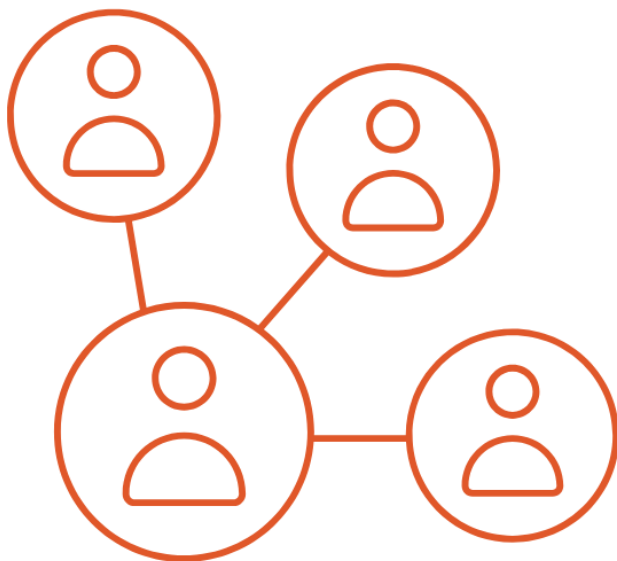


SEPTEMBER 2026

COUNTRY REPORT

INTERMEDIARY MODELS FOR LOCALLY LED ACTION

SYRIA



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Executive Summary

For more than a decade, Syria's humanitarian response operated within a fragmented and highly politicized environment shaped by territorial control, restricted access, sanctions-related compliance concerns, remote management, and divided coordination structures. Assistance was organized through Damascus-based, cross-border, cross-line, and area-specific modalities spanning government-controlled areas, opposition-held northern and northwestern Syria, and Syrian Democratic Forces-controlled northeast Syria. This architecture made Syrian NGOs, diaspora-rooted organizations, civil society actors, and locally embedded networks central to the response. In many areas, they provided not only program delivery but also access negotiation, contextual analysis, community engagement, technical systems, coordination, and the practical means through which international assistance could operate.

The fall of the Assad regime in December 2024 significantly changed this operating environment. Expanded physical and institutional access has created opportunities for more coherent countrywide programming, more direct engagement between international and Syrian organizations, and stronger links between NGO-developed technical capacities and recovering public institutions. The relatively stable operational environment, along with international political support to the new administration, created a paradigm shift in the Syria response towards reconstruction and development support. However, Syria's operating environment remains transitional and negotiated rather than fully settled. Registration and re-registration procedures, foreign-funding approvals, project authorizations, geographic permissions, and coordination expectations continue to evolve. Banking and cash-transfer barriers, commercial de-risking, donor compliance requirements, and concerns over organizational affiliation also continue to affect which actors can receive and manage funding. At the same time, humanitarian and development funding has not expanded in proportion to operational opportunities, increasing competition among UN agencies, INGOs, Syrian NGOs, diaspora organizations, and emerging national structures. Civic actors working on accountability, advocacy, independent media, rights, and public participation may also face more constrained operating conditions than organizations focused on service delivery and recovery.

Against this backdrop, the central question is how improved access can be used to strengthen Syrian leadership and partnership quality rather than recentralize funding and decision-making or return Syrian organizations to implementation-only roles. Public system recovery and renewed international presence can complement Syrian NGO capacity, but should not absorb or displace the independent technical, operational, civic, and accountability functions that Syrian organizations continue to provide. This report examines how different intermediary models can distribute funding, authority, risk, and accountability more effectively during Syria's transition.

Landscape

Syria's intermediary landscape includes Syrian national and local NGOs, civil society organizations and networks, diaspora-rooted organizations, pooled funds, INGOs, and UN agencies. These actors do not form a simple or fixed funding chain. Many combine direct implementation with functions such as onward granting, partner selection and accompaniment, technical support, coordination, compliance management, contextual analysis, and engagement with communities or public institutions. International actors remain prominent grant-holders because of their donor relationships, fiduciary systems, scale, and access to international financial channels, while Syrian and diaspora-rooted actors often connect these resources and systems with locally embedded organizations, expertise, and networks. Uniquely, and due to the dependency on local NGOs before the fall of the Assad regime, many Syrian NGOs were able to grow operationally and be considered equal in size and capacity to some INGOs working in Syria.

The landscape of intermediaries examined in this research was predominantly Syrian and Syrian-led, though research also included INGO, donor, and civil society perspectives. In this research, "intermediary" is used operationally, according to the functions an organization performs, rather than as a narrow theoretical category or a description of its formal contractual position. Almost all participating Syrian NGOs lacked a direct funding relationship with the original donor but nevertheless performed intermediary functions including selecting or supporting smaller partners, providing technical assistance, and connecting international actors with communities and local institutions. An organization may therefore act simultaneously as an implementing partner and an intermediary, even when it is not formally designated or funded as one. This research is illustrative rather than fully representative of all perspectives and experiences. Furthermore, it was conducted during a rapidly evolving transition, making it a time-bound mapping of the intermediary functions, relationships, and perceptions.

Key Issues

Localized delivery has not necessarily produced locally led action. Syrian organizations became indispensable during years of restricted international access yet authority over priorities, funding, program design, and compliance and risk clearance frequently remained with donors, UN agencies, and INGOs. Local implementation should therefore not be treated as evidence of local leadership.

Improved access creates opportunities for Syrian leadership but also risks recentralization. Increased international access since December 2024 could allow for stronger partnerships with Syrian organizations, but some raised concerns that UN agencies and INGOs were instead expanding direct implementation and concentrating resources and decisions internationally.

Financial and legal constraints can justify intermediation but not unequal partnerships. Banking restrictions, donor compliance requirements, registration procedures, sanctions-related controls, and limited financial channels may require pooled funds, diaspora organizations, INGOs, or UN agencies to provide financial and fiduciary functions. Their role should remain proportionate to the constraint being addressed and should not exclude Syrian actors from decision-making or transfer disproportionate risks to them.

Civil society requires dedicated support beyond sectoral programming. Syria's transition increases the importance of advocacy, accountability, independent media and research, community representation, social cohesion, and public participation. These functions cannot be adequately supported through service-delivery grants alone. Donors should treat independent civil society and civic space as distinct funding objectives.

Public-system recovery should complement independent Syrian capacity. Technical links between Syrian NGOs and public institutions can strengthen national systems but should not imply the wholesale transfer of NGO capacities or the end of independent organizations. Different functions may require coordination, interoperability, joint management, selective integration, or continued independent provision. Stronger public institutions, capable Syrian NGOs, and an independent civil society remain complementary parts of Syria's recovery.

Comparative Advantages

Comparative advantage is functional rather than inherent to an organization's classification. Different actors may perform the same function, but with different strengths. The tables below identify the advantages most consistently associated with each intermediary type in the Syria research; however, they should inform role selection rather than create a fixed hierarchy among actors.

Comparative Advantages of Local Actors

Function	Comparative Advantage
Fundraising	Cost efficiency, along with access to diaspora, philanthropic, community, and private funding.
Program design	Strong contextual knowledge, contextualizing program design, community relationships.
Fund management	Cost-efficient grant management and support to smaller organizations.
Programmatic delivery	Local access, trusted networks, expandable geographic reach, sustainability, and continuity.

	Scale and multi-sector delivery experience (including technical sectors)
	Capacity-building to other local actors
Risk sharing and management	Operational flexibility, rapid contextual adaptation
	Early identification and mitigation of contextual and operational risks.
	Political navigation and community embeddedness

Diaspora-rooted Syrian organizations may also provide international banking access, donor-facing systems, and specialist expertise. Syrian NGOs’ strongest advantages lie in contextual knowledge, local relationships, adaptive delivery, and operational efficiency. Their direct access to institutional funding nevertheless remains limited.

Comparative Advantages of International Actors

Function	Comparative Advantage
Fundraising	Established donor relationships and capacity to secure large grants.
	Global platform and presence
Program design	Experience across multiple contexts and international specialised advisors via HQs
	Technical expertise, international evidence, and pre-established technical standards.
Fund management	Experience accessing and managing large-scale funding, including compliance
	Financial and banking infrastructure
	Pre-established compliance, safeguarding, procurement, and granting procedures.
Programmatic delivery	Capacity building, technical backstopping, surge capacity, and pre-set reporting and M&E systems.
Risk sharing	Institutional reserves and legal, compliance, insurance, and duty-of-care capacity.

INGOs add most value through donor access, specialist expertise, strong management systems, and their capacity to absorb risk. These strengths can support rather than replace Syrian leadership.

Comparative Advantages of Pooled Funds

Function	Comparative Advantage
Fundraising	Pool donor contributions and channel funding to Syrian organizations.
	Strong relations with donors
Program design	Flexible funding windows informed by changing needs and local participation.
	Technical expertise, international evidence, and pre-established technical standards.
Fund management	Centralized due diligence, contracting, monitoring, and direct grant-making.
	Financial and banking infrastructure
	Context-customized compliance, safeguarding, procurement, and granting procedures.
Programmatic delivery	Contextualized capacity building, technical backstopping, surge capacity, reporting and M&E systems.
	Diverse portfolios spanning sectors, locations, and organization sizes.
Risk sharing	Funding is diversified across several donors, organizations, projects, sectors, and locations, so risk is not concentrated in one grant or partner.

Pooled funds' localization value depends on Syrian participation and contextualization in the governance of the pooled fund and on risks being shared rather than transferred to grantees.

Comparative Advantages of UN Agencies and UN-led funds

Function	Comparative Advantage
Fundraising	Access to large-scale governmental and multilateral funding.
	Global platform and presence
Program design	Countrywide planning, and engagement with public institutions.
	Technical expertise, international evidence, and pre-established technical standards.
Fund management	Management of major funds, procurement systems, and complex reporting.
	Financial and banking infrastructure with facilitations from governments and international financial institutions
	Pre-established compliance, safeguarding, procurement, and granting procedures.

Programmatic delivery	National-scale operations, international and national supply chains, coordination, and common services.
	Capacity building, technical backstopping, surge capacity, and pre-set reporting and M&E systems.
Risk sharing	Capacity to manage major financial and compliance risks and negotiate relaxed financial regulations with authorities.

UN agencies' main advantages are scale, coordination, public-institution engagement, and management of major resources. These capacities are most valuable if they enable locally led action.

Barriers to Locally Led Action

Barrier	Description	Dimension of Locally Led Action
Contextual		
Regulatory uncertainty	Evolving registration, foreign-funding, project-approval, and geographic-permission requirements constrain Syrian organizations.	Legal recognition and operational autonomy
Financial access restrictions	Banking de-risking and transfer restrictions limit funding to Syria-based organizations.	Direct funding and financial autonomy
Constrained civic space	Political sensitivities restrict advocacy, accountability, independent media, and participation.	Civic participation, independence, and social accountability
Legacy political divisions and mistrust	Conflict-era political affiliations, perceived alignments, and differences in organizations' geographic histories continue to generate grievances and weaken trust and collaboration among Syrian, international, and UN actors.	Trust, equitable participation, and collaboration
Operational and Organizational		
Institutional eligibility gaps	Smaller and civic organizations may lack registration, banking access, audit histories, or donor-required systems.	Equitable access and organizational readiness

Weak institutional investment	Limited core funding to national NGOs and competition for experienced staff with INGOs/ UN weaken organizational resilience.	Sustainability and leadership capacity
Unrecognized and under-resourced Syrian intermediation	Syrian NGOs' intermediary functions have generally developed within individual programs rather than being deliberately recognized, funded, and strengthened as Syrian-led intermediation.	Institutional recognition, capacity sharing, and Syrian leadership
Communication and Coordination		
Centralized coordination	Coordination and regranting decisions becoming concentrated within the UN and very few INGOs.	Representation and decision-making influence
Limited donor dialogue	Syrian organizations have limited direct engagement with donors and allocation processes.	Voice, transparency, and agenda-setting
Underused local knowledge	Community, civic, and locally generated analysis does not consistently inform strategy and coordination.	Community accountability and locally informed design
Weak Syrian-led coordination platforms	Syrian NGOs lack sufficiently effective and influential platforms through which to develop common positions, make collective decisions, and shape donor, UN, and sector-level priorities.	Collective voice, coordination, and agenda-setting
Donor Policy and Practice on Partner Selection		
Preference for established international channels	Donor risk systems and administrative incentives favor familiar UN and INGO partners whose business model revolves around donor funding.	Direct funding and absence of Syrian leadership
Disproportionate eligibility requirements	Standardized due-diligence requirements disadvantage smaller, civic, and Syria-based organizations.	Equitable access and partner diversity
Inappropriate selection criteria	Selection may prioritize size, status, location, past donor experience, or perceived affiliation over current capacity, accountability, and added value.	Transparent and appropriate partner selection
Donor Policy and Practice on Project Design and Management		
Upstream control of programs	Priorities, design, budgets, and adaptation decisions frequently remain controlled by international actors.	Programmatic autonomy and decision-making authority
Rigid and short-term funding	Short subcontracts, limited overhead, and restricted flexibility undermine adaptation and institutional planning.	Funding quality and organizational sustainability
Downstream risk transfer	Operational and compliance risks are transferred to Syrian partners without corresponding resources or authority.	Equitable partnership and risk sharing

Recommendations

These recommendations distinguish immediate and medium-term localization priorities from Syria's long-term institutional recovery. The immediate priority is to strengthen Syrian organizations, preserve service continuity, expand their authority, and invest in their independent institutional capacity. Over the longer term—and beyond individual projects or annual funding cycles—this capacity can support community and youth initiatives, professional skills and employment, responsible private-sector social responsibility engagement, and the gradual recovery of public services and reconstruction systems.

References to transition or integration therefore describe strategic, phased, function-specific, and readiness-based pathways. They do not imply the near-term handover or wholesale absorption of NGO functions by public institutions. The objective is a complementary recovery ecosystem comprising capable public institutions, strong and independent Syrian NGOs, active civil society, responsible businesses, and skilled professionals.

For Donors

1. Expand direct and progressively direct funding to Syrian organizations.
2. Provide flexible, predictable, multi-year funding with adequate overhead and institutional support.
3. Include Syrian actors in funding allocations, governance, program design, adaptation, and risk decisions.
4. Require intermediaries to pass flexibility, resources, and meaningful authority to Syrian partners.
5. Measure localization by Syrian and community influence, not only funding volumes or partner numbers.
6. Use proportionate, transparent, and contextual partner-selection and affiliation assessments.
7. Fund independent civil society functions separately from sectoral service delivery.
8. Recognize long-term ecosystem-building—including youth development, professional skills, social initiatives, and institutional networks—as a legitimate localization outcome.

International Intermediaries: UN Agencies and INGOs

1. Define intermediary roles according to the specific function and added value required.
2. Use improved access to strengthen Syrian leadership rather than expand unnecessary direct implementation.
3. Provide technical, fiduciary, coordination, procurement, and back-office support where these enable Syrian-led action.

4. Invest in Syrian co-leadership, partner systems, structured mentoring, and professional development.
5. Avoid creating parallel systems where Syrian organizations or institutions can perform or progressively develop the function.
6. Develop long-term, readiness-based pathways connecting selected NGO capacities to public, professional, or market systems without weakening independent Syrian capacity.

Pooled Funds

1. Expand Syrian organizations' roles as grant-holders, strategic intermediaries, and governance participants.
2. Create flexible small-grant and institutional-funding windows with proportionate requirements.
3. Deliberately recognize and finance Syrian intermediary functions, including regranting, technical accompaniment, and partner support.
4. Centralize due diligence and donor requirements while reducing duplication for grantees.
5. Pool donor exposure and diversify risk across grants, organizations, sectors, and locations.
6. Use transparent, contextual criteria to assess organizational capacity, accountability, independence, and affiliation.
7. Support longer-term investments that retain organizational, technical, and professional capacity within Syria.

Syrian NGOs and Intermediaries

1. Clearly articulate and seek recognition for the intermediary functions they already perform.
2. Strengthen Syrian-led coordination platforms and develop shared positions on funding and response priorities.
3. Support smaller NGOs and civic actors through funding, mentoring, technical assistance, and access to networks.
4. Avoid reproducing rigid subcontracting and downstream risk transfer when acting as intermediaries.
5. Strengthen accountability to communities, partners, and other Syrian organizations.
7. Maintain the independence of decision-making and ensure a neutral technical relationship with governmental bodies to guarantee non-affiliated operations and programs.
8. Invest in young professionals, technical networks, and locally rooted leadership.
9. Where consistent with their mandates, incubate social initiatives and convene communities, public institutions, and responsible businesses around locally identified priorities.

Syrian Public Authorities

1. Establish clear and predictable registration, project-approval, and geographic-permission procedures.

2. Facilitate lawful and workable banking and financial-transfer arrangements.
3. Protect the independence and operating space of NGOs and civil society actors.
4. Address affiliation concerns transparently and avoid exclusion based solely on perceived wartime alignments.
5. Establish transparent frameworks for long-term collaboration among NGOs, public institutions, professional bodies, and responsible businesses.
6. Approach any eventual integration of selected functions gradually and according to demonstrated capacity, resources, accountability, and public legitimacy.

All Actors

1. Select intermediary arrangements according to the function required and the comparative advantage each actor contributes.
2. Address legacy grievances and mistrust through transparent assessment, dialogue, and inclusive coordination.
3. Preserve service continuity, independent NGO capacity, and civic space throughout Syria's recovery.
4. Treat localization as a long-term investment in Syria's civic, professional, economic, and institutional recovery ecosystem.
5. Develop strategic, phased, and function-specific pathways for selected capacities that may eventually connect with public institutions, professional systems, or markets.
6. Recognize that some functions—particularly advocacy, independent monitoring, community representation, innovation, and social accountability—should remain independent over the long term.

1. Introduction

For more than a decade, the Syria humanitarian response operated under conditions of constrained access, fragmented territorial control, sanctions-related compliance concerns, and a highly politicized aid architecture. The Assad regime used to manipulate and politicize access, approvals, and partner selection. Delivery routes were shaped by territorial control, controlling actors' consent, donor restrictions, sanctions, and competing legitimacy claims rather than humanitarian need alone. International humanitarian actors could not work across the country through a single direct presence with security and political restrictions preventing them from working across different control areas. The response therefore developed through multiple hubs, cross-border, and cross-line modalities, with remote management arrangements and layered partnerships with Syrian organizations, diaspora-led initiatives, local councils, community networks, and other intermediaries with operational reach inside the country.

Over time, this experience produced a generation of Syrian organizations with substantial technical, administrative, and managerial capacity. Many developed systems for procurement, monitoring, safeguarding, financial management, donor reporting, sectoral programming, coordination, and remote or high-risk operations. Some also performed functions normally associated with public institutions, including data systems, early warning, service coordination, technical assessments, and support to local governance. In parts of the country where formal authorities were designated, contested, or inaccessible to donors, Syrian organizations often acted as a buffer between international actors, local authorities, and communities.

The fall of the Assad regime in December 2024 has altered this equation. The response is now moving from a fragmented, hub-based architecture toward a more centralized and countrywide operating environment, even as governance arrangements, registration processes, security conditions, and coordination systems remain unsettled. Areas that were previously difficult or impossible for many international actors to access have become more reachable, and several UN agencies and INGOs have explored or established expanded offices and field presence in Damascus and other newly accessible cities.

Improved access creates an important opportunity to strengthen Syrian leadership of the response. International actors can now engage Syrian organizations more directly, develop partnerships through sustained in-country interaction, and draw more systematically on their contextual knowledge, technical capacity, and relationships with communities and public institutions. Reduced reliance on remote management should therefore enable better-quality partnerships rather than reduce the role of Syrian organizations. Improved access can also support closer coordination and technical links between NGO-managed capacities and public institutions where appropriate, while preserving the continuing role and independence of Syrian NGOs.

However, improved access does not automatically produce localization. If international actors use greater physical and institutional access primarily to expand direct implementation or centralize decisions within UN agencies and INGOs, Syrian organizations may again be confined to implementation roles. The relevant test is therefore not only who can access affected areas, but whether Syrian actors gain greater influence over priorities, program design, resource allocation, adaptation, risk management, and accountability.

The transition is also changing the role of diaspora-led and exile-based Syrian organizations. During the conflict, diaspora organizations often provided a bridge between donors, advocacy spaces, technical expertise, and networks inside Syria. Some played important roles in civil society strengthening, documentation, accountability, medical support, humanitarian delivery, and policy engagement. In the post-December 2024 context, their role is being reassessed. Their continued relevance depends less on their past representation of Syrian civil society in exile and more on whether they retain meaningful presence, networks, legitimacy, technical value, and accountability to actors inside Syria.

The transition presents distinct challenges for civil society support. Before December 2024, many civic activities were funded under sectoral labels, such as supplementary education, livelihoods, women's empowerment, protection, social cohesion, media, or community engagement. After the fall of the regime, civil society work needs to be understood more explicitly on its own terms: as support to accountability, participation, advocacy, local voice, social cohesion, watchdog functions, research, media, and democratic public life. This type of work cannot be funded or assessed in the same way as ordinary humanitarian service delivery. It requires different risk tolerance, different indicators, different intermediary arrangements, a different understanding of complex political economy factors, and a clearer strategy for protecting civic space.

At the same time, donors face real constraints. Donors may still rely on UN agencies, INGOs, pooled funds, or international civil society intermediaries because of factors like institutional risk, accountability requirements, banking and cash-transfer barriers, , registration uncertainty, the need for background checks and anti-terror and policy-alignment screening—and insufficient capacity of donor staff to manage all of these challenges directly. The question is not whether to replace international intermediaries. In some cases, they will still provide necessary back-office, fiduciary, technical, diplomatic, or risk-sharing functions. The more important question is whether these functions are used to enable Syrian leadership or to preserve international control.

If expanded international presence leads to more direct implementation, heavier compliance requirements, weaker partnership incentives, and limited Syrian participation in allocation decisions, it could reproduce a familiar pattern: local actors carry contextual risk and community accountability, while international actors retain strategic control, funding power, and institutional visibility.

In addition, international intermediaries' long-term value should be judged by whether they help reduce unnecessary intermediation over time. As Syria moves from humanitarian response toward recovery, aid-funded intermediary models should include a clear transition logic: which functions can be absorbed by Syrian public institutions, which can be taken up by local markets or private-sector actors, which should remain with independent civil society, and which require continued external support. The goal is not simply to localize the aid chain, but to ensure that aid investments strengthen Syrian systems rather than reproduce them through a parallel humanitarian architecture.

This report examines Syria's intermediary landscape at a moment of transition. It maps both local and international intermediaries, compares the advantages and limitations of different models, identifies barriers to more locally led intermediary action, and considers what donors, INGOs, UN agencies, pooled funds, and Syrian organizations can do to strengthen local leadership. Its central argument is that Syria does not need a return to the old partnership model, nor a simple replacement of local intermediaries by international direct presence. It needs a recalibrated intermediary system in which international actors use their access, funding relationships, and compliance capacities to shift more authority, resources, and decision-making power to Syrian organizations and civic actors that have already demonstrated their role as core response actors.

2. Methodology and Definitions

2.1 Research scope and definition of intermediary

The study uses the term “intermediary” to refer to an organization or mechanism that sits between donors or major funding institutions and a wider ecosystem of local and national actors, communities, or implementing organizations. Intermediaries may perform a range of functions, including regranting, capacity strengthening, technical accompaniment, compliance management, risk sharing, coordination, advocacy, contextual analysis, access support, civil society accompaniment, and support to local implementation.

A note on terminology

This report uses the term "intermediary" to describe organizations that regrant or channel donor funding to other actors, but, as a term, it has some limitations. "Intermediary" is often used in localization discourse, and risks defining an organization in relation to a donor rather than in its own right and implying a homogenous category of organizations whose primary function is to act as a "go-between," connecting donors to other actors. In reality, as this research affirms, most intermediary organizations also engage in programmatic work, capacity sharing, advocacy, evidence generation, and community empowerment, depending on the type of organization.

The “intermediary” framing was directly challenged in several of our own consultations, where representatives of organizations that perform intermediary functions pushed back on being defined as “an intermediary,” arguing it understates the breadth and significance of their role. This conversation has also taken place in the context of the sector-wide Grand Bargain Caucus on the Role of Intermediaries which was established specifically to address ongoing challenges within the relationships between donors, intermediaries, and local and national organizations.

We were unable to identify an alternative term that has gained meaningful traction across the sector and so retain "intermediary" in this report for clarity and consistency, while encouraging readers to bear these limitations in mind.

The primary focus of the mapping is on intermediaries that perform a regranting or funding function, either as their sole function or as one of several core functions. It also focuses on relatively “large scale” intermediaries, defined loosely as those with an operating budget >~\$2 million. These lenses reflect The Share Trust’s broader research focus on identifying viable local intermediary models and international intermediary models that can bridge bilateral donors’ funding to shift more resources and decision-making power to local actors.

Given the Syria context, the study also considers non-funding intermediary functions where they are central to locally led action. These include contextual understanding, access negotiation, risk

management, compliance support, coordination, civil society support, technical accompaniment, and institutional capacity strengthening. This broader lens is important because, in Syria, actors may play important intermediary roles even when they do not formally operate as grant-making mechanisms.

2.2 Intermediary categories

The analysis distinguishes between several broad intermediary categories:

- Syrian local and national NGOs;
- diaspora-linked or Syrian-led international organizations;
- international NGOs;
- UN agencies;
- pooled funds and trust-fund mechanisms, which may be managed by UN agencies or INGOs;
- civil society support organizations and networks;
- other mechanisms that provide fiscal hosting, technical accompaniment, coordination, or regranting support.

These categories are used as analytical tools rather than fixed labels. Several organizations in the Syria response perform multiple functions at once. For example, a Syrian NGO may implement directly, regrant to smaller organizations, provide technical support, coordinate with authorities, and act as a bridge between donors and local communities. Similarly, an international NGO may combine grant-holding, compliance management, technical accompaniment, capacity strengthening, and direct implementation.

For this reason, the study assesses intermediaries not only by organizational type, but also by function. This allows the report to examine which actors are currently performing different roles, which actors have comparative advantages in those roles, and which functions could be shifted, shared, or supported differently in a more locally led response model.

2.3 Data collection, adaptation of methodology

The research initially intended to draw more heavily on structured survey and questionnaire data, including comparative-advantages responses across different intermediary types. However, response rates were lower than anticipated, and the organizations that responded were primarily Syrian NGOs and Syrian-led actors. As a result, the methodology was adapted during implementation. Rather than treating the survey and questionnaire data as a quantitative or

representative dataset, the study uses them as descriptive profile data and triangulates them with key informant interviews, interview notes, and desk review.

The final analysis is therefore qualitative and purposive. It draws on 19 key informant interviews, including ten Syrian NGOs and intermediaries, two civil society-focused interviews, two INGO perspective, and three donor perspectives, and two subject matter experts. Survey/profile data from 12 respondents or organizations are used to describe characteristics such as sectoral focus, staff size, funding size, geographic scope, and organizational capacity. These data help illustrate the range of actors included in the study, but they should not be read as fully representative of the wider Syria response.

2.4 Analytical framework

The analysis is organized around four main questions:

1. What does Syria's intermediary landscape look like, including both local and international intermediary models?
2. What are the comparative advantages and limitations of different types of intermediaries?
3. What barriers prevent or limit more locally led intermediary models?
4. What can donors, INGOs, UN agencies, pooled funds, and other actors do to reinforce locally led action?

The comparative advantages analysis focuses on five core functional areas:

- decentralizing decision-making and funding;
- financial and management efficiency;
- programmatic approach and reach;
- contextual understanding, access, and adaptation;
- shared risk management.

The analysis also includes an open category for other emerging functions raised by respondents, including civil society strengthening, advocacy, representation, technical accompaniment, diaspora bridging, coordination, social cohesion, support to local initiatives, and transition or recovery planning.

Interview evidence was analyzed thematically against these functional areas. Particular attention was given to the distinction between where there is current capacity and where appropriate leadership should ideally lie. Some international actors may currently have stronger systems for donor compliance, large-scale grant management, procurement, or formal coordination, but this does not necessarily mean these functions should remain under international control over the longer term. Conversely, Syrian actors may have strong comparative advantages in contextual

understanding, access, community trust, adaptive programming, and local legitimacy, but may require better funding modalities, risk-sharing arrangements, and institutional investment to exercise these advantages fully.

2.5 Case studies and organizational profiles

Selected organizations and mechanisms are used as illustrative examples throughout the report. These examples are not intended to rank organizations or provide full institutional assessments. Rather, they illustrate different intermediary functions, models, strengths, and constraints within the Syria response.

2.6 Limitations

The study's main limitation is that the evidence base is qualitative and not statistically representative. Although the research initially intended to include a stronger quantitative component, low response rates and a respondent pool weighted toward Syrian NGOs and Syrian-led actors required a shift to an interview-led approach. Survey and profile data are therefore used descriptively, while the main findings draw on thematic analysis of interviews, interview notes, and available documentation.

Public and organizational information is uneven. Some organizations provide detailed information on budgets, governance, policies, partnerships, and geographic reach, while others provide limited public data. Where information was unavailable, the study relied on interviews, survey/profile responses, or triangulation with other sources.

The INGO interviews provide an international organization perspective through the lens of their Syrian staff. Their input was useful for understanding how international organizations may experience the post-December 2024 operating environment, partnership models, registration processes, and the changing relationship between INGOs and Syrian actors. However, it does not substitute for a broader set of institutional interviews with INGOs or UN agencies.

The Syria operating environment is also changing rapidly, with evolving registration requirements, shifting donor policies, changing sanctions and banking conditions, and the reconfiguration of coordination structures—all of which affect the relevance of findings. The report should therefore be read as an analysis of a transitional moment rather than a settled operating model.

The evolving and uncertain context creates sensitivity around the topics covered in this research (the limited participation of INGOs may reflect, in part, this sensitivity). Respondents discussed

donors, partners, authorities, competitors, funding relationships, and risk. Some findings are therefore presented in aggregate or anonymized form to protect respondents and avoid attributing sensitive views to named individuals or organizations.

Finally, this study is not a due diligence assessment, audit, or vetting exercise. It does not determine whether specific organizations should or should not receive funding. Its purpose is to map intermediary roles, assess comparative advantages, identify barriers, and suggest ways donors and international actors can reinforce locally led action in Syria.

Box 1: Profile of surveyed and interviewed Syrian and diaspora organizations

The organizations included in the sample varied significantly in size, funding levels, staffing, geographic reach, and sectoral focus. Several Syrian organizations reported substantial operational capacity, including multi-sector programming, sizeable staff structures, experience managing donor-funded portfolios, and roles in regranting, partner support, technical assistance, coordination, or support to smaller grassroots actors.

Reported staff size ranged from 20 for some civil society organizations to figures in the hundreds. Reported annual funding ranged from less than US\$2 million for the civil society organizations and up to US\$50 million.

The main sectors represented in the sample included health, WASH, livelihoods, protection, education, shelter, governance, civil society, social cohesion, data/information management, and early recovery.

3. Syria's Intermediary Landscape

As noted above, Syria's intermediary landscape reflects over a decade of fragmented control, constrained access, and divided coordination structures, producing distinct intermediary types across Damascus-based, cross-border, and northeast Syria operations. The Assad regime's fall in December 2024 has expanded access for international actors but has not simplified this landscape.

At the same time, Syrian organizations that built their role during years of constrained access are facing a new dilemma: the international actors that once depended on them may now be expanding their own offices, field teams, and direct implementation capacity. This creates an important transition question for locally led action: will the new operating environment reinforce Syrian organizations as strategic intermediaries, or will it recentralize funding and decision-making within UN and INGO systems?

The landscape is also changing because different forms of local capacity are moving in different directions. Some Syrian NGOs are seeking direct donor funding or larger intermediary roles. Some technical organizations are transferring systems, staff, and expertise into emerging public institutions. Some diaspora organizations are trying to demonstrate continued relevance inside Syria, while others are being reassessed by donors. Civil society actors, especially those working on democracy, media, advocacy, social cohesion, and accountability, face a distinct challenge: they do not fit neatly into humanitarian service delivery models and their role in the new Syria remains politically and institutionally uncertain.

3.1 UN agencies

UN agencies remain among the most powerful intermediaries in the Syria response because of their mandate, scale, diplomatic access, coordination role, and ability to receive and manage large donor contributions. They sit between donors, authorities, international NGOs, national NGOs, and affected populations. Their intermediary role is not limited to direct implementation; it includes needs analysis, response planning, cluster coordination, pooled-fund governance, advocacy with authorities, procurement, logistics, and the onward channeling of resources through implementing partners.

Before December 2024, the UN's role was shaped by the divided aid architecture. Damascus-based UN agencies operated within a system dependent on the consent, permissions, and access conditions set by the Assad-led Syrian government. This gave UN agencies access to official systems and an ability to work at scale in government-controlled areas. However, it also generated longstanding concerns among Syrian civil society and humanitarian actors about restricted access, politicized aid, and the perceived closeness of some UN operations to the former authorities. Cross-

border assistance, by contrast, developed partly because Damascus-based channels could not reliably or impartially reach populations in areas outside government control.

After December 2024, UN agencies have sought to reposition themselves within a more countrywide response architecture. Their comparative advantages remain significant: they can mobilize large-scale donor funding, support national-level coordination, engage authorities, maintain sectoral standards, and provide procurement and logistics capacity that few other actors can replicate. These functions are particularly important in a transition marked by large-scale humanitarian needs, return movements, infrastructure damage, and institutional uncertainty.

However, the UN's intermediary role is also contested. Several key informants raised concerns that decision-making has become less inclusive of Syrian NGOs since the fall of the regime, particularly as coordination and funding discussions move toward Damascus-centred structures. Donor-side evidence also suggests a more nuanced picture: UN agencies may be attractive to donors where programs require scale, government counterpart engagement, legitimacy, or large systems management, but they are not always the most appropriate intermediary for civil society strengthening, grassroots civic work, or flexible small-grant models.

This distinction matters. UN agencies may be best placed to provide coordination, diplomatic engagement, technical standards, and large-scale systems support, but these functions should not automatically translate into control over local priority-setting, partner selection, or allocation decisions. For locally led action to be meaningful, UN intermediation should enable Syrian organizations to participate in strategic decisions, access direct or high-quality funding where feasible, and shape programming based on their contextual knowledge and community relationships.

3.2 International NGOs

International NGOs occupy a second major layer of intermediation in Syria. During the conflict, many INGOs acted as grant-holders, compliance managers, technical advisers, remote managers, and implementing partners for donor-funded programs. In areas where international staff could not be directly present, they often relied on Syrian NGOs, Syrian staff, diaspora-linked networks, and local service providers to deliver assistance. These dynamics created a model in which INGOs held funding and donor-facing responsibility, while Syrian partners carried much of the operational burden and community-facing risk.

INGOs have important comparative advantages. They often have established donor relationships; experience managing multi-country grants, compliance and reporting systems; technical sector capacity; safeguarding frameworks; procurement systems; and the ability to provide surge support. In the current transition, INGOs can also play a useful enabling role by supporting Syrian

organizations with systems strengthening, proposal development, donor engagement, risk management, technical accompaniment, and advocacy.

The interview evidence suggests that some INGOs have historically implemented a large share of programs through Syrian partners and developed extensive partner networks. This form of intermediation can support localization when it strengthens Syrian organizations' technical capacity, institutional systems, and grant management ability. Some respondents also pointed to Syrian umbrella organizations as a useful localization route because they can reduce costs, sustain local operations, and cover a broader network of smaller actors.

At the same time, the post-December 2024 environment creates a risk that INGOs shift from being intermediaries that enable Syrian partners to becoming direct competitors. As access expands, some INGOs are increasing their physical presence, opening or expanding offices, recruiting Syrian staff, and exploring more direct delivery. Key informants described a reduction in responsiveness from some international counterparts that had previously relied heavily on Syrian partners. They also raised concerns that funding opportunities are increasingly concentrated among UN agencies and a small number of INGOs, while local NGOs remain outside the spaces where allocation decisions are made.

INGOs also face genuine operational constraints. Registration processes, approvals, coordination with multiple ministries or authorities, and uncertainty over the emerging regulatory environment can be exhausting and time-consuming. For some INGOs, this may create incentives either to reduce their presence, hire local staff to manage the bureaucracy, or work through intermediary arrangements that shift local engagement and administrative burden onto another actor.

The issue is not whether INGOs should operate in Syria. Their technical, financial, and operational capacities remain important. The more important question is what kind of INGO intermediation is needed. In a locally led model, INGOs should not simply reproduce a subcontracting chain in which Syrian NGOs implement activities designed and controlled elsewhere. Their strongest role may be as enabling intermediaries: helping local actors access funding, absorb risk, strengthen systems, engage donors, and influence strategy. This role requires INGOs to separate support functions from control functions, and to avoid using compliance, capacity strengthening, or risk management as a justification for retaining decision-making power.

3.3 National NGOs

Syrian national and local NGOs are central to the intermediary landscape. Before the fall of the regime, particularly in the cross-border response in northern Syria, Syrian NGOs were not only delivery partners. Many played important roles in needs identification, access negotiation, community engagement, coordination, steering committees, technical working groups, and

collective advocacy. Their importance was partly produced by necessity: international actors often lacked direct access, while Syrian organizations had the staff, relationships, language, contextual understanding, and operational reach needed to sustain assistance. As noted above, however, Syrian NGOs' increased operational capacity has not always translated into equal power, often remaining dependent on international grant-holders and limited by donor compliance systems designed around international intermediaries.

Still, over time, many Syrian NGOs generated significant organizational capacity, with robust procurement, financial management, safeguarding, monitoring and evaluation, reporting, programming, and regranting/subawarding capacity, including in remote or high-risk operations. Some became large multi-sector actors. Others developed specialized technical functions, including data systems, early warning, water and health information management, laboratory services, service coordination platforms, civic engagement, and social accountability work. In parts of the country where authorities were designated, contested, or inaccessible to donors, Syrian organizations also acted as buffers between international actors, local authorities, and communities.

The current national NGO landscape is shaped by residual political identities inherited from Syria's highly politicized aid environment. Many Syrian NGOs were associated, formally or informally, with particular political positions, geographies, or social constituencies. For some, this identity reflected the political views of founders or leadership, including opposition to the Assad regime. For others, it was ascribed by circumstance: organizations working in government-controlled areas, opposition-held areas, or Kurdish-controlled areas were often perceived through the politics of those territories, regardless of their actual mandate or activities.

These identities have not disappeared in the post-Assad period. Two respondents expected that organizations previously aligned with the current authorities would monopolize space or marginalize NGOs and INGOs that had worked in former regime-controlled areas. However, one key informant who led an organization in those areas described a more mixed picture: while there was initial caution and mistrust, ministry-led and civil society initiatives brought different organizations together, creating some space for exchange and relationship-building across old divides. This process reportedly had a difficult start but also revealed that organizations from former government-held areas had experience navigating complex ministry procedures that other Syrian NGOs had not previously faced. At the same time, respondents from former government- and Kurdish-controlled areas remained concerned about access to funding, perceived closeness between some formerly opposition-linked NGOs and the new authorities, and the movement of NGO staff into public institutions. They could not say with certainty that they were facing systematic discrimination, as all NGOs appear to be struggling with approvals, funding, and regulatory uncertainty, but they emphasized that residual identity issues remain present and will take time to resolve.

These sensitivities also affect partnership and intermediation between Syrian NGOs. Large Syrian NGOs may cooperate, coordinate, and form consortia where there is a clear technical need, but they do not always intermediate for one another easily, particularly when they work in the same sector or compete for similar funding. Partnerships appear more feasible when organizations bring different technical functions or geographic advantages, rather than when one large Syrian NGO is positioned above another in a funding chain. Pooled funds and other intermediaries should therefore be attentive to old political identities, perceived affiliations, and competition between large Syrian NGOs. Locally led intermediation will require not only technical due diligence, but also careful conflict-sensitive analysis of how partner selection, consortium leadership, sub-granting roles, and geographic priorities may be perceived by other Syrian actors.

The post-December 2024 transition has created several different trajectories for Syrian NGO capacity. Some key informants described a decline in Syrian NGO participation in decision-making spaces, including reduced consultation by actors who previously depended on Syrian partners during the cross-border period. They also expressed concern that recent U.S. funding decisions have favored UN agencies and a limited number of INGOs, leaving local NGOs outside direct allocation channels.

Still, some organizations are seeking to convert years of indirect donor compliance experience into direct funding relationships. Some are trying to play a stronger intermediary role by regranting to smaller organizations or absorbing heavy compliance functions on behalf of grassroots initiatives. Others are transferring technical systems, staff, and expertise into emerging public institutions.

This latter dynamic is particularly visible among technical organizations that previously performed quasi-public functions in areas where government systems were absent, contested, or inaccessible to donors. Closer technical coordination between Syrian NGOs and public institutions is both an opportunity and a risk. It can strengthen national systems, but it should not be treated as requiring the absorption or eventual closure of capable NGOs. On one hand, it may help transfer locally developed Syrian capacity into national systems, particularly in sectors such as health surveillance, WASH, data management, agriculture, and service coordination. This is especially relevant for Syrian NGOs that expanded service delivery in areas where public services were absent, contested, or inaccessible.

On the other hand, the distinction between “service delivery” organizations and “civil society” organizations should not be overstated. Even NGOs that primarily delivered services can play important civic roles if they remain independent, including monitoring service quality, representing community needs, advocating for equitable access, and holding public institutions accountable. Losing this independent sectoral civil society capacity could be significant, particularly if more explicitly rights-based, inclusion-focused, or democracy-oriented civil society becomes politically constrained. The opportunity is therefore not simply to absorb NGO capacity into public systems,

but to distinguish which technical functions can support recovery through public institutions and which independent roles should be protected as part of Syria's civic and accountability ecosystem.

Syrian NGOs' increased operational capacity has not always translated into equal power. Even when they delivered large shares of assistance, they often remained dependent on international grant-holders and subject to donor compliance systems designed around international intermediaries. Localization, in practice, often meant greater implementation responsibility without equivalent control over funding, program design, risk decisions, or strategic priorities.

The post-December 2024 transition has intensified this tension. Key informants described a decline in Syrian NGO participation in decision-making spaces, including reduced consultation by actors who previously depended on Syrian partners during the cross-border period. They also expressed concern that recent U.S. funding decisions have favored UN agencies and a limited number of INGOs, leaving local NGOs outside direct allocation channels. This was interpreted not only as a funding problem, but as a signal that the response may be recentralizing as international actors regain direct access.

Civil society actors form a distinct part of the national intermediary landscape. During the conflict, many civic activities were funded under service-oriented labels such as education, livelihoods, women's empowerment, protection, social cohesion, media, or community engagement. In the post-December 2024 context, civil society work needs to be understood more explicitly as support to accountability, public participation, advocacy, research, media, watchdog functions, social cohesion, and democratic public life. Respondents stressed that authorities and aid institutions often know how to deal with organizations delivering food baskets, schools, or basic services, but are less clear on how to engage actors working on democracy, governance, media, or civic accountability.

Diaspora-linked Syrian organizations also remain important, but their role is changing. During the conflict, they often acted as bridges between donors, advocacy platforms, technical expertise, and networks inside Syria. They may continue to offer a valuable combination of foreign banking access, donor-facing compliance infrastructure, contextual knowledge, and Syrian social networks. These relationships can make them particularly useful intermediaries for smaller grassroots actors that cannot manage direct donor requirements. However, diaspora organizations are also being reassessed. Their continued relevance depends on whether they retain meaningful presence, legitimacy, networks, and accountability inside Syria, rather than relying only on their earlier role as representatives of Syrian civil society in exile.

Syrian NGOs therefore sit at the center of the localization question. They have comparative advantages in contextual understanding, community trust, access, adaptive programming, technical continuity, and local legitimacy. Some also have the systems and experience needed to manage large grants or to regrant to smaller organizations. Others may not yet meet donor thresholds for direct funding but could do so with appropriate investment, quality funding, and risk-sharing

arrangements. The key challenge is to avoid treating Syrian NGOs only as implementers. A more locally led intermediary system would recognize them as strategic actors capable of shaping priorities, managing resources, supporting smaller organizations, transferring technical capacity where appropriate, and holding international and public actors accountable to local realities.

3.4 Pooled funds

Pooled funds are a fourth important intermediary type in Syria because they shape who can access funding, under what conditions, and with how much decision-making authority. They are not simply financial mechanisms; they influence eligibility, allocation priorities, risk thresholds, partnership models, and the balance of power between international and Syrian actors. To their grantees, pooled funds act more like a donor than many other intermediary types.

Before December 2024, Syria's pooled-fund landscape reflected the political geography of the response. UN OCHA's Syria Humanitarian Fund (SHF) was associated mainly with the Damascus-based response and the official country architecture operating in government-controlled areas. The Syria Cross-border Humanitarian Fund (SCHF), by contrast, was linked to the cross-border response from Türkiye into areas outside the control of the former Syrian government. This distinction mattered for localization: the cross-border architecture created more space for Syrian NGOs in northern Syria to access funding, participate in coordination, and act as operational intermediaries. In 2025, UN OCHA closed the SCHF and began the consolidation of the SCHF into the SHF. The combined SHF positioning in Damascus gives it potential advantages in government-facing access, national coordination, standard-setting, and scale, as well as in combining networks and sets of relationships from SCHF and legacy SHF. However, several Syrian respondents noted that formal and geographic access have not yet clearly translated into locally led access, in terms of local actors' ability to hold decision making roles and receive direct funding.

The Aid Fund for Syria (AFS) illustrates another model. It is hosted by an international advisory firm and was originally established as the Aid Fund for Northern Syria with a mandate to elevate Syrian decision making and access to resources. In 2025, AFS also expanded to take on a nationwide mandate, while preserving its model that prioritizes Syrian organizations, flexible programming, and locally led delivery.

4. Comparative Advantages of Intermediary Types

The analysis is organized around five core intermediary functions: decentralizing decision-making and funding; financial and management efficiency; programmatic approach and reach; contextual understanding, access and adaptation; and shared risk management. It also considers other emerging functions raised by respondents, including civil society strengthening, diaspora bridging, technical accompaniment, public-sector transition, social cohesion, advocacy, and support to grassroots initiatives.

A central distinction runs through this section: current capacity is not necessarily the same as where appropriate leadership should lie. International actors may have stronger donor-facing systems, banking channels, compliance infrastructure, or large-contract management capacity, but these functions should not automatically remain under international control. Syrian actors may have clearer advantages in contextual understanding, legitimacy, technical continuity, cost efficiency, and adaptation, provided they receive the funding, risk-sharing, and institutional support needed to exercise them.

The key question is therefore not which intermediary type is best in general. It is which functions should be led by Syrian actors now, which functions should be shared, which functions require temporary international support, and which functions should eventually be transferred closer to local and national organizations.

4.1. Decentralizing Decision-Making & Funding

The localization debate in Syria—as in other contexts—revolves around devolving both resources and decision making power to local levels; it is not just a question of transferring funds to local actors but also includes enabling Syrian organizations to shape priorities, select partners, adapt programming, support smaller initiatives, and manage the practical obstacles that determine whether local actors can participate meaningfully in the response.

Across interviews, Syrian NGOs and localization-oriented pooled funds were viewed as having a strong comparative advantage in this area. Several Syrian organizations described experience working through smaller NGOs, grassroots initiatives, community groups, technical partners, and social networks. Their value lies not only in their ability to regrant, but in their ability to make funding accessible to actors that would otherwise be excluded by donor requirements—including helping smaller organizations prepare proposals, meet basic compliance standards, navigate registration or approval procedures, manage procurement, respond to audit questions, and translate donor expectations into workable local practice.

Engaging smaller Syrian organizations is an important role because many small civic and community actors do not have the systems, bank access, registration status, staffing, or audit history needed to receive donor funding directly. Syrian intermediaries can create a bridge to these smaller groups, carrying heavier compliance functions, providing administrative and financial backstopping, and helping grassroots actors remain focused on their community or civic role rather than forcing them to become fully professionalized NGOs—all with (often) lower overhead costs and more contextual and social understanding at all staff and leadership levels than their INGO counterparts.

Respondents also emphasized the informal and relational dimensions of Syrian intermediation. Local and diaspora-rooted Syrian organizations can use their networks to resolve disputes, facilitate registration or access, advise smaller actors, identify trusted partners, and manage tensions with authorities, communities, vendors, or other NGOs. This form of “social backstopping” is difficult to capture in formal capacity assessments, but it is central to whether decentralized funding works in practice. In a fluid operating environment, the ability to pick up the phone, understand local sensitivities, and resolve problems through trusted relationships can be as important as formal grant-management systems.

Localization-oriented pooled funds can also support decentralized funding where their allocation models are designed to enable Syrian grant-holding and onward support to smaller actors. The Aid Fund for Syria was identified by several respondents as a comparatively positive model because it was seen as flexible, context-aware, and more willing to work through Syrian organizations and support institutional development. This kind of pooled fund can help donors manage risk while avoiding a model in which all meaningful decision-making remains with UN agencies or INGOs.

However, Syrian intermediaries are not inherently more predisposed to decentralization. Large Syrian NGOs can also reproduce hierarchical relationships if they centralize resources, select smaller partners without transparency, or treat grassroots actors as implementers rather than agenda-setters. The comparative advantage of Syrian intermediaries therefore depends to a degree on individual effects. Locally led intermediation—by any partner—also requires that donors set clear expectations around transparent partner selection, allow for proportionate compliance, and set expectations around the participation of smaller actors in program design and accountability to local communities and sub-partners.

UN agencies and INGOs can still play useful roles in decentralizing decision-making and funding, but mainly as enablers rather than controllers. Donor evidence suggests that international intermediaries may remain necessary where donors face banking, contracting, due diligence, or fiduciary constraints that prevent direct funding to Syrian organizations. In these cases, the quality of intermediation depends on whether international actors pass on the flexibility, duration, and predictability they receive from donors. For example, longer-term, flexible donor awards lose much of their localization value if they become short, rigid subcontracts for Syrian partners.

Taken together, the evidence points to a clear but conditional advantage for Syrian NGOs and localization-oriented pooled funds. They are often best placed to devolve funding and decision-making more locally but only when their role is deliberately designed to pass on authority as well as resources. International actors still have a role where they provide back-office support, absorb donor-facing risk, or help Syrian actors move toward more direct funding. They weaken decentralization when they keep control over priorities, partner selection, budget decisions, and compliance rules while presenting Syrian organizations mainly as implementers.

Box: Is funding smaller NGOs always more localized?

One interviewee highlighted a recurring tension in the localization debate: some international actors argue that funding “local NGOs” should mean prioritizing smaller grassroots organizations rather than larger Syrian NGOs. This argument raises an important concern. Localization should not result in a small number of large national NGOs capturing funding that was intended to reach community-based organizations, women-led groups, youth initiatives, volunteer networks, and smaller civic actors.

However, equating “smaller” with “more localized” can also be misleading. Many smaller organizations and grassroots initiatives do not have the registration status, bank access, audit history, safeguarding policies, procurement systems, or staff capacity required to manage donor funding directly. Funding them without proportionate support may expose them to compliance, reputational, security, or financial risks they are not equipped to absorb.

There is also a strategic limitation. Grassroots actors often have deep knowledge of their own communities, but they may not be positioned to participate meaningfully in regional, national, or sector-wide agenda-setting beyond the issues directly affecting their area. If localization is defined only as funding the smallest actors, program strategy and design may still be controlled by the international intermediary that holds the grant. In such cases, the model may bypass larger Syrian organizations that have a broader national or sectoral view, while leaving INGOs or UN agencies to define the overall approach.

The more useful distinction is not between large and small Syrian organizations, but between extractive and enabling intermediation. Large Syrian NGOs can play a locally led intermediary role when they regrant transparently, provide light-touch compliance support, help smaller actors navigate registration and approvals, use their networks to resolve problems, and allow grassroots actors to shape priorities. They become problematic when they centralize resources, compete with smaller actors, or reproduce controlling subcontracting relationships.

A more locally led model should therefore avoid a false choice between large Syrian NGOs and smaller grassroots actors. Donors should fund capable Syrian intermediaries where they can manage resources and risk, while requiring them to pass on flexible funding, decision-making space, and practical support to smaller organizations and community initiatives.

4.2. Financial & Management Efficiency

Financial and management efficiency was one of the more contested areas of comparative advantage. Respondents did not describe a simple trade-off in which international actors are more efficient because they have larger systems or Syrian actors are more efficient because they are closer to delivery and may have lower costs. The picture is more practical than that.

Several Syrian respondents argued that capable Syrian NGOs are more cost-efficient than INGOs. One technical Syrian NGO estimated that its salary, office, and operational overheads were substantially lower than those of INGOs, and that a higher share of funding could therefore reach implementation inside Syria.¹ The respondent also noted that locally incurred office costs, taxes, and salaries circulate more fully inside the Syrian economy, rather than being absorbed through international headquarters, expatriate staffing, or regional management costs.

This cost-efficiency argument should be treated carefully. It does not mean that Syrian NGOs are automatically cheaper or better in all cases. Some international costs reflect real functions: fiduciary systems, safeguarding, audit readiness, insurance, duty of care, technical surge capacity, and donor-facing risk absorption. These functions can be valuable, especially in a high-risk environment. However, respondents argued that these costs become harder to justify when international actors retain large overheads while Syrian partners perform most of the delivery, carry the community-facing risk, and receive short or rigid downstream contracts. A counter argument to this point is that higher overheads enable INGOs to have the capacities that donors often perceive local NGOs to lack, contributing to the higher risk perceptions of the latter.

Diaspora-rooted Syrian organizations occupy a distinctive position in this area. Several respondents identified them as potentially strong financial intermediaries because they combine Syrian contextual knowledge with financial structures outside Syria. Diaspora organizations may have European or North American bank accounts, donor-facing compliance systems, access to philanthropic networks, and the ability to raise emergency or supplementary funds from Syrian and non-Syrian supporters abroad. This can help cover gaps created by delayed donor disbursements, short funding cycles, or sudden operational needs. In this sense, diaspora intermediaries can provide not only a channel for donor funding, but also a bridge to private philanthropy and emergency fundraising that Syria-based organizations may not be able to access directly. This role should not be assumed automatically. Diaspora organizations are not all alike, however, and are strongest where they maintain present-day legitimacy, active relationships, accountability, and operational relevance inside Syria.

¹ The Share Trust's analysis of the program budgets of four UN OCHA pooled funds reaches a similar conclusion finding local partners are 10-19 percent lower cost than international partners. (The Share Trust. (2026). [Passing the Buck: The Economics of Localizing Aid: Analysis of Four UN OCHA Pooled Funds.](#))

The importance of financial structures outside Syria was emphasized by both donor and civil society respondents. A donor respondent noted that direct funding to Syria-based organizations remains difficult because donors may not have a realistic modality for transferring funds into Syria, while organizations with European or North American bank accounts make it possible to move money through recognized financial channels. A civil society respondent similarly noted that despite donor interest in funding actors inside Syria directly after December 2024, the practical realities of banking, registration, and transfer capacity quickly complicated this approach. In practice, organizations that can operate from Syria while maintaining foreign banking infrastructure may have a comparative advantage over both purely local actors and international intermediaries with weaker contextual reach.

Challenges with financial access cannot be reduced only to sanctions themselves. Sanctions relief has changed the formal operating environment, but it has not automatically restored banking confidence, correspondent banking relationships, or risk appetite among commercial banks. Respondents described continued banking caution even after changes to US, UK, and EU sanctions frameworks. One interviewee gave an example that involved their UK bank warning them after they made a transfer from the NGO's British bank account to the NGO's Syrian bank account in Damascus, despite the transfer taking place after major sanctions changes. This suggests that de-risking, internal bank compliance rules, reputational caution, and uncertainty about Syrian financial institutions remain major constraints. The practical barrier is therefore not only whether a transaction is legally permitted, but whether banks, donors, and intermediaries are willing to process it.

The Syrian government also has a central role in financial and management efficiency. Respondents highlighted registration, approvals, ministry coordination, and unclear regulatory procedures as major constraints on NGO operations. If Syrian organizations are expected to receive funding directly, regrant to smaller actors, and operate transparently, they need a clearer enabling environment. This includes predictable registration procedures, recognized legal status for NGOs and civil society organizations, transparent rules for foreign funding, practical banking arrangements, protection from arbitrary interference, and clear guidance on what types of civic, humanitarian, recovery, and development activities are permitted. Without this, even capable Syrian organizations will continue to depend on external financial structures or international agreement-holders.

Financial and management efficiency should therefore be understood as a system-level issue, not only an organizational capacity issue. Syrian NGOs may be highly cost-efficient and technically capable, but still unable to receive funds directly because of banking, registration, donor risk appetite, or unclear government procedures. INGOs and UN agencies may be less cost-efficient in delivery terms, but more efficient for donors because they reduce contracting burden, absorb fiduciary risk, and provide recognized financial channels. Diaspora organizations and localization-

oriented pooled funds may offer a middle path where they combine external financial infrastructure with Syrian contextual knowledge and local partner networks.

For that reason, financial efficiency in Syria should not be reduced to a comparison of overhead rates. The more important question is whether funding can move safely, legally, quickly, and proportionately to the actors best placed to use it. A more locally led financial model would combine the cost and contextual advantages of Syrian implementation with reliable banking channels, proportionate compliance, donor risk-sharing, and Syrian government regulations that enable rather than obstruct NGO and civil society operations.

4.3. Programmatic Approach & Reach

Programmatic approach and reach are areas where comparative advantage depends heavily on the type of program being delivered. Respondents did not suggest that one intermediary type is best suited to all forms of programming. Instead, they pointed to a more differentiated picture: Syrian NGOs and Syrian-led intermediaries often have the strongest reach into communities and local systems; INGOs may add value where specialized technical expertise, partner accompaniment, or multi-sector coordination is needed; UN agencies may be appropriate for large-scale programs requiring government counterpart engagement; and pooled funds can support flexible, area-based programming if their allocation models allow Syrian actors to shape priorities.

Syrian NGOs were viewed as having strong comparative advantages in programmatic reach because of their continuity of presence, local relationships, sectoral experience, and ability to adapt to shifting conditions. Several Syrian organizations developed substantial technical and operational capacity during the conflict, not only as service providers but also as system-builders. One technical Syrian NGO described operating early warning and health surveillance systems, maintaining databases for water stations, supporting WASH and community engagement, coordinating with NGOs managing infrastructure, and building systems that are now being connected to wider national structures. This experience shows that Syrian NGOs can contribute not only to project delivery, but also to sector coordination, public systems strengthening, and technical continuity.

Syrian organizations also have a comparative advantage where programming depends on community trust and granular contextual knowledge. This angle is particularly important for neighborhood engagement, social accountability, local conflict sensitivity, protection, women's participation, youth initiatives, and work with small community-based actors. In these areas, reach is not only about being physically present. It is about knowing who can convene people, which local actors are trusted, how authorities or informal powerholders may react, and how to adapt activities when formal approvals, community sensitivities, or local tensions change.

INGOs retain important programmatic advantages where they bring specialized technical mandates, sector expertise, structured capacity strengthening, and experience managing complex programs across geographies. An interview with an INGO, for example, points to INGO added value in specialized areas such as demining, mine risk education, livelihoods, protection, economic support, and work in post-Islamic State areas. It also shows that some INGOs have historically delivered a high proportion of programming through local partners while supporting technical capacity, institutional development, and grant management. This suggests that INGOs can contribute to locally led action where they use their technical strengths to support and accompany Syrian actors rather than replace them.

Donor evidence also suggests that partner choice should be driven by program purpose. For broad basic services programs, donors may use consortia because no single actor is likely to have all the required technical capabilities across WASH, agriculture, housing, land and property, livelihoods, protection, or infrastructure. In this sense, consortia can improve programmatic reach by bringing together specialized organizations. However, consortia should not be assumed to be flat or locally led. They often create a hierarchy in which one lead agency holds the contract and compliance responsibility, while other members and local partners operate downstream. Their value therefore depends on whether they genuinely distribute roles according to expertise or simply create a longer delivery chain.

UN agencies have comparative advantages in programs that require national level coordination, government counterpart engagement, sector standards, large procurement, or formal system alignment. This may be particularly relevant for vaccines, national health systems, public infrastructure, large-scale service restoration, and policy-facing technical support. However, respondents and donor evidence suggest that UN agencies are less suited to programs that require flexible small grants, civic mobilization, community-led design, or civil society strengthening. In those areas, UN systems may be too heavy, too government-facing, or too far from grassroots actors. Both Syrian NGOs and INGOs are better suited to implement on the field level than UN agencies, as nearly all respondents confirmed.

Civil society programming requires a particularly different understanding of reach. Before December 2024, many civic activities were funded under safer sectoral categories such as education, livelihoods, women's empowerment, protection, media, social cohesion, or community engagement. In the current period, respondents argued that civil society should be supported more explicitly as civil society: research, watchdog work, advocacy, democracy, accountability, social cohesion, media, and local public participation. These programs often need small grants, incubation, coaching, flexible timelines, and protection from excessive professionalization. Their reach is measured less by numbers served and more by whether they enable local voice, trust, civic initiative, and accountability.

Diaspora-rooted Syrian organizations may also have programmatic advantages where they combine external funding infrastructure with Syrian networks and technical expertise. They can support smaller initiatives, provide proposal and program design support, help interpret donor expectations, and use diaspora or social networks to resolve practical problems. Their advantage is strongest where they remain meaningfully connected to actors inside Syria and where they provide enabling support rather than representing communities from a distance.

Pooled funds can support programmatic reach when they allow area-based, flexible, and locally informed allocation. Their added value is strongest when they fund Syrian actors directly or through Syrian-led consortia, allow adaptation to local priorities, and support smaller organizations without imposing disproportionate compliance requirements. They are weaker as localization tools when eligibility, pre-selection, or risk thresholds concentrate funding among UN agencies and a small group of INGOs.

Programmatic reach therefore needs to be assessed by purpose, not by organizational label. Syrian NGOs are often strongest in community reach, adaptive delivery, social accountability, and technical continuity. INGOs add the most value when they bring specialized expertise and accompaniment without taking over leadership. UN agencies are strongest where scale, standards, and government engagement are required. Pooled funds are strongest when they enable flexible, Syrian-led programming. A locally led approach should combine these strengths without allowing technical capacity or scale to become a justification for displacing Syrian leadership.

4.4. Contextual Understanding, Access & Adaptation

Contextual understanding, access, and adaptation emerged as one of the clearest comparative advantages of Syrian actors and Syrian-led intermediary models. In the Syria response, this function goes beyond general knowledge of the country. It includes understanding local power relations, community perceptions, authority structures, security risks, gendered access barriers, social tensions, conflict dynamics, informal gatekeepers, and the practical procedures that determine whether programming can actually take place.

Syrian NGOs, civil society actors, and diaspora-rooted Syrian organizations were viewed as particularly strong in this area because they combine language, social networks, historical knowledge, and practical experience of operating across different areas of control. Their comparative advantage is not only that they know the context, but that they can act on that knowledge quickly. They can identify trusted local partners, anticipate sensitivities, adjust program modalities, advise smaller organizations, resolve local disputes, and navigate formal and informal approval systems. In a fluid transition environment, this ability to interpret and respond to local change is central to program quality and risk management.

Localization-oriented pooled funds can strengthen this advantage when their governance and allocation systems include Syrian actors in meaningful decision-making roles. Respondents identified the Aid Fund for Syria as a relatively positive example because its steering and decision-making structures include Syrian and local NGO representation, allowing allocations and program adjustments to be informed by actors with direct contextual knowledge. This type of structure can make funding more adaptive: local representatives are better placed to identify emerging risks, adjust priorities, interpret partner constraints, and respond to changes in access or community needs. The comparative advantage therefore lies not only in the fund's flexibility, but in the fact that flexibility is linked to local knowledge.

By contrast, UN systems were frequently described as more rigid. UN agencies, specifically SHF, North Syria's cross boarder mechanism, and clusters' committees, had important advantages in coordination, standards, government engagement, and large-scale systems, but their procedures can be slow, formalized, and difficult to adapt to local variation. Heavy compliance processes, lengthy approvals, standardized reporting, and government-facing operating models can make it difficult to respond quickly to community-level change. This does not mean UN agencies lack contextual knowledge, but their institutional procedures may limit how quickly that knowledge can influence decisions.

INGOs occupy a more mixed position. Many INGOs depend heavily on Syrian staff, Syrian consultants, and Syrian partner organizations for contextual understanding. This can give them access to strong local knowledge. However, respondents suggested that this knowledge does not always translate into institutional flexibility. Local staff may understand the context well, but decision-making may still sit with regional or headquarters teams, donor compliance departments, or expatriate management structures. In these cases, Syrian contextual knowledge is drawn into international systems without necessarily shifting authority to those who hold that knowledge.

Diaspora-rooted Syrian organizations can also provide flexible contextual adaptation, especially when they combine foreign financial infrastructure with active networks inside Syria. Their ability to raise emergency funds or mobilize diaspora philanthropy may allow them to respond to gaps, delays, or sudden needs more quickly than organizations dependent only on formal donor disbursements. However, this advantage depends on whether diaspora organizations maintain current, accountable, and operationally meaningful relationships inside Syria. Diaspora identity alone is not a substitute for present-day legitimacy and contextual embeddedness.

Registration and approval procedures are also part of contextual access. Syrian organizations may have a comparative advantage because they understand evolving procedures and can use professional networks to resolve practical obstacles. However, these relationships can also raise donor concerns around independence and affiliation. This issue requires more careful treatment than a simple comparison of intermediary types, particularly because the same relationships that enable access may also be perceived as a source of influence or reputational risk. However, the risks

linked to proximity can be managed through transparent, conflict-sensitive tools that assess independence, program integrity, and accountability. They should not be used as a reason to exclude Syrian organizations from decisions where their contextual judgement is essential.

Box: Access relationships or affiliation risk?

Registration, approvals, and government relationships are increasingly important to intermediary effectiveness in Syria. Syrian NGOs often have practical advantages in navigating these systems because they understand the procedures, know relevant officials, and may have former staff now working inside ministries or public institutions.

These relationships can help resolve administrative obstacles, clarify requirements, secure permissions, and avoid delays. However, proximity to authorities can also raise donor concerns. Relationships that enable access may be interpreted as risks of affiliation, influence, or reduced independence.

This is a sensitive concern in Syria, where aid diversion, political capture, and reputational risk remain central to donor decision-making. There is also a tension in how this risk is often framed. International donors and aid actors may support engagement with the new Syrian government as necessary for recovery, service restoration, and national systems strengthening, while treating Syrian NGOs' own relationships with ministries as a potential risk. If engagement with public authorities is necessary for international actors, it should not automatically be considered problematic when Syrian organizations use similar relationships to facilitate programming.

The more useful question is not whether an NGO has relationships with public authorities, but whether those relationships shape program decisions in inappropriate ways. Donors and intermediaries should assess whether partner selection, beneficiary criteria, geographic priorities, staffing, procurement, messaging, and program design are independently defined or closely aligned with government preferences. This would help distinguish between legitimate access relationships and problematic political influence.

4.5. Shared Risk Management

Shared risk management is central to the question of whether Syria's intermediary system has produced meaningful localization or only functional dependence on local actors. Respondents repeatedly distinguished between risk sharing and risk transfer. In their view, much of the pre-December 2024 partnership model was described in localization language but functioned in practice as a risk-mitigation arrangement for international actors.

Risk sharing should not be understood only as a response to physical insecurity or restricted humanitarian access. In a localization context, risk sharing is a principle of equitable partnership. It recognizes that local and national actors do not only carry security risks; they also carry operational, regulatory, reputational, financial, community-facing, staff-related, and institutional risks created by the delivery chain itself. Genuine risk sharing requires donors, UN agencies, INGOs, pooled funds,

and Syrian partners to identify and manage risks jointly, while ensuring that resources, flexibility, authority, and accountability move together.

Risk transfer, by contrast, occurs when international actors push responsibility downward while retaining control and decision making. In this model, Syrian partners are expected to manage security risks, access negotiations, community pressure, local authority relationships, procurement constraints, staff safety, beneficiary complaints, reputational exposure, and program continuity, while international actors retain the donor contract, institutional visibility, and final decision-making power. It also matters where decision making sits. Controlling decisions about which risks will be undertaken in a top down vs. co-created (on an ongoing basis) way itself introduces risk.

This distinction helps explain why some Syrian NGOs experienced the post-December 2024 transition as a form of exclusion rather than normal restructuring. As access conditions changed and international actors became more able to operate directly inside Syria, some Syrian organizations felt that their role was quickly reduced. For them, this reinforced the view that the previous partnership model had valued them mainly because they mitigated risks that international actors could not or would not carry. Once some access and security barriers appeared less acute, the international system no longer treated those same organizations as equally necessary strategic partners.

This does not mean that risk has disappeared. Rather, the risk landscape has changed. Syria still presents complex fiduciary, political, reputational, banking, regulatory, security, social, and conflict-sensitivity risks. NGOs continue to navigate unclear registration procedures, shifting authority structures, donor compliance requirements, community perceptions, aid diversion concerns, banking restrictions, procurement obstacles, and potential interference by public or informal powerholders. Syrian organizations may be better placed to understand and manage many of these risks locally, but they should not be expected to absorb them alone.

Comparative advantage in risk management is therefore divided by function. Syrian NGOs and Syrian-led intermediaries are often strongest on contextual, operational, community-facing, and access risks because they understand local sensitivities, trusted actors, approval pathways, and adaptation needs. Diaspora-rooted Syrian organizations can add value where they combine this contextual knowledge with external banking channels, donor-facing systems, and emergency fundraising capacity.

INGOs and UN agencies have comparative advantages in donor-facing risk management. They can hold contracts, manage audits, maintain safeguarding systems, provide duty-of-care structures, operate recognized bank accounts, and reassure donors that fiduciary and reputational risks are being addressed. These functions can be valuable, especially where donors cannot contract directly with Syrian organizations. However, they become problematic when they are used to justify international control while Syrian actors carry the operational and community-facing consequences.

Pooled funds and specialized intermediary mechanisms can provide a more balanced model where they are designed to pool donor risk rather than transfer it. Such a model requires proportionate compliance, flexible milestones, realistic timelines, partner-system assessments, accompaniment, contingency funding, and adaptation when conditions change.

Sustainable localization requires more than reliance on local actors during periods of restricted access. It requires long-term investment in Syrian systems, direct or progressively direct funding pathways, fair overhead, shared duty of care, joint risk registers, flexible contracts, transparent decision-making, and transition plans that reduce unnecessary international intermediation over time.

In this sense, risk sharing should evolve as the context evolves. When physical access risk decreases, donors and international intermediaries should not recentralize control. They should use the lower-risk environment to deepen localization through more direct funding, longer agreements, shared governance, fairer risk allocation, and clearer transition pathways for Syrian organizations. A more locally led intermediary model would recognize Syrian organizations not only as risk absorbers, but as risk analysts, program designers, resource managers, and strategic actors.

This distinction between risk sharing and risk transfer is especially important for assessing whether past partnership models produced sustainable localization. The following test helps distinguish between partnerships that genuinely shared risk and those that primarily used local actors to mitigate risk for the international system.

Box: Risk sharing or risk transfer? A localisation test

In a locally led partnership, risk sharing means that risk, resources, authority, and accountability move together. Local and national actors are not only asked to manage difficult operating conditions; they are also given the funding, flexibility, decision-making power, overhead, and institutional support needed to manage those risks.

Risk transfer occurs when local actors carry operational, security, regulatory, community-facing, reputational, or staff-related risks while international actors retain control over funding, program design, partner selection, visibility, and final decision-making.

A practical test is whether the partnership still strengthens local leadership when the risk environment changes. If local actors are needed only when access is constrained but are sidelined once international actors can operate more directly, the model was closer to risk mitigation than sustainable localization.

If improved access leads to more direct funding, longer agreements, shared governance, and greater local decision-making power, then risk sharing has supported localization.

4.6. Capacity Building and Technical Support

Capacity building and technical support are core intermediary functions in Syria, but respondents distinguished between support that enables local leadership and support that reinforces dependency. Most Syrian actors interviewed did not reject capacity strengthening as a concept. Rather, they questioned how it is designed, who defines the capacity gaps, and whether it leads to greater local autonomy or simply makes Syrian organizations more compliant with international systems.

International actors, particularly INGOs and UN agencies, often have comparative advantages in formal technical support. They may provide sector standards, safeguarding frameworks, financial management tools, MEAL systems, proposal development support, procurement guidance, donor compliance training, and specialized technical expertise. These functions can be valuable, especially for organizations seeking to manage larger grants, diversify donors, strengthen internal systems, or expand into technically complex sectors.

However, respondents cautioned that capacity building can easily become a form of control. When capacity support focuses mainly on audits, reporting templates, financial procedures, risk registers, and donor compliance, it may strengthen the international intermediary's ability to manage risk without necessarily strengthening the Syrian partner's strategic autonomy. In these cases, capacity building prepares local actors to fit into existing subcontracting models rather than enabling them to access funding directly, shape programs, or negotiate more equal partnerships.

A more enabling model of capacity strengthening would be demand-led, practical, and linked to transition pathways. It would help Syrian organizations build the systems they need to receive funding more directly, manage partnerships, support smaller actors, and influence program design. Support for governance, financial management, safeguarding, human resources, donor diversification, proposal development, MEAL, strategic planning, advocacy, gender-sensitive programming, and conflict-sensitive programming were raised as important. Helping organizations understand and navigate registration, banking, procurement, and donor due diligence requirements were also raised.

Some respondents pointed to more practical forms of institutional investment, including support to build internal systems such as enterprise resource planning tools. These examples are important because they go beyond training workshops or donor templates. They strengthen the organizational infrastructure that allows Syrian NGOs to manage larger grants, improve audit readiness, track procurement and finance, and reduce dependence on external grant-management structures.

Syrian NGOs and Syrian-led intermediaries also have important comparative advantages as capacity builders. They can provide accompaniment that is more context-specific, linguistically accessible, and grounded in the realities of operating inside Syria. Larger Syrian NGOs may be particularly well

placed to support smaller organizations and grassroots initiatives because they understand both donor expectations and local constraints. Their support can include proposal coaching, compliance mentoring, help with registration and approvals, financial backstopping, technical advice, partner-system development, and practical problem-solving during implementation. The comparative advantage of Syrian NGOs lies not only in their contextual knowledge, but in their permanence: when they support grassroots actors, they strengthen local networks that can continue beyond project cycles, whereas INGO support often expands or contracts with donor funding and operational priorities.

Civil society support requires a different capacity-building approach from humanitarian service delivery. Smaller civic actors, media initiatives, women-led groups, youth networks, community committees, and social initiatives may not need to become fully professionalized NGOs. For these actors, the most useful support may be incubation, coaching, small-grant management, basic financial procedures, safe activity design, advocacy skills, research methods, communications, and protection from excessive administrative burden. Capacity strengthening should therefore avoid turning every local initiative into a formal NGO simply because that is easier for donor systems to fund.

Diaspora-rooted Syrian organizations can also play a useful capacity-support role where they combine donor-facing experience with Syrian networks and language. They may help smaller organizations understand international expectations, develop proposals, access philanthropic support, or manage reporting requirements. Their value is strongest when they act as bridges and mentors rather than gatekeepers.

UN agencies may be particularly useful for technical standards, national systems support, coordination, and government-facing capacity development. This can be relevant in sectors such as health, WASH, education, agriculture, protection, data systems, and service restoration. However, UN-led capacity support is less suited to flexible civil society strengthening where actors need political independence, small-scale experimentation, and locally defined agendas.

Capacity building should therefore not be treated as a routine add-on to partnership. Its value depends on whether it reduces dependency over time. Effective support should help Syrian actors move from implementation roles toward greater funding access, decision-making authority, institutional resilience, and the ability to support others. In a locally led intermediary model, the aim is not to make Syrian organizations better subcontractors. It is to invest in the systems, confidence, and organizational resilience that make unnecessary intermediation less necessary over time.

Capacity building as institutional investment — AFS support for partner systems

One example raised in the interview data was AFS support to help a Syrian partner build an enterprise resource planning (ERP) system. This type of support goes beyond conventional training or compliance coaching. By investing in a partner's financial, procurement, human

resources, reporting, and internal control systems, the intermediary strengthened the organization's ability to manage larger grants, meet donor requirements, improve audit readiness, and reduce dependence on external grant-management structures.

The example illustrates what enabling capacity building can look like in practice. Rather than training a partner only to complete donor templates, the support invested in institutional infrastructure that remained with the Syrian organization. This is the kind of capacity strengthening that supports localization: practical investment in systems, confidence, and organizational resilience that can help make unnecessary intermediation less necessary over time.

4.7 Civil Society, Civic Space and Grassroots Intermediation

Civil society support should be treated as a distinct intermediary function, not as an extension of humanitarian service delivery. During the conflict, civic work was often funded through “safer” sectoral labels, which kept some activities alive but blurred the strategic purpose of supporting civic space, accountability, advocacy, and public participation. In the post-December 2024 context, this distinction matters more: civil society work is often smaller, more politically sensitive, harder to measure, and more dependent on trust, legitimacy, and local relationships than conventional service delivery.

Civil society intermediation therefore requires different funding and partnership models. Many grassroots initiatives, civic groups, women-led networks, youth initiatives, media actors, volunteer groups, and community committees do not have the registration status, bank accounts, audit history, or administrative systems required to receive donor funding directly. At the same time, forcing them to professionalize into formal NGOs can undermine the very qualities that make them valuable: proximity, informality, trust, responsiveness, and community ownership. A locally led intermediary model should therefore support civic actors without requiring every local initiative to become a full NGO.

Syrian NGOs, Syrian-led civil society organizations, and diaspora-rooted intermediaries may have comparative advantages in this area. They can provide small grants, incubation, mentoring, proposal support, basic financial management, safe activity design, advocacy coaching, research support, communications assistance, and protection from excessive donor compliance. They can also help smaller civic actors navigate registration, approvals, community sensitivities, and local tensions. This type of support is not only administrative; it is relational and protective. It allows smaller actors to operate without being exposed directly to donor systems they are not equipped to manage.

Civil society support also requires a different understanding of risk. The risks faced by civic actors are not only fiduciary or operational. They may include political pressure, reputational attacks,

community backlash, surveillance, restrictions on public events, gendered barriers to participation, and uncertainty over what authorities will permit. These risks are particularly acute for actors working on accountability, governance, media, social cohesion, women's rights, minority inclusion, documentation, or advocacy. Intermediaries supporting civil society therefore need political judgement, discretion, and the ability to adapt quickly.

UN agencies are generally less well suited to this function, except where they provide broad coordination, protection frameworks, or support to enabling environments. Their government-facing role, formal procedures, and large-scale programming logic make them less appropriate for flexible civic initiatives or politically sensitive civil society strengthening. INGOs may add value where they bring specialized technical expertise, an ability to bridge funding to informal organizations, protection approaches, accompaniment, or international advocacy, but only if they act as enabling partners rather than agenda-setters. Donor evidence also suggests that civil society strengthening should not be reduced to a money-forwarding function. Intermediaries in this space need values, political understanding, trust, and a clear commitment to strengthening local civic actors over time.

Pooled funds and specialized small-grant mechanisms could play an important role if they are designed with proportionate compliance, flexible timelines, and local decision-making. However, support to civil society may not be a natural fit with many pooled funds' strictly or highly humanitarian lens. Civil society grants may need to be smaller, longer-term, and more adaptive than standard humanitarian grants. They may also require different indicators, focused on participation, trust, networks, advocacy capacity, community problem-solving, and accountability rather than only numbers of people reached.

This section also highlights a wider transition challenge. Some respondents argued that Syrian civil society expanded during the conflict partly because many forms of public, political, professional, and community action had no other institutional space. In the coming period, some capacities may move into public institutions, local administration, the private sector, media, research, or professional associations. This should not be seen only as a loss. However, it also makes it more important to protect independent civic space and to support the types of civil society work that remain essential outside government: watchdog functions, advocacy, social cohesion, public participation, accountability, and community representation.

5. Barriers to Locally Led Intermediary Action

The comparative advantages described above do not, by themselves, produce locally led intermediary action. Syrian organizations may have the access, technical knowledge, community relationships, and operational experience needed to lead, but their ability to do so is shaped by the systems around them. Donor accountability requirements, financial infrastructure, regulatory uncertainty, coordination arrangements, partnership practices, and the political economy of the post-December 2024 response all influence whether Syrian actors can move from implementation to leadership.

The barriers below help explain the gap between Syrian capacity and comparative advantages and its more consistent translation into direct funding, recognized intermediary roles, or meaningful participation in decisions that shape the response.

5.1 Donor risk appetite and accountability systems

Donor risk appetite remains one of the most important constraints on locally led intermediary action. Many donors support localization in principle but still operate within accountability systems that make direct funding to Syrian organizations difficult. As noted above, these systems may require anti-terror screening, background checks, anti-corruption controls, safeguarding checks, gender and policy-alignment requirements, audit trails, financial controls, and political reporting.

For donor staff, funding a Syrian organization directly can involve more time, documentation, justification, and perceived institutional—or even individual—risk than funding a UN agency, INGO, or established international intermediary. These dynamics create practical incentives to use familiar international channels, even when Syrian organizations may have stronger contextual reach or lower delivery costs. In this way, localization commitments can be limited by accountability systems that reward risk avoidance more than carefully managed risk sharing.

These donor concerns are not illegitimate. Syria remains a high-risk environment, and donors have legal and political obligations to prevent diversion, misuse, and capture by politically connected actors. The issue is how those risks are managed. When risk is managed mainly by avoiding direct local funding, Syrian organizations remain downstream. A more enabling approach would assess, share, and manage risk with Syrian actors rather than treating international intermediation as the default solution. A more balanced approach treats risk not only as threat, but also as opportunity to create conditions in which local actors can safely assume greater responsibility, authority, and leadership.

5.2 Banking, cash transfer, and financial infrastructure

Financial infrastructure is a second major barrier. Even where donors are willing to fund Syrian organizations, moving money into Syria can remain difficult, especially since changes in sanctions have not automatically restored banking confidence, correspondent banking relationships, or commercial banks' willingness to process Syria-linked transactions. Banks may continue to apply internal de-risking policies, avoid Syrian transactions, or treat transfers to Syrian accounts as reputational and compliance risks.

This context gives organizations with financial structures outside Syria an important intermediary advantage. Diaspora-rooted Syrian organizations, European-registered Syrian NGOs, and international intermediaries with recognized bank accounts may be able to move funds more easily than Syria-registered organizations. Yet this also creates dependency. Syrian actors inside the country may still need external financial structures to receive and manage donor funding. A locally led model therefore requires workable banking channels, clearer donor guidance, and financial-risk arrangements that do not permanently exclude Syria-based organizations.

5.3 Registration, approvals, and the Syrian regulatory environment

The Syrian regulatory environment is another major constraint. Organizations face uncertainty around registration, approvals, ministry coordination, geographic permissions, foreign funding rules, and the legal status of civil society activities. Respondents described procedures that are still evolving, sometimes unclear, and unevenly applied depending on sector, geography, and type of activity.

This uncertainty affects local and international actors in different ways. INGOs may find registration and approvals slow, costly, and administratively heavy. Syrian NGOs may have stronger contextual knowledge and networks for navigating these procedures, but they may also face unclear legal status, arbitrary interference, or pressure to align with official priorities. Smaller civic actors are often the most exposed because they may lack registration, legal advice, bank access, or the administrative systems needed to comply with new requirements.

The Syrian government therefore has a significant role in enabling locally led action. If NGOs and civil society organizations are expected to contribute to recovery, service delivery, accountability, social cohesion, and public participation, they need predictable rules, including clear registration procedures, transparent rules for receiving foreign funding, recognized legal status for civil society organizations, practical banking arrangements, and protection from arbitrary interference. Without these conditions, even capable Syrian organizations will remain dependent on international agreement-holders or external financial structures.

5.4 Recentralization of funding and coordination after December 2024

The post-December 2024 transition has created a real risk of recentralization. Several Syrian respondents expressed concerns that the previous partnership model depended on Syrian actors because international actors needed them, not necessarily because there was a durable commitment to Syrian leadership. When access was constrained, Syrian partners were indispensable. Once access became easier, some international actors began expanding their own field presence, recruiting staff, opening offices, and competing for funding. This has created concern that Syrian organizations may lose influence at the very moment when the response should be investing in their long-term leadership.

Recentralization is not only a geographic issue. It is also about who sits in coordination spaces, who influences allocation priorities, who has access to donors, and whose analysis shapes strategy. A more coherent countrywide response would be welcome, but if coherence comes at the expense of Syrian leadership, the transition may solve one problem while recreating another.

5.5 Partnership quality: subcontracting, short contracts, and risk transfer

Partnership quality remains a major barrier. Many Syrian organizations have years of experience implementing donor-funded programs through UN agencies and INGOs, but this has not always produced equal partnership. Respondents described arrangements in which Syrian NGOs carried implementation, access, community engagement, and operational risk, while international actors retained program design, budget authority, donor visibility, and final decision-making power.

This was seen as especially problematic when longer-term or flexible donor agreements were converted into short, rigid subcontracts for Syrian partners.

Capacity building can reinforce this pattern when it focuses mainly on audits, reporting, compliance, and control. Support that helps Syrian organizations strengthen systems, diversify donors, negotiate better partnerships, and access funding more directly can enable localization. Support that simply makes Syrian organizations easier to monitor as subcontractors does not.

5.6 Civil society and civic space constraints

Civil society faces a distinct set of barriers. Civic actors working on accountability, advocacy, research, media, watchdog functions, social cohesion, women's participation, youth engagement, and community problem-solving often do not fit standard humanitarian funding models. Their work

is more politically sensitive, harder to measure through output indicators, and often smaller in scale than service delivery.

During the conflict, some civil society work was funded under safer sectoral labels such as education, livelihoods, protection, women's empowerment, media, social cohesion, or community engagement. In the current transition, civil society needs more explicit support. That requires different risk tolerance, different indicators, smaller and more flexible grants, and intermediaries that understand civic space rather than only humanitarian delivery.

Civil society actors may also face uncertainty over registration, approvals, and the boundaries of permissible activity. Authorities and aid institutions may find it easier to engage organizations that deliver services than those working on governance, accountability, media, or democratic participation. This risks narrowing civil society support at precisely the moment when Syria needs independent civic voice, social accountability, and public participation.

5.7 Diaspora legitimacy and transition uncertainty

Diaspora-rooted Syrian organizations face a different but important barrier. During the conflict, many served as bridges between donors, advocacy spaces, technical expertise, and networks inside Syria. Some built strong operational, financial, and political roles. They often had foreign bank accounts, donor-facing systems, and the ability to mobilize diaspora philanthropy.

In the post-December 2024 context, however, their role is being reassessed. Donors and Syrian actors may ask whether diaspora organizations still have meaningful presence, legitimacy, networks, and accountability inside Syria. This reassessment is necessary, but it should not lead to a blanket dismissal of diaspora actors. Some may continue to provide valuable financial infrastructure, technical expertise, advocacy capacity, and support to smaller grassroots actors. Others may need to redefine their role, shift leadership inside Syria, or demonstrate clearer accountability to local constituencies.

The transition therefore creates uncertainty for diaspora organizations and for donors deciding how to work with them. Diaspora actors need to show that they are not only representatives of an earlier exile-based civil society moment, but relevant intermediaries in the current Syrian context. Donors should assess them on present-day connection, accountability, value added, and ability to enable Syrian leadership, rather than assuming either continued legitimacy or automatic irrelevance.

6. Enablers and Recommended Actions

The recommendations below set out how different actors can support a shift to greater influence of Syrian actors over priorities, program design, resource allocation, adaptation, risk management, coordination, and accountability.

The following actions are organized by responsibility. Some require leadership by specific actors, while others require shared action across the aid system.

6.1 Shared principle: make intermediation transitional and locally led

Responsible actors: donors, UN agencies, INGOs, pooled funds, Syrian intermediaries, Syrian authorities

Intermediation should be treated as a function-specific and transitional role, not a permanent parallel aid structure. Intermediaries will continue to be needed in Syria to manage funding, compliance, risk, financial channels, technical support, and support to smaller actors. The key question is whether these functions help Syrian actors gain authority over time, or whether they reproduce dependency on international systems.

Every major intermediary arrangement should identify its intended transition route. In some cases, this may mean direct or progressively direct funding to Syrian organizations. In others, it may involve coordination with, support to, or selective integration with public institution, market-based continuation, dedicated civil society support, or continued external accompaniment where there is a clear justification.

Some technical systems, service coordination functions, infrastructure support, market-based recovery activities, livelihoods programming, and sectoral functions may gradually be transferred to Syrian public institutions or private-sector actors where this is appropriate, transparent, and accountable. Capacities developed by Syrian NGOs in health information, WASH coordination, data systems, agriculture, and service delivery should be recognized as recovery assets, not only as project capacity.

Other functions should remain outside the state or market. Civil society, advocacy, watchdog work, media, social accountability, women's and youth participation, community representation, and conflict-sensitive civic engagement require independent space and sustained support. For these areas, the transition pathway should not be absorption into government structures or service-delivery contracts, but continued support for independent civic actors.

As noted throughout this report, locally led action should also be measured through power, not only funding flows. Relevant indicators include who designs programs, who controls budgets, who

selects partners, who makes risk decisions, who can adapt activities, who receives overhead, who sits in allocation bodies, and who benefits institutionally from the partnership.

Transition planning should distinguish between the future of a particular function and the future of the organization that developed it. Linking an NGO-managed system to public institutions does not necessarily require transferring the entire system or ending the NGO's role. Depending on the function, the appropriate model may be institutional integration, interoperability, joint technical management, independent monitoring, contracted specialist support, or parallel NGO capacity that provides innovation, surge support, community responsiveness, and accountability.

The aim is not simply to localize the aid chain, but to ensure that aid investments strengthen Syrian public, private, and civic systems over time.

From humanitarian workaround to public-system recovery — ACU's evolving role

The ACU (Assistance Coordination Unit) provides an example of how Syrian NGO capacity developed during the conflict can contribute to public-system recovery while retaining an independent NGO role. During the years when formal authorities in northwest Syria were designated, contested, or inaccessible to many international actors, ACU performed technical and coordination functions that partly substituted for absent or inaccessible public systems. These included early warning and health information systems, laboratory capacity, WASH-related data, water-station coordination, technical assessments, and service-coordination platforms.

In the post-December 2024 context, ACU is developing coordination and technical links with emerging public institutions. Some systems may be aligned, made interoperable, jointly managed, or selectively integrated where this improves national coverage and continuity. A number of former ACU staff have also moved into senior technical roles in ministries. These developments demonstrate how NGO expertise can strengthen public institutions, but they do not imply the wholesale transfer of ACU's capacities, the end of its intermediary role, or that independent NGO capacity is no longer required.

Public institutions and independent NGOs can perform complementary functions. For each system, the relevant questions are which elements should be coordinated with or integrated into public structures; which should remain independently managed; and how technical integrity, continuity, accountability, and responsiveness to communities will be protected. Independent NGOs may continue to provide technical innovation, monitoring, surge capacity, community feedback, partner support, and accountability alongside stronger public institutions.

6.2 Donors and pooled funds: shift funding quality, governance, risk, and affiliation assessment

Responsible actors: donors and pooled funds

Donors and pooled funds should translate this opportunity into more direct engagement and higher-quality funding relationships with Syrian organizations, including expanding direct or progressively direct funding, involving Syrian actors meaningfully in allocation and governance, and providing flexible, predictable, and multi-year support where possible.

To support this shift, donors and pooled funds should increase flexible, predictable, and multi-year funding where possible, especially for organizations that support smaller actors, civic initiatives, and technical systems. Funding agreements should include adequate overhead for organizational management, safeguarding, staff duty of care, risk management, compliance, partner accompaniment, and institutional development.

Where donors provide flexible or multi-year funding to UN agencies, INGOs, or other international intermediaries, those same qualities should be passed on wherever possible. Long donor agreements should not be converted into short, rigid subcontracts for Syrian partners. If flexibility is held only at the top of the delivery chain, it does little to support local leadership.

Pooled funds and specialized funding mechanisms should be used as practical platforms for locally led intermediation. Their value lies not only in pooling donor money, but in shaping eligibility, governance, allocation priorities, risk thresholds, funding quality, and decision-making structures. Syrian NGOs and civil society actors should participate meaningfully in steering committees, allocation boards, technical review processes, and strategic priority-setting.

Shared risk management should also become a funding principle. Syrian organizations should not be expected to carry operational, community-facing, regulatory, reputational, and staff-related risks while international actors retain funding, visibility, and final decision-making power. Risk-sharing arrangements should include joint risk registers, shared decisions on acceptable risk, flexible budget lines, contingency resources, fair overhead, realistic timelines, and duty-of-care support for Syrian staff and partners.

Affiliation and influence concerns should be treated as part of transparent governance and risk management, not as informal reputational judgements. Syrian organizations often need working relationships with ministries, municipalities, local authorities, and public institutions to operate. These relationships can enable registration, access, coordination, service delivery, and problem-solving, while still requiring careful scrutiny.

Donors, pooled funds, and intermediary governance bodies should use an affiliation and independence indicator matrix to distinguish legitimate access relationships from problematic

influence. Such a matrix could assess whether partner selection, beneficiary criteria, geographic priorities, staffing, procurement, public messaging, complaints mechanisms, and program design are independently managed or shaped by government preferences or other external pressure.

An indicator-based approach would also reduce inconsistent standards. International actors' engagement with government is often treated as necessary for recovery and systems work, while similar Syrian NGO engagement may be treated as a reputational concern. A transparent influence and independence framework would allow risks to be assessed more fairly and consistently.

6.3 INGOs and UN agencies: enable Syrian leadership rather than replace it

Responsible actors: INGOs and UN agencies

UN agencies and INGOs continue to offer important comparative advantages, including fiduciary systems, technical expertise, safeguarding frameworks, procurement capacity, diplomatic access, coordination roles, and specialized accompaniment. Their role should be defined by these specific functions rather than by an assumed preference for direct international implementation. Where capable Syrian organizations can lead, international actors should enable that leadership through back-office support, fiscal hosting, risk sharing, technical accompaniment, donor communication, coordination, standards, and national systems support.

International intermediaries should also develop clear transition pathways. Where their role is necessary in the short term, they should identify how that role will increase Syrian authority, funding access, institutional resilience, and ability to lead over time. This may include passing on longer and more flexible funding, investing in Syrian partner systems, supporting direct donor engagement, transferring tools and knowledge, or reducing unnecessary layers in the delivery chain.

INGOs should avoid partnership models that leave Syrian organizations responsible for implementation while retaining program design, budget control, visibility, and strategic decision-making internationally. UN agencies should focus on areas where they add clear value, including coordination, standards, large-scale procurement, government-facing systems, and national frameworks, while ensuring that these roles do not crowd out Syrian NGO and civil society participation in priority-setting and allocation decisions.

6.4 Syrian intermediaries and diaspora organizations: support smaller actors without reproducing hierarchy

Responsible actors: larger Syrian NGOs, Syrian-led intermediaries, diaspora-rooted Syrian organizations

Larger Syrian organizations can play an important enabling role for smaller NGOs, grassroots initiatives, women-led groups, youth networks, media actors, community committees, and volunteer networks. Direct funding to smaller actors may be desirable in principle, but it is not always feasible or protective where organizations lack registration, bank access, audit history, safeguarding systems, or administrative capacity.

Capable Syrian intermediaries can bridge this gap through small grants, proposal coaching, compliance mentoring, registration advice, procurement support, financial backstopping, and practical problem-solving during implementation. Their permanence, local legitimacy, and embedded networks allow them to strengthen local ecosystems that can continue beyond project cycles.

At the same time, larger Syrian NGOs should not simply capture resources or reproduce the subcontracting hierarchies they experienced with international actors. Their intermediary role should be judged by whether they pass on flexible funding, decision-making space, and practical support to smaller organizations and community initiatives. Partner selection should be transparent, participatory, and accountable to smaller partners, not only to donors.

Diaspora-rooted Syrian organizations also have a specific role where they combine external financial infrastructure with active relationships inside Syria. Their foreign bank accounts, donor-facing systems, fundraising capacity, and access to philanthropic networks can help address financial barriers that continue to affect Syria-based organizations. Their value, however, depends on present-day legitimacy, accountability, and active connection to actors inside Syria. Diaspora infrastructure should enable Syrian leadership, not substitute for it or represent local actors from a distance.

6.5 Syrian authorities: create an enabling regulatory and financial environment

Responsible actors: Syrian authorities, relevant ministries, financial regulators

Locally led intermediation requires an enabling operating environment. Syrian authorities should create clearer and more predictable rules for NGO and civil society registration, approvals, foreign funding, banking arrangements, and operational permissions. A clear enabling environment is

especially important for actors whose work does not fit neatly into humanitarian service delivery, including those working on accountability, advocacy, research, media, social cohesion, and public participation.

Clearer rules would reduce uncertainty for Syrian NGOs, civil society actors, donors, and international organizations. They would also reduce reliance on informal connections and opaque approval processes, which can create risks of exclusion, favoritism, and perceived affiliation.

The regulatory environment should distinguish between reasonable oversight and political control. NGOs and civil society organizations need legal and operational clarity to contribute to recovery, service delivery, accountability, and public participation. Without predictable procedures, even capable Syrian organizations will remain dependent on external agreement-holders, informal mediation, or financial structures outside Syria.

Practical banking arrangements are also essential. Even where formal legal restrictions change, commercial banks may continue to apply de-risking policies or avoid Syria-linked transactions. Clearer financial rules, recognized channels for foreign funding, and practical guidance to banks would help reduce the need for indirect or improvised transfer arrangements.

6.6 Shared responsibility: protect civil society, recognize political identities, and bridge old divides

Responsible actors: donors, pooled funds, INGOs, UN agencies, Syrian intermediaries, Syrian authorities

Civil society support should not be treated as a subcategory of humanitarian service delivery, nor should it be assumed to be politically neutral. In Syria, civil society actors, Syrian NGOs, and in some cases INGOs, often carry visible or ascribed identities shaped by geography, conflict history, perceived political position, religious or social identity, civic orientation, or previous areas of operation. These identities may not accurately reflect an organization's mandate or activities, but they influence how organizations are perceived and whether they are trusted, included, or excluded.

The post-December 2024 context creates an opening to recognize civil society functions on their own terms: accountability, advocacy, watchdog work, research, media, social cohesion, women's participation, youth engagement, public problem-solving, and local voice. These functions are often political in the broad civic sense because they involve representation, public debate, accountability, and relationships with authorities and communities. Treating civil society as if it should be identity-free or apolitical risks excluding precisely the actors needed to rebuild civic life.

Protecting civil society therefore requires more than small grants or technical support. It requires deliberate efforts to bridge residual political identities and old grievances between organizations that operated in different areas of control or were perceived through different political, social, or ideological labels. Donors, pooled funds, and intermediaries should support spaces for dialogue, exchange of experience, joint problem-solving, and collaboration across these divides, while avoiding funding practices that reinforce old suspicions or privilege one identity bloc over another.

Civil society funding and accompaniment models should provide smaller grants, flexible timelines, incubation, coaching, safe activity design, research and advocacy support, and protection from excessive compliance burdens. Indicators should reflect participation, trust, advocacy capacity, networks, accountability, bridge-building, and community problem-solving, rather than only numbers reached.

Intermediaries supporting civil society need political judgement, discretion, values, and trust. Syrian civil society organizations and diaspora-rooted civic intermediaries may be particularly well placed where they maintain active networks inside Syria and can support smaller actors without exposing them to excessive donor requirements. Their role should be to protect plural civic space, enable dialogue, and support locally grounded civic agendas, not to depoliticize civil society or force it into conventional service-delivery models.

7. Conclusion

Taken together, these responsibilities point to a practical shift: from using Syrian organizations as implementers within international systems to recognizing them as strategic intermediaries, civic actors, and long-term recovery partners. This shift requires changes in funding quality, risk sharing, governance, capacity investment, regulatory clarity, and the way international actors understand their own role.

Syria's transition creates a narrow but important opportunity to redesign intermediary relationships before new patterns become fixed. If donors and international actors use this moment to shift authority, resources, and accountability closer to Syrian actors, localization can become more than a delivery arrangement. If they do not, the response risks reproducing the same imbalance in a new context: Syrian organizations close to communities, but distant from power, and aid systems that continue without a clear pathway into Syrian public, private, and civic institutions.

Annex. Comparative Advantages of Intermediary Types Matrix

FUNCTION	SYRIAN NGOS, SYRIAN-LED/DIASPORA-ROOTED ORGANIZATIONS, AND GRASSROOTS/CIVIC ACTORS	INGOS	UN AGENCIES	POOLED FUNDS / SPECIALISED FUNDS
Decentralizing decision-making and funding	Strong where larger Syrian NGOs regrant transparently, support smaller actors, and bring a broader Syrian sectoral or national view. Grassroots actors bring community legitimacy but may need protective intermediation. Risk: larger Syrian actors may reproduce hierarchy or compete with smaller organizations.	Useful if they pass on flexible funding and support local design. Risk: may retain strategy, budget control, and partner selection.	Limited as direct localization actors; useful where they include Syrian actors in allocation and coordination decisions.	Very strong comparative advantage where governance includes Syrian actors. Pooled funds can decentralize funding while retaining donor confidence, provide direct Syrian grant-holding, support smaller actors, and allow allocation decisions to reflect local priorities.
Financial and management efficiency	Often cost-efficient, with lower overhead and local expenditure remaining inside Syria. Diaspora-rooted organizations add value through foreign bank accounts, donor-facing systems, diaspora fundraising, and emergency philanthropy. Barriers: banking, registration, and donor risk appetite.	Strong donor-facing systems, audit capacity, procurement, and compliance. Risk: high overhead, long delivery chains, and limited pass-through of funding quality.	Strong for large-scale procurement, formal financial systems, and donor confidence. Risk: slower, heavier procedures.	Strong comparative advantage. Pooled funds can pool donor resources, reduce transaction costs, centralize due diligence, apply proportionate compliance, and manage donor risk without requiring every donor to contract directly with every Syrian actor.
Programmatic approach and reach	Strong community reach, adaptive delivery, sectoral experience, and technical continuity. Larger Syrian NGOs can support public systems in health, WASH, data, agriculture, and service coordination. Grassroots actors are strongest	Useful for specialized technical sectors and accompaniment, especially where they enable rather than replace Syrian actors.	Strong for national coordination, standards, government-facing systems, vaccines, procurement, and large-scale program.	Strong if designed flexibly. Pooled funds can finance area-based, sectoral, or thematic windows; combine Syrian-led delivery with technical expertise; and adjust allocations as needs, access, and risks change.

	for community-level problem solving and local voice.			
Contextual understanding, access and adaptation	Clear advantage for Syrian actors: local networks, authority navigation, conflict sensitivity, social backstopping, and ability to adapt quickly. Grassroots actors provide deep micro-level insight; larger Syrian NGOs can connect local realities to broader strategies.	Often rely on Syrian staff and partners for context. Risk: local knowledge may be extracted without shifting authority.	Strong at high-level access and formal engagement, but weaker on granular community dynamics; procedures may be rigid.	Strong where Syrian actors are embedded in governance. Pooled funds can institutionalize contextual knowledge through steering committees, technical review groups, local advisory structures, and adaptive allocation processes.
Shared risk management	Strong in identifying and managing operational, access, community-facing, reputational, and conflict-sensitivity risks. However, Syrian actors often carry disproportionate frontline risk.	Strong in donor-facing risk absorption, contracts, safeguarding, compliance, and duty of care. Risk: risk transfer rather than risk sharing.	Strong in diplomatic, fiduciary, and formal risk management. Risk: centralizes control under risk logic.	Very strong comparative advantage. Pooled funds can pool and share risk, apply common due diligence, provide flexible milestones, fund contingency costs, support partner accompaniment, and prevent risk from being pushed entirely onto Syrian actors.
Capacity building and technical support	Strong as peer mentors and practical accompaniers for smaller actors. Larger Syrian NGOs can provide context-specific support on proposals, registration, compliance, procurement, and implementation. Grassroots actors need incubation and protection from over-professionalization.	Strong formal technical support, safeguarding, MEAL, compliance, and sector standards. Risk: capacity building becomes control.	Strong for national standards, technical frameworks, and public-system strengthening. Less suited to flexible civic accompaniment.	Strong and flexible. Pooled funds can add technical-assistance windows, finance systems investment such as ERP tools, fund accompaniment providers, and tailor capacity support to partner needs rather than one fixed training model.
Civil society, civic space and grassroots support	Core advantage where Syrian actors support accountability, advocacy, watchdog work, media, women's and youth participation, social cohesion, community committees, and local voice. Grassroots actors are essential for	Useful for specialized civic accompaniment and protection if they enable local agendas. Risk: may impose external civic priorities or compliance burdens.	Less suited to politically sensitive grassroots civic work because of formal, government-facing role.	Potentially very strong if designed specifically for civic work. Pooled funds can create small-grant windows, flexible timelines, incubation support, civic indicators, and protective accompaniment without forcing all grassroots

	legitimacy and community ownership.			initiatives into standard NGO models.
Affiliation, influence and political sensitivity	Syrian actors often carry inherited or ascribed political identities shaped by geography, areas of operation, founders' positions, religious/social perceptions, or previous control areas. They may need relationships with authorities to operate, but these should be assessed transparently rather than treated as automatic affiliation.	Often perceived as more neutral by donors, though they also depend on Syrian staff, local partners, and authority engagement. Risk: inconsistent standards.	Government engagement is often treated as necessary for recovery and systems work but can shape perceptions of neutrality and access.	Strong comparative advantage if equipped with clear tools. Pooled funds can apply transparent affiliation and independence indicators across all applicants, assess influence consistently, separate legitimate access relationships from political capture, and reduce ad hoc reputational judgements.
Transition and recovery pathways	Strong potential to connect technical systems, expertise, and service-coordination capacity with Syrian public or private systems, while retaining independent NGO a functions where these remain valuable, especially preserving independent civic and accountability roles.	Useful as temporary or function-specific enablers; should include exit or transition logic that increases Syrian authority over time.	Important for national systems and government-facing recovery but should not crowd out Syrian NGOs or independent civil society.	Very strong as a transition platform. Pooled funds can finance different transition routes: direct Syrian leadership, public-system handover, market-based recovery, civic independence, or continued external accompaniment where justified.

Overall implication: Pooled funds and specialized funds may have the strongest cross-cutting comparative advantage if they are designed with Syrian participation, flexible windows, proportionate compliance, technical-assistance capacity, transparent affiliation assessment, and a clear localization mandate. Unlike a single INGO, UN agency, or Syrian NGO, a pooled fund can combine multiple functions: donor confidence, risk pooling, local governance, flexible funding, technical support, and accountable onward funding to smaller actors. Their value, however, depends on design. If governance, eligibility, and allocation decisions remain dominated by international actors, pooled funds can reproduce the same centralization they are meant to solve.