70,495,803 (37%)	€59,530,533 (51%)	€60,205,687 (44%)
UN	€69,661,896 (37%)	€49,948,902 (42%)	€45,460,082 (33%)
International Organisations (IO) ⁴⁷	€48,300,000 (26%)	€ 8,000,000 (7%)	€31,000,000 (23%)
Total	€188,457,699 (100)	€117,479,435 (100)	€136,665,768 (100)

Table 5: HIP actual consumption data for different partner categories (2017-2018) (Source: DG ECHO (2019). HIP Actual Consumption, 2016-2018)

Overall, during the three-year period (2016-2018), nearly 42% of the total DG ECHO grants were allocated to IPs working across the country (Table 6) involving working both XB and via Damascus (X-Damascus), this went mainly to the UN agencies (36%). Allocations to those working XB with no X-Damascus intervention - mainly INGOs - was 34%; 24% of the total allocated budget went to IPs working just X-Damascus with no XB programmes (13%).

	IO	NGO	UN	Total
No X Border, only Damascus	13.19%	7.59%	3.51%	24.3%
X Border operations, no Damascus	0	32.56%	1.46%	34.0%
X Border and Damascus operations	0	5.6%	35.82%	41.4%

Table 6: Distribution of allocations as per modality, 2016-2018 (Source: 2016-2018 grant allocation data derived from DG ECHO Syria project list).

⁴⁷ The only agency in this category is ICRC

2. Evaluation approach and methods

2.1. The evaluation process and framework

The evaluation used a mixed-methods approach combining desk research, key informant interviews (KIIs) and beneficiary/community interviews. The evaluation started with an inception phase during which the Evaluation Team (ET) undertook scoping interviews and a preliminary review of key documents related to DG ECHO's humanitarian funding in Syria. Subsequently, an inception report with a detailed evaluation methodology was produced and discussed with the DG ECHO evaluation steering group which managed the evaluation. There after an extensive desk review of documents and secondary data through study of available data in DG ECHO documents and HOPE database was undertaken, culminating in a desk report. The field or data collection phase involved interviews with a range of stakeholders including DG ECHO staff, implementing partner (IP) staff, humanitarian donors and other relevant external organisations undertaken by the international consultants (IC) in the ET. As a result of the Covid-19 pandemic, the ICs could not travel to the region and had to undertake all the KIIs remotely. However, as was envisaged in the inception report, the ET undertook interviews with a cross section sample of beneficiaries/communities who benefitted from DG ECHO-assisted response. The beneficiary interviews were undertaken through a team of local researchers in Syria.

During the inception phase, the ET developed an intervention logic of DG ECHO's Syria response (Figure 4 below) based on an analysis of the Syria conflict context, HIPs, DG ECHO's thematic policies and its strategic plan. As the intervention logic shows, the DG ECHO Syria portfolio aims to deliver several complex outputs and outcomes, the evaluation of which required methodologies that took into account the complexities of dealing with different types of data, quantitative and qualitative, often with little or no counterfactuals to compare against. The ET used mixed methods, with primary and secondary data gathered from a representative sample of projects supported through the HIPs. To help gather evidence from the interventions, the ET developed a series of judgement criteria for all 11 evaluation questions; this was done to enable a granular analysis of DG ECHO-supported work in line with the strategy and results identified in the intervention logic. The judgment criteria were used to develop appropriate methods for data collection and analysis and was collated into an evaluation matrix (Annex 2) which guided the entire evaluation.

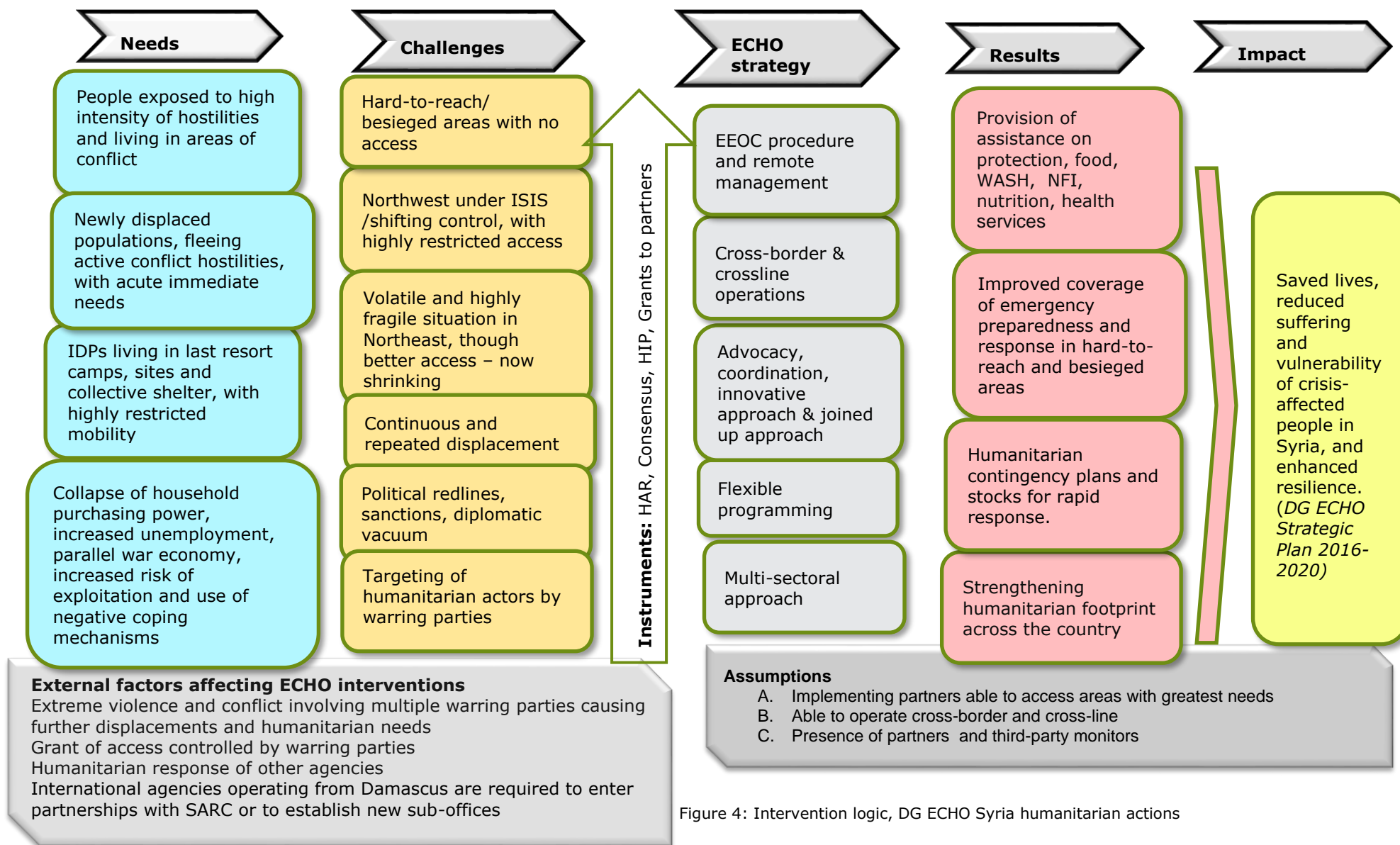


Figure 4: Intervention logic, DG ECHO Syria humanitarian actions

2.2. Methods and sampling

The selection of key informants (DG ECHO and IP staff, other humanitarian partners) was done in a way that ensured that the ET covered humanitarian response in all of the three different hubs/sub-regions (North-East, North-West and Central/South-Central). For KIIs, a purposive sample was used for data collection based on any or a combination of the following criteria:

- i. sectoral representation (particularly of major sectors, namely: health, food, protection, WASH and education in emergencies);
- ii. actions which were current and /recently completed so that the ET could take advantage of recent effects in gathering primary data;
- iii. actions covering NES, NWS and WoS, including Damascus and the South-Central region;
- iv. actions undertaken by INGOs, UN agencies and IOs; and
- v. actions that have been continued to the current year covering HIP 2018.⁴⁸

In total, 78 KIIs were conducted with staff from 26 IPs (a full list of IPs interviewed is attached as Annex 3),⁴⁹ seven humanitarian donor agencies and the EU. A breakdown of the stakeholder groups that comprised the key informants is presented in Table 7 below.

Stakeholder group	Total interviews	WoS/HQ	Damascus hub	NES	NWS
DG ECHO	16	13	-	2	1
EU	3	3	-	-	-
Donor agencies	7	7	-	-	-
IP - INGOs	31	15	7	6	3
IP - UN	18	6	7	-	5
IP - IO	3	1	1	1	-
Total	78	45	15	9	9

Table 7 breakdown of key informant interviews (Source: Compiled by the ET based on KIIs held)

During the desk review phase, the ET reviewed, various policy and thematic documents provided by DG ECHO, project files (fichops, e-single forms, monitoring reports) related to the following implementing partners (IP) which accounted for over 86 per cent of all allocations during the evaluation period: International Committee of the Red Cross (ICRC), Concern, Danish Red Cross, Humanities & Inclusion, Caritas-Luxembourg, COOPI-Italia, International Rescue Committee UK, Mercy Corps Europe, Norwegian Refugee Council, People in Need, International Organisation for Migration, UN Fund for Population Activities, UN High Commission for Refugees (UNHCR), UN Children's Fund (UNICEF), UN Relief and Works Agency for Palestinian Refugees, World Food Programme (WFP) and World Health Organisation (WHO).⁵⁰ A full list of documents studied by the ET is attached as Annex 4.

⁴⁸ Actions from 2018 HIP that have continued into the year 2020.

⁴⁹ The breakdown is: 18 NGOs, 7 UN agencies, and 1 IO

⁵⁰ All these agencies received grants over €10 million during the period covered by the evaluation.

During the data collection phase, a beneficiary survey of DG ECHO-assisted activities implemented by a number of the above IPs was conducted. Out of 18 targeted IPs, 12 participated. Those who did not participate found it difficult to share beneficiary contacts with the team of enumerators due to their data protection policies. Additionally, the team of enumerators interviewed frontline staff and volunteers (working directly with communities) from local NGOs and local organisations that are *cooperating partners* of the IPs and several local council members and community leaders. These interviews were qualitatively different from KIIs in that they were limited in depth and were administered using a survey questionnaire. In total, **470 beneficiaries/community members who received assistance and 41 frontline staff were surveyed – the hub-wise breakdown is shown below (Table 8).**

Region/Hub	Beneficiary interviews		Frontline staff interviews
	Male	Female	
NES	78	47	9 (including 2 local council staff)
NWS	84	156 ⁵¹	21 (including 6 local council staff and community leaders)
South-Central Syria & Damascus	49	56	11
Total	211	259	41

Table 8: Breakdown of beneficiary survey (Source: Beneficiary survey data)

A detailed report on this process (beneficiary and frontline staff interviews) is attached as Annex 5. Wherever relevant, vital data from the beneficiary interviews is summarised in the main report.

2.3. Data mapping and analysis

Throughout the evaluation, data collected from both primary and secondary sources were recorded systematically for evidence assessment based on the judgment criteria against each EQ as defined in the evaluation matrix. The ET carried out an analysis of patterns in the data, clustering the data around emerging themes and sub-themes. A rigorous analysis of data was then undertaken, and findings on each EQ were compared for their congruence. Rigorous data triangulation was done mainly through comparing information gathered through multiple sources and methods. Where discrepancies occurred that could not be resolved, the ET did not use such data for drawing findings or conclusions. All data from the desk review, KII notes, beneficiary and frontline staff interviews were examined by two members of the ET independently to check for their: (i) representativeness: does the data and information represent the whole or a sizeable picture; (ii) relevance – to the questions in the evaluation matrix; and (iii) attributability – if the data convey a 'state', is it attributable to the intervention/cause being described? The team then assessed the findings for **strength of evidence** using the following scoring system:

4. Strong evidence. The finding is fully supported by all evidence from a wide range of data sources and methods.

3. Good evidence. The finding is supported by most evidence from a range of data sources.

⁵¹ The high share of women participants in the NWS survey is attributable to the fact that nearly 23 percent of the respondents were UNFPA beneficiaries (face to face) who were exclusively women in the targeted sector, Protection.

2. Some/limited evidence. The finding is supported by some/most evidence from limited data sources.

1. Weak evidence. There is not enough triangulated evidence to support the finding.

2.4. Evaluation ethics and data protection

The ET was fully cognisant of the sensitivities and risks associated with collecting data in a country which has high degrees of sensitivity for the safety and the security of all stakeholders. Protecting personal data is essential in any evaluation to respect dignity and ensure security of all stakeholders involved. The ET has ensured full confidentiality of data provided, accessed and produced during their work, unless information was obtained from sources that are in the public domain. Besides maintaining the independence and impartiality of the evaluation process, the ET ensured that, when interacting with communities, the evaluation avoided any situation that could have caused harm to the respondents, including vulnerable groups, as well as the enumerators. Appropriate measures were adopted to ensure that all health guidelines pertaining to the COVID-19 pandemic were followed. For all community interviews, the ET discussed beforehand with the IPs and their cooperating partners in the targeted locations to assess if there was sensitivity around the interview process. In coordination with local stakeholders and IPs, the ET ensured that the evaluation complies with all local data protection and privacy laws.

Any personal data collected has been minimal and anonymised in the report. For any community/beneficiary interviews, no name(s) or personal details were collected or recorded at all, except the gender (M/F) of the respondents. For all other stakeholders (key informants), although their names and title (function/role in an organisation) were collected by the ET for analysis of any trend with regard to information/data collected, their names or any other details are not presented in the report in any way that enables the information presented to be traced back to an individual interviewee or organisation, unless authorised by the latter in writing, or cited from published documents.

All ET members are contractually obliged not to publish or otherwise communicate to third parties, through any medium whatsoever, any information obtained during this evaluation, except those presented in this report. In its communication with communities and all stakeholders, the ET explained these commitments and procedures in a transparent way for participants to understand the data protection protocol.

In specific terms, the ET adhered to the following ethical principles for the evaluation at all stages:

- i. *Principle 1: independence and impartiality of the evaluators* - while a consultative process underpinned the team's engagement with DG ECHO staff and other stakeholders, impartiality and independence of the ET was strictly maintained;
- ii. *Principle 2: Avoiding harm* – evaluators ensured that the basic human rights of individuals and groups with whom they interacted as well as their health and safety (risks related to Covid-19, for example) were protected.
- iii. *Principle 3: Voluntary participation* - participation in the evaluation process was voluntary and free from external pressure. All participants had a right to withdraw from the process and withdraw any data concerning them at any point without fear of penalty.
- iv. *Principle 4: Informed consent* - evaluators informed participants how information and data obtained would be used, processed, shared, disposed of, prior to obtaining consent.
- v. *Principle 5: Ensuring confidentiality* – evaluators respected people's right to provide information in confidence and are committed ensure that information cannot be traced to its source.

2.5. Limitations of the evaluation

Core members of the evaluation team were unable to visit the country due to the Covid-19 pandemic, and so most of the data collection was undertaken remotely and through desk reviews, except for the beneficiary survey and frontline staff interviews undertaken by a team of local enumerators. This lack of direct observation which is normally possible during field visits

was counterbalanced to a significant extent by the extensive number of KIIs undertaken by the ET, supplemented by interviews with frontline staff involved in delivery of humanitarian response at community level. This enabled triangulation of data from multiple sources and methods.

Data from beneficiary interviews suffered from a lack of consistency for several reasons: (i) difficulty in recalling or disaggregating beneficiaries' experience dating back 3-4 years from their current experience and state; (ii) in some instances (for example, in GCAs), beneficiary interviews were required to be held in the presence of cooperating partners which may have inhibited some beneficiaries from sharing their views openly; (iii) lack of experience of enumerators and the data collection provider to undertake complex qualitative surveys covering the breadth of DG ECHO programming, compounded by the senior members of the ET not being able to provide direct oversight from a distance. Despite these challenges, there are some interesting findings which were validated through rigorous quality check and these have been used, where appropriate, in the report.

3. Evaluation findings

3.1. Relevance

Key findings
F1: Targeting the most vulnerable people has received strong attention in DG ECHO monitoring of IP actions and where necessary, partners are encouraged to take remedial action. Given the access challenges most agencies face, systematic consultation and participation of communities has been a challenge. Most agencies have put in place some form of complaints response mechanism (CRM), though their use and effectiveness has varied (<i>Strength of evidence - 3</i>).
F2: A few IPs designed their interventions based on secondary data (HNO, HNPAP etc). These fell short on assessing vulnerability at household level and beneficiary selection was made based on status (for example, returnees, refugees, displaced), rather than level of vulnerability (<i>Strength of evidence - 2</i>).
F3: DG ECHO and partners undertook continuous review of needs and evolving crises and reassigned, increased or decreased funds within projects as needs emerged. DG ECHO used a range of operational modalities and operating procedures to enable access in HTR populations for providing life-saving aid. (<i>Strength of evidence - 4</i>).
F4: DG ECHO is strongly recognised for its flexible approach in humanitarian programming and support to partners to provide timely and appropriate response. (<i>Strength of evidence - 4</i>).

3.1.1. Needs assessment and vulnerability-based targeting

Operating in high-threat environments imposes limitations on agencies' ability to conduct needs assessments due to access challenges. In the immediate aftermaths of displacements and emergencies, needs assessments by IPs were often based on secondary data and cooperating partners' (local NGOs and CSOs) assessments. In addition, at least three interagency assessments were widely used:

- The Humanitarian Needs Assessment Programme (HNAP)⁵² – of which DG ECHO is one of the major donors – provides data on tracking displacement and return movements on an ongoing basis, and monitors humanitarian needs inside Syria.
- The Humanitarian System Overview in Syria (HSOS) conducted by REACH is a monthly assessment⁵³ that provides comprehensive, multi-sectoral information about the humanitarian conditions and priority needs inside Syria.
- Annual food security and nutrition assessment (FSNA) undertaken along with periodic market assessments.

Of the 26 IPs interviewed, at least 17 stated that they used the HNAP alerts regularly, especially for first response. Agencies which have a better access to conduct assessments used the HNAP assessments for broad identification of pockets of needs and then undertook a combination of joint assessments with several organisations and/or independent assessments,

⁵² The main indicators that are captured through the interagency (UN-wide) HNAP assessments are displacement and mobility dynamics (including returns), shelter status, food and non-food gaps, protection, WASH, and other sectoral needs.

⁵³ The assessment is conducted using a key informant (KI) methodology at the community level, and collects information on shelter, electricity and non-food items (NFIs), water, sanitation and hygiene (WASH), food security and livelihoods (FSL), health, education, protection, humanitarian assistance and accountability to affected populations (AAP), as well as priority needs.

depending on access. One of the IPs facilitated collection, analysis and dissemination of essential information on health risks, needs, health sector response, gaps and performance through real-time assessment missions and up-to-date information through the Health Resource Availability Mapping System (HeRAMS).⁵⁴ Most health partners used these data for their health response.

The IPs often find it difficult to conduct systematic in-depth assessments. In the GCAs, independent needs assessments are challenging because mandatory formal approvals for data collection, from authorities, are usually difficult to obtain. Partners therefore use creative methods to carry out assessments, mostly informally, such as through community interviews during relief distributions, monitoring visits and phone calls with key informants. In the NWS, most IPs operate through local NGO partners and a number of IPs (INGOs) claim to operate through their local staff based inside NWS. These entities carry out ongoing needs assessments. In the NES, presence of both INGOs and local NGOs makes needs assessments easier for most agencies, although UN agencies have limitations of access outside the camps.

In selecting beneficiaries for assistance, especially for ongoing food distribution, cash and livelihoods interventions, agencies used a mix of household-level vulnerability factors (income, work-capable dependents, situation of the head of household, illnesses, disabilities, survivors of violence, negative coping strategies, etc.) and status-based considerations that identified people adversely affected by a situation of displacement. A small number of IPs tended to design their interventions based on pockets identified in the HNO/HNAP, without granular assessments at community level. In these instances, needs assessments often missed some of the socially excluded groups and fell short on assessing vulnerability at household level, as their beneficiary selection remained based on status (returnees, refugees, displaced, for example) rather than level of vulnerability.

23% of beneficiary-respondents stated that some items (NFI, foods) were not appropriate to their need. 36% claimed to have sold such items and 44 % swapped with neighbours for 'something else'. (*Beneficiary Survey data*)

Specific issues found during the evaluation from internal documents in this regard were as follows:

- According to DG ECHO TA notes, one IP allowed itself to be directed by the government for its WASH activities, and was weak in identifying beneficiary groups, being unquestioningly reliant on local officials. Criteria for selection of beneficiaries remained too general without clear analysis of vulnerability. Similar reliance on local area councils in NWS and NES in cross-border operations by another agency resulted in poor targeting.
- Another agency, which did not have direct access, relied on local partners across the country to apply necessary vulnerability criteria and beneficiary targeting. DG ECHO found the IP's capacity to monitor activities and verify beneficiary lists to be weak.
- In a few instances, selection of beneficiaries may have been heavily influenced by government agencies or local authorities, resulting in poor targeting, especially where regular monitoring by the IP was weak. In such instances, IPs attempted to take corrective actions (verifying individual beneficiary vulnerability) as soon as the problems were apparent.

Targeting the most vulnerable people has received strong attention in DG ECHO's monitoring of IP actions, as was evidenced in all monitoring reports and internal documents related to grants. Internal project documents and KIIs indicated that one of the key aspects of ongoing monitoring and discussions with IPs by DG ECHO field staff focused on vulnerability-based targeting. At least two IPs stated that these discussions prompted them to undertake a review of their current practices and ensure multi-dimensional vulnerability assessment and targeting. While requiring proposals to demonstrate granular needs assessment, DG ECHO adapted to the ground realities when the situation warranted it. It was emphasised by at least a dozen IPs and several other key informants that unlike in other complex emergency crises, vulnerability of Syrians is not based on food-insecurity; hence, all humanitarian actions needed to be grounded in multi-sector needs assessments. As access to

⁵⁴ Source: <http://www.emro.who.int/syr/information-resources/herams-reports.html>

areas in East-Ghouta was difficult for a full-fledged needs assessment to take place during the proposal stage, DG ECHO (in the Field Expert Appraisal) approved the grants on the understanding that a multi-sector needs assessment would be conducted when access was feasible for the partners. In Eastern Ghouta, for example, where overall needs were well known, it made sense to conduct assessments and assistance at the same time so as not to lose any time in launching the response.

The European Consensus on Humanitarian Aid stresses the need to integrate gender considerations, including protection strategies against sexual and gender-based violence (SGBV), in humanitarian response. It highlights the importance of promoting the participation of crisis-affected women, girls, boys, and men in the design, implementation and evaluation of humanitarian actions.⁵⁵ In order to facilitate this, DG ECHO uses a tool Gender-Age-Marker (See Box 2). This is a quality and accountability tool that measures the extent to which EU-funded humanitarian actions integrate gender and age considerations. IP proposals and reports are required to demonstrate use of DG ECHO's Gender-Age-Marker. Review of documents show an inconsistent use of these in regular monitoring and progress reports.

Box 2: DG ECHO Gender-Age-Maker: Uses four criteria -

1. Gender and Age Analysis - Does the proposal contain an adequate Gender-Age Analysis and does the final report contain sex- and age- disaggregated data for beneficiaries?
2. Adapted assistance - Is the assistance adapted to the specific needs and capacities of different gender and age groups?
3. Negative effects - Does the action prevent or mitigate negative effects?
4. Adequate participation - Do relevant gender and age groups adequately participate in design, implementation and evaluation?

DG ECHO makes concerted efforts to ensure identification and targeting of people with disabilities; however, the evaluation found that these were not always evident in individual agency criteria and targeting in the field. Disaggregated data on gender, age and disability/special needs and other diversity factors (e.g., minority/marginalised groups) were mentioned, but less systematically included in assessments and targeting criteria. DG ECHO guidance⁵⁶ on disability emphasises the need for humanitarian response to analyse risk factors and identify barriers (of the disabled for their inclusion in humanitarian response), enablers and access.

Specific vulnerabilities reported by the beneficiaries

Child	Disability	Displaced	Elderly	Illness	Widow	Woman HoH and ..	Dont know	Other
0.64%	11.91%	11.49%	2.34%	22.77%	18.09%	8.09%	6.60%	18.09%

Only 6 of the 26 IPs mentioned disability upfront when asked about the core criteria in their need's assessments. Gender issues especially with regard to targeting women-headed households, access of women to humanitarian assistance and addressing GBV appear to receive frequent mention in at least 20 of the 26 IPs interviewed. Though the beneficiary survey was not necessarily representative of the entire beneficiary population, beneficiaries in the survey reported specific vulnerabilities: 23% of illness, 18% of widows, 12% of disability, 12% of displaced people, 8% of women-headed households.

3.1.2. Beneficiary consultation and accountability to affected population

Access constraints challenged all IPs into undertaking systematic beneficiary consultation. Most agencies invested in putting in place a complaints mechanism; their use and effectiveness however have varied. Accountability to Affected Population (AAP) is

⁵⁵ Source: https://ec.europa.eu/echo/what/humanitarian-aid/gender-sensitive-aid_en

⁵⁶ DG ECHO (2019). Operational Guidance – The inclusion of persons with disabilities in EU-funded humanitarian aid operations, February 2019.

a core component of conflict sensitivity and in ensuring centrality of protection in humanitarian response. The Interagency Standing Committee (IASC) strategic priority outcome (SP 2.1) requires humanitarian response to be “*based on the specific feedback and needs of affected populations.*”⁵⁷ The Sphere Core Standard 1, People-centred Humanitarian Response, focuses on feedback mechanisms to ensure accountability to conflict/disaster-affected people. Insecurity and access constraints make it difficult for all agencies to use standard beneficiary participation approaches in Syria as most operate either through local partners or remote management. At the individual agency level, different methods are used, both informal/personal contact and formal, namely: use of complaint boxes, electronic media (WhatsApp, Viber, Facebook messenger), hotline, data collection through beneficiary feedback assistants, community meetings, etc. A near-unanimous view of the key informants was that face-to-face contact through focus group discussions, post-distribution monitoring (PDM) and personal meetings with IP staff, were the most preferred method of complaints by communities, followed by WhatsApp calls. Complaint boxes were noted to be the least useful method. A number (7) of IPs stated that they set up help desks at all cash distribution sites to interact with communities and receive complaints and feedback on-site. One of the IPs which has undertaken community water infrastructure rehabilitation, trained community members managing the infrastructure and established focal points for complaints and feedback at each water station. One IP which did not have a formal complaints system and used PDM process and regular field visits to interact with the beneficiaries and frontline staff/volunteers, whereby feedback was received across relevance, sufficiency, quality, challenges and, at times, issues linked to misutilisation of given assistance.

The beneficiary survey showed that awareness about the complaint's mechanism was good (69% respondents claimed to be aware) in NWS, while in GCA a little over a quarter of survey

Complaint mechanism: respondents' knowledge		
Hub	Do you know how/where to contact the organisation?	
	No	Yes
NES	54.40%	45.60%
NWS	30.83%	69.17%
XDam	71.43%	28.57%
Total	46.17%	53.83%

respondents knew where or who to send a complaint to. In the NES a little less than half (46%) of respondents were aware of the complaint's mechanism. Among the respondents, 50 beneficiaries (of the 470, or 11%) reported having made a complaint; nearly 70% reported receiving feedback to their complaint from an organisation, 93 % where “very satisfied” to “some extent”, with the response to their complaints. Women expressed the most satisfaction to the feedback; and 4%

reported that it took too long to get any response and only 1 respondent referred to the IP as not being cooperative. Nearly 50% indicated their preference for face-to-face complaints through partner staff, 33% for phone and 19% for WhatsApp.

3.1.3. Adapting to context

DG ECHO is strongly recognised for its flexible approach in humanitarian programming and support to partners to provide timely and appropriate response. Of the 46 IP key informants⁵⁸ who were interviewed on programming issues, 30 of them referred to DG ECHO's flexible approach to funding, without any prompting, and DG ECHO TAs' knowledge and understanding of the specific context of the Syria response on the ground received all-round praise from interviewees. Technical capacity of staff and their relative ability (compared to other humanitarian donors) was cited as a unique strength of DG ECHO by all other donors and EU stakeholders interviewed for this evaluation. Some of the frequently mentioned phrases were:

- ‘TAs very field-oriented and travel frequently’;
- ‘understand humanitarian issues and complexity’;
- ‘TAs come with good humanitarian expertise’;
- ‘feet on the ground – they know their partners’;

⁵⁷ Inter-Agency Standing Committee (2019). IASC work plan 2019 – 2020

⁵⁸ Out of 52 IP key informants, there were 6 interviewees who were either new or the interviews with them focused on administrative/financial issues.

- 'easy to communicate with';
- 'collegial relationship.'

Documentary evidence confirmed DG ECHO's ability to adapt to continuous changes.

Needs are assessed continuously and actions modified as and when new needs are identified. Dozens of examples were noted from observations made by DG ECHO staff in IP FichOps of allowing flexibility in operations. For example, an IP action initially supported two hospitals in NES, but later when the cooperating partner highlighted funding gaps in Homs governorate, additional funding was allocated for two additional hospitals. To address the unfolding humanitarian crisis following the Raqqa offensive and subsequent displacement of 200,000 people in Raqqa and Hassakeh governorates, one IP was permitted to divert some of the resources under one activity to be able to better respond to the needs in Raqqa. In another instance, to respond to new influxes of IDPs into NWS in 2017, funds were reallocated from one project. Within the approved actions, DG ECHO also allowed partners to modify activities during implementation.

Besides being flexible, DG ECHO is also seen to be highly proactive in encouraging IPs to respond to new crises as they emerged and adapt their response.

The fall of Eastern Ghouta was a turning point for DG ECHO as after this, it scaled up its funding in GCAs. Before 2017, DG ECHO had a smaller portfolio in GCAs. DG ECHO ensured that IPs were enabled to respond in the highly volatile context through deployment of various tools; the FLER and Exceptional Extreme Operational Constraints (EEOC) being the two principal examples. DG ECHO put the FLER mechanism⁵⁹ in place in 2016, with three main objectives: to facilitate flexible and rapid response, improve operational coordination through the WoS approach, and improve humanitarian outreach, mainly in besieged and HTR areas.⁶⁰ IPs who had a FLER component of grant could scale up immediately, with minimal paperwork to get funding approved. Internal notes show that for 2016, the initial amount allocated for FLER was €5 million and during 2018 it was €9.2 million which was used to top up seven ongoing projects.

Contingency planning and other disaster preparedness measures are an obvious place to integrate conflict analysis based on analysis of the context and risk factors, as well as vulnerability.

Following the guidance from the International Syria Support Group (ISSG) in early 2016, DG ECHO supported OCHA to set up Access Working Groups as a sounding board for OCHA-drafted scenarios (response and preparedness area-based plans) which have been useful in sharing sensitive access-related incidents. OCHA Damascus office worked on negotiating humanitarian access for besieged and HTR locations, submitting bi-monthly inter-agency convoy plans to the GoS, and led inter-agency convoys to said locations. Funded by DG ECHO, one IP established the Humanitarian Access Team (HAT) in March 2015 which was a dedicated service for collating critical information on besieged and HTR areas. The service undertook analysis of humanitarian access and conflict dynamics and provided vital information for adaptation of humanitarian response and for contingency planning. DG ECHO also supported two common initiatives to strengthen situational and needs assessments and crisis analysis: (a) International NGO Safety Organisation (INSO) which produces real-time data on the security situation, situational awareness through to long-term strategic analysis, preparedness, crisis support and access strengthening; and (b) REACH, which provides needs assessments and interagency assessments.

As part of emergency preparedness, DG ECHO supported IPs to explore all possible modalities (including XB and XL operations or remote management strategies) and partnerships in order to maximise humanitarian presence in every potential hotspot.

DG ECHO supported NGOs in NES, and an ad hoc coordination forum to track evolving humanitarian consequences in the region as the fights against ISIS across the border in Mosul in Iraq intensified. In 2016, OCHA supported the development of a preparedness plan for Aleppo

⁵⁹ FLER is DG ECHO Syria's rapid response mechanism

⁶⁰ DG-ECHO ECHO Syria Strategy, 2016

and NWS through partners in the Turkey hub and developed various products to support emergency preparedness and access in besieged and HTR areas. In 2018, OCHA continued to develop area-based preparedness and response plans: The East Ghouta Rapid Response Plan, the Operational Response Plan for Southern-Syria, the Northwest-Syria Readiness Plan(s) and Ar-Raqqa City Plan.

In response to the operational constraints in active conflict zones, DG ECHO developed an ad hoc procedure, the EEOC, which provided for financial management and procurement in a way that allowed certain exceptions and specific interpretation of internal control standards for lifesaving interventions. This was done only in extreme situations when the application of DG ECHO standard procedures would have impeded the partner's ability to reach beneficiaries.⁶¹ For example, where civilians were trapped in disregard of IHL by parties to the conflict, in particular in besieged and HTR areas⁶², these special provisions allowed: the IPs to not have to share beneficiary list/data if those risked compromising their security and safety; anonymisation of staff and suppliers' list; use of informal currency exchange market; procedure for single source procurement; derogation of requirements for quality control for medical equipment and supplies.⁶³ For grants under the EEOC, IPs had to demonstrate the existence of extreme operational conditions within the given operational context, showing that the security of beneficiaries, aid workers, and/or suppliers, was at risk. They were required to outline alternative procedures, as well as verification and monitoring methods that would be put in place during the implementation of the action. This procedure was used for five grants made to three IPs to enable them to respond to lifesaving needs in besieged Eastern Ghouta (Box 3 below).

DG ECHO's adaptive response is demonstrated in the fact that until 2017, predominant focus of its response was on rapid response and life-saving interventions; since 2018, and increasingly since 2019, the response has shifted towards life-sustaining interventions, for example: cash-based interventions (CBI) and livelihoods, education in emergencies, and rehabilitation of community WASH structures. Since late-2019, with large-scale displacement in NWS, DG ECHO's funding in the Gaziantep hub has increased while funding for Damascus has reduced (Table 9).

Year	Damascus/ Southcentral	NWS	NEW	WoS
2018	53%	26%	18%	3%
2019	48%	32%	18%	2%
2020 (Provisional)	38%	39%	20%	3%

Table 9: Overall grants allocation (per cent) during 2018-2020 (Source: Data obtained from DG ECHO Beirut office, September 2020)

DG ECHO undertakes annual and six-monthly reviews of contextual changes and their implications for DG ECHO actions in the HIP. There is good evidence of the use of Modification Requests (MR) to reassign, increase or decrease funds within projects as needs emerged. Tracking the date of MR approvals in the dashboard, the ET constructed a

⁶¹ DG ECHO (undated). INSTRUCTIONS FOR THE ASSESSMENT OF EXCEPTIONAL EXTREME OPERATIONAL CONSTRAINTS FUNDING REQUESTS

⁶² DG ECHO Syria evaluation ToR

⁶³ To be eligible for application of EEOC procedure, the applicant organisation has to demonstrate the existence of extreme operational constraints with regard to the security of beneficiaries, aid workers and/or suppliers.

timeline to see if these dates had any relation with major changes in the conflict situation on the ground. As can be seen from Figure 5 below, the peaks in the timeline correlated with major escalations in the conflict leading to massive displacements during Aleppo siege (2016), Eastern Ghouta fighting (early 2018) and following the end of Dara'a operations and just at the onset of winter when needs of the displaced were at their peak.

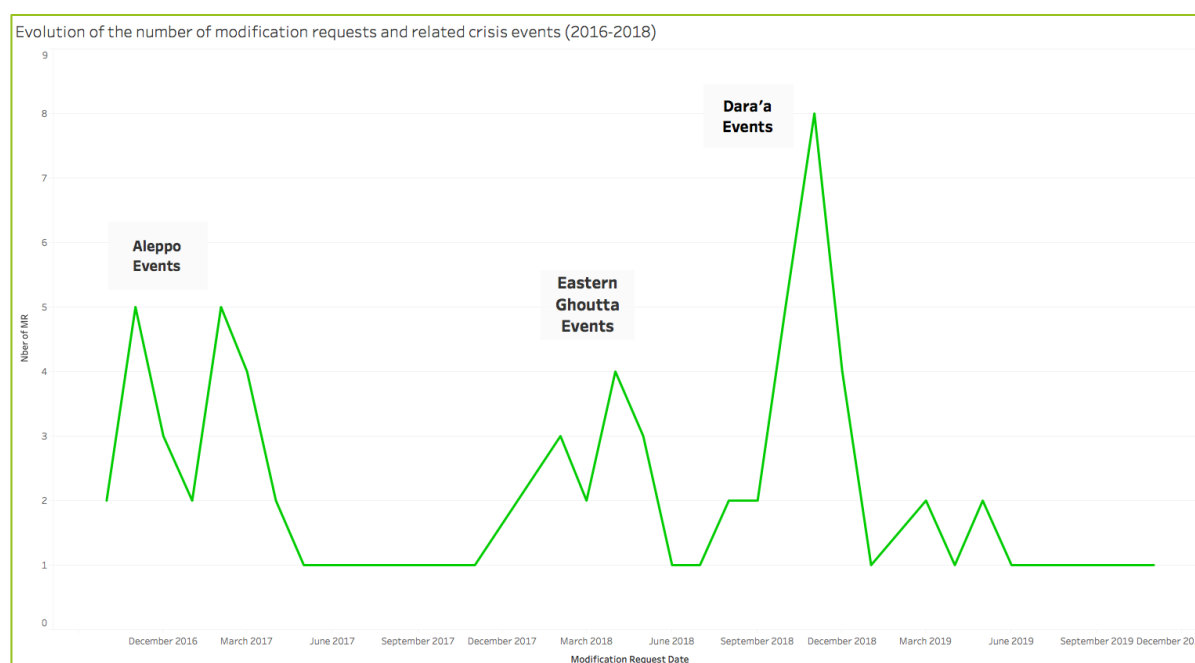


Figure 5: No. of modification requests and related crises events

3.1.4. Operational modalities

Through cross-border operations, DG ECHO ensured that its IPs could maximise access, operating from different hubs and with different types of cooperating partners – UN agencies, Red Cross Red Crescent, national/local NGOs, CSOs and education/health authorities. DG ECHO supported XB, Damascus-based and crossline (operating out of Damascus but accessing parts of NES). Crossline interventions brought humanitarian relief through the physical crossing of frontlines between the GoS and rebels held areas. In the GCAs, field access had to be approved by the Ministry of Local Affairs High Relief Committee, which issues authorisations for humanitarian organisations to work. The evolving nature of the Syria crisis has involved constant changes in implementation modalities. NGOs which were registered and operated in Syria in the period before 2011 started to operate in the GoS-controlled areas and through XL operations after the conflict. They operated mainly through local partners approved by the GoS, the SARC being the most important local humanitarian partner (LHP). In some very specific cases, a few INGOs could operate in GoS areas without official registration, using remote management, through the support of faith-based organisations. DG ECHO approved these grants as they were targeting very isolated populations unreachable through other interventions.

In XB operations during 2016-2018, humanitarian stakeholders mostly focused on North Syria through Turkey as the latter allowed direct access to the field and mainly to Aleppo and Idlib governorates. Other XB operations have been organised depending on the changing context and access constraints from Jordan for South Syria and from Lebanon for Central Syria. The Iraq hub is the last one to have been developed for NES, depending on the access capacity after the fall of ISIS and their defeat in the main cities of Raqqa and Deir-e-Zor. To facilitate XB activities in besieged areas in Central Syria, DG ECHO supported the Operational Platform for Rapid Response (OPRR; established by 4 INGO partners for operational coordination of response to the Eastern Ghouta and rural Homs crises) in 2015 for first-line response to emergency outbreaks

in different locations. In these XB (and XL) operations, especially in NWS and Eastern Ghouta, Syrian NGOs, CSOs and local councils have been key in facilitating aid delivery.⁶⁴

In line with the WoS approach, DG ECHO-funded actions were spread across the country and responded to needs as they arose. A scan of the project list for HIPs 2016-2018 shows that **Aleppo, Idlib and Rural Damascus (including Ghouta) were targeted by the largest number of actions during the period, reflecting response to needs in areas with large numbers of IDPs, high population density, exposure to hostilities and besiegement.** Between 2016 and 2018, DG ECHO's allocation for delivery through Damascus and Iraq hubs increased significantly while delivery through Jordan and Lebanon hubs declined as territorial control over Eastern Ghouta (See Box 3) and South of Syria changed, and XB operations from Turkey remained slightly above a quarter of all allocations (Table 8 presented earlier). During 2019-20, developments in NWS mean that the XB operations from Turkey (Gaziantep hub) had increased significantly and is likely to reach €70-€80 million. Whereas multi-regional or Whole of Syria actions were more likely to be implemented by UN agencies, the bulk of actions in North-East Syria (NES) and North-West Syria (NWS) were implemented by INGOs in partnership with their local counterparts and Syrian CSOs.

Box 3: Eastern Ghouta humanitarian response through local organisations

After the first 'Arab spring' protests emerged in Deraa in February 2011, the Ghouta had been one of the first areas to rise up in revolt against the government in April 2012, and it quickly became one of the first rebel-held areas controlled by the Free Syrian Army (FSA). From April 2013 until its fall in April 2018, the Syrian government forces laid siege on the Eastern Ghouta, a territory of around 100 km² with a population of 400,000. The siege affected farming, businesses and daily lives of its inhabitants. Humanitarian assistance was blocked or was subjected to arbitrary taxes and fees imposed by all warring sides. To cope with the besiegement, limited survival strategies were developed through engagement in smuggling and illicit trade using a network of man-made tunnels.

Despite several UN resolutions against besiegement as a tactic of war, intermittent bombardment of civilians and chemical warfare continued, making Eastern Ghouta siege one of the longest in modern history. Early in 2017, the Syrian government intensified the siege and bombardment, and captured areas bordering the Harasta neighbourhood of Eastern Ghouta, closing off all smuggling tunnels that for years had guaranteed a small flow of food, water, and medical supplies. In February 2018, the Syrian government and its ally Russia began a seven-week bombing offensive, including a chemical attack, on the people of Eastern Ghouta. This intensified warfare and targeting of civilians perpetrated by pro-government armed forces amounted to "war crimes", according to the UN.⁶⁵ In an effort to avoid the bombardments, terrified civilians relocated to makeshift basement shelters in February, where they subsisted for months underground in dire circumstances. Besieged armed groups and terrorist organisations also relentlessly fired unguided mortars into neighbouring Damascus city and nearby areas, killing and maiming hundreds of Syrian civilians. By the time government forces declared eastern Ghouta successfully recaptured on 14 April, some 1,700 people were dead, 5,000 injured and about 158,000 people displaced, including 65,000 people evacuated to Idlib governorate. In some areas nearly 90% of the infrastructure was destroyed.

During the siege, there was no international presence in Eastern Ghouta as it was inaccessible to INGOs and the UN, except for periodic convoys of aid trucks organised through SARC as and when authorised by the GoS. Periodic XL operations in besieged areas with agreement of the GoS were undertaken by SARC alone, or SARC with ICRC or UN, and on occasions, SARC with both ICRC & UN. The operations were coordinated with Local Councils (LC)

⁶⁴ DG ECHO (2017). ECHO/SYR/BUD/2017/91000. HUMANITARIAN IMPLEMENTATION PLAN (HIP) SYRIA REGIONAL CRISIS, Year: 2017, Last update: 11/05/2017 Version 2

⁶⁵ Source: 'UN Commission of Inquiry on Syria: The siege and recapture of eastern Ghouta marked by war crimes, crimes against humanity', <https://www.ohchr.org/EN/HRBodies/HRC/Pages/NewsDetail.aspx?NewsID=23226&LangID=E>

and the Local Relief Committees on the other side of the frontline. In coordination with SARC volunteers' network, needs and population figures were collected and the delivery and the distribution organised with the LC. Each operation involved between 20 to 55 trucks and at least one primary medical kit enough to treat 2,500 chronic disease patients and one war wounded kit (the surgical items were always removed by the GoS) enough to treat 50-200 wounded. A total of 42,000 food parcels, 4,500 canned food parcels, 19,400 hygiene kits, and 30,000 candles (pieces), water tanks, tank-stands, handpumps, jerrycans and maintenance tools were distributed. Moreover 2500 dialysis sessions were provided in Eastern Ghouta from 2015 to 2018. Authorities often disallowed bringing in medical equipment and medicines (such as anxiety medicines, burn kits, pneumonia & cardiac meds, solar lamps and selected items from midwifery kits).

Following the intensification of the siege during 2017-2018, using remote management (cross-border) from Lebanon, 4 DG ECHO IPs partnered with 11 local cooperating partners to deliver assistance (mainly NFI and food) through a joint response plan. This XB partnership with local NGOs was the fulcrum of the Eastern Ghouta response. The Beirut-based Operational Platform for Rapid Response (OPRR) which DG ECHO helped set up in 2016 to facilitate cross-border activities, spearheaded the response by the 4 IPs. The OPRR became an appropriate mechanism to coordinate and plan IPs' response in Homs and Eastern Ghouta during various phases of the siege. With a shift in control of the territory in April-May 2018, the local partners could not operate any longer and the IPs lost contacts with their cooperating partners. The OPRR allowed a coordinated approach in a situation where information sharing was very sensitive for protection, security and organisational issues.

All humanitarian operations in besieged areas had to evolve within the context of a war economy where different warring parties levied "access fees" – arbitrary payments demanded by various warring parties for humanitarian access. Strong vetting and due diligence processes were therefore necessary for humanitarian actors to avoid aid diversion and build strong partnerships with local partners. A DG ECHO-supported initiative, Humanitarian Access Team (HAT, discussed in more detail in section 3.4.2a), kept track of access impediments imposed by controlling forces indulging in war profiteering. As mentioned earlier, availability of essential goods in Eastern Ghouta was limited to those brought in through the tunnels and other limited entry points. Humanitarian agencies therefore had to take care not to cause harm by destabilising the market and people's access to goods. Ability of the IPs working XB to following standard procurement procedures was severely hampered by: (a) wide price fluctuations over a short period, and (b) dearth of suppliers. DG ECHO therefore allowed the IPs to use EEOC procedures to overcome these challenges. IPs working XL however could procure goods in Damascus or import these through the Tartous logistics hub.

Remote management involved extensive use of mobile and electronic technologies for monitoring and reporting: mobile application on connected devices to send monitoring data with geolocation to track implemented activities or to undertake interviews with beneficiaries; live pictures or videos during important moments in project implementation. Feedback mechanisms were systematically developed using hotlines and social networks namely, WhatsApp, Facebook or through IPs' website. Cross-checking the information collected from local partners was done through various methods, with the IPs remaining in the background so as not to put their partners at risk. The main methods used were:

- Employment of monitors under direct IPs work contract
- Employment of third-party monitors under service contracts
- Monitoring of Local Councils distributions by SARC Volunteers
- Remote interviews with Local Councils and local stakeholders
- Remote beneficiary interviews through PDM, needs assessments or feedback mechanisms
- Random selection of beneficiaries at distribution site to monitor previous XL operations.
- External monitoring between IPs.

The security threat to IP staff and their cooperating partners operating in Syria is immense, especially during shifts in territorial control between the government and opposition groups. DG ECHO proactively encouraged all IPs to develop duty-of-care policies, making it mandatory for all IPs to have for their own staff and for cooperating partners appropriate insurance policies and compensation arrangements in the event of adverse physical and psychological effects on

staff. This has also involved ensuring appropriate ways of dealing with identity protection and confidentiality of documents.

3.2. Coherence

Key findings:

F5: DG ECHO has continued to advocate for humanitarian principles and engaged regularly with IPs on various aspects of humanitarian principles and challenges in the consistent operationalisation of humanitarian principles and do-no-harm principles. DG ECHO monitoring placed a strong emphasis on the criticality of needs-based response, primacy of humanitarian principles and risks of aid-diversion. The application of the EU red line with regard to actions in the GCAs is considered by some humanitarian actors as having challenged DG ECHO in ensuring a principled humanitarian response in accordance with the EU Humanitarian Consensus. *Strength of evidence – 3.*

F6: DG ECHO's limited presence in Damascus affects its capacity and space for technical dialogue with technical authorities which could have helped raise humanitarian concerns and advocate on IHL and protection of civilians as well as for a greater access to people in need. *Strength of evidence – 3*

F7: Balancing access, working with local partners and authorities, and upholding humanitarian principles in high-threat environments require agencies to have good understanding and strong capacity to monitor their response and have open dialogue with all stakeholders. Some of the IPs particularly face this challenge because of their limited direct access and close working relationship with government. *Strength of evidence – 3.*

F8: DG ECHO often leads humanitarian donor coordination and acts as a bridge between several IPs and donors. The latter rely on DG ECHO's knowledge and understanding of ground realities inside Syria. *Strength of evidence – 3.*

F9: Nexus and resilience are challenging constructs in Syria. Since 2018-2019, DG ECHO has attempted to encourage other EU institutions (DG NEAR and FPI) to address livelihoods and WASH needs in NES. In a limited way, linkages have been developed. *Strength of evidence – 3.*

3.2.1. Adherence to relevant policies and Humanitarian Principles

DG ECHO has continued to advocate for humanitarian principles and worked to build consensus on guidelines for the delivery of aid. The HIPs, issued by DG ECHO on an annual basis, define the expected humanitarian response in the country and are based on Regulation (EC) No. 1257/96 (HAR) and the Consensus. The Consensus commits the EU to upholding and promoting the fundamental humanitarian principles of humanity, neutrality, impartiality and independence. The perception of the EU and its commitment to these fundamental principles in humanitarian action are linked to the behaviour and engagement on the ground of all EU actors. The Consensus specifically enjoins "*Respect for independence means the autonomy of humanitarian objectives from political, economic, military or other objectives, and serves to ensure that the sole purpose of humanitarian aid remains to relieve and prevent the suffering of victims of humanitarian crises*".

DG ECHO consistently raised concerns in international forums about IHL violations, including starvation of civilians through the besiegement of populated areas as a tactic of war. In 2016, realising that the humanitarian system, especially operating in NWS and NES, needed deeper engagement on IHL, DG ECHO started partnering with the UN Office of the High Commissioner for Human Rights (OHCHR) and Geneva Call. The OHCHR Actions aimed at enabling the capacity of the Humanitarian Coordinator (HC) and the Humanitarian Country Team (HCT) for integrating human rights into humanitarian response. This action was complementary to another action supported by DG NEAR with DG ECHO focusing on humanitarian response. The Geneva Call Action was aimed at promoting IHL among the armed non-state actors (ANSA), strengthening protection of child soldiers/ children associated with armed forces and armed groups (CAAFAG). The Geneva Call organised dialogue, awareness sessions and training for ANSAs and humanitarian organisations on IHL and specific issues related to antipersonnel mines, child protections and sexual and gender-based violence (SGV).

A review of all progress reports and FichOps and KIIs confirms that DG ECHO-supported humanitarian actions that adhere to the principle DG ECHO's thematic policies and standards (detailed discussion in section 4). DG ECHO requires all partners to adhere to humanitarian principles and standards in all their actions. The principle 'Do No Harm' requires agencies involved in humanitarian response to do all they reasonably can to avoid exposing people affected by disaster or armed conflict to further harm (for example by building settlements for displaced people in insecure areas). All IPs are required to recognise and prevent or remedy any potentially negative effects of their actions on beneficiaries and ensure that people have access to impartial assistance in proportion to needs and without any discrimination. DG ECHO also emphasises continuous monitoring of humanitarian access and the need to avoid targeting only one group. All IPs interviewed during the evaluation affirmed DG ECHO's uniqueness among all humanitarian donors for its strong commitment to operationalising the humanitarian principles of independence, impartiality and neutrality. DG ECHO's sole focus on humanitarian needs and staying away from any development or stabilisation interventions which often have strong political dimensions were cited as distinctive when compared with other donors.

There is concern however that DG ECHO may not always be following the fundamental principles in the Consensus. A few IPs (5 out of 26) and at least two (2) humanitarian donors

Box 4: The EU redline and Humanitarian Principles

One Member State (MS) is funding an INGO to undertake training of teachers and health officials in NES and Government WASH staff in GCA, besides undertaking repairs of schools in GoS controlled areas. The MS considers this assistance very much within the redline as long as these are part of the HRP. Another MS questioned the wisdom of DG ECHO not supporting rehabilitation of health centres or schools in GCA, especially where vulnerable populations exist.

thought that in the past 3-4 years, especially since the upscaling of the European Union's involvement in the refugee response in the region, DG ECHO has been subservient to the EU's redline which has meant that even where life-saving needs existed, the former has refrained from considering these. Examples cited included: DG ECHO's dependence on the European External Assistance Service (EEAS) and inability to set up an office in Damascus; not supporting training of health or social workers of government hospitals in GCA even where such a training could have

enabled life-saving response; reluctance to support rehabilitation of water systems managed by local authorities in GCAs although such repairs and rehabilitation could meet water needs of target communities. Furthermore, due to its limited presence in Damascus, DG ECHO may have missed some policy/operational advocacy opportunities in Syria for technical dialogue with central authorities which could have helped raise humanitarian concerns, and advocate on IHL and protection of civilians, as well as for greater access to people in need. DG ECHO reasons that not having a permanent presence in Damascus did not affect its operations or its ability to deliver a principled humanitarian response. During the period of the evaluation, it had multi-entry visas for staff to travel frequently to the GCAs, though monitoring visits to the fields were always tightly controlled by the authorities. However, there is a perception that DG ECHO's dependence on the EU's political institutions somewhat undermines its independence and neutrality. It is to be noted here that DG ECHO has implemented rehabilitation of health facilities and schools in GCAs where these were linked to health or education outcomes of the interventions.

IPs (4) in the NES referred to the EU Member States' expectation that DG ECHO, the only agency which has access on the ground, would take care of families of former European fighters now imprisoned in the camps, with an expectation that IPs would undertake a deradicalisation programme. DG ECHO has managed to steer clear of this. DG ECHO has, without success, advocated for the Member States to take over their state responsibilities towards their own civilian citizens, as required under the IHL. Several donors stopped working in camps in NES because of the fear of political backlash over any support reaching former-ISIS families. Some rehabilitation works of health facilities or schools have been implemented in GCAs; DG ECHO has made efforts to make sure these works and their scope would indeed be considered as rehabilitation works.

DG ECHO's internal documents show evidence of regular dialogue with IPs on various aspects of humanitarian principles. Some IPs have particular challenges in consistent adherence to the Principles. Balancing access, working with local partners, and upholding humanitarian principles in high-threat environments require agencies to have strong capacity to monitor their response and have open dialogue with all stakeholders. Some of the UN agencies particularly face this challenge because of their limited direct access and close working relationship with the GoS. While all partners emphasise principled humanitarian response, the realities on the ground in Syria often bring to the fore tensions between some of the principles (see Box 5). The principle of humanity requires access, and access is determined by various factors, for example, relationship with governments and non-state actors (NSAs), general perception about an organisation's identity and affiliation, the agency's standing as a neutral, impartial and independent actor, approach to partnership, besides the agency's security policies. One major partner works on all three pillars namely, humanitarian assistance, stabilisation and resilience. Work on stabilisation often involves working with governments which are party to the conflict. These tensions are more pronounced in some of the UN agencies as they are often required to work closely with governments and international political/stabilisation missions across a range of programme areas. There are partners who rely almost exclusively on other cooperating agencies which may be local/national NGOs, civil society and local governments/authorities for frontline delivery of their response. This often ensures greater access; however, where an agency concerned does not have adequate first-hand access and capacity to monitor, principles of Impartiality and Neutrality may be compromised. This came into sharp focus in Syria, at least with one IP operations which works closely with government agencies to deliver aid, as was noted in an independent evaluation⁶⁶ as well as DG ECHO internal documents.

Box 5: Tensions between access and Humanitarian Principles

'We operate through several dozen local partners to gain maximum access so as to reach the population in need. Some of the partners may not be very good, but sometimes these are the only options we can get.'

It is a challenge for IPs to assess, monitor and capacity-build the cooperating agencies' understanding and operationalisation of humanitarian principles and do-no-harm principles while delivering humanitarian response. Organisations, to varying degrees, provide training to staff on humanitarian principles and recruit on the basis of candidates' understanding of these. INGOs appear to be methodical about this and ensure that their frontline staff are trained in the principles and know how to interpret these in the local context. All local NGOs operating in the NWS are run by Syrians living in Turkey and they are mostly compliant with the dictates of the Turkish authorities. During the 2019-20 Turkish incursions into North Syria, as new areas were being brought under the control of the Turkish military, some of these NGOs rushed to provide aid at the former's request,⁶⁷ raising questions about principled humanitarian response. DG ECHO did not rush to intervene in these areas and started working with a selected number of INGO with demonstrated and quality access. Where the IPs used a large number of local/national NGOs as frontline delivery agencies, it is unclear how the partners assess, monitor and capacity-build the cooperating agencies' understanding and operationalisation of humanitarian and do-no harm principles while delivering humanitarian response.

DG ECHO proactively supported OCHA and IPs to deal with sensitive situations involving pressure from authorities which challenged a principled humanitarian response. Using their strong programme footprint, acceptance in communities and long-established presence, IPs endeavour to constructively engage with authorities to continuously stress the criticality of needs-based response and primacy of humanitarian principles and IHL in their programme and practice. Several IPs reported having come under pressure from authorities to either channel assistance through them or provide assistance to communities of their choice. In these instances, direct engagement and advocacy with authorities to explain the IPs' beneficiary selection criteria and humanitarian

⁶⁶ Konterra (2018). Corporate Emergency Evaluation of the WFP Regional Response to the Syrian Crisis (January 2015-March 2018), Evaluation Report: Volume I, October 2018

⁶⁷ None of these were funded by DG ECHO

principles were resorted to. In some instances, IPs called a halt to their response until issues were settled. In one ANSA area, one of the IPs withdrew part of its programming where neutrality was no longer guaranteed. Most of the INGO-IPs avoid substantive engagement with the GoS or local authorities, except where they are mandatorily required to share information and /or seek necessary approvals to operate. In the GCAs, all the seven (7) INGOs interviewed during the evaluation mentioned having been approached by GoS-related agencies on occasions with beneficiary lists for support, but the INGOs always ensured that they undertook systematic household assessments before making any selection and provided an explanation to the authorities regarding their selection criteria. In NES and NWS, NGOs coordinate their dealings with authorities through OCHA. In NWS, collective effort has also been made through OCHA to sensitise and educate armed groups on humanitarian principles, an initiative supported by DG ECHO. At the end of 2018, more than 30 groups signed Joint Operating Principles and the Deeds of Commitment. The documents provided an entry point for discussions with these groups on the humanitarian principles, how humanitarian aid differs from stabilisation and development work, and how humanitarians operate.

The risk of aid diversion is substantial in Syria and although all IPs claim to have a robust system to monitor these, during their monitoring missions, DG ECHO raised the need for periodic risk assessments to identify relevant contextual factors regarding each field of potential diversion: anti-fraud/money laundering, anti-bribery/corruption, and anti-terrorism-financing. Based on this analysis, DG ECHO encouraged IPs to adapt broader anti-aid diversion policies to the specifics of the situation. All IPs affirmed that their monitoring system, including TPM, puts a strong emphasis on this; additionally, complaints mechanism and hotlines are used to obtain feedback on aid diversion. In-kind assistance provided to families ending up in markets is a kind of aid diversion which has been noted in multiple interviews and documents. This is one of the reasons why DG ECHO now strongly encourages CBI, instead of in-kind assistance.

3.2.2. Coordination with other donors and advocacy

DG ECHO is proactive in coordinating with other humanitarian donors on overall humanitarian response, according to all donors and IPs interviewed for this evaluation. There are several levels at which DG ECHO coordinates its actions with other donors. There is the ISSG and Top Donor Group (TDG) and various ad-hoc donor mechanisms in the region in which DG ECHO plays a lead or co-lead role. For the country-based pooled fund (which DG ECHO does not contribute to), there is good communication and coordination with other key donors to the fund (in particular, the USA, the UK, Sweden, Germany, Japan and several other European donors) so that there is a joined-up approach to prioritisation of humanitarian needs and approach. There have been several joint advocacy initiatives from time to time, for example, on coordination between UNHCR and OCHA, and on WFP's food rations. DG ECHO leads on joint donor advocacy to get access to Turkey-controlled areas; there is regular donor coordination in NWS and NES in this regard. In 2018, DG ECHO, Germany and UK Aid conducted field level strategic dialogue with humanitarian agencies to jointly advocate for the specific issues of harmonisation, coordination and CBI. Since 2016, DG ECHO co-organises, together with the European External Action Service (EEAS) and DG NEAR, the Brussels conference which brings together donors, IPs, UN agencies, the World Bank and several major private financial institutions to discuss the Syria situation. The donor group has its own meetings twice a year, including a special meeting during the annual Brussels conference. In the 2018 meeting, DG ECHO invited representatives of the Damascus-based INGOs (DINGOs) to brief like-minded donors on access constraints and the role of INGOs. They called upon the TDG to sustain and increase its engagement with INGOs in Damascus and have consistent messaging with the authorities in Damascus on access and humanitarian principles.⁶⁸ The Brussels conference raised awareness on the plight of affected civilians in Syria, with pledges totalling EUR 3.5 billion for 2018, as well as multi-year pledges of EUR 2.7 billion for 2019-2020.⁶⁹

⁶⁸ European Commission, Ref. Ares(2018)4648770 - 11/09/2018 .DG ECHO, Syria Top-Donors Group meeting 4 and 5 September 2018, Amman Mission Report

⁶⁹ DG ECHO (2018). 2018 Annual Activity Report Directorate-General for European Civil Protection and Humanitarian Aid Operations

IPs operating from Damascus and several donors, including other EU institutions, mentioned that DG ECHO staff on the ground act as a bridge between the IPs and donors since the majority of the donors cannot visit GCAs. European Member State donors particularly found DG ECHO's insights into the ground realities and their understanding of the humanitarian context useful in their planning, stated the key informants. Two key informants from Member States referred to DG ECHO field staff's professional humanitarian background, their understanding of technical issues and humanitarian principles being of unique value to all donors as most other donor agencies' staff are diplomats or politicians with limited understanding of complex humanitarian issues. Other EU key informants lauded the role played by DG ECHO staff in enabling coordination between different instruments for a coherent response. DG ECHO facilitated a meeting of different EU agencies and Member State institutions with the Turkish provincial authorities in border areas to coordinate response in the NWS.

3.2.3. Nexus and complementarity with other EU instruments

The humanitarian-development nexus is a challenging construct in Syria where the humanitarian system has to carry the burden of needs of all vulnerable people, in the absence of any development intervention. Documents show that during 2016 and 2017, DG ECHO programming was focused on the FLER approach while maintaining regular humanitarian

Box 6: Syria is a case of "reverse nexus"

'While we are meant to focus on humanitarian needs caused by conflict and displacement, chronic poverty and vulnerability goes unaddressed, throwing increasing number of people into humanitarian caseload.'

One key informant

assistance through Post-Emergency Response (PER). In 2018 DG ECHO started to highlight the need to begin working on nexus and long-term strategy in parallel with its FLER flexible and reactive approach⁷⁰. According to donor key informants and several IPs, very little funding comes into Syria for any action other than humanitarian response. One key informant described Syria as a case of 'reverse nexus', since there is no

development, most people sooner or later slip into the humanitarian basket. Resilience is one of the pillars of the HRP. DG ECHO has been trying to move from lifesaving to life-sustaining interventions for the past two years through recovery and resilience-oriented action, but the budget limits its capacity to support such programming to any significant scale. Particularly since 2019, DG ECHO has funded several resilience focused actions in shelter rehabilitation which, according to 2 IPs, other donors balk at funding. Rehabilitation of water systems has also been prioritised in the past two years. DG ECHO and its partners have focused mainly at the level of household resilience, staying clear of 'systems resilience' – i.e., capacity of government systems.

DG ECHO has attempted to encourage other EU institutions (DG NEAR and FPI) to deal with livelihoods and WASH needs in NES. Overall aid agencies' appetite for investment in nexus and development remains low in Syria, within this limitation, DG ECHO is developing linkages where feasible. In the education sector, while DG ECHO funds non-formal education (NFE) through its education in emergencies (EiE) programme, DG NEAR has begun to support formal education in the NES. FPI's Instrument contributing to Stabilisation and Peace (IcSP) is also supporting education programmes through NGOs in areas where DG ECHO has been assisting with EiE. DG ECHO used to support de-mining previously as no other agency had prioritised it; in the past two years, FPI has taken over this portfolio. KIIs indicate that several donors are now engaging with INGOs (including DG ECHO IPs) to implement stabilisation programmes in the NES, and to a limited extent, in the NWS. DG NEAR closely coordinates with DG ECHO its activities in health, livelihoods and education. Since 2018-19, several DG ECHO IPs are receiving funds from DG NEAR for recovery activities in these sectors. With technical support and advice from DG ECHO, DG NEAR is developing a cash, seeds and tools project in NES. In GCAs, DG NEAR is now assisting one of the IPs to undertake a seed multiplication project, with support from DG ECHO which acted as a bridge between the two institutions to ensure that the project will not have any link with the GoS apparatus in any way. Desk review shows that during 2018 one IP implemented a DG-NEAR programme which specifically provided linkages with

⁷⁰ Source: An Operational Model for an Effective & Coordinated response to the Syria Humanitarian Crisis

longer-term health support, including secondary health clinics, and aimed at rehabilitating health clinics in the GoS areas.

3.3. EU added value

Key findings:

F10: The EU is perceived differently from its member state governments, including their official aid apparatuses, and the EU instruments together as a collective have the potential to leverage significant influence which no single Member State probably can have, working on its own. This, combined with DG ECHO's strong humanitarian mandate, could potentially give the EU greater space for dialogue on the humanitarian situation in the country, an opportunity DG ECHO was not able to seize fully. *Strength of evidence – 2.*

The EU institutions and instruments (DG ECHO, DG NEAR and Instrument contributing to Stabilisation and Peace of the FPI, in particular) bring together, conceptually, a coherent approach to the humanitarian – peace – development nexus (section 3.2 above). This is constrained, however, by the EU red lines on engaging in any reconstruction or activities that involve governments and local authorities. The annual Brussels conference which brings together a diverse range of actors on humanitarian response, stabilisation, peacebuilding and development was cited by all IPs and donors interviewed during this evaluation as a prime example of the leverage the EU as a collective can bring to complex issues which no single Member State can probably have access to, working on its own. In preparation for the Brussels conference, the senior officials' meeting for donors and humanitarian partners was highly valued by stakeholders. DG ECHO's role in donor coordination at regional level and its ability to bring first-hand knowledge of the situation inside Syria into discussions was acknowledged by five Member State donors to provide crucial inputs for their own programming strategy.

The EU is perceived differently from its Member State governments or their official aid apparatuses tied to foreign policies of their governments. This arguably gives the EU greater space for dialogue on the humanitarian situation in the country, an opportunity DG ECHO has failed to seize fully, as exemplified by not setting up an office in Damascus that could have strengthened its humanitarian response capacity. It is an accepted practice in all humanitarian operations to engage with technical agencies (agriculture, health, education, etc) of any government or local authority which may play a crucial role in providing basic services to vulnerable populations. In the case of Syria, however, DG ECHO has been forced to avoid any contact with these agencies, even though this bears negatively on effective humanitarian response. All these hurt DG ECHO's standing as a neutral and independent humanitarian agency in the perception of external stakeholders.

3.4. Effectiveness

Key findings:

F11: DG ECHO ensured that IPs used a range of modalities to ensure vulnerability-based targeting for food security and emergency relief interventions. DG ECHO has been at the forefront of promoting cash-based interventions which an increasing number of partners are adopting for delivering food and non-food aid, rather than in-kind assistance. *Strength of evidence – 4.*

F12: DG ECHO's strong focus on protection is evident in its support to various facets of protection work, including: protection monitoring, GBV and SGBV, HLP issues, psychosocial support, mine risk reduction and dealing with ERWs and integration of human rights. *Strength of evidence – 4.*

F13: On health response, DG ECHO has been able to identify a range of partners who collectively have access to all areas of the country where pre-existing infrastructure for provision of basic, primary and secondary healthcare was partially or totally damaged by the conflict. The partners have been able to bring in a diverse range of services like trauma care, GBV treatment, Sexual and Reproductive Health Services (SRHS), psychosocial support/mental health, treatment of chronic and acute diseases, treatment of malnutrition and sexual and reproductive health. *Strength of evidence – 3.*

F14: In other key sectors, the response included short-term response (water trucking) and rehabilitation of community-managed systems to meet WASH needs. Non-formal education targeting children has constituted DG ECHO's response on education in emergencies, with no links to formal education system. *Strength of evidence – 3.*

F15: The achievement of results has been strongly influenced by three major factors, namely: (i) flexibility and adaptability to use different modalities and hubs to launch rapid response; (ii) DG ECHO's ability to identify a range of partners who collectively can access all areas of the country, working closely with either international/ local NGOs, civil society, or local authorities; (iii) contribution to strengthening the humanitarian ecosystem. *Strength of evidence – 4.*

F16: DG ECHO has been at the forefront of advocacy and coordination at different levels to make the humanitarian response more effective and to ensure standards and quality in response delivery. However, there appears to be poor coordination among some agencies at the field level in selection of cooperating partners for frontline delivery – several IPs used the same partners, but there was little information sharing and coordination in terms of programming. *Strength of evidence – 3.*

F17: Quality of monitoring data and results reporting varied depending on the extent of access by the IPs, capacity of their downstream partners or TPM providers and the IP's own capacity to track and analyse data from multiple sources. *Strength of evidence – 2.*

The evaluation examined key elements of the results and strategy outlined in the intervention logic (Figure 1) presented earlier. These elements capture what DG ECHO set out to deliver in its HIPs through its multi-sectoral humanitarian assistance. The following paragraphs present evidence gathered by the evaluation on the results achieved in major sectors of response and key factors that contributed to these.

3.4.1. Multi-sectoral assistance

i. Food security and livelihoods

Food security and livelihoods (FSL) received the largest share of funding during the evaluation period (see section 1.3.3). There were 14 Actions which had FSL classified as the main sector in the EVA database of project list for the HIP period 2016-2018. DG ECHO's food assistance policy⁷¹ requires, amongst others: (i) food availability, access to nutritious food and proper nutrition awareness are ensured for vulnerable populations; (ii) mainstream gender considerations in humanitarian food-needs assessments; (iii) an informed choice of transfer modality (in-kind or cash) appropriate in the context is made; and (iv) community's coping capacity and resilience is not undermined.

KIIs and monitoring notes in internal documents show a strong focus of DG ECHO staff on regular monitoring of IPs' actions on issues of vulnerability-based targeting, as opposed to blanket or status-based targeting. Special emphasis is laid on vulnerable women-headed households, pregnant women and young children and the elderly. DG ECHO is recognised for being at the forefront of integrating CBI in its food security and multi-sectoral

⁷¹ DG ECHO (2013). Thematic Policy Document No1: Humanitarian Food Assistance. From Food Aid to Food Assistance, November 2013

response. This was appropriate considering that while in the previous years (2016-2017) food needs were significant for displaced populations and those in besieged areas, livelihoods and access to basic services became paramount needs after 2017. DG ECHO's FLER enabled IPs to launch rapid response within 72 hours of crises erupting in HTR/besieged areas. Up until 2016-2017 when large-scale in-kind assistance was the norm, agencies faced logistical challenges which raised delivery costs significantly. Besides this, beneficiaries were often seen selling food and non-food items in markets in exchange for cash. DG ECHO began encouraging IPs to move away from in-kind assistance. IPs were supported to ensure the most appropriate response depending on household vulnerability and capacity, with in-kind assistance provided only if CBI was found to be not a feasible option.

There is evidence that DG ECHO's ongoing engagement and advocacy with IPs and other humanitarian donors on harmonised and coordinated CBIs has encouraged the latter to scale up CBI (cash in hand, food vouchers). Local procurement, where feasible, was encouraged in cases where in-kind assistance was a necessity. In line with DG ECHO's policy on cash and vouchers,⁷² interventions were aimed at covering basic needs and to support the re-establishment of livelihoods at household level, using the most appropriate and feasible type of transfer to meet identified needs.

Cash and voucher interventions were difficult to undertake in GCAs as the authorities did not allow any large-scale cash programming. Several INGO-IPs were able to start limited interventions namely, cash for farmers and rehabilitation of bakeries from 2019 as the government began to allow cash-based interventions on a limited scale. It is understood that in 2020, the GoS has finally allowed one of the IPs to pilot CBI (mainly vouchers) on a larger scale covering 6,000 households.⁷³ In the NWS, large-scale cash is seen to be fraught with high risk of diversion due to the presence of multiple armed groups, and this factor has contributed to several donors refraining from supporting cash interventions in both NWS and NES. Among the IPs, INGOs tended to have developed a greater appetite and capacity for cash response across the country, working with the Food Security and Livelihoods working group. All IPs who have been undertaking CBI affirmed that they have had no experience of finding cash assistance being more susceptible to aid-diversion than in-kind assistance; on the contrary, cash is more effectively utilised when it is given in the hands of the right people who are vulnerable, a fact also confirmed by at least 4 of the humanitarian donors⁷⁴ interviewed. However, the perception of risk associated with CBIs remains higher among many donors.

ii. Health

There has been an overwhelming emphasis on delivering primary health services and enabling primary healthcare facilities as these can deal with the large majority of the cases people face. DG ECHO health policy requires interventions to deliver cost-effective interventions through primary healthcare, vaccination, screening of infectious diseases and screening of pregnancy and mental health issues. DG ECHO's health response aims to limit excess preventable mortality, permanent disability and diseases associated with humanitarian crises, and supports programmes that seek to restore or to reinforce disrupted essential health services in a manner that allows for the fullest and most rapid recovery of health services and their return to normality. Provision of essential health services covering a range of actions in primary and secondary healthcare as well as trauma care has been a key focus of the DG ECHO portfolio of actions in Syria, absorbing at least 22 per cent (Section 1.3.3) of all HIP allocations during the period covered by the evaluation. Destruction of health facilities and attacks on health personnel left most of the health system in zones of active hostilities paralysed. During the large-scale military operations, IPs supported and coordinated trauma response for the war victims, supporting trauma and physical rehabilitation care capacity through the secondary level hospitals

⁷² DG ECHO (2013). Thematic Policy Document No3: Increasing Efficiency and effectiveness across all sector, December 2013

⁷³ These interventions are strictly speaking outside the temporal scope of this evaluation. It is cited here to demonstrate that previous engagement and advocacy are now starting to produce results.

⁷⁴ One of the donors, among these four, however, stopped their cash assistance in the NES as politically they feared a potential backlash in public opinion back home that viewed any cash handouts as potentially ending up in the hands of terrorists only.

and multiple trauma stabilisation points. Other health interventions aimed at ensuring essential primary care services in IDP camps and capacity for surveillance of infectious disease outbreak, when needed, in line with DG ECHO Health Guidelines.

Several IPs providing primary and secondary healthcare in NWS worked to strengthen the referral system to ensure a complete package of health services was available to patients. Several others provided support on mental health support through screening and referral, counselling, including for survivors of gender-based violence (GBV). In 2016, one specialised IP provided people with injuries and disabilities access to quality physical and psychosocial rehabilitation services support across four governorates in Central Syria (Aleppo, Hama, Homs and Rural Damascus), delivering through local partners and local health structures, using FLER funding. DG ECHO also made significant contributions to training of medical staff on trauma care and physical rehabilitation and in providing psychosocial support for patients and caregivers. A range of modalities in health services gave another IP flexibility to reach the most vulnerable in remote and underserved areas in conflict-affected communities in Aleppo, Idlib, and Hama governorates with essential primary and secondary healthcare. Even in the midst of a highly volatile context with continuing airstrikes, intra-Armed Opposition Group (AOG) fighting and possible GoS offensive, the IP was able to work with its partners to provide life-saving services in the HTR area of NWS in 2018. The services, besides standard primary care, included nutrition, GBV and mental health care, while secondary care included trauma care for the injured and war-wounded through fixed and mobile clinics. During the Raqqa offensive in 2017, another IP provided emergency medicines and medical equipment to 25 clinics and mobile health units, including in Afrin and Eastern Ghouta and made ad hoc donations of surgical and other medical items.

DG ECHO supported one IP which had capacity to deliver response at scale to integrate reproductive health (RH) and GBV in the health package through cross-border operations from Gaziantep as well as from Damascus. Working in partnership with INGOs and local NGOs, this intervention succeeded in providing direct support to 226 health facilities for delivery of RH and GBV services across 537 communities in besieged areas of Damascus, Idlib, Homs, Aleppo, Dara'a, Deir Ezzor, Al Raqqa and Al Hassakeh. Besides support to hospitals and PHCs and mobiles clinics, outreach services and functional referral mechanism for specialized sexual and reproductive health (SRH) and GBV care were provided by this IP.

One criticism (from 3 IPs) about DG ECHO's approach was that it did not prioritise sexual-and-gender-based-violence (SGBV) as a protection issue and looked at it from a health angle. The ET found that discussions on SGBV is taboo, particularly in GCAs and NWS. A health-centric approach would create space for victims of SGBV to come forward to discuss their issues with health professionals in confidence. DG ECHO therefore uses health as an entry point for engagement on the sensitive issue of GBV and protection. Moreover, the most crucial first response in SGBV cases relates to medical care, and then comes mental health, legal, social and livelihoods support, in that order. Given that legal and social assistance, as well as livelihoods opportunities and referral systems are weak in the country, its health-focused approach (which gives primary emphasis on medical and mental health care) is appropriate. Though not holistic, in the sense that the SGBV response ideally ought to integrate a range of medical, psychosocial, legal, social, livelihoods and rehabilitation services – DG ECHO's response takes a pragmatic view in the context and focuses on what SGBV victims need most urgently and what its IPs can deliver.

iii. WASH

Major WASH response was provided by at least seven (7) IPs who have had substantive grants from DG ECHO on this during the period 2016-2018. Emergency WASH response included water trucking, hygiene kits and hygiene education. Since 2017, a major emphasis has been on rehabilitation of water systems, where humanitarian access allowed. DG ECHO's monitoring notes show a strong focus on targeting communities with critical humanitarian needs, while ensuring that gender considerations (for example, women's ability to access these facilities safely) were considered in delivering these. DG ECHO and IPs agreed not to undertake substantive response where the latter faced access difficulties and administrative impediment in undertaking systematic and independent needs analysis, especially in GCAs during 2016-2017 when government agencies attempted to influence beneficiary selection. In

line with DG ECHO's thematic policy⁷⁵ on WASH, assistance was prioritised for community-managed infrastructure using local technologies and operating systems. The IPs provided training for operating water and sewage systems to local service providers and improved access to sustainable water resources instead of expensive water trucking intervention. Several IPs also worked on providing emergency sanitation facilities hygiene kits and hygiene promotion in camps of displaced populations.

Documentary evidence and KIIs showed that on several occasions, IPs failed to meet the quality standards in WASH provisions. Some of these were brought out during TPMs by IPs or during DG ECHO monitoring missions. These took place mostly in areas where access was difficult and infrequent, and in a small number of instances IPs lacked the needed technical competence to monitor quality standards.

iv. Protection

Protection is considered central to all actions undertaken with DG ECHO funds, and interviews with all IPs confirmed a strong emphasis on this laid out by TAs during discussions with the former. DG ECHO's protection interventions in Syria include:

humanitarian access, protection of aid workers, child protection, prevention and response to GBV, Prevention of Sexual Exploitation and Abuse (PSEA), child protection, de-mining and mine-risk education, supporting registration and access to documentation, case management in response to violence, protection of disabled people, survivors of torture and other groups of concern, promoting IHL, International Human Rights Law (IHL) and International Refugee Law (IRL) through evidence-based advocacy, awareness and communication, and protection monitoring. Partners are expected to provide an all-of-Syria analysis in their proposals and justification, including costing, for the choice of hub and method of delivery, improving access to quality services and assistance to war-wounded and victims of violence, including GBV.⁷⁶ An important ongoing initiative of the PSEA network (Box 7) funded by DG ECHO in the NWS is the inclusion of

Box 7: PSEA hotline: DG ECHO, along with a few other humanitarian donors, have supported an interagency network on PSEA, with a WoS approach. Its membership now exceeds 80 organisations in Gaziantep, 30 in NES and a smaller number in Damascus. So far, it has mainly operated in NWS, and starting to take shape in the NES. The Damascus chapter is managed by a separate PSEA Coordinator from RC office in Damascus. The PSEA network operates a hotline allowing communities (and humanitarian staff) to call/report on any incidence. KIIs however indicate that only a small number of complaints come from communities on PSEA, but more on non-inclusion in food /relief assistance.

PSEA in Third-Party Monitoring (TPM) operations. The goal of this innovative initiative is to ensure that monitoring is inclusive of PSEA relevant questions and for sexual-exploitation-and-abuse (SEA) risks to be observed and addressed.⁷⁷ In 2017, DG ECHO supported two specialist agencies for mapping of contaminated areas and mine clearing actions, and undertake risk education programme in communities to develop a more comprehensive understanding of the impact of Explosive Remnants of War (ERW) in NES, specifically in areas previously occupied by ISIS. Other protection actions have been roll out of the WoS Protection Strategy and protection mainstreaming in HNO and HRP since 2016.

All grants proposals from IPs are required to show protection risk analysis as a framework for decision making on programming. However, a number of IPs do not undertake this, or present any systematic protection risk analysis in their Single Forms or reports. Restrictions in data collection and data sharing, especially in GCAs, were common

⁷⁵ DG ECHO (2014). Thematic Policy Document No 2: Water, Sanitation and Hygiene: Meeting the challenge of rapidly increasing humanitarian needs in WASH, May 2014

⁷⁶ DG ECHO (2017). ECHO/SYR/BUD/2017/91000. HUMANITARIAN IMPLEMENTATION PLAN (HIP) SYRIA REGIONAL CRISIS, Year: 2017, Last update: 11/05/2017 Version 2

⁷⁷ IOM. Project update – ECHO Desk Review, 28 April 2020, Multisectoral Assistance, Information Management, and PSEA for crisis-affected populations inside Syria

reasons cited in interviews. DG ECHO's humanitarian protection policy⁷⁸ requires actions to prevent, reduce/mitigate and respond to the risks and consequences of violence, coercion, deliberate deprivation and abuse for persons, groups and communities in the context of humanitarian crises. This is to be achieved through working on three specific objectives: (i) to prevent, reduce, mitigate and respond to protection threats against persons, groups and communities affected by on-going, imminent or future humanitarian crises; (ii) to reduce the protection vulnerabilities and increase the protection capacities of persons, groups and communities affected by on-going, imminent or future humanitarian crises; (iii) to strengthen the capacity of the international humanitarian aid system to enhance efficiency, quality and effectiveness in reducing protection risks in on-going, imminent or future humanitarian crises. Internal monitoring notes indicate that TAs generally were able to pick up issues where IPs fell

Box 8: Use of PMI: Two IPs changed their assistance patterns since they started using the PMI. One moved its food/NFI distribution from one central location to multiple locations so as to make access easier for women and elderly. Another IP stated that previously their use of gender marker was limited to ensuring that women were targeted in their response. Using the PMI, they started to include psychosocial counselling, especially for women and children in their programme. At least 7 IPs who affirmed their use of PMI maintained that while PMI was a good tool, some elements of it were unrealistic in Syria as referral system for various services is non-existent. Humanitarian organisations also do not share/coordinate beneficiary information/data.

short on protection outcomes. About 2 years ago, DG ECHO developed Protection Monitoring Indicators (PMI) which are being piloted in several countries including Syria. IPs are being encouraged to use these in their response; field staff monitoring notes suggest that these are followed up during visits. At least 7 IPs confirmed during interviews to be using these for their response (See Box 8). In case of one IP which was a key protection partner, a disproportionate part of the grant went into staff capacity building, rather than providing services to the

most vulnerable. In some instances, weak integration of protection interventions was noted, for example, mine risk education in one area, without any linkage to survey and clearance. In several instances, overlap between emergency protection issues and structural social issues like domestic violence and child marriage practices was noted.

Overall performance on protection-related interventions has varied in the hubs, with major challenges in a WoS approach to protection response. All IP interviews pointed to major challenges in the GCAs. Two IPs used to provide legal aid in the past, but since 2017-2018, no international organisation is permitted to undertake this. IPs then focused on psychosocial support through community centres and schools. As discussions on protection and SGBV are considered sensitive in GCAs, at least two IPs focus on issues which are politically more acceptable: for instance, housing, land and property (HLP) rights and documentation on nationality, birth and civil registration. In NES, protection actions are concentrated in the Al Hawl camp, with very little support going outside of that, besides some work on GBV. Protection coordination in the NES is a challenge as there are two parallel coordination systems operating, one within camps, and the other managed by an NGO forum operating outside the camps. The protection Cluster lead agency is allowed to operate only in the camps, while the XB-NGOs that are part of the NES (NGO forum) operate both within and outside of the camps. Damascus-based actors operating in the camps are not supposed to talk with XB NGO which are considered 'illegal' by GoS. In the NWS, protection coordination is stronger as the NGOs (mostly local) have good capacity, working with their international counterparts and UN agencies in based in Turkey or neighbouring region.

Advocacy is central to protection. While focusing on meeting the urgent humanitarian needs, the portfolio of actions shows that DG ECHO focused on advocacy on complex issue of links between human rights violations, humanitarian principles and the escalating humanitarian situation on the ground. As discussed earlier, one major approach to protection action funded by DG ECHO has been to focus on SGBV and sexual and SRHS, with strong advocacy by one of the IPs, using reproductive health as a point of entry. An external

⁷⁸ DG ECHO (2016). Thematic Policy Document No 8. Humanitarian Protection - Improving protection outcomes to reduce risks for people in humanitarian crises

evaluation commented that this agency has been able to shape priorities in the WoS HRP and strategic cooperation agreements between the Government of Syria and the United Nations.⁷⁹ DG ECHO's advocacy on appropriate duty of care policies within IPs and their cooperating partners, especially in areas caught in transfer of controlling authority from one warring party to another, was crucial throughout the response in ensuring safety and security of the partners and their staff involved in the response (See Eastern Ghouta case study, Box 3). As mentioned earlier (section 3.2.1), DG ECHO played a key role in ensuring that the humanitarian leadership had the capacity to engage on human rights and IHL issues through engagement with partners and UN forums to advocate on these complex issues.

v. Education in Emergencies (EiE)

Over the years, funding for EiE in Syria has increased, demonstrating commitment to addressing this issue, despite challenges imposed by the EU redline on working with local education authorities. DG ECHO's thematic policy⁸⁰ on EiE aims at promoting quality education that increases personal resilience of children affected by humanitarian crises. At its core is the protection of children affected by humanitarian crises by minimising damage to education service delivery and enabling education to provide life-sustaining and life-saving physical, psychosocial, and cognitive support. During 2018, DG ECHO's global funding for EiE reached 8.5% of its humanitarian aid budget, surpassing the target of 8%. In Syria, as communities prioritise children's education high, DG ECHO actions have consistently prioritised this, as data presented in Table 2 showed. The EiE policy framework not only anchors support to EiE in humanitarian response, but also creates a holistic scope that includes both emergencies and protracted crises, thereby harnessing the added value and funding by all relevant humanitarian and development instruments of the EU.⁸¹ The policy encourages linking EiE interventions with other life-saving humanitarian sectors, such as WASH, and health and nutrition, whenever relevant and feasible.⁸² DG ECHO's support to EiE in Syria, which focuses on NFE as engagement through a formal system, runs the risk of impinging on the EU redline. However, while delivering NFE, attempt is made to ensure that children are later able to access formal schools; therefore, all efforts are made to link pathways from non-formal to formal education. The challenge sometimes is to determine which curriculum to use, especially in NES and NWS where the formal status of the governance structures remain contested.

At least five of the IPs interviewed for this evaluation undertook EiE and they all emphasised NFE; one IP in particular, created links between formal and non-formal education which has been considered by DG ECHO as a good example of supporting and investing in local capacities. Another IP targeted enhancing the learning capacity of children enrolled in formal education. The project offers vulnerable support to out-of-school (OOS) children and children at risk of dropping out of formal education and psychosocial programmes to strengthen their learning abilities, skills and resilience, thus mitigating protection risks associated with drop-out, non-attendance and untreated trauma. Another IP has focused on building capacity of local partners in early childhood development in the NES, with the aim that the programme will become sustainable once the IP withdraws from the area.

3.4.2. Major factors affecting response effectiveness

i. Humanitarian access and response preparedness

DG ECHO has invested significantly in enabling the overall humanitarian ecosystem. Following the guidance from the ISSG in early 2016, DG ECHO supported OCHA to set up Access

⁷⁹ UNFPA (2019). Evaluation of the UNFPA response to the Syria crisis, 2011-2018. (<https://www.unfpa.org/admin-resource/evaluation-unfpa-response-syria-crisis-2011-2018>)

⁸⁰ DG ECHO (2019). Thematic Policy Document No10: Education in Emergencies in EU-funded Humanitarian Aid Operations, July 2019

⁸¹ DG ECHO (2018). Annual Activity Report

⁸² 2018 HIP Technical Annex

Working Groups as a sounding board for OCHA-drafted scenarios (response and preparedness area-based plans) which have been useful in sharing sensitive access-related incidents. OCHA Damascus office worked on negotiating humanitarian access for besieged and HTR locations, submitting bi-monthly inter-agency convoy plans to the GoS and led inter-agency convoys to said locations. Funded by DG ECHO, one IP established in 2015 the Humanitarian Access Team (HAT) which is a dedicated service for collating critical information on besieged and HTR areas and undertaking analysis of humanitarian access and conflict dynamics, to provide vital information for adaptation of humanitarian response and for contingency planning. It produced crises analysis based on data obtained on the ground and the information was made available to the wider humanitarian sector for up-to-date analysis of conflict. A range of products (daily updates during high-intensity periods, regular weekly Whole-of-Syria summaries, in-depth thematic reports and scenario planning) helped NGOs in particular in their situational assessment and response planning. An important aspect of HAT compared to other analyses was its holistic approach and information triangulation approaches specifically geared for remote management. In 2018, HAT reached over 1,449 active web site users across 274 organisations. During 2017 HAT also played a role in coordination supporting the NES forum. HAT was key to identifying Eastern Ghouta and Northern Homs countryside as hotspots in 2017. Its analysis also allowed better identification of issues in partnerships with local cooperating partners, stakeholders relationships and interests, in anticipation of military moves and offensives.

DG ECHO supported several other common initiatives to strengthen situational and needs assessments and crisis analysis:

- a) In 2017, the International NGO Safety Organisation (INSO) was supported to enhance humanitarian access. This was done by providing a range of essential information, advisory and coordination services. Including flash reporting, in-depth analysis, NGO safety and access roundtable meetings, crisis management support, and training. INSO's monitoring capacity to develop a granular understanding of local operating environments, while also responding to individual NGO requests for support and continuously expanding outreach among partner organisations, were considered highly valuable by 11 IP key informants.
- b) The critical role played by HNAP (funded by DG ECHO, and other donors) has already been mentioned. Besides, supporting needs assessment, HNAP's network of 433 (September 2020) enumerators across the country, often provides a supplementary role in post-distribution monitoring/feedback of activities supported through the Syria Humanitarian Fund (SHF).
- c) REACH⁸³ is supported on interagency needs assessments and inter-sectoral assessments.

As part of preparedness, DG ECHO supported IPs to explore all possible modalities (including XB and XL operations or remote management strategies) and partnerships to maximise humanitarian presence in every potential hotspot. Internal documents show that DG ECHO supported NGOs in NES, and an ad hoc coordination forum to track evolving humanitarian consequences in the region as the fights against ISIS across the border in Mosul in Iraq intensified. In 2016, OCHA supported the development of preparedness plan for Aleppo and NWS through partners in the Turkey hub and developed various products to support emergency preparedness and access in besieged and HTR areas. In 2018, OCHA continued to develop area-based preparedness and response plans: the Eastern Ghouta Rapid Response Plan, the Operational Response Plan for southern Syria, the Northwest Syria Readiness Plan(s), and Ar-Raqqa City Plan. All the above initiatives complemented the more general programme and humanitarian coordination services provided by OCHA. OCHA Damascus office works on negotiating humanitarian access for besieged and HTR locations, submits bi-monthly inter-agency convoy plans to the GoS, and leads inter-agency convoys to said locations once approval and safe passage guarantees are obtained.

Individual partners were supported to explore all options for accessing all areas to provide a principled humanitarian response. Several IP's access strategies utilised: i) a

⁸³ REACH is a leading humanitarian initiative providing granular data, timely information and in-depth analysis from contexts of crisis, disaster and displacement. REACH activities are conducted within the framework of inter-agency coordination mechanisms at field and global levels to enabling more efficient aid planning and response.

wide network of local partnerships with acceptance among the communities; ii) contracting of non-Damascus registered partners through specific contracting mechanism; and iii) flexible operational approach. Two IPs established coverage through their large geographical presence and extended network of IPs (60+ organisations including NGOs, CSOs and local authorities), besides relations with GoS technical authorities at central level. Operating from Damascus, another IP had direct access as well access through SARC in hard-to-reach, besieged or armed opposition groups (AOG)-controlled areas in NES. Using the WoS response framework, several IPs were encouraged to set up multiple hubs (Beirut, Gaziantep, Amman and Derik and Damascus) in order to access potential hotspots from multiple entry points, as noted by DG ECHO TAs in an internal document.

Prepositioning of relief items has been a core intervention in the emergency preparedness strategy. DG ECHO assisted one IP in 2017 to develop logistical capacity of SARC and prepositioning of food and non-food items (NFI). This grant also set up a sub-medical warehouse through which it could not only preposition supplies, but also ensure timely delivery of medical items to health facilities. DG ECHO-funded contingency supply stock was critical to replenish supplies as part of the Raqqa response; the process also helped DG ECHO to have extensive discussions at a field level to identify key triggers for timeliness and adequateness of the response. Various IPs have also prepositioned medical stocks for XB operations. DG ECHO has also tried consistently, but with limited success in some instances, to plan for continuity of services in case of shift of territorial control in order for life-saving assistance not to be abruptly terminated.

ii. Partner selection

One of the key considerations for DG ECHO funding is the capacity of the IPs to monitor the situation on the ground. DG ECHO does not fund remote managed action unless some conditions are met.⁸⁴ These conditions are outlined in seven questions listed in the DG ECHO instruction note for project grants. IPs' partnerships with local NGOs and CSOs (and private companies providing services on third-party monitoring (TPM), cash transfers etc.) are analysed to ensure that IPs have a rigorous validation process, and that monitoring on the ground is not fully dependent on private TPM. IPs' skills and capacities through their geographical coverage, their capacity to implement, security management, ability to adhere to do-no-harm and humanitarian principles, integrated approach, their emergency response and preparedness priorities and partnerships all are taken into account in grant allocations. The capacity to use different modalities, in kind or cash-based interventions, are also factored in while taking allocation decisions. DG ECHO has encouraged several IPs to make use of the in-kind modality for FLER actions. In health response, for example, IPs were supported to use mobile and fixed clinics approach as well as work through umbrella organisations to avoid administrative constraints from Damascus authorities.

3.4.3. Humanitarian advocacy and coordination

Portfolio of actions show that DG ECHO focused on advocacy on complex issues of human rights violations, humanitarian principles and effectiveness of humanitarian operations. Mention has already been made about support to the UN human rights organisation to enable the humanitarian leadership and HC on human rights issues. DG ECHO's role in the multi-lateral annual forum was discussed in section 3.2.2. In KIIs, 17 of the 26 IPs interviewed mentioned DG ECHO's advocacy role in shaping humanitarian response in the country has been crucial as it is the only humanitarian donor which covers the entire country. Several examples were cited in this regard:

- Advocacy by DG ECHO with the nodal agency in Damascus helped two IPs to obtain beneficiary lists which the agency was refusing to share with the IPs.
- DG ECHO supported one IP to undertake advocacy with its bankers on transfer of funds⁸⁵ from Europe to Syria.

⁸⁴ DG-ECHO approach to remote management (Internal Note)

⁸⁵ The UN sanctions exempt humanitarian funds coming into the country; however, often bankers are often unaware of the detailed procedure and tend to block such transfers.

- DG ECHO supported a number of NGO forums in NWS and NES to undertake advocacy at local level.
- DG ECHO facilitated advocacy by several IPs in NES to advocate with Member States on children of the foreign fighters in Al Hawl camp.
- Several IPs were supported by DG ECHO in lobbying Turkish government on their registration status.

DG ECHO engaged with partners and UN forums to advocate on various issues to make humanitarian response more effective. At the operational level, DG ECHO repeatedly highlighted in the food security cluster the need to ensure targeting for food aid based on shared vulnerability criteria, instead of status alone. DG ECHO played a key role through advocacy and support on coordination to help streamline ambiguity on coordination between UNHCR and OCHA in 2016. During 2016 (and years preceding), coordination of Syria response remained a confusing array of multiple structures located in different countries (Syria, Jordan, Lebanon, Turkey, Iraq), with interagency turf war between UNHCR and OCHA in some places. This led to complicated coordination structures which DG ECHO rightly identified as a problem and sought to tackle through advocacy towards the UN agencies in Amman and other countries. In Lebanon and Jordan, UNHCR led the refugee response from the beginning. Despite the early designation of HCs, UNHCR's control of resources made it the de facto coordinator (in Jordan, the UNHCR representative was made the acting HC). DG ECHO made significant efforts to improve strategic coordination, supporting the coordination role of OCHA both inside Syria and in neighbouring countries, including supporting the development of OCHA's Whole-of-Syria approach. With the advent of resolution 2165 and the WoS approach, OCHA's coordination role gradually grew.⁸⁶ However, strategy-level coordination was still hampered by the ambiguity between UNHCR's and OCHA's mandates in a Level 3 crisis that includes an intertwined set of refugee, IDP and host community populations.⁸⁷ DG ECHO invested in the regional approach to coordination, supporting the Regional HC's office in Amman and seeking to improve coordination of efforts both inside Syria and across neighbouring countries. DG ECHO also encouraged UNHCR to include non-HCR partner organisations in coordination in Lebanon with positive effects. With time, and as cross-border operations developed, the role between two agencies (OCHA and UNHCR) got streamlined. Internally DG ECHO focused on coordination between various XB operations and operations inside Syria, phasing out multi-country contracts and replaced these with single-country contracts.⁸⁸

There appeared to be poor coordination among the agencies at the field level in selection of cooperating partners for frontline delivery: many UN agencies and OPRR members used the same cooperating partners, but there was little information sharing and coordination in terms of programming. In a monitoring visit to South Central Syria, DG ECHO team found very weak localised coordination efforts on GBV and psychosocial support. In one location, one IP's cooperating partners were providing GBV services close to where another IP had already been focusing on GBV issues; the monitoring also showed extremely weak or non-existent referral system between IPs. This 'duplication' – different IPs working through the same set of cooperating partners using DG ECHO funds to operate in the same area – issue was voiced by at least 5 key informants as a matter of concern.

3.4.4. M&E and results tracking

In view of the limited humanitarian access in Syria, the IPs are required to provide the Commission with a quarterly report on their monitoring/assessment visits related to the Action. These monitoring/ assessment visits are to be conducted with a view to ensuring accountability towards final beneficiaries and donors, by identifying and addressing any circumstances likely to hamper or delay the implementation of the Action, including instances of aid diversion or other misuse of humanitarian aid. The quarterly report provides DG ECHO with information on: (i) the

⁸⁶ Lewis Sida, Lorenzo Trombetta and Veronica Panero (2016). Evaluation of OCHA response to the Syria crisis, March, 2016

⁸⁷ ADE, URD (2016). Evaluation of the ECHO response to the Syrian Crisis 2012-2014, Final Report, June 2016

⁸⁸ ADE, URD (2016). Evaluation of the ECHO response to the Syrian Crisis 2012-2014 (Pages 12-14)

dates and locations of the activities monitored; (ii) the aid delivery method(s) being used; (iii) the circumstances likely to hamper or delay implementation of the Action, if any, identified on the occasion of the monitoring/assessment visits, and, if so, the steps taken by the IP to address the latter; (iv) the number and level of senior/management/ expatriate staff and the number of national staff under contract present in the affected area(s); (v) difficulties encountered in conducting adequate monitoring/assessment visits during the reporting period; and (vi) the type and level of personnel participating in the monitoring/assessment visits.

Quality of monitoring data and results reporting varied depending on the extent of access by the IPs, capacity of their downstream partners or TPM providers and the IP's own capacity to track and analyse data from multiple sources. Working in insecure and HTR areas through a diverse range of partners poses its own challenges in monitoring and tracking of results, as well as ensuring accountability and principled response. Besides the IP reports, as previously mentioned, DG ECHO TAs undertook periodic visits to project locations where feasible, or to IP offices in different hubs to discuss progress and challenges. These provided rich real-time monitoring data which helped in identifying progress and shortcomings and take appropriate corrective measures by both DG ECHO and the IP. Some IPs were noted for strong M&E system with strong disaggregated data on gender, age and vulnerability, while a few had no disaggregated data available for over 18+age groups. One IP's reporting was noted to be weak and non-transparent and the agency declined to share any PDM reports or third-party monitoring reports with DG ECHO on the pretext of data protection. Interim and final reports indicate that several IPs which had better access to their beneficiary population had better quality monitoring data and analysis of their results through regular monitoring and PDM. Desk review showed that even where monitoring is good, this is usually focused on activity level; capacity for generating systematic evidence to track and report on outcomes appears weak at both ECHO and partners' level.

Direct access by DG ECHO TAs to project locations for monitoring is limited to about a fifth of the portfolio (mostly in the NES and to a limited extent in GCAs), according to key informants. Therefore, most of the monitoring by TAs and thematic experts are undertaken remotely and through desk-based processes. Similar remote management and monitoring processes are adopted by IPs, with direct access being considerably higher, and variable, for INGO-IPs than for UN agencies. Of the 26 IPs, only one claimed to use direct access and no remote monitoring, using local staff operating in all the hubs. Various tools and processes have been developed by different IPs to ensure reasonable monitoring of their actions delivered by cooperating partners, for example:

- 11 of the 26 IPs mentioned that their partner reports from the ground are required to show photographs and geotags of activities implemented, where appropriate;
- All IPs require their cooperating partners to submit beneficiary lists – not always feasible in GCAs – which is used for random monitoring calls by the IP's M&E /accountability teams;
- 19 IPs referred to TPM and PDM undertaken regularly; different IPs have different standard operating procedures (SOPs) with regard to how TPMs are conducted - 3 of these IPs mentioned that they have multiple third-party monitoring contractors, and ensure that the contractors are rotated periodically to cover different geographical areas;
- One IP has ensured that the TPM contractors work with independent technical specialists (in areas such as WASH, Shelter) who are hired separately by the IP, and TPM contractors are paid only after verification of TPM reports by technical specialists and the M&E team;
- One IP has different sub-teams within the M&E team to undertake (a) selection (of beneficiaries) monitoring, (b) distribution monitoring, and (c) PDM.

A desk review of all the grants during 2016-2018 showed that IPs **achieved their targets with an average of 133% (Figure 6), showing that indicators have been exceeded in average regardless of the operational modality, XB or cross-Damascus.** IPs targeted a total of 1,296 quantitative and qualitative indicators through various actions. Of this, 22.3% concerned health, 13.2% protection, 9.49% wash, 6.56% emergency response and timeliness, 6% food security and livelihood (also reached through cash transfer modalities). There were 50 indicators, mostly outputs, for emergency preparedness and 86 for emergency response and timeliness.

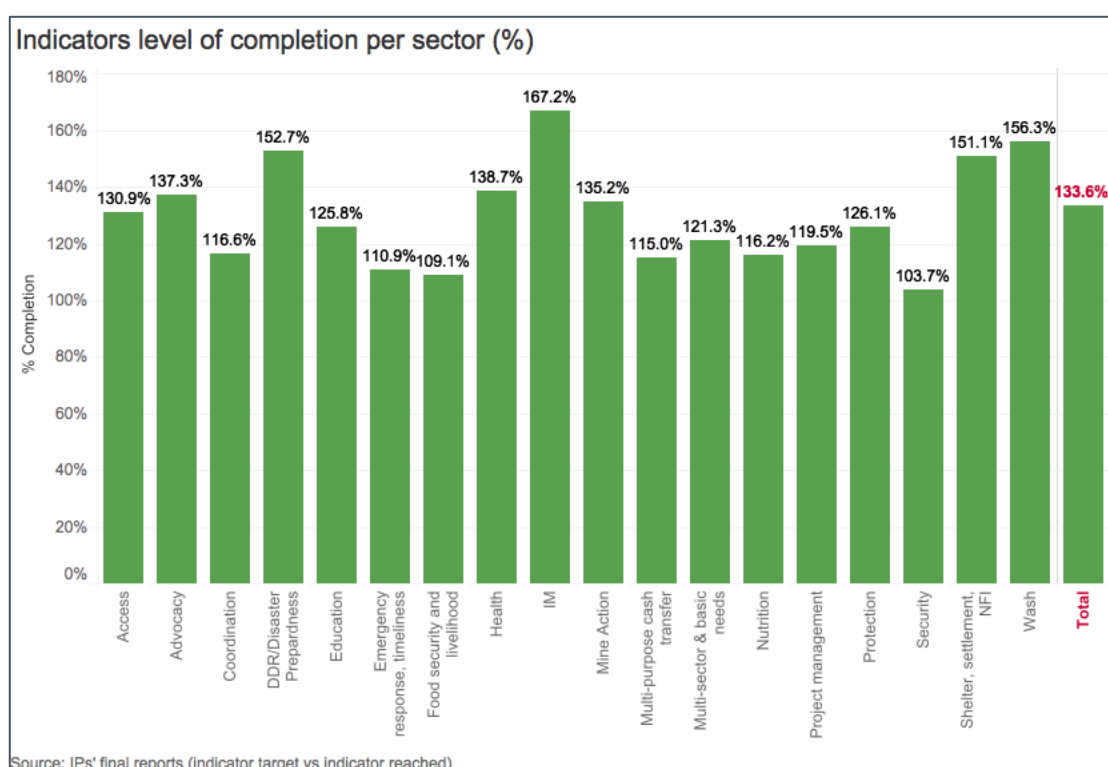


Figure 6 Results indicators' level of achievement (%)

In the beneficiary survey, 84 percent of respondents expressed satisfaction - “good” or “very good” - with the assistance received. DG ECHO IPs have reported 68 beneficiary satisfaction indicators, and all IPs (except one) have achieved them all. Some of the indicators related to beneficiary satisfaction, for example, were:

- Number of most vulnerable families assisted confirming that assistance improved their living conditions (target 80% of 383 families)
- % of beneficiaries reporting that assistance responded to their needs
- Beneficiaries are satisfied with the assistance provided (more than 80% of the interviewed sample)

In brief, the achievement of results has been strongly influenced by DG ECHO's ability to identify a range of partners with different expertise who collectively have been able to access all areas of the country, working closely with either international/local NGOs, civil society or local authorities. In health, the partners were able to bring in a diverse range of services like trauma care, GBV treatment, SRHS, psychosocial support, treatment of chronic and acute diseases, and treatment of malnutrition and sexual and reproductive health. In food security, good logistical capability backed by extensive access by partners and good needs assessment have been key contributing factors. Additionally, some partners' capability to undertake cash programming has also been significant for timely response. In all of these, preparedness involving pre-positioning supplies at critical hotspots and pre-identification of local (downstream) partners have been crucial success factors, aided by DG ECHO's rapid response tools (FLER and EEOC).

3.5. Efficiency

Key findings:
F18: Internally, DG ECHO adapted its structure within the WoS framework to have access to all hotspots inside Syria from different hubs/ entry points. Though the flexible structure enhanced its ability to access and some of the tools and systems deployed (EEOC, FLER, cash) were appropriate, protracted grants approval and procurement procedures sometimes affected timely response in all areas. <i>Strength of evidence – 4.</i>
F19: The evidence suggests that FLER (having a pre-allocated amount of funding agreed for rapid response) helps in both timely response and, through preparedness (pre-positioning of supplies, for example), it can bring significant gains across a range of inputs, including material costs, transport, storage, and salaries. <i>Strength of evidence – 3.</i>
F20: There is no explicit cost-effectiveness framework by means of which projects are appraised, monitored and assessed. However, evidence shows that DG ECHO staff have a good analysis and understanding of what constitutes efficient and cost-effective response and have used several sophisticated principles and parameters to ensure cost-effectiveness in its Actions. <i>Strength of evidence – 3.</i>
F21: Taking HRP requests as measures for humanitarian needs in the country, DG ECHO's response may be considered reasonable for both the relative size and consistency over the years. <i>Strength of evidence – 2.</i>

3.5.1. Efficiency and cost effectiveness

DG ECHO's commitment to project efficiency⁸⁹ and cost-effectiveness as one of their operating principles in the Syria response is expressed in the 2016, 2017 and 2018 Syria HIPs in three ways:

- First, in its endorsement of a WoS approach, seen as a system that should be nimble and flexible enough to respond to needs efficiently and effectively. While DG ECHO required partners to give a WoS analysis in their proposals, IPs were encouraged to operate from multiple hubs in order to increase access and ability to launch rapid response;
- Second, by linking an overarching emphasis on cost-efficiency and effectiveness to a list of key requirements for partner proposals including: vulnerability targeting, addressing basic needs with the most appropriate transfer modality (i.e., in kind, voucher or cash), improved co-ordination, and capacity building. In 2017 and 2018, flexibility and reactivity/responsiveness to newly and/or quickly emerging needs was also added; and
- Third, by emphasising the importance of good project management and, in particular, good risk analysis and risk management.

DG ECHO field staff have a shared understanding of effective need-based response.

There is a willingness to challenge inefficient or ineffective practices, both DG ECHO's and IPs', and an emphasis on preparedness, flexibility, adaptability and risk-taking. This is seen in the mechanisms DG ECHO put in place, the operational decisions and the requirements the staff made of partners, as discussed here. Internally, DG ECHO adapted its structure within the WoS framework to have access to all hotspots inside Syria from different hubs/entry points. This gave it flexibility and agility to proactively identify gaps in humanitarian response and coordinate closely with all key actors in the humanitarian system, which other donors may have difficulty to match. With a number of desk officers based in Brussels, 3 TAs and 2 Programme Assistants (PA) in Beirut, 2 TAs and 2 PAs in GTP, and 1 TA in Erbil (as of 2019), as well as a regional coordination hub in Amman, DG ECHO is able to access work of different IPs working across

⁸⁹ Efficiency is about how well inputs are converted into outputs. Cost-Effectiveness is about the project's outcomes in relation to its costs: how well *the cost of assistance stacked up against what was achieved*. This is a broader question, as the outcome will depend not just on good project management on the ground, but on the initial choice of programme approach, design and set up (for example, choice of hubs; choice of partners etc).

most parts of the country. Presence and access in Damascus remain an issue, though until early 2019, DG ECHO was able to obtain visas regularly from the authorities to have TAs/PAs visiting Damascus. Combined with some of the tools and systems deployed – EEOC, FLER, cash – the flexible structure enhanced its ability to access and strengthen DG ECHO's capacity for timely response. In circumstances when access becomes problematic from one hub, TAs from another hub or Brussels can step in to support. To enable better access and provide timely response, IPs are encouraged to operate from different hubs; and this has additional costs associated with each separate office and staff team which donors have to provide for. This may not be the most 'economic' way of operating, but this is often the only way a timely response (humanitarian output) can be provided in a context as complex as Syria.

While timely response benefits from structure and tools (discussed above), at least 18 of the 26 IPs mentioned DG ECHO's tardiness in proposal approvals (See Box 9), including for EEOC which was supposed to be rapid response. At least half a dozen key informants who have been present in the country for some time mentioned that this delay has

been getting progressively worse in the past 3-4 years – a fact corroborated in DG ECHO staff interviews as well. A complicated proposal format and a minimum time requirement of 3-6 months⁹⁰ for a proposal's formal approval from the original submission date appears to be a long-standing issue. The IPs receive an informal/tentative approval from the field staff and desk in the first instance, which is usually quick, and then have to wait for months for contracts to be formally signed. In this regard, having a pre-approved FLER component, as some IPs have, makes it easier for launching rapid response. Several IPs which operate at scale and have substantial resources from multiple donors, however, do not wait for formal approval and contract, and may start their response in anticipation of DG ECHO grants being approved in due course. Several IPs saw DG ECHO funding as 'directive' and 'earmarked' since the latter always specified activities to be funded, and any change in allocation between activities needed authorisation from DG ECHO.

Box 9: Protracted process of proposal vetting and contracts: Typical examples cited were:

- IP submitted proposal on 23/01/2018 for project to start on May 1. Revised version, at the request of DG ECHO, submitted on 26 April. Signed contract received end of July.
- Another IP submitted proposal in December 2019 for a grant to start 1 May; approval came 20 June 2020.
- At the onset of COVID-19 crisis, after agreement with a TA, one IP sent a MR to move funds from one activity to COVID-19 response. At the time of the interview, the IP was still waiting for approval after 6 weeks of submission and implementation had not yet started.

Timeliness in response has been affected by delayed proposal approvals and DG ECHO's procurement requirements, which IPs are required to follow as part of the framework partnership agreement. This has been particularly problematic in the last year due to runaway inflation and devaluation of local currency. As the tendering procedure is cumbersome, by the time tenders are approved, the contractors insist on revising the quotes (which are required to be in local currency) in their tender. In one instance, an IP had to re-tender twice for a building repair work, only to find the contractors backing out by the time a decision is made. Finally, the project for rehabilitation of a health centre had to be dropped.

⁹⁰ DG ECHO internal documents however show a much lower processing time as it tracks the time from final request submission date to the date of signing of contract, while IPs rightly consider the timeline from submission of original proposal, developed after consultation with DG ECHO field staff.

The evidence suggests that FLER (having a pre-allocated amount of funding agreed for rapid response) helps in both timely response and, through preparedness like pre-positioning of supplies, it can bring significant gains across a range of inputs, including material costs, transport, storage, and salaries. Additionally, it also saves DG ECHO and IP staff time in cumbersome proposal development and processing. Multi-year funding (at this stage 18 - 24 months) which has been used for six grants⁹¹ made during 2016-2018 to several IPs whose capacity and quality standards have been tried and tested in the past

54% of the NES respondents and a larger proportion (77% and 80%) of the NWS and Damascus respondents respectively found the response/assistance they received timely. (*Beneficiary survey data*)

several years also contributes to economy in the overall response. However, so far the use of multi-year grants has been limited to 4.2 percent of grants paid during the period.

DG ECHO has promoted cash-based modalities (wherever protection and market assessments indicate that these are appropriate) and IP co-ordination to improve efficiency, and better procurement to improve economy⁹². While the push for cash-based interventions, instead of in-kind, aims at enhancing effectiveness, it is also cost-efficient by driving down delivery costs, besides being timely (in-kind procurement involves time-consuming logistics). DG ECHO also sought out opportunities to ensure economy in its response; this is demonstrated in their promoting of practices like local procurement and, wherever possible, bulking procurement through inter-agency mechanisms (for example, hygiene kits through one IP; WASH supplies through another IP; NFI pipeline managed by one IP and funded by DG ECHO). In one instance IP contracted food vendors locally and regionally to provide specific food rations within a very short lead time, reducing storage costs for the organisation.

There is no explicit cost-effectiveness framework by means of which projects are appraised, monitored and assessed. DG ECHO cites administration cost ratios and unit costs in its assessments of IP proposals; while this shows an awareness of and concern for costs, the methodology is weak. The ratio of administration or overhead costs to direct activity costs feature significantly in appraisals of IP budgets, where judgements of reasonableness are made. Cost-effectiveness is a complex construct as it is not about cost-minimisation, but *optimisation*. To have better access and provide timely response, IPs are encouraged to operate from different hubs; and this has additional costs associated with each separate office and staff team. This may not be the most 'economic' way of operating, but this is often the only way an *effective response* (humanitarian output) can be provided in as complex a context as Syria. While allowing for multiple hubs, proposals are also assessed for the proportion/ratio of budget going into *direct activity costs* (i.e., those reaching the final beneficiaries), delivery costs and management costs. For example, one IP proposal is assessed 'reasonable' as 75% of the budget is dedicated to direct activity costs for a remotely managed operation. Another IP project which cost 25% for its human resources, with only 3% expatriate staff cost, is rated satisfactory on cost grounds. A cash-assistance activity of a protection and emergency assistance project of another IP was rightly rated low on *cost-efficiency* as the value of cash assistance planned was only 48% while the rest was to be spent on delivery and management and was therefore rejected. For food distribution and nutrition interventions, multi-purpose cash transfers were considered *cost-efficient* and the adoption of a common beneficiary platform by all partners was considered a *cost-effective* intervention as this would also have positive effect on coordination of beneficiary lists. Other examples include:

- One IP's integration of different sectors in its emergency response was noted to lead to a reduction in operational costs and increase *programme quality*;
- Another IP contracted food vendors locally and regionally to provide specific food rations within a very short lead time, reducing storage costs for the organisation.

⁹¹ Of the six grants, one was made during 2016 HIP and the rest were made in 2018. Five of the grants were of 18 months duration and only one was for a duration of 24 months (source: Project consumption list, DG ECHO)

⁹² Economy refers to the cost, quality and timeliness of inputs.

Comments on efficiency and costs in dashboards and project documents typically are not always clear, but as discussed above, DG ECHO staff have a good analysis and understanding of what constitutes efficient and cost-effective response. The push for cash-based interventions, instead of in-kind, aims at enhancing effectiveness; it is also cost-effective by driving down delivery costs, besides being timely (in-kind procurement involves time-consuming logistics). Cost judgements are highly context specific. Cost comparison is only possible where the contextual factors affecting costs can be controlled, for example comparison year-on-year of the delivery costs of the same goods or services; or comparison of costs of delivering the same service across similar locations. Even within a country, costs of different Actions may vary depending on access, security, and logistics in different regions. If one has to use cost judgements using any benchmarking method, it may be more realistic to make *cost comparisons of specific outputs delivered by different partners in the same area* – for example, cost of running a NFE centre per 100 children in the country or cost of running a primary healthcare centre for every 1,000 people served (not counting any capital costs that may be incurred on top) by different partners. Such metrics, however, can only be of limited use when tracking effectiveness of response.

3.5.2. Size of budget and proportionality

The HIP allocation is based on country/regional assessment of needs, combined with assessments drawn from the Index for Risk Management (INFORM) and the Forgotten Crisis Assessment (FCA).⁹³ The dashboard provides DG ECHO staff with a format in which to assess partner proposals against a set of compliance markers, together with a narrative analysis of the partner's proposal. Central to the DG ECHO appraisal of partner proposals is analysis of the proposed results areas. Often the funding ECHO offers is less than the amount requested by a partner, for which justification is provided in the dashboard. The key point here is that in the Single Form, result areas are costed. It is therefore a relatively straightforward calculation to set a funding level that covers only the approved results areas. The dashboard confirms that at the level of budget allocations to projects, DG ECHO bases the size of its budgets on a costed assessment of the results to be achieved.

Taking HRP requests as a measure for humanitarian needs in the country in a year, DG ECHO's response may be considered reasonable, for both the relative size and consistency over the years. As shown in Table 3 in section 1.3.3, DG ECHO has been consistently funding about 7-10 percent of the entire HRP request on average and is the fourth-largest humanitarian donor in Syria. In sectoral coverage, DG ECHO has consistently funded a fifth to a quarter of the HRP health actions every year during 2016-2018, as well as a significant (almost a quarter) share of HRP spending on coordination during 2016 and 2018 (Table 10). This was appropriate as coordination was consistently underfunded, according to key informants. Spending on FSL has been relatively low as DG ECHO rightly observed that Syria was not a food insecure country at any phase of the conflict. However, as livelihoods opportunities were systematically destroyed for the conflict-affected and displaced affecting access to food, there was a need to support livelihoods interventions which DG ECHO interventions didn't prioritise during 2016-2018. There is now a commitment in the 2020 HIP to increase support on livelihoods.

Table 10 ECHO contribution vis-à-vis overall HRP, 2016-2018 (€ million)

Sector	2016		2017		2018	
	HRP Funded	ECHO spend	HRP Funded	ECHO spend	HRP Funded	ECHO spend
Food security &	541.9	79.3	512.6	34.5	538.5	16

⁹³ DG ECHO (2014). FPA Guidelines (2014), Section 5 Financing Decisions, pages 33/34.

livelihoods		14.6%		6.7%		3%
Health	119.4	26	144.6	36.3	148.5	31.1
		21.8%		25%		20.9%
WASH	61.2	15.4	121.7	-	112.1	4.5
		25%		NA		4%
Disaster preparedness/risk reduction	NA	12.9	NA	8.8	NA	11.7
		NA		NA		NA
Protection	48.0	5.7	205	6.9	85.1	37.3
		11.9%		3.4%		43.8%
Coordination & support	35.6	9.2	NA	4.9	27.5	6.2
		25.8%		NA		22.5%
Shelter/NFI	89.5	6.5	114.2	-	123.6	3.8
		7.2%		NA		3%
Education in emergencies	95.6	Unspecified	120.4	-	92.1	4.2
		-		NA		4.6%

3.5.3. Humanitarian access and fund absorption

Fund absorption has not been a problem for DG ECHO in the period covered by the evaluation. As discussed in different sections, through a range of modalities, tools and partners, DG ECHO has been able to utilise available funds appropriately. When individual IPs may have had challenges in access at different points in time, this has not affected DG ECHO's overall portfolio as it retains the flexibility to reallocate any unused funding by one IP to other IPs, depending on the situation.

3.6. Sustainability

Key finding

F22: Sustainability of humanitarian actions is difficult to achieve in a context where life-saving humanitarian needs are continuously increasing, and the state has receded from its primary role of protection and provision of services. DG ECHO project appraisals and monitoring reflect good attempts to explore opportunities. *Strength of evidence – 2.*

DG ECHO's support during 2016-2018 was predominantly focused on life-saving emergency response through actions like food (mostly in-kind) and NFI distribution,

hygiene kits, shelter, water trucking (and sometimes undertaking basic repairs of small water infrastructure). In limited instances, there were grants made which promoted sustainability in DG ECHO supported actions. One IP was supported (2017) in its prosthetic and orthopaedic services which worked with local hospitals and community health committees, with the idea of ensuring integration of these services in the health system; however, lack of the possibility of engaging with a central authority did not enable development of a clear roadmap for sustainability. Another IP's interventions in education linked non-formal education with formal education in existing schools and developing capacity of school authorities in this regard. Since 2019, there has been an increasing emphasis on early recovery and *life-sustaining* activities, according to key informants. Multi-purpose cash response, substantial repair and rehabilitation of community-managed water systems, and (limited) livelihood interventions were mentioned in a number of IP interviews to be some of the new initiatives supported by DG ECHO. The capacity building of local cooperating partners through the years of aid delivery and support from IPs, especially in NWS, has created a number of local organisations with good capacity to deliver humanitarian response on their own.

Sustainability of humanitarian actions is difficult to assess in a context where life-saving humanitarian needs is continuously increasing, and the state has receded from its primary role of protection and provision of services. DG ECHO project appraisals and monitoring reflect good attempts to explore opportunities. In Syria, communities are primarily reliant on services provided by humanitarian organisations and in some areas by the local authorities. In NWS, for basic services, communities are totally reliant on NGOs in the absence of the Syrian state and hence an exit strategy was considered unrealistic in the current context. Documents show that project appraisals by DG ECHO staff assess the feasibility of an exit and handover of services to local organisations or alternative institutions, though in a war-ravaged Syria this is often not feasible. As discussed in section 3.2.3, DG ECHO has been encouraging IPs to mobilise resources from other sources, including other

60% respondents expressed confidence in being able to better deal with crisis now. 65% of women especially agree or strongly agree on their capacity to cope with problems more than men (53%). NWS respondents consider to have better coping capacities than people in other hubs. (*Beneficiary survey data*).

EU instruments, that are contributing towards medium to longer-term solutions which DG ECHO's limited funds cannot often support. Beneficiary interviews however presented a very optimistic picture of beneficiaries' coping capacity and resilience; this may be explained by the 'recency effect', in that people's comments are tinged by their current experience which in all likelihood may be far better than what they went through in the immediate aftermath of the conflict or displacement.

4. Conclusions and recommendations

4.1. Overall Conclusions

The conflict in Syria has been one of the most brutal in modern history, costing nearly 550,000 lives since the beginning of the conflict, and displacing over 13 million people who are now either refugees in neighbouring countries (6.8 million) or internally displaced (5.8 million) inside Syria. The conflict shows little sign of abating. DG ECHO has maintained a consistent presence across different hubs, allocating over €442 million during the 2016-2018 HIP period. It has positioned itself as the only major humanitarian donor able to operate in all parts of the country through its wide network of IPs and its own field staff who are able to access all hotspots, directly or indirectly. DG ECHO's unique contribution to strengthening the humanitarian footprint across the country and improve coverage of response in hard-to-reach and besieged areas are widely recognised by other donors and humanitarian organisations.

Adapting to a fast-moving context, by demonstrating a flexible approach, DG ECHO was able to support several innovative tools and mechanisms which enabled its partners to provide timely and cost-effective emergency response in multiple sectors even during periods of intense fighting (Easter Ghouta and other besieged areas). Besides its operational role on the ground, DG ECHO was able to leverage its humanitarian footprint to strengthen coordination among key humanitarian actors and engage in humanitarian diplomacy with other donors, including EU Member States. Recognised generally for its strong emphasis on principled humanitarian response, the application of EU red line related to actions in the GCAs may have on occasions challenged DG ECHO in ensuring a principled humanitarian response.

Detailed conclusions

i. Relevance

DG ECHO's flexible approach in humanitarian programming, and support to partners to provide timely and appropriate response enabled IPs to respond in the highly volatile context in a flexible manner through deployment of various tools (FLER, EEOC) and modes of delivery (cash, in-kind, vouchers). Using a range of operational modalities (XB, XL, X-Damascus, or remotely) to access HTR populations, DG ECHO consistently prioritised HTR and besieged areas and ensured good partner selection based on their presence, operational capacity in the country and ability to access the priority areas where needs were the greatest. Aleppo, Idlib and Rural Damascus (including Eastern Ghouta) were targeted by the largest number of Actions during the period, reflecting response to needs in areas with large numbers of IDPs, high population density, exposure to hostilities and siege. Pre-positioning of relief items has been a core intervention in emergency preparedness strategy.

In line with its policy, targeting the most vulnerable people has received strong attention in DG ECHO's monitoring of IP actions. Given the volatility in the context, DG ECHO encouraged partners to undertake continuous review of needs as the crises evolved and allowed adjustment (through Modification Requests) in the level of funding within projects as needs emerged. As direct and regular interactions with communities for most IPs had been challenged by access issues, several agencies put in place some form of complaints response mechanism to obtain feedback from communities on an ongoing basis, though their use and effectiveness have varied. DG ECHO lays strong emphasis on providing response based on household-level vulnerability assessment which most agencies attempted to ensure, though in the GCAs this was not always possible.

ii. Coherence

The evaluation concluded that DG ECHO's response in Syria was in strong alignment with the humanitarian principles enshrined in the EU Consensus and HAR. Despite challenges in a high-threat environment, DG ECHO was able to operationalise fundamental tenets of the Principles

and by and large ensured an impartial needs-based response. The EU redline, however, on occasions militated against full adherence to the Principles in GCAs. There were also challenges faced in operationalising humanitarian principles in the case of IPs who relied solely on local partners due to lack of direct access, as happened in the case of a number of UN organisations whose ability to access different areas is tightly controlled by the Government.

The response in different sectors was based on guidance in several DG ECHO thematic policies, for instance: (a) an integrated approach to food availability, access and nutrition, using appropriate transfer modality (in-kind or cash or livelihoods) and ensure that the community's coping capacity and resilience were not undermined; (b) strong focus on health through primary healthcare, vaccination, surveillance for infectious diseases and screening of pregnancy and mental health issues; (c) emergency WASH response included water trucking, hygiene kits and hygiene education, and community-managed infrastructure using local technologies and operating systems; (d) protection mainstreaming through protection risk analysis in all Actions and ensuring capacity of the international humanitarian aid system; (e) children's education through EiE interventions.

DG ECHO played a lead role in donor coordination on the Syria response; its direct involvement in the Actions on the ground in partnership with a large number of implementing partners enabled it to act as a bridge between IPs and donors as a majority of the donors cannot visit GCAs. There is limited scope for nexus programming in the country; within this, DG ECHO is proactively engaging with other EU Institutions (DG NEAR and FPI) to pursue humanitarian-resilience nexus, where feasible.

iii. EU Added value

The EU has the advantage of being less closely identified with the political and foreign policy posturing of its member governments and this potentially enables DG ECHO to position itself as an independent humanitarian donor, though this has been constrained by DG ECHO being forced to follow the political redline of the EU. The annual Brussels conference which brings together a diverse range of actors on humanitarian response, stabilisation, peacebuilding and development is due mainly to the leverage the EU as a collective has which no single Member State probably can have access to, working on its own. Individual EU member states rely heavily on the eyes and ears of DG ECHO on the ground as the level of engagement required is costly in the complex context of Syria.

iv. Effectiveness

Going by output indicators for all grants, all IPs exceeded their target indicators. In line with the HAR and HIP objectives, DG ECHO's multi-sectoral response integrating protection and assistance for meeting basic needs of the conflict-affected populations reached all parts of the country. This was achieved through a range of modalities and interventions and enabled a strengthening of the capacity of the humanitarian system to deliver a coordinated response. At the humanitarian system level, DG ECHO's strengths are acknowledged by all stakeholders, through its ongoing support for: humanitarian coordination; strengthening humanitarian access strategies in a highly volatile environment; and support for advocacy on human rights violations. DG ECHO is also recognised for its coherence with Humanitarian Principles and for facilitating the engagement of the donor community in the multi-dimensional nature of Syrian response. Through sustained focus on ensuring quality of response, DG ECHO has strengthened a large part of the humanitarian system for adopting and making extensive use of innovative tools and modalities like HAT, OPRR, CRMS and CBIs.

IDPs and host populations affected by the ongoing conflict have come to depend on food, NFIs, water and shelter provided by humanitarian agencies, and DG ECHO assistance has played a significant part in this in the immediate aftermath of displacement. DG ECHO's move to CBIs is recognised by all stakeholders, including communities, for the flexibility these offer in terms of communities being able to prioritise their own essential needs. The extensive scale and range of health interventions through DG ECHO support have enabled primary healthcare providers to continue to function and deliver healthcare, including trauma-care to deal with the war-wounded and mental health issues, and care for chronic diseases; provided services through physical

rehabilitation centres; and essential public healthcare services, as well as treatment of SRH issues, including SGV.

DG ECHO's role in advocacy and coordination at operational and global levels have played a pivotal role in strengthening the humanitarian system. However, inadequate coordination at the point of delivery of response may have caused duplication of efforts and undermined effectiveness as several IPs used the same local organisations, often in the same area to undertake the last-mile delivery of assistance. The ability of these cooperating partners who largely are local CSOs or NGOs to ensure consistent adherence to Humanitarian Principles and do-no harm principles remains unclear as IPs do not have adequate monitoring or quality assurance mechanism to assess these, especially in instances where the IPs themselves have limited direct access. TPMs are not always able to flag these complex issues, as the TPMs themselves may be weak in analysis of such issues and TPM protocols and standards vary in different organisations.

v. Efficiency

Efficiency in humanitarian response involves several elements, of which the most important are: (a) timeliness, (b) economy (cost per unit of input is minimised), and (c) cost-effectiveness (cost per output is optimised). Timeliness in response has been sometimes affected by delayed proposal approvals and DG ECHO's procurement requirements. In terms of cost-effectiveness, DG ECHO operations reflect a good understanding of what an efficient response should look like in the Syrian context. DG ECHO has been rigorous in operationalising its principles and monitoring their effect, as seen in its organisational culture and focus. At the core of cost-effectiveness are the fact that field staff: (i) have a shared understanding of an effective needs-based response; (ii) continually keep challenging current practices in the response by its IPs (and the overall humanitarian system); (iii) are able to encourage IPs to continuously seek to increase value for money (timely and cost-efficient measures, greater proportion of funds reaching the beneficiaries, and quality of response at optimum costs).

Cost-judgements in humanitarian response cannot be made by a benchmarking approach using a simplistic metric like unit costs per output without reference to all factors contributing to timeliness, cost-effectiveness, and the context of the operation. Benchmarking of costs is fraught with difficulty because: (a) there are very many contextual factors that drive costs, and (b) costs need to be justified, not in isolation, but in relation to quality and timeliness.⁹⁴ Adapting to the complex context of Syria, multiple hubs providing access to all hotspots inside Syria, and use of tools and systems (like EEOC, FLER, cash) enhanced ability to access and provide timely response in all areas. Bulk procurements through interagency mechanisms, having a pre-allocated amount of funding agreed for rapid response through FLER, and pre-positioning of supplies helped in both timely response and cost-savings across a range of inputs, including material costs, transport, and storage.

vi. Sustainability

In an environment where humanitarian needs continue growing and development interventions remain frozen, sustainability will continue to be a challenge, though DG ECHO has in the past two years made efforts to move toward life-sustaining actions with its limited funds and facilitated other EU institutions to step in, where feasible.

4.2. Lessons and good practices

There are several tools and mechanisms DG ECHO has introduced in the Syria response which have strengthened its capacity, as well as that of the overall humanitarian system in Syria to respond to a fast-moving crisis. Building on the strength of one of the IPs, DG ECHO supported the HAT as a dedicated service for collating critical information and analyses on besieged and HTR areas and conflict dynamics. The OPRR as a dedicated coordination platform for operations in besieged areas in the south-central was another mechanism that enabled the four partners

⁹⁴ The ADE Study's definition of Economy is relevant here (ADE Study Executive Summary, page i): *Are inputs of the appropriate quality bought at the right price?* Generally, the frame of reference for assessment of costs is the Cost-Quality-Timeliness framework.

to coordinate their approach and engagement with local cooperating partners. The strong emphasis on CBIs which facilitated timely and need-based response allowed beneficiaries to take some control over how they met their essential needs, besides reducing many of the inappropriate in-kind assistance that found its way to the markets.

4.3. Recommendations

- R1:** Develop a regular communication and advocacy message for engagement with other EU institutions and Member States at policy level on DG ECHO's humanitarian imperative and humanitarian principles in accordance with the HAR (*linked to finding F5 – application of red lines challenging principled humanitarian action*).
- R2:** DG ECHO needs to explore the feasibility of setting up a continuous international presence in Damascus to be able to enhance its humanitarian access and engage proactively on humanitarian issues in which it is currently constrained in GCAs due to the visa restrictions (*linked to finding F6 - limited presence in Damascus affecting capacity and space for technical dialogue*).
- R3:** As most of the response in the GCAs and NWS are delivered through local cooperating partners of DG ECHO partners, DG ECHO needs to ensure that all implementing partners, while selecting cooperating partners, follow a standard set of criteria which include their understanding of and experience in operationalising humanitarian principles, and this needs to be reinforced with periodic training (by implementing partners) and review (*linked to finding F7 – good understanding and strong monitoring of operationalisation of humanitarian principles, especially where response is highly dependent on local partners*).
- R4:** DG ECHO needs to work with other humanitarian donors and implementing partners to develop a harmonised set of standards and protocols for TPM mechanism which will continue to remain a critical tool in monitoring humanitarian action (*linked to finding F18 – inadequate quality of monitoring data and results reporting*).
- R5:** Continue to advocate with all humanitarian agencies and donors for increasing cash response, wherever feasible, instead of in-kind response (*linked to F11 – DG ECHO leading on cash response*).
- R6:** DG ECHO needs to conduct an in-depth audit of its protracted grant processing mechanism for Syria to assess its appropriateness for humanitarian response and explore room for improvement (*linked to finding F19 - protracted grants approval and procurement procedures affecting timely response*).
- R7:** In order to have a shared understanding of efficiency and cost-effectiveness across the organisation, DG ECHO could consider the feasibility of developing a set of operational guidelines for use during grant appraisals, monitoring and reporting for Syria operations. This needs to be based on a construct of efficiency which is context-specific and integrates (a) timeliness, (b) economy (cost per unit of input minimised) and (c) cost-effectiveness (cost per output optimised) (*linked to finding F21 - no explicit cost-effectiveness framework*).

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