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

1. IDENTIFICATION

Title/Number	Further and Higher Education Programme for vulnerable Syrian youth		
Total cost	Total estimated cost: EUR 12,000,000 Total amount drawn from the Trust Fund : EUR 12,000,000		
Aid method / Method of implementation	Project Approach Direct management - grant		
DAC-code	11420/11430	Sector	Education

2. RATIONALE AND CONTEXT

"If I don't get accepted to university this year, I am going back to Syria to fight. At least I will do something useful there instead of sitting around all day doing nothing". – Syrian refugee in Gaziantep

Before the war in Syria, the participation of the age group 18-24 in higher education was 20%. Today, four years later, this has dropped dramatically to almost half, and among the more than 400,000 of this age group having fled the country, less than 5% have access to higher education today. Many of them are at risk of being radicalised and drawn as fighters into the armed conflict in Syria.

Thus the need to improve access for young Syrians to higher education is acute. Not targeting the needs of vulnerable Syrians youth in the region is a risk, since the stability of the Middle East for a major part depends on maintaining its human and intellectual capital. Educating Syrian youth is crucial, since it is their generation that will lay the foundations for a post-conflict reconstruction effort. But many HE institutions within Syria ceased to function as the conflict enters its fifth year, and HE institutions in host countries are unable to deal with the large numbers of students who wish to enroll.

The overwhelming demand for higher education by far outstrips the availability of resources in the region. While some 7,000 Syrian students could continue studies outside Syria with the help of several scholarship initiatives, more than 90,000 would need to be covered. It is therefore crucial that limited available resources are deployed strategically whilst producing more sustainable and longer-term local and regional solutions. This can only be done in close partnership with host governments and through existing HE institutions in the region, choosing a cost-effective approach.

2.1. Summary of the action and its objectives

This action document builds on analysis that has been provided by a recent EU-funded expert study, which has been subject to inclusive stakeholder consultations since February 2015.²

¹ Quote from interview with Syrian refugees in Gaziantep in a focus group discussion organized by SPARK, during the observation mission of the General Certificate Exam in Turkey, from 22-28 June 2014.

In following key recommendations of the expert study, the objective of the action is increased participation and equal access to further and higher education in the region for vulnerable Syrian youth who had to abandon their studies as a result of the war and displacements.

The action proposed is the establishment of a programme, which encourages further and higher education providers based in the region (to submit proposals which address further and higher education needs of young Syrians (age group 18-28) in Syria and in host countries in the region (Iraq (KRG), Jordan, Lebanon, Turkey). This mechanism will:

- make use of existing potentials;
- meet needs of the target group for participating in EQF levels 5 and 6 (or equivalent) education: the programme will target university programmes at BA level (first university cycle) and vocational training at tertiary level.
- support equal access to further and higher education to the ones most in need;
- provide guidance and orientation for the target group to identify the most appropriate education opportunity;
- contribute to better coordination and to continuously improving further and higher education interventions in the region;
- further promote the use of e-learning tools and approaches in further and higher education.

As a result, this programme shall reach and assist up to 20,000 young Syrians through a combination of full-time scholarships, full time enrolment in Short-Cycle Higher Education courses, bothface to face, blended and online, inside the region.

In particular, the proposed action contributes to the implementation of <u>EU regional strategy</u> for Syria and Iraq as well as the ISIL/Da'esh threat under section 2.2.5, where the Madad Fund is called upon to i.a. Explore further possibilities to support neighbouring countries and universities in providing higher education services to Syrian students and to Explore further opportunities for Syrian students and researchers through scholarships in Europe and vocational training opportunities in the region.

2.2. Context

2.2.1. Sector context: policies and challenges

Many HE institutions within Syria ceased to function as the conflict enters its fifth year, and HE institutions in host countries are unable to deal with the large numbers of students who wish to enrol. Within Syria, educational facilities have been destroyed or closed down on a large scale. The need and want of Syrian refugees to find employment or engage is another challenge facing host countries. Registered refugees are legally not allowed to work, in an attempt to not stimulate settlement in the host country and to avoid competition with the national workforce. Unfortunately, this results in an informal economy where refugees e.g. avoid taxes and fees.

The target group of this programme are Syrian refugees of university age (18-24). A large number of Syrian students have either been displaced inside Syria or fled the country and have settled down in neighbouring countries, the majority in Turkey, Lebanon and Jordan.

² Study to Design a Programme / Clearinghouse Providing Access to Higher Education for Syrian Refugees and Internal Displaced Persons, Submission: 24th of March 2015, Team: Irene LORISIKA, Leon CREMONINI, Malaz SAFAR JALANI (ENPI 2014 350-391 171014)

They face a very unique situation: not only are their participation rates in further and higher education lower than those of their peers in host countries, but they also face a significant drop in participation vis-à-vis the Syrian access rate before 2011. The latter circumstance in particular indicates a considerable unmet demand for further and higher education.

The table below shows estimates of the Syrian Persons of Concern (PoC), aged between 18 and 25 as of end 2014³. The table also shows the gap to fill with the intervention to reach potential pre-war participation levels of about 20%.

Syrian Students in Need, in Syria and outside Syria

Country	Syrians aged 18- 24 in the country (est.)	Syrians enrolled in higher education	20% target	Current Participation	Gap to fill with intervention
Syria (2010)	3,340,500 ^(b)	661,281 ^(a)		20%	
Lebanon	146,456	8,549	29,291	6%	20,742
Jordan	77,718	6,057	15,544	8%	9,487
Turkey	145,310	1,784	29,062	1%	27,278
Syria IDPs (2014)	969,760 ^(d)	164,859 (not possible to determine) (c)	193,952	17%	29,093
Iraq, Egypt, Other	54,552	4,224	10,910	8%	6,686
Total (excl. Syria 2010)	1,393,796	185,473	278,759	13%	93,286

⁽a) Syrian Central Bureau of Statistics

(b) Estimation based on United Nations, Department of Economic and Social Affairs (UN DESA), Population Division (2013). World Population Prospects: The 2012 Revision. Because the UN breaks down in age groups of five years (0-5; 6-10; 11-15; 16-20; 20-25; etc.) from 1950 to 2010, we calculate people aged 15-20 x 50% + people aged 20-25

These calculations are rough estimates meant solely to give a sense of the problem's scale. Particularly for Syria there are no reliable post-2010 statistics. The data for Syria are extrapolations based on information gathered through interviews and the recent article by *Al-Fanar*—a venture philanthropy organization working in the Arab world with its own dedicated discussion platform on higher education—according to which "[...] Syrian universities have lost about one third of their professors, while around 100,000 students have dropped out, according to official statements, which could well be minimizing the problem.

Since there are accurate (albeit fluctuating over time) data from UNHCR about the refugee population in Jordan, including a breakdown for the 18-24 age group (not available for all neighbouring countries), this information is used as the base for extrapolating the demand in the other countries (whilst remaining well aware that the situations differ and that this exercise is meant to provide a sense of the problem). In Jordan the 18-24 population of Syrian refugees is about 29% of the 18-59 age group, which in turn is 44% of the total refugee population (and this percentage is similar all neighbouring countries).

The analysis, hence, assumes that in Syria the 18-25 group is approximately 29% of 44% of the total IDP population (as reported by the EU Humanitarian Aid and Civil Protection

^(c) A note of caution: This, more than the figures for the other countries, is a very rough estimate meant solely to give a sense of scale of the problem within the country. This guess indicates a loss of about 3% in participation but this should be in no way taken as precise as the situation is probably far worse than this.

⁽d) Estimation based on an IDP population of 7.6m (reported by the EU Humanitarian Aid and Civil Protection department (ECHO)).

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³ For IDPs we use information as of March 2015, provided via the EU Humanitarian Aid and Civil Protection department (ECHO), because there has been a very significant increase in person of concern (over one million).

department, ECHO⁴). That is, 7.6m x 44% x 29% = 969,760. Subsequently, an estimation had to be made as to how many IDPs aged 18-24 had to abandon their study. In the absence of hard data, one may assume that—as reported in February 2015 by Al-Fanar—about 15% had to abandon their studies. This corresponds to the reported $\pm 100,000$ drop-outs over pre-war enrolments of over 600,000 indicated by the Syrian Central Bureau of Statistics. A 15% loss in participation calculated over an "normal" 20% enrolment rate among of 18-24 year olds leads to a conservative estimate that about 29,000 IDP students are missing out on further and higher education in Syria alone (969,760 x 20% = 193,952; 193,952-15% = 164,859; 193,952-164,859= 29,093, which may be seen as the estimated gap in IDP participation).

Similar extrapolations were made for other neighbouring countries, using information from UNHCR. However, UNHCR does provide the numbers of 18-59 year olds in neighbouring countries. Hence, extrapolations were made by assuming about 29% of the official UNHCR data for 18-59 year-olds were between 18 and 25⁵. Information on participation rates in neighbouring countries was provided by the relevant authorities (e.g. ministry or the accreditation agency) in the countries themselves. The total gap in participation across the region is, thus, estimated at between 90,000 and 100,000 persons.

Two final considerations are that:

- (a) These extrapolations are an underestimation of the problem, given that they are based on refugees registered with UNHCR
- (b) The number of people in need has been changing at a very fast pace over the last year(s), which also means that these estimates are likely to be increase before the project start. For example, as of March 2015 the estimated number of IDPs is 7.6m, but this was 6.5m just four months before.

2.3. Lessons learnt

- Several initiatives already exist in the region. These initiatives are usually independent from one another (i.e. there is little coordination among the different donors and providers). Coordination of initiatives, and information-sharing would improve efficiency, reduce overlap and cater for higher numbers of Syrians in need of further and higher education.
- To ensure project effectiveness, participation by local organisations is essential. There are systemic weaknesses of the higher education systems in the region (including for example a lack of capacity to cater for local students). Activities should be regionally-driven and relate to national development strategies and plans. Moreover, in the case of refugees, the needs of hosting communities should also be taken into account: the implemented actions should also benefit to local institutions/ students to the extent possible.
- In crisis situations, tangible and quick results are critical to build confidence in national institutions, to reduce the possibility of a 'lost generation' of higher education students, and to reinforce trust in the international community.
- Donor-funded projects are not always coordinated with the governments of the neighbouring countries where they are implemented and are not always evaluated

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⁴ See the EC's "Syria Crisis Facts and Figures" updated to 6 March 2015, at: http://ec.europa.eu/echo/files/aid/countries/factsheets/syria en.pdf

⁵ In other words, it was deemed that a further approximation—calculating 44% of all refugees to estimate the persons between 18 and 59—would have been even less accurate, though it would have been more consistent with the way the number of 18-24 IDPs was estimated

nationally. Moreover, most donor-funded projects are not coordinated amongst each other, which leads to inefficiencies in information to and delivery opportunities for the target group.

- For the target group, it is difficult to identify and find the most appropriate further or higher education opportunity.
- The gap in the target group's participation in higher education is too great to fill with the existing scholarship schemes. To optimise the project's outcomes, the project should look beyond the immediate financial constraints of individual Syrians aged 18-28 who wish to access tertiary education, and also address problems such as the adequacy of the target group's skill set and social integration.
- Nobody knows when the conflict in Syria will end but policies in neighbouring countries are based on the assumption that the situation is temporary even though it is expected that a number of refugees will ultimately settle in the hosting communities. The skills that the target group will have to develop for the future must not be limited to academic higher education but should also cover tertiary level technical and vocational studies, needed both for the future reconstruction of Syria and to contribute to host communities. Therefore, the project should promote both further and higher education.
- Compliance with a set of formal prerequisites that the target group must fulfil (e.g. the
 possession of the necessary secondary diplomas to be eligible for further and higher
 education) is a necessary condition that the project has little power to influence.
 Notwithstanding compliance with national regulations, the project must ensure
 participation and cooperation of local partners to:
 - find flexible solutions for acceptance to regular programmes in hosting countries (e.g. allowing beneficiaries a longer time span to produce necessary documents);
 - find flexible solutions to enable the recognition of Syrian's prior (experiential) learning;
 - find flexible solutions to enable the acceptance of online learning.
- Of utmost importance is that this program will also benefit the host institutions and host populations to garner the required local support and avoid a backlash against the refugee beneficiaries. Social integration in the new context component is added. In all countries under this proposal, especially in Jordan and Lebanon, tensions between host community and refugees are rising. Therefore, in all interventions proposed host community students are just as welcome as refugee students, as long as they are meet similar socio-economic needs. All interventions will be implemented with host community universities and local organizations were possible, in order to build the capacity of HE institutions in the host countries.

2.4. Complementary actions

There are several initiatives already in place provided by an array of different organisations.

The table below presents the key players and the further and higher education options for Syrian students in the region. The table specifies the EQF-level covered by the initiatives, the approximate number of beneficiaries and the countries involved (i.e. the residence of Syrian applicants and possible destinations). The EQF levels indicate the achievement of learning outcomes at that particular EQF level though not necessarily the completion of a degree. The totals are estimates, which include the beneficiaries of short and sub-tertiary courses.

Actor	EQF level (or Equivalent)	Approximate number of beneficiaries (p/y)	Programme	Country
AMIDEAST (funds from US gov / USAID)	6	55	Tomorrow's Leaders Hope Fund Undergraduate Scholarship	Middle East; Lebanon
AUF	6 and above	50		Syria and Lebanon
British Council	Below 6	1,500		Jordan and Lebanon
DAAD	6 and above	200	Leaderships for Syria	Any
European Commission	7-8	100	Erasmus Mundus	Syria
не	6 and above	200	IIE Syria Consortium for Higher Education in Crisis	Any
Jesuit Commons	Below 5	230	From Camps to Campus Higher education at the Margins	Syria and Jordan
Jusoor	6 - 7	12		Global
LASeR	6 and above	670		Lebanon
NUFFIC	>6 (professional courses)	160	MENA Scholarship Programme (MSP)	MENA countries excluding Syria
NRC	Below 6	3,700	Youth Education Programme	Jordan and Lebanon
Sampaio Foundation	6 and above	600	Global Platform for Syrian Students	Global
SPARK	7	100	(Manages the MSP) "Syrian summer University in Exile"	Turkey / The Netherlands
Swedish Institute Study Scholarships	7	15		Syria / Sweden
UNESCO	6 and above		Youth Education for Stability	Iraq, Jordan, Lebanon, and Syria
UNHCR	6	105	Albert Einstein German Academic Refugee Initiative (DAFI)	Jordan (45), Lebanon (60)
UNRWA	6	50		Regional
WUSC	5 and above	74	Student Refugee Programme	Global
Total (all forms of provision)		±7,000		

In addition the EC/DEVCO is funding the programme titled "Reforming technical and vocational education and training (TVET) in Iraq" implemented by UNESCO. The overall objective of the project is to increase the competiveness and relevance of TVET in line with the international standards so that it can deliver quality education to young people to prepare them for wage and self-employment. The specific objectives are: 1. strengthen the TVET sub-sector through an endorsed and operational governance framework; 2.assess the labour market to obtain statistically representative data on the structure of employment to design a sectorial approach to curricula development and modernization and to better understand how to engage the private sector in TVET activities; 3. build the capacity of TVET teachers, instructors, managers and supervisors based on a long term plan of action; 4. create enabling conditions for a smooth school to work transition for graduates of TVET colleges, institutes and technical universities and for a better access to non-formal vocational and entrepreneurship training by vulnerable groups. The direct beneficiaries of the programme are young people, who choose TVET (600,000), and employers (20,000), who are in need of work force with technical and vocational skill (incl. Syrian people)

2.5. Donor coordination

The total EU Funding for Humanitarian Aid for the Syrian crisis since January 2012 amounts to €817m, while the total overall EU (i.e. EU + Member States) funding for the crisis amounts to €3.35bn (for relief and recovery assistance to Syrians in their country and to refugees and their host communities in neighbouring Lebanon, Jordan, Iraq, Turkey and Egypt).

- UNICEF has launched a campaign called No Lost Generation referring to the Syrian crisis, but so far not addressed the issue of higher education since this is outside their mandate. Within Lebanon an inter-agency UN response has also been set-up.
- The EU has also supported students from Syria and countries of the region through the Erasmus Mundus programme, and has provided capacity building assistance to higher education institutions through the Tempus programme.
 - The countries of the region, including Syria, are now partner countries of the newly launched Erasmus + programme.
- Other donors are active in the field of higher education and offer a number of programmes, as shown in the table above; however, many of these programmes are not enshrined in a strategic framework.

All donors operate within the regulatory boundaries of the countries and in agreement with the relevant authorities. Thus, there is coordination with the national authorities, usually through specific working groups.

However, despite many initiatives there appears to be little coordination (a) among them; (b) with the national authorities; and (c) with other (European) partners. Moreover, as mentioned under section 2.4, most operations either offer activities not framed in a real university programme, or focus on full scholarships outside the region, leaving the mass of students under-served.

3. DETAILED DESCRIPTION

3.1. Objectives

Overall objective of the action is:

Improved perspectives on life for Syrian refugees in the host countries in the Middle East and in Syria and preparation for post-crisis Syria reconstruction

The **specific objective** (purpose) of the action is as follows:

Increased participation and equal access to further and higher education in the region for vulnerable Syrian youth who had to abandon their studies as a result of the war and displacements

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⁶ However, in higher education there is very little coordination and different donors might deal directly with the Ministry responsible for higher education or with other ministries (e.g. Planning and International Cooperation or Labour).

⁷ For example the Jordan Response Platform to the Syrian Crisis is a partnership mechanism between the Government of Jordan, donors, and UN agencies to address the Syrian refugee crisis, operating through several thematic working groups (e.g. on health and education).

3.2. Expected results and main activities

The action has four main results which can be broken down into a number of key activities and sub-activities as shown below, in order of priority of results.

Result 1: More Syrian students are enrolled and trained in certified and recognised higher education programmes and further training courses, including innovative further education options.

- 1.1. Establish mechanisms of participation in certified higher education for vulnerable Syrian youth: within (national) regulatory boundaries and within recognised university system and technical/vocational college systems, set up flexible registration/enrolment mechanisms for vulnerable Syrian youth, in existing or new higher education programmes leading to certification.
- 1.2. Reach and assist up to 20,000 young Syrians through a combination of full-time scholarships, full time enrolment in Short-Cycle Higher Education courses, bothface to face, blended and online, inside the region.
- 1.3. Support broader acceptance of online learning and other innovative approaches to teaching and training: support projects that integrate and use existing or newly designed online learning elements, leading to recognised higher education level qualifications.
- 1.4. Monitor the implementation of the supported initiatives.

Result 2: Improved higher education institutions' capacity to provide Syrian youth and other vulnerable groups with opportunities to access further and higher education

- 2.1. Assess higher education institutions' capacity to cater for vulnerable youth, in particular Syrian youth
- 2.2. Develop higher education institutions' capacity to cater for Syrian youth and vulnerable youth:
 - 2.2.1. Support projects establishing teaching and research networks as part of enrolment programmes dedicated to Syrian and vulnerable youth.
 - 2.2.2. Support projects that design, implement and/or pilot flexible learning modalities for Syrian and vulnerable youth, for example projects that:
- 2.3. Use modularization to allow easier recognition of individual learning outcomes;
- 2.4. Use a mix of learning tools (traditional, on-line, preparatory courses, etc.);

Result 3: A clearinghouse mechanism to provide information to vulnerable Syrian youth on existing opportunities in further and higher education for them is in place.

- 3.1 Scan the field for existing clearinghouse mechanisms and/or information instruments on further and higher education opportunities for vulnerable Syrian youth.
- 3.2 Design a clearinghouse mechanism, or scale up one of the existing mechanisms, to complement current information instruments identified under 1.1.
- 3.3 Implement the clearinghouse mechanism.
 - 3.3.1 Publish website.
 - 3.3.2 Disseminate clearinghouse mechanisms with target group, including through the organisation of a communication campaign.
- 3.4 Monitor target group's use of the clearinghouse mechanism.
- 3.5 Provide personalised assistance to Syrian students throughout the enrolment process.

Result 4: Exchange of experience and continuous learning and improvement of further and higher education interventions in the context of the Syrian crisis is facilitated.

- 4.1 Design and develop a mechanism (e.g. Website) for facilitating the sharing of good results and best practices (and to stimulate other stakeholders to follow/participate).
- 4.2 Observe 'supply market' for further and higher education in the region with special focus on Syrian refugees and adapt the programme based on the information gathered.
- 4.3 Continuously collect information and regularly publish/update them.

3.3. Risks and assumptions

- No further deterioration of the situation in Syria and in host countries.
- Readiness of regional further and higher education providers to participate.
- Additional international assistance and finance available.
- Actors in the region have an interest in providing required information to feed into the clearinghouse.
- Higher education institutes of the region have the capacities and are willing to participate in the programme.
- National accreditation systems need to have the organisational, technical and financial capacity to engage on online education.
- Syrian vulnerable students can be reached, are interested and can enrol in higher education programmes.
- Involvement and commitment of relevant institutional committees and concerned line ministries (e.g. in the validation of newly developed curricula) is ensured.
- Higher education institutions are open to using some resources (funding, time, personnel) in projects to support access and study success of vulnerable youth. with support from this programme

Mitigating measures will be further defined in the actual projects, but have been already taken or will be considered, including:

- By working together with HE institutions in providing scholarships and building capacity, a firm working relationship will be established with key local institutions, which in turn will provide leverage in lobbying and advocacy efforts.
- Through working closely with the beneficiaries receiving scholarships and the training, real-time information of barriers to access to education and labour market is collected. Furthermore, by empowering student organizations and working intensively with the refugee population and HE institutions, this will organically provide input.
- Surveys and focus groups with up to one thousand beneficiary students in primarily Turkey, Syria (SIG) and Iraq (KRG) have been held. Consultations have been taking place with host universities to negotiate lower below market rate access and in all countries meeting have been held with national authorities to attain a green light for operations. Priority will be to work with reliable and affordable, preferably public HE institutions,
- Of utmost importance is that this program will also benefit the host institutions and host populations to garner the required local support and avoid a backlash against the refugee

beneficiaries. In all countries under this proposal, especially in Jordan and Lebanon, tensions between host community and refugees are rising. Therefore, in all interventions proposed host community students are also eligible, as long as they are meet similar socio-economic needs. All interventions will be implemented with host community universities and local organizations were possible, in order to build the capacity of HE institutions in the host countries.

3.4. Cross-cutting issues

The programme will be implemented in an instable crisis scenario. Thus, as in humanitarian aid interventions, special attention has to be paid to security issues (e.g. that students have secure access to services) and to the application of do-no-harm principles (e.g. avoid conflicts that can be triggered by a high degree of competition for few opportunities), to inclusiveness (e.g. to give access to the ones most in need, and not to exclude students because of their financial situation). Gender issues have to be strictly considered in all funded projects, as linked to the current situation: equal participation of young men and women in the offered education opportunities has to be guaranteed and monitored.

3.5. Stakeholders

- Facility management, project partners (further and higher education providers, CSOs, government agencies in the region).
- Immediate beneficiaries: Syrian students and families and vulnerable youth in host countries
- Final beneficiaries: young Syrians and their families, Syrian post-crisis society, further and higher education providers in Syria and in the region, young people in the Middle East.

4. IMPLEMENTATION ISSUES

4.1. Financing agreement

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

4.2. Indicative operational implementation period

The indicative operational implementation period of this action, during which the activities described in sections 3.2 and 4.3 will be carried out, is 24-48 months.

4.3. Implementation components and modules

In order to be able to respond to immediate needs for coordinating interventions in the context of the Syrian crisis in favour of learning opportunities for young Syrians the contracting modalities for this programme will be:

Specialised European or International non-profit operators and CSOs will be privileged partners through allocations of grants under direct management. They will be selected in agreement with the flexible procedures applicable in crisis situations as defined by the Financial Regulation and its Rules of Application. Presence and experience in the region, immediate intervention capacity, and the ability to work in multi-actor approaches and inclusive partnerships aimed at recognising

the value of different stakeholders' contributions and synergies will be part of the selection criteria. The awarded grants could be supported by service contracts in case of the need.

Management structure

The management structure will depend on the implementation bodies that will be chosen. A Steering Committee gathering the main stakeholders should meet regularly; the Madad Fund team and relevant EU Delegations may participate as observer.

4.4. Indicative budget

Module	Amount of	Third party
	total budget	contribution
Further and higher education assistance	11 500 000	Not yet determined
projects (Results 1-4) – grants, direct		
management		
Evaluation and audit*	150 000	
Communication and visibility*	250 000	
Contingencies	100 000	
Total	12 000 000	

^{*} 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).

4.5. Evaluation and audit

Provisions for mid-term and final evaluation of the facility and audit are included in the budget for the management of the facility. The projects will include a budget line on monitoring and evaluation and audit, they shall carry out an obligatory final evaluation, and one external audit per year. Whenever possible, evaluations will be jointly carried out by partners. This will also contribute to harmonise further and higher education support to Syrian refugees and to the host countries in the region, in order to make technical cooperation more effective in line with current EU guidelines.⁸

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

4.6. 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.

⁸ EC Guidelines No. 3, Making Technical Cooperation More Effective, March 2009.

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

All visibility actions by Madad Fund implementing partners outside areas of conflict should be stepped up. 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 Madad Fund and relevant EU Delegation. The related costs will be covered by the budgets of the contract as part of the project.

The measures shall be implemented by the implementing consortium/ia, its contractors, and/or its grant beneficiaries. Appropriate contractual obligations shall be included in, respectively, procurement and grant contracts.

The Communication and Visibility Manual for European Union External Action together with specific requirements to highlight the Madad Fund shall be used to establish the Communication and Visibility Plan of the Action and the appropriate contractual obligations.

A dedicated communications/visibility expert will be employed as project staff.