

Action Document for EU Trust Fund to be used for the decisions of the Operational Board

1. IDENTIFICATION

Title/Number	Increasing access to inclusive quality primary, secondary and higher education opportunities for Turkish and Syrian children, youth and students (Human Resources Development)	
	Facility priority area: EDUCATION	
Total cost	Total estimated cost: €22.352.942 Total amount drawn from the EU Trust Fund: €22.352.942	
Aid method / Method of implementation	Project Approach: Indirect Management with UNICEF and UNHCR	
DAC-code	110, 112, 113, 11420	<u>Sectors:</u> Education, Basic Education, Secondary Education, Higher Education

2. RATIONALE AND CONTEXT

2.1. Summary of the action and its objectives

In line with the "Strategic orientation document for the European Union Regional Trust Fund in response to the Syrian crisis" (EUTF), the **main objective** of the proposed programme is to cater to displaced persons longer-term resilience, in particular with regard to **education for children**.

The **specific objective** of this programme is to increase access to inclusive quality primary, secondary and higher education opportunities for Turkish and Syrian children, youth and students.

2.2. Context

Currently, Turkey hosts the world’s largest community of Syrians displaced by the ongoing conflict in their country. According to data provided by the DG for Migration Management (DGMM), as of March 2016 Turkey’s Syrian Refugee¹ population was more than 2.7 million. While 10% of this population (265,086) reside in camps funded and managed by the Turkish state and nongovernmental actors, a majority (2,150,408) took shelter in towns and cities mostly in the south-eastern provinces.

In Turkey, more than half (54%) of the 2.7 million Syrians are under temporary protection status are children. Based on Ministry of National Education's (MoNE) estimates, in Turkey over 750,000 Syrian children are at the school age of 5-17 years. Many Syrian children have not received any education over the last years and are at risk of becoming a so-called lost generation. According to the Human Rights Watch report of November 2015 the Syrian children interviewed had, on average, lost already two years of schooling. Out-of-school children and youth are at risk of isolation, discrimination and political radicalization. Especially in host communities, children with disabilities also find it hard to access existing education opportunities.

¹ Since Turkey has not ratified 1967 Protocol of the Geneva Convention of 1954, the Syrian Refugees referred to in this document shall be understood as “Syrian people under temporary protection according to Turkish legislation”.

In September 2014, MoNE issued a circular which ensures children under temporary protection in the country can be enrolled in Turkish schools or MoNE certified temporary education centres (TECs). This was followed up by the Temporary Protection Regulation from 22 October 2014 which guarantees legal access to basic education services for the temporary protection beneficiaries. TECs are using adjusted Syrian curriculum where Turkish is a mandatory subject, Arabic as the language of instruction, and Syrian volunteer teachers with oversight by MoNE directors and coordinators.

While around 90 percent of school-aged Syrian children living in camps regularly attend school, the vast majority of Syrian children outside refugee camps in towns and cities show a significantly lower school enrolment rate. According to MoNE, 325,000 Syrian children were registered in schools by mid-February 2016. That implies that 425,000 school-age Syrian children are not receiving education.

In the academic year of 2015-2016, 73,000 Syrian children aged 5-17 are receiving education together with Turkish students in the schools attached to MoNE, the Ministry aims at increasing this number to over 105,000. In this period, 82,000 and 155,000 children are receiving education in TECs in the camps and outside the camps in cities, respectively. Still, the needs and challenges remain immense and complex. Lack of school facilities, economic vulnerability and financial shortcomings, distance from schools, limited teacher capacity, lack of funding for teacher salaries and language problems remain huge barriers to educational participation for Syrians in Turkey.

The Temporary Protection Regulation also makes specific provision for access to higher education by persons under temporary protection, with the Higher Education Council (YOK) being responsible for overseeing these services. The Government of Turkey (GoT) demonstrated its support for access to higher education by Syrian refugees by waiving university tuition fees at state universities for three successive years (2013, 2014 and 2015). This decision has been announced annually by the Council of Ministers and YOK. By the end of 2015, YOK announced that over 10,000 Syrian youth were enrolled in Turkish universities. There is a high demand for access to higher education programmes, as demonstrated by the fact that UNHCR's scholarship programme received 5,803 applications in two weeks.

In spite of these efforts to facilitate access to higher education, many Syrian students are unable to fulfil ambitions of receiving higher education or resume studies that were interrupted by war and displacement. The most significant barriers to higher education participation are economic need and pressure on youth to support their families, lack of proficiency in the language of instruction in Turkish universities, lack of awareness of application procedures and dates and lack of recognition of academic credits obtained in Syria.

2.3. Lessons learnt

- Early investment in systems ensures national ownership and enhances opportunities for Government to explore gaps in terms of policy, national budgeting and capacity that can benefit from financial and technical resources mobilized by the EU and its partners through the emergency to ensure upgrade or sustain critical services, beyond the time-frame of the emergency.
- Although having a smaller absorption capacity than UN agencies, both international and national CSOs have shown proactivity and ability to implement significant projects at a local scale.
- It is very important to distinguish the features of working with urban refugees, as opposed to camp based refugees. Different targeting strategies are required, with: a stronger focus

on information campaigns and outreach work; service provision in multiple locations as well as service provision to host and refugee populations; and the development of partnerships with local organisations.

- All responses to the crisis have shown that the situation on the ground develops fast and often beyond projections made. For that reason, a large degree of flexibility will be required for any intervention addressing medium to long term needs to allow for an effective response to the evolving needs of the beneficiary populations.
- Providing access to schools does not ensure that children stay and learn. An understanding of the bottlenecks and barriers to learning are important to ensure learning outcomes.
- The integration between Conditional Cash Transfer (CCT) and education constitutes an effective and efficient contribution to the Syria crisis response to decrease and/or prevent socio-economic vulnerability and risk of exploitation among vulnerable Syrian children; it seeks to mitigate the risk of child exploitation resulting from the poverty trap in which many Syrian families find themselves.
- Students drop out of higher education programmes and preparatory Turkish academic proficiency programmes due to financial need and inability to meet transportation and basic living costs.
- Even students who have passed advanced Turkish courses (C1 level) struggle with academic proficiency in Turkish and require additional support to understand technical terminology and more abstract or figurative use of language in academic texts.

2.4. Complementary actions

This action reflects the findings of an independent needs assessment that was commissioned to help guide and target short and medium-term assistance to refugees, which is to be mobilised within the framework of the Facility for Refugees in Turkey (June 2016). This assessment builds on the Government of Turkey's first stage needs assessment (March 2016).

This action is complementary to and in synergy with past, current and future actions, which are to be funded under the Facility under various EU mechanisms and instruments. It corresponds to one or more priority areas of the Facility as defined by the Facility Steering Committee on 12 May (Humanitarian Assistance, Migration Management, Education, Health, Municipal Infrastructure and Socio-economic Support). Special care will be taken to avoid overlap with any other EU or third donor funded activity in these areas.

The present action will provide an initial contribution in the priority area of Education, which will be complemented by further interventions under humanitarian and/or non-humanitarian assistance within the framework of the Facility.

The proposed intervention builds upon initial support from the EU Trust Fund to UNICEF, a first totalling €12.5 million signed in September 2015 and a second totalling €34.3 million signed in March 2016. These actions are complementary and provide an integrated package of activities to increase access to formal schooling and non-formal education. The proposed intervention will increase the impact of the planned activities to support access to formal schooling by providing education cash grants to reduce the financial barriers to formal education at the household level.

Under the EU Trust Fund, further actions in the area of higher education have been contracted or are in preparation. Mid-April 2016 a regional contract was signed with the German Academic Exchange Service DAAD and British Council which will provide higher education scholarships, language courses, education counselling. Furthermore, an action is in

preparation to be implemented by SPARK providing higher education scholarships. The EUD will undertake any efforts to ensure coordination and complementarity of these actions.

In addition, this plan considers results and lessons learned from the UNICEF EU-funded project "Increasing Resilience of Syrian Children under Temporary Protection in Turkey."² This project, which aimed at contributing to the increased resilience of vulnerable school-aged Syrian children and youth (4-18) living in camps in Turkey, came to an end in March 2015. Being based on an EU-project that has been completed, the proposed Action ensures complementary and sustainability of previously EU-funded actions in response to the Syrian refugee crisis in the field of education in Turkey.

In addition, the ECHO programme has been also an important support to expand the support for the education of Syrian children in host communities which has been taken into account in the Provincial Action Plans (PAPs) and related interventions. Through the end of 2015 UNICEF was implementing ECHO-funded school transportation support in cooperation with IOM to bus students from remote areas to schools, based on the needs assessment done with the local education authorities. In addition, the proposed action aims to address the barrier of school transportation through the Education Cash Grant.

ECHO's Humanitarian Implementation Plan (HIP) for the Turkey Crisis (published 3 June 2016) considers supporting the delivery of conditional cash top-ups for education particularly under the Emergency Social Safety Net (ESSN) framework in partnership with the Ministry of Family and Social Planning. Therefore, funding under this Action for Conditional Cash Transfer for Education will be channelled through the agreed mechanism. To avoid any possible overlaps, EUD and ECHO will ensure coordination and complementarity of assistance to be provided in this area under the Facility.

Furthermore, the proposed interventions will also complement a project financed under the 2010 IPA Programme totalling €9.9 million implemented by UNHCR enhancing access to education through increased capacity of institutions and services. This action will enhance the capacity of MoNE to teach Turkish as a foreign language to school-aged children, youth and adults through the development of appropriate curriculum frameworks, teaching materials and teacher training. The project will also enhance the capacity of MoNE to provide responsive and relevant skills training through Public Education Centres.

Further IPA financed projects, both to be implemented by UNHCR (€9.8 million and €40 million), are in the contracting phase. Both projects include higher education-related activities, with a university preparation programme being piloted and developed under the IPA Education project in 2016 and then being scaled up through the education component in the €40 million multi-sector IPA project in 2017. The pilot under the IPA education project looks at a preparation programme for 442 students in September 2016, with the €40 million IPA project increasing its scope and coverage to a greater number of universities and students. The €40 million IPA project foresees two cohorts of overall 2.530 students, the first to be enrolled in the programme in September 2017 and the second in September 2018. The financing provided under the current action will increase the scope and coverage of these university preparation programmes, also by including students from host communities.

2.5. Donor co-ordination

The EU Delegation (EUD) in Ankara is co-chairing with ECHO monthly meetings of the EU Refugees and Migration Coordination contact group with EU Member States.

² Euro 1 million; Instrument contributing to Stability and Peace – IcSP

Furthermore, the EUD is participating in the regular meetings of the Working Group on Education, chaired by AFAD, which will lead to the conclusion of a Special Measure for Education under the Facility.

The EUTF Management is in the lead to ensure coordination with EU Member States contributing to the fund. Moreover, the Fund Management will also coordinate with its selected implementing partners or other stakeholders on regional level or cross border issues.

At a broader level the EU is actively contributing to overall donor co-ordination under the auspices of the United Nations in the framework of the 3RP that integrates humanitarian, development and macro fiscal interventions to increase coherence between humanitarian and development and national and regional priorities.

In the Education sector, MoNE is leading the provision of educational opportunities for Syrian children. UNICEF and UNHCR have closely supported the Education Sector Working Group (ESWG) chaired by MoNE at the central level (Ankara), with the participation of the Disaster and Emergency Management Authority (AFAD)³, DGMM, UNHCR, IOM and Kizilay (Turkish Red Crescent).

UNHCR has advocated for and will be supporting the establishment of a coordination and information sharing forum for higher education actors that includes donors, government stakeholders (including YOK) and scholarship providers. The Presidency for Turks Abroad and Related Communities (YTB) has supported the establishment of such a body; UNHCR and YTB are actively engaged in discussions to formalise the operation of a higher education working group. UNHCR hosted a meeting of scholarship providers to promote exchange of information amongst providers to ensure the complementarity of different programmes and to ensure that no students receiving financial support from more than one programme.

3. DETAILED DESCRIPTION

3.1. Objectives

In line with the "Strategic orientation document for the European Union Regional Trust Fund in response to the Syrian crisis" (EUTF), the **main objective** of the proposed programme is to cater to displaced persons longer-term development needs, in particular with regard to education for children.

The **specific objective** of this programme is to increase access to inclusive quality primary, secondary and higher education opportunities for Turkish and Syrian children, youth and students.

3.2. Expected results and main activities

The **expected results** are⁴:

In cooperation with UNICEF

- An increased number of Syrian Refugee children and youth are able to resume their educational enrolment via the provision of formal, non-formal/informal, and early childhood education learning opportunities⁵.

³ At the beginning of April 2016, the Office of Chief Advisor to the Prime Minister as main coordinator for all refugee related issues was replaced by AFAD.

⁴ There are very few aggregated data on gender composition amongst refugees with regard to education or access to education. The EUD, however, will make sure that the Implementing Partner of the proposed action will report on the results achieved gender specifically in terms of target numbers.

in cooperation with UNHCR

- Indicatively 1,790 Syrian refugee students meet the language proficiency requirements for entry into Turkish universities.
- Indicatively 730 Syrian refugee students remain enrolled in and complete higher education programmes in Turkey.

Main **activities** will be:

In cooperation with UNICEF

- Expansion of the national social protection system to refugees by extension of the coverage of the Ministry of Family and Social Policy's (MoFSP) conditional cash grant program for education to vulnerable Syrian children. Families meeting the MoFSP vulnerability criteria will be registered and receive a monthly payment per child via PTT, conditional upon continued school attendance. This grant aims to remove some of the financial barriers blocking access for families to the formal education system and reduce attrition among enrolled students.

In cooperation with UNHCR

- Provision of an intensive 10-month university preparation programme for overall 1.500 students that will lead to an advanced certificate in Turkish proficiency (C1 level) and provide supplementary instruction in mathematics and science that will prepare students for university entrance examinations and future study.
- Provision of scholarships to Syrian refugee students enrolled in higher education programmes offered by Turkish universities, who meet academic performance criteria and demonstrate the potential to succeed academically.

3.3. Risks and assumptions

Assumptions

- Legal framework guaranteeing access to rights and services for Syrians under temporary protection remains in force.
- Government of Turkey's commitment to providing educational access for Syrians under temporary protection continues and is reflected in regulatory instruments passed by MoNE.
- Government of Turkey remains committed to tackle issues which hamper access to education, such as child labour and early/forced marriages among the Syrian community.
- Government of Turkey continues to waive tuition fees for Syrian students who wish to attend university in Turkey.
- Foreign student quota determined annually by YOK makes sufficient provision for the number of Syrian students seeking access to higher education programmes.
- Students remain enrolled in university and university preparation programmes throughout the duration of these programmes.

⁵ At the current time, a concrete number of beneficiaries cannot be given as discussions between the involved Turkish Ministries (Ministry of Family and Social Policy and Ministry of National Education), the UN, International and Turkish NGO's as well as the EU are ongoing regarding an unified system for Conditional Cash Transfer (regarding methodology, CCT amounts, verification, etc.). It is hoped that at the time the EUTF Operational Board meeting on 21 June 2016, concrete numbers can be provided.

Risks	Planned Risk Response
Commitment of GoT for education as priority area not present any longer	UNHCR and UNICEF will continuously assess and monitor the policy environment through its regular activities and on-going liaison with key government actors
Key stakeholders, particularly MoNE, AFAD and MoFSP, do not actively engage in necessary inter-agency and inter-governmental coordination mechanisms	UNHCR and UNICEF will continue to play facilitating/ brokering role to ensure necessary engagement with coordination mechanisms.
Elements of the action, particularly Conditional Cash Transfer, may not be sustainable beyond the period of the action	UNICEF will continue to advocate for the integration of such activities into national systems and budgets, and will work with other donors and stakeholders to identify the resources necessary for a sustainable approach.
Government of Turkey introduces tuition fees for Syrian students	UNHCR will continuously advocacy with the authorities to maintain existing policies and practices
YTB dedicates insufficient human resources to the Action to ensure concurrent implementation of several elements of the project and that the scholarships and other forms of support are fully absorbed.	UNHCR will monitor project implementation with YTB to determine whether additional human resource capacity is required to implement multiple activities concurrently. If additional capacity is needed, this will be discussed with YTB to ensure that adjustments are made.
Insufficient numbers of students show an interest in studying in Turkish Universities	Community outreach and advocacy
Risk for school drop out especially among girls	To minimize the risk of drop out, students will be able to receive counselling and advice from academic advisors who will be appointed at participating institutions under a complementary Action funded through the Instrument for Pre-Accession. The Implementing partners will carry out advocacy and outreach activities and will report any such cases to the local/national authorities in charge.
Universities have insufficient capacity to significantly scale up provision of language and academic preparation programmes	Mapping of absorptive capacity of institutions ahead of implementation.
Divergences in the opinions and approach of the implementing partners and national/local stakeholders may occur during the implementation of the actions.	The implementing partners will consult and remain in full dialogue with the national/local stakeholders by fully adhering to the principles and values of the international conventions which Turkey is party to.

3.4. Cross-cutting issues

Projects funded under this programme will integrate a Rights-Based Approach in each step of the project cycle from identification, formulation, implementation, monitoring to evaluation.

Gender: throughout the project design and implementation gender mainstreaming will be taken into consideration throughout the project. This includes staff involved in the project, targeted population etc. Female students will be specifically targeted and encouraged to apply. Where possible female students will be accommodated in programmes delivered in their cities of residence (as some families refuse participation if their daughters have to travel long distances or reside apart from their families and male relatives). Students' vulnerability will be considered and priority will be given to students who are disabled. The aim is that at least 50 per cent of scholarship recipients will be women.

The proposed action will target boys and girls. It will be conducted in line with an awareness of gender issues including discriminatory social attitudes and expectations and the different needs of and risks faced by boys and girls. With respect to access to quality education, special effort will be made to ensure gender parity, bearing in mind that girls have had less access to quality education than boys in the region in the past, and taking account of the different barriers which may influence boys' and girls' participation, such as child labour, domestic labour, child marriage and traditional gender roles. This will result in an increased number of girls benefiting from the proposed intervention under its different components.

Disability: the proposed Implementing Partners for this action will make efforts to mainstream children with disabilities into education programmes. Since youth with disabilities may be more prevalent among economically inactive and marginalized youth, the implementing partners will strive to include them in entrepreneurship capacity building as well as in youth consultations.

Special attention will be paid to ensuring the inclusion of children and youth with disabilities under all the aims and activities of the action, in view of the high risk of their under-participation and social exclusion. Environmental and social barriers to the participation of these children and youth will be identified and addressed. Training activities and community outreach and campaigns will be planned.

3.5. Stakeholders

Implementation of activities will be undertaken in collaboration with national and provincial authorities specifically MoNE, AFAD, MoFSP, Kizilay, NGOs, local authorities and relevant partners in specific technical areas.

In Turkey, MoNE is leading the provision of educational opportunities for Syrian children. UNICEF is working closely with both central and provincial MoNE offices. The provincial action plans (PAPs), to which UNICEF provided technical support, are key tools for both MoNE and UNICEF to ensure assessing and monitoring the needs and preventing duplication of support.

UNHCR will implement activities in close collaboration with YTB. UNHCR has entered into a partnership agreement with YTB to implement UNHCR's flagship scholarship programme, the DAFI (Albert Einstein Refugee Academic Initiative) programme. YTB is responsible for the management of the Government of Turkey's *Turkiye Burslari* programme and has extensive experience in the management of scholarship programmes and has, since 2013, been managing and overseeing programmes to provide advanced Turkish language programmes to Syrian refugees. As of 2015, UNHCR began funding this programme when it was expanded to refugees residing outside of camps. YTB, through an exchange of letters

with UNHCR Representation, has reiterated its commitment to collaborating with UNHCR in the implementation of higher education access programmes for refugees. UNHCR also works closely with MoNE and is a member of the Education Working Group established by MoNE. UNHCR has established relations with YOK which has the statutory responsibility, under the Temporary Protection Regulation, for the oversight of higher education access for Syrians in Turkey.

The content of the present action has been shared with the TR authorities (AFAD and line ministries) on 1 June 2016 and received a positive feedback. Moreover, the choice of the Implementing Partner was agreed.

4. IMPLEMENTATION ISSUES

4.1. Financing agreement, if relevant

In order to implement this action, it is not foreseen to conclude a financing agreement with Turkey, referred to in Article 184(2)(b) of Regulation (EU, Euratom) No 966/2012.

4.2. Indicative operational implementation period

The implementation of the action is 36 months, depending on the different components of the action. However, the latest date for implementation is 15 December 2019, the end of the legal duration of the EUTF.

4.3. Implementation components and modules

Indirect management with UNICEF and UNHCR

To be able to respond to immediate needs in the context of the Syrian crisis for interventions for Syrian refugees and their host communities in Turkey in accordance with the above objectives, two delegation agreements are foreseen in accordance with Article 58(1)(c) of the Regulation (EU, Euratom) No 966/2012.

Eligible implementing partners were selected on the basis of their experience in the field, and possibility to scale up their existing operations and/or introducing new activities within their portfolio. Furthermore, proven experience in cooperating with the GoT and having obtained an agreement of GoT on the planned intervention were decisive factors for selecting an implementing partner. As such the selection of these entities is justified by their unique market position to absorb considerable aid funds in a short period but maintaining the required accountability standards at the same time.

4.4. Indicative budget

Indicative budget*	Amount in EUR
Indirect management with UNICEF	10.000.000
Indirect management with UNHCR	12.352.942
Total	22.352.942

* *The costs of Evaluation and audit and Communication and visibility will be included in the projects' budgets and/or contracted separately via service contract(s).*

The funds for implementing this action stem from IPA funds transferred to the EUTF by the end of 2015 (Ex IPA Human Resources Development Operational Programme) as they were in danger of being de-committed. The eligible expenditure under this action shall be the total of

the decisions on the allocation of funds to individual actions taken by the EUTF before 30 September 2018 in pursuing the objectives set out in the revised Human Resources Development Operational Programme.

4.5. Performance monitoring

4.5.1. EUTF M&E

Monitoring shall be ensured primarily through the EUD and in particular with the assistance of specific EUTF field & liaison officers posted within the EUD. In addition, the EUTF will launch an independent M&E exercise to accompany all Fund programmes and ensure that targets are met and lessons learnt can be incorporated into other EUTF actions.

The purpose of the EUTF Monitoring and Evaluation Framework will be to assess, across various levels, the degree to which the Overall Objective of the EUTF has been achieved. The EUTF M&E Framework will assess the effective delivery of programmes, contribute to improved project design, and develop a knowledge base of 'what works' to allow for continuous improvement of aid delivery. Above all and in the spirit of the Agenda for Change, the EUTF M&E Framework aims to ensure upward and downward accountability and transparency of EU support towards the EUTF Board and end beneficiaries, respectively.

The EUTF and actions financed by it are subject to the monitoring and evaluation rules applicable to EU external programmes, in order to ensure the respect of the principles of economy, efficiency and effectiveness, as per Article 13 of the Agreement Establishing the EUTF.

There are currently two EUTF actions with UNICEF ongoing which the EUD has been monitoring through regular Steering Committee meetings, reporting and external monitoring missions. The EUD will make sure that this point will be equally addressed at the time of contracting of the present action with both selected Implementing Partners.

4.5.2. UNICEF monitoring

UNICEF Turkey will be responsible for overall programme management, oversight and coordination including regular progress monitoring and reporting. Progress and results of activities will be systematically monitored through the UNICEF internal monitoring.

UNICEF will collaborate with national and local authorities and relevant partners in monitoring implementation through field visits to locations in the south-east of Turkey, inputs for monthly regional situation reports as well as quarterly and annual progress reviews. UNICEF is strengthening the field monitoring component of the performance monitoring system, including with additional staff and potentially the use of third party verification of key activities. UNICEF will also continue to provide technical support to the MoNE in the further development and operationalisation of the complementary education management information system for foreign pupils and students under temporary protection, known as YOBIS, which could be linked to the country Education Management of Information System (EMIS) and generate periodical situational reports of Syrian children's access to the education systems under the Circular 2014/21. Besides serving as a monitoring tool, this system will contribute to strengthening national capacities and assuring sustainability of the institutional response.

4.5.3. UNHCR monitoring

This Action being part of the Office's regular operational plan, UNHCR will monitor its progress and performance against pre-set targets. Quantitative indicators will be measured through the collection of data by YTB that has a monitoring system in place whereby they can

track the academic performance of students. The language preparation programmes are provided by recognised, accredited providers that meet industry standards. All partners however are subject to the standard UNHCR monitoring procedures.

4.6. Evaluation and audit

The EUTF will launch an independent M&E exercise to accompany all Fund programmes and ensure that targets are met and lessons learnt can be incorporated into other EUTF actions.

If necessary, ad hoc audits or expenditure verification assignments could be contracted by the European Commission for one or several contracts or agreements. Audits and expenditure verification assignments will be carried out in conformity with the risk analysis in the frame of the yearly Audit Plan exercise conducted by the European Commission. Evaluation and audit assignments will be implemented through service contracts, making use of one of the Commission's dedicated framework contracts or alternatively through the competitive negotiated procedure or the single tender procedure.

If necessary, the European Commission may conduct a verification of the action in accordance with the verification clause of the UN-EU Financial and Administrative Framework Agreement (FAFA).

4.7. Communication and visibility

While communication and visibility of the EU is a legal obligation for all external actions funded by the EU, to date the visibility of the EU's support to the Syrian crisis, in particular in neighbouring countries affected by the crisis, has been insufficient. The public perception is that the EU is not addressing the Syrian crisis, when in fact it is the largest donor. The lack of visibility to the EU's actions weakens the EU's political traction in the region and its standing in Europe.

Therefore, communication and visibility is an important part of all EUTF programmes factored into the implementation to underline its importance at all stages of the planning and implementation of the Programme.

All visibility actions by EUTF implementing partners outside areas of conflict should be stepped up, except where such visibility may put children at risk due to security concerns. Each implementer will have to draw up a comprehensive visibility and communication plan for their respective target country/community and submit a copy for approval to the EUTF and EUD. The related costs will be covered by the budgets of the contract as part of the project.

The Communication and Visibility Manual for European Union External Action and/or other agreed joint visibility guidelines shall be used. All visual and audio outputs (*e.g.* spots, short films, video, interview, pictures, *etc.*) should be shared and used by the European Commission / the EUTF free from copyrights and limitations. Media related events will be carried out in partnership with EUTF and EUD in line with EUTF guidelines.

In addition, the EU support shall be visible to all direct beneficiaries – in particular on school buildings, TEC's, NFE and ECE facilities and other information tools distributed in schools through various visibility materials where the contribution of the EU and its logo should be mentioned or included.