

THE SYRIAN SALVATION GOVERNMENT

A ROADMAP FOR HUMANITARIAN ORGANIZATIONS IN THE NORTHWEST

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KEY POINTS

This report maps the structure of SSG's ministries which directly impact the work of humanitarian agencies, for programmatic clarity.

- › The SSG does not impose any financial strains, taxation, or fees on humanitarian assistance in northwest Syria and has issued multiple statements indicating the importance of the continuity of delivery of humanitarian aid and their intention to facilitate humanitarian activities.
- › The SSG has not declared an official policy towards humanitarian work in areas under its control. The relationship between the relief organizations active in the area and the SSG is a reactive one - access of humanitarian organizations in SSG-controlled areas has become heavily dependent on the capacity and relationships of local staff and their understanding of local dynamics.
- › At present, the Ministry of Development and Humanitarian Affairs (MDHA) is the only institution within the SSG that has direct jurisdiction over humanitarian activities (relief aid and service provision) in the opposition-controlled northwest.
- › The MDHA structure is made up of three main directorates, fourteen under-directorates and seven sub-directorates, four of which currently have direct interactions with humanitarian agencies: the General Directorate of Humanitarian Affairs, Camps Affairs Directorate, Directorate of Association Affairs, and Legal Affairs Department.
- › The General Directorate of Humanitarian Affairs is the main entry point for humanitarian agencies working, or planning to work, in SSG-controlled areas. It has six directorates, two of which currently have direct interactions with humanitarian agencies: the Department of Coordination and Direction and the General Directorate of Humanitarian Affairs sub-directorate.
 - The Department of Coordination and Direction at the General Directorate of Humanitarian Affairs includes the Project Management Unit (PMU), which is the first step in the process of obtaining an MDHA's work permit to implement humanitarian projects.
 - The process for obtaining an MDHA's work permit varies depending on two factors: the type of project - whether it is a relief assistant distribution or service provision; and the location of implementation - whether it is in a community or an IDP camp.
 - There are seven sub-directorates under the supervision of the MDHA's General Directorate of Humanitarian Affairs, each of which is considered the executive authority of the Directorate's decisions and policies in areas that fall under its jurisdiction. Each sub-directorate includes nine offices, six of them that have different roles and responsibilities.

- › The Directorate of Camps Affairs is the directorate responsible for supervising humanitarian affairs within the IDP camps in SSG-controlled areas and it consists of nine departments, two of which have direct interactions with humanitarian agencies: the Coordination and Direction Department and the Technical Supervision Department

 - The Coordination and Direction Department is responsible for reviewing humanitarian projects, whether relief or service provision, targeting IDP camps in northwest Syria and ensuring that it does not conflict with the work plan of other directorates of the MDHA.
 - The Technical Supervision Department at the Camps Affairs Directorate is the central authority for approving and monitoring humanitarian projects of service provision nature in IDP camps.

- › The Directorate of Organizations Affairs is concerned with solving all matters related to the affairs of humanitarian organizations. The directorate consists of nine departments, three of which have direct interactions with humanitarian agencies: the Licensing Department, Department of Relief work Facilitation, and the Liaison Department.

 - The Licensing Department of the Directorate of Associations Affairs is the authority responsible for registering and licensing local associations and volunteer teams emerging in areas under the control of the Salvation Government.
 - The Department of Relief Work Facilitation at the Directorate of Associations Affairs provides free of charge non-obligatory facilitation services to humanitarian organizations operating in SSG-controlled areas through two main offices: the Protection and Safety Office and the Crossings Office.

- › The Liaison Department is responsible for coordinating service provision projects with other ministries of the Salvation Government. The directorate includes several liaison platforms, each of which is specialized in following up humanitarian projects with the relevant ministry in the Salvation Government.

- › The Legal Affairs Department of the MDHA's General Directorate is the main interface between humanitarian organizations and the security and judicial entities in SSG-controlled areas. The Department includes four divisions, one of which is relevant to the work of humanitarian organizations.

- › The Judicial Follow-up Department includes four main offices, each with a specific jurisdiction, including Camps Cases Division; Organizations Cases Division; Personnel Cases Division; and the Ministry Cases Division

INTRODUCTION

Humanitarian needs have increased dramatically in northwest Syria, with residents, opposition supporters and the internally displaced seeking refuge in the region. There are approximately 2,771,739 people in opposition-held areas of northwest Syria, 1,854,166 of whom are internally displaced persons (IDPs) who live in IDP camps and collective shelters. The UN Office for the Coordination of Humanitarian Affairs (OCHA) reports that both local and displaced populations in the opposition-controlled northwest share the same humanitarian needs, including food security, shelter, access to basic services, health facilities, and education. Martin Griffiths, Under-Secretary-General for Humanitarian Affairs and Emergency Relief Coordinator, stated that a combination of hostilities, economic crisis, water shortages and COVID-19 have raised humanitarian needs in Syria to their highest levels since the beginning of the conflict. However, the 2021 Humanitarian Response Plan received only a quarter of the requested funding.¹

The opposition-controlled northwest of Syria has also witnessed major internal military and political unrest in recent years. This upheaval began when Hay'at Tahrir al-Sham (HTS) succeeded in excluding its rivals and imposed absolute military control over opposition areas in Idlib. This was followed shortly by the emergence of the Syrian Salvation Government (SSG), which has systematically consumed previous local administrations and unified governance structures, including administrative, judicial, and service provision directorates, across the opposition-controlled northwest.

The emergence of the SSG has greatly affected the work of humanitarian organizations in northwest Syria. Changes in the administrative landscape have led to a change in the administrative process for implementing humanitarian projects which humanitarian organizations had become accustomed to since early 2015. The local councils, which were operating independently, moved to the SSG's Ministry of Local Administration and Services (MLAS), while the relief offices, which were part of the local councils, moved to the SSG's Ministry of Development and Humanitarian Affairs (MDHA). Further, on October 17 2021, MLAS issued a [circular](#) preventing all local councils in its areas of control from communicating directly with humanitarian agencies, stating that all communications must instead be conducted through the MDHA. This came in the absence of a clear policy by the SSG towards humanitarian work and humanitarian organizations. The government has not issued any information or clarifications on the conduct of humanitarian work within these ministries and their affiliated institutions. Key informant interviews concluded that a number of actors involved in the implementation of humanitarian assistance projects are unable to obtain work permits, whether in

¹ UN Press Release, [Escalating Conflict, Deepening Economic Crisis in Syria Pushing Humanitarian Needs to Highest Levels Since Start of Conflict](#), Senior Officials Tell Security Council | Meetings Coverage and Press Releases, August 2021.

camps or local communities, and most of them do not have a clear idea of how to act if the organization faces a lawsuit or complaint or have been subjected to attempts to interfere or harass.

This paper examines the administrative structure of the institutions of the SSG concerned with humanitarian affairs and the responsibilities and powers of each of them. It is worth noting that this report is not intended to evaluate the actions or policies of the SSG nor promote it in any way. Instead, this research aims to improve the understanding of humanitarian organizations of how to work within these institutions, navigate procedures, and improve the clarity of reporting of issues when they occur.

For the purposes of this research, humanitarian interventions in northern Syria are divided into two categories: relief assistance (delivered through multiple modalities), such as food baskets and non-food items, and service provision, such as healthcare, education, psychosocial support, WASH, livelihoods, and other sectors. The research for this paper is reliant on qualitative data collected from both primary and secondary sources. Primary data is collected via key informant interviews (KIIs) with a variety of stakeholders involved in the implementation of humanitarian assistance projects including representatives of LNGOs, I/NGOs, and officials of the SSG. Secondary data relies on open-source research.

PART I: THE SYRIAN SALVATION GOVERNMENT IN NORTHWEST SYRIA

THE EMERGENCE OF THE SYRIAN SALVATION GOVERNMENT

Until late July 2017, opposition-held areas in northwest Syria – to include Idleb governorate and parts of western Aleppo, northern Hama and rural Lattakia – were under the military and administrative control of two main organizations: Ahrar Al-Sham and Hay'at Tahrir Al-Sham (HTS). The two organizations were nominally allied under the Jaish al-Fatah alliance since 2015, but simultaneously maintained separate, competing service provision entities for revenue generation: HTS's General Administration for Services (GAS), and Ahrar Al-Sham's General Commission for Service Management (GCS).² In late July 2017, the rivalry between Ahrar Al-Sham and HTS erupted into armed conflict, in which Ahrar al-Sham suffered large losses and was ultimately defeated. Subsequently, HTS became the predominant armed and political actor in opposition-controlled northwest Syria.³

HTS immediately sought to establish a governance body to cement its role in the civilian sphere. In late August 2017, the president of Idleb University, Dr. Mohammed al-Sheikh, convened local activists, community leaders, civil society actors and journalists to discuss the establishment of a neutral, alternative governing body with a view to creating a unified civilian and military opposition against the Syrian government. The meeting represented the first direct step towards the formation of the SSG, with attendees agreeing on the formation of the Establishment Committee.⁴ By 11 September, the Committee, headed by Dr. Bassam Suhyoun, announced the formation of a constituent assembly to determine the structure of the SSG, as well as the appointment of Dr. al-Sheikh as the SSG's Prime Minister. By early November, the constituent assembly and Dr. al-Sheikh had concluded their work in coordination with the EC, and 11 ministries were subsequently announced.

Consolidation of control

Once established, the SSG immediately and systematically sought to absorb responsibilities that were under the control of the two previous rival administrations. Ahrar Al-Sham's GCS was forcibly

² Wikipedia, [Army of Conquest](#), Updated 2017

³ On 18 July, 2017, clashes between Ahrar Al-Sham and HTS began in strategic areas in northern Idleb and northwestern Aleppo governorate. HTS took control of Ahrar Al-Sham's strategic locations in northern Idleb, and by 23 July, a governorate-wide ceasefire was implemented to evacuate Ahrar Al-Sham's core leadership to Jarablus in northern Aleppo.

⁴ The Establishment Committee consisted of 32 members and was initially known as the Civil Administration for the Liberated Areas.

dissolved, and its responsibilities were taken over by Hay'at Tahrir Al-Sham's GAS, which it later handed it over to the SSG's Ministry of Local Administration and Services (MLAS).⁵

However, and despite its efforts to expand its influence and unify governance structures across the opposition-held northwest region, the SSG's influence did not extend beyond HTS-controlled communities until early 2019. HTS has however played an important role in eliminating the remaining rival administrations in the region, such as the Turkish-supported Syrian Interim Government (SIG) and the Civil Administration of the National Liberation Front (NLF) in western Aleppo countryside – HTS enforced the SSG's decision to close SIG offices across Idlib and western Aleppo in response to SIG's officials publicly rejecting an initiative to merge with the SSG in late December 2017.⁶ HTS also launched a military campaign targeting opposition National Liberation Front (NLF) and Nourredine al-Zinki-held areas in Idlib and western Aleppo, leading to widespread expulsion of their combatants and the consolidation of control under the SSG in December 2018.^{7,8}

Structure and influence

The SSG's cabinet structure changed several times over the four years prior to reaching its current structure.⁹ It is currently made up of 10 ministries, with over 5,000 employees.¹⁰ The SSG cabinet includes several subcommittees and a General Secretariat that focuses on archiving issued and incoming decisions and organizing files of government workers through the General Archives and the General Directorate of Human Resources. The current sub-committees in the SSG cabinet include the following; Legal Affairs, Public Relations, Control and Inspection, Planning and Statistics, Missing and Detainees Affairs, Sports and Youth, and Federation of General Trade Unions. Each sub-committee is responsible to oversee the work at the various departments and ministries of the SSG. For example, the Legal Affairs committee is responsible for reviewing internal laws and overseeing the legal departments in the various ministries while the Public Relations committee oversees the PR departments and complaints offices in the various ministries across the SSG.¹¹

⁵ For more detailed information on the establishment of the SSG, readers are strongly advised to read HAT Syria's [Consolidation of Hay'at Tahrir al-Sham's Control in Opposition-controlled Northwest Syria](#), published in September 2017.

⁶ In mid-December 2017, when a number of local community leaders put forward an initiative to integrate the SSG and the SIG. Though SSG officials showed no objection to the initiative, SIG officials publicly rejected it, citing an unwillingness to deal with a government linked to terrorism. As a result, SSG officials demanded the SIG to close all offices in northwest Syria within 72 hours, a demand that was eventually enforced by HTS security forces. SIG education, health, and local administration offices in Ma'ret An-Nua'man were subsequently closed.

⁷ For further reading on the consolidation of the SSG, readers are strongly advised to read HAT Syria's [Consolidation of Salvation Government's Control in Opposition-Controlled Northwestern Syria](#), published in March 2019.

⁸ On 28 December, 2018, HTS accused Nourredine al-Zinki (NDZ) of killing four HTS fighters in Jabal Sheikh Barakat, Daret Azza subdistrict. Although both NDZ and the NLF were quick to deny involvement, HTS launched a campaign against NDZ in the western Aleppo countryside. By 6 January, after heavy fighting, HTS had expelled NDZ and established full control over western Aleppo.

⁹ Syrian Salvation Government. [Official website](#), updated regularly.

¹⁰ Youtube, [An interview conducted by Al-Sham News Agency with the Prime Minister of the Syrian Salvation Government](#), September 2020.

¹¹ [SSG-produced visual report](#) explaining the structure and responsibilities of SSG prime ministry and its committees

Ministers of the Syrian Salvation Government

Prime Minister

Ali Keda, born in the village of Harbnos in the northern countryside of Idlib in 1973. He holds a bachelor's degree in Electrical Engineering and in Military Engineering. He had held the position of Assistant Minister of Interior for Administrative Affairs and Public Relations in the SSG. He previously worked in the administration of the city of Idlib and participated in the management of local councils and the educational process in the schools of the region.



Ministry of Justice

Headed by Minister Anas Mansour Al-Sulaiman, born in Atareb city in 1979. He held the position of Minister of Justice in the third term. He holds the position of President of the First Financial Chamber in the Court of Appeal. He has worked as a judge in many Sharia courts since early 2012 and has worked in the field of justice since the beginning of the establishment of the government.



Ministry of Education

Headed by Minister Bassam Mohamed Sehyoni. Born in Baniyas in 1972 and holds a PhD in Sharia and Law. He served as Chairman of the Constituent Assembly of the Syrian General Conference between 2017-2018 before serving as Chairman of the Shuwa Council for the year 2019-2020.



Ministry of Higher Education

Minister Fayez Ahmed Al-Khalif, born in Rusafa 1982. Holds a PhD in agricultural sciences from Cairo University. He held the position of Minister of Agriculture in the first term before becoming the Secretary of the Council of Higher Education. Khalif is a faculty member at the University of Idlib.



Ministry of Health

Minister Ayman Ismail Jabbs, born in 1975 in the town of Kafr Takharim in the western Idlib countryside. He holds a master's degree in internal diseases from Damascus University. He served as Minister of Health in the previous term. He has been the medical director of the Nursing and Gynecology Hospital since 2018.



Ministry of Agriculture and Irrigation

Minister Muhammad Taha Al-Ahmad, born in Hama Governorate in 1982. He holds a bachelor's degree in agricultural engineering from the University of Aleppo and a PhD in agricultural engineering from the University of Idlib. He held several positions, including director of the Idlib administration and director of the civil administration for services before he became the Minister of Economy and Resources in the Salvation Government and then the Minister of Agriculture in the previous term.



Ministry of Economy and Resources

Minister Basil Abdel Aziz, born in Aleppo Governorate in 1984. He holds a bachelor's degree in Energy Engineering from Aleppo University. He served as Minister of Economy and Resources in the rescue government in the third term.



Ministry of Local Administration and Services

Minister Qutaiba Abdel Hamid Al-Khalaf, born in the town of Qminas in the Idleb countryside in 1983. He holds a bachelor's degree in Civil Engineering from Aleppo University. He held several positions, including director of technical services in the Ministry of Local Administration and Services and the position of director of housing and construction in the Ministry of Local Administration and Services before becoming a minister in the third term of the Salvation Government.



Ministry of Awqaf and Guidance

Minister Hussam Haj Hussein, born in Idleb Governorate in 1977. He holds a bachelor's degree from the Faculty of Sharia and a diploma in educational qualification from Damascus University. Director of the Office of Mosques Affairs at the Ministry of Awqaf in 2019 before becoming the Assistant Minister of Awqaf in 2020.



Ministry of Interior

Minister Ahmad Muhammad Latouf, born in Dana in the northern countryside of Idleb in 1971. He holds a bachelor's degree in Law from Aleppo University. He held the position of Deputy Minister of Interior in the first term of the SSG, and he held the position of Minister of Interior in the second and third terms of the government.

Figure 1. SSG ministerial structure, 2021. (Source: SSG website)

PART II: THE SALVATION GOVERNMENT AND HUMANITARIAN ORGANIZATIONS

POLICY TOWARDS HUMANITARIAN ORGANIZATIONS

There is no doubt that the SSG acts to try to ensure the continuation of humanitarian activities in the areas under its control. It does not impose any direct financial pressures or taxes on humanitarian goods or deliveries, nor does it enforce any regulations restricting the work of aid organizations.¹² On the contrary, the SSG has issued several statements emphasizing the importance of the continued provision of humanitarian assistance and its intention to facilitate humanitarian activities.¹³ This can be attributed largely to the fact that out of the almost four million people living in government areas, nearly two million live under challenging conditions and need life-saving humanitarian assistance, which the SSG does not have the resources to meet – the SSG-controlled areas of northwest Syria are not rich in easily extractable natural resources and its only revenue source remains internal fees and trade taxes that would not independently cover the incredibly high humanitarian needs. It is therefore in its own interest to facilitate humanitarian programming, and has done so since it gained control.

Motives for recent structural and administrative changes which could impact humanitarian programming are unclear, and have not been clarified by the respective ministries. What has become clear however, through interviews conducted during this research, is that a large number of humanitarian actors are not familiar with the administrative structure of the SSG's Ministry of Development and Humanitarian Affairs (MDHA), the main institution concerned with humanitarian work and humanitarian organizations in the opposition-controlled areas. Most of the participants were unable to list the steps required to obtain permission to implement a project, and all indicated that it depends largely on the capacity and relationships of local employees with SSG employees and their understanding of local dynamics. All participants did not have a clear idea of how to act in the event that the organization faced a lawsuit or complaint, or was exposed to attempts at interference or harassment. OCHA and its Assessment Working Group remains the only path for NGOs (although this

¹² Some of its policies however have impacted the humanitarian organizations indirectly, for example the work of [the Public Monetary Authority](#), as reported by HAT Syria.

¹³ Enab Baladi, HTS stresses the importance of continuing humanitarian work, July 2017; [إيقاف الرسوم المفروضة على السيارات الشاحنة للمساعدات](#) Syrian Salvation Government, official website; [وكالة أنباء الشام - NAS News](#); Syrian Salvation Government, official site. [The SSG stops fees imposed on trucks for humanitarian aid](#) Exempting contractors and suppliers from supervision fees for projects implemented inside the camps,

is usually the larger NGOs familiar with the support structure) to report issues and receive the support they need.

MINISTRY AND DIRECTORATE STRUCTURE

At present, the Ministry of Development and Humanitarian Affairs (MDHA) is the central institution within the SSG that has direct jurisdiction over humanitarian activities (relief aid and service provision) in the opposition-controlled northwest of Syria.¹⁴ The MDHA plays an important role in coordinating humanitarian projects of a service provision nature with other relevant ministries, mainly the Ministry of Local Administration and Services (MLAS) – the main institution of the SSG that has jurisdiction over local councils and basic service provision in the area – the Ministry of Agriculture, and the Ministry of Economy.¹⁵ Interviews conducted within this research indicated that there is confusion among humanitarian actors about the difference between the respective mandates of the MDHA and MLAS for humanitarian work in the region. This confusion can be attributed to several factors, most importantly that relief offices (also known as local council humanitarian offices), the main entities which enjoyed jurisdiction over humanitarian activities prior to the SSG's emergence, were not independent offices, but rather a department within local councils that were later placed under MLAS jurisdiction.¹⁶

At present, MLAS has authority over local councils except for relief offices that have come under the direct control of MDHA and continues to act as direct links between humanitarian agencies and local communities, as will be explained in the next sections.¹⁷

Ministry of Development and Humanitarian Affairs

The Ministry of Development and Humanitarian Affairs (MDHA) is the central institution within the SSG responsible for humanitarian activities and humanitarian organizations operating in opposition-controlled northwest Syria. The MDHA was established with the emergence of the Syrian government and soon established control over two main entities: the Organizations Office of the Hayat Tahrir Al-Sham General Administration for Services (GAS) and relief offices (also known as local council humanitarian offices) in the cities and villages located in SSG-controlled areas.¹⁸ At its inception, the

¹⁴ Humanitarian interventions in northern Syria can be divided into two categories: emergency in-kind distributions (delivered through multiple routes), such as food baskets and non-food items, and service delivery, such as health, education, psychosocial support, WASH, and other sectors.

¹⁵ Facebook, <https://fb.watch/89AvRvzAYR/>

¹⁶ حكومة الإنقاذ تعيد هيكلة المجالس المحلية وتعتمد هذه الصفات لأعضائها

¹⁷ Local Councils (LCs) initially formed out of the *tansiqiyat* activist networks during the initial Syrian uprising in 2011. However, beginning in 2012, armed opposition groups (AOGs) began to seize territory previously administered by the GoS, and citizens in these areas were left without many public services. Consequently, several *tansiqiyat* restructured and developed into LCs, which assumed many of the functions and services that the GoS had previously administered.

¹⁸ The Office of Humanitarian Organizations formed in late 2015 as a component of the GAS and is nominally responsible for registering and overseeing humanitarian operations in Idlib. However, the Office of Humanitarian Organizations was considered financially weak, poorly staffed, and largely neglected by Hay'at Tahrir Al-Sham leadership.

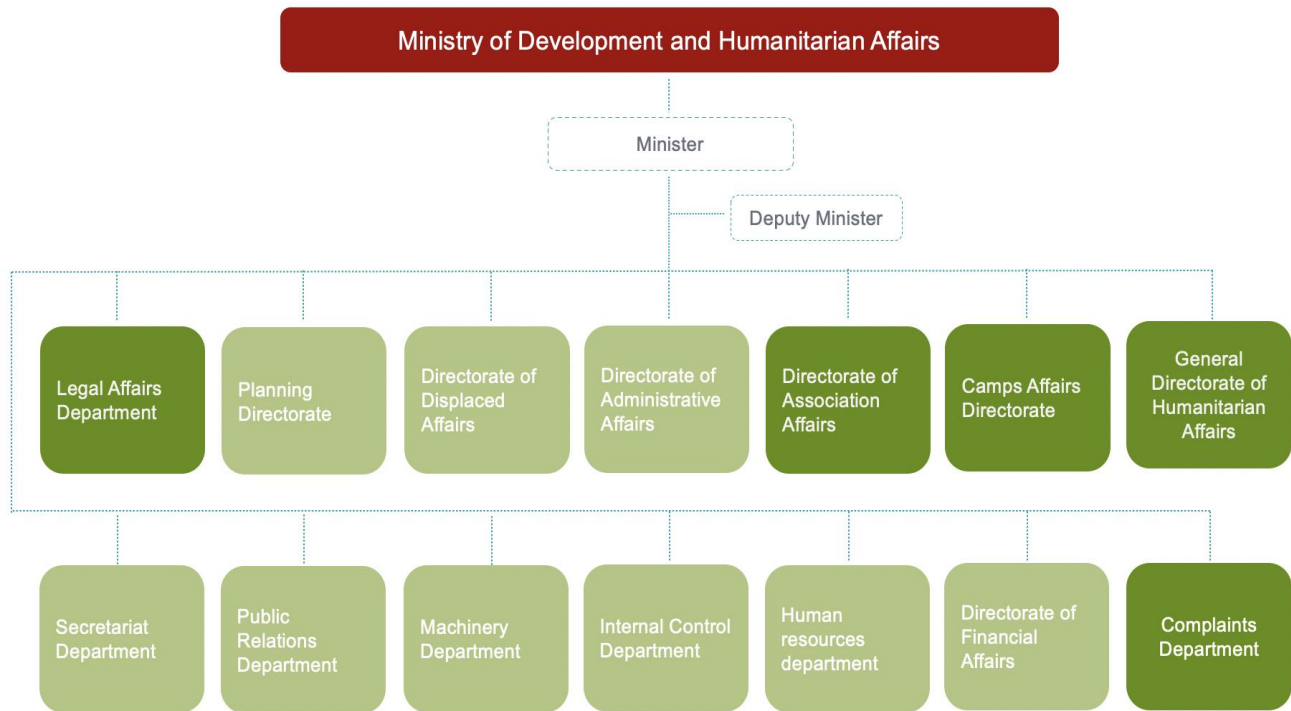


Figure 2. Current structure of the Ministry of Development and Humanitarian Affairs. (Source: MDHA Officials)

MDHA replaced the GAS's Organizations Office with three main directorates (hereafter referred to as sub-directorates) to manage humanitarian affairs alongside relief offices in the regions of Idleb, Sarmada, and Atmah. This situation continued until early 2019 when the MDHA was restructured and expanded to include 14 directorates and seven sub-directorates, each of which has a different role in the field of humanitarian work (shown in Figure 2).

The interviews conducted during this research indicated that the MDHA has two prominent roles in the humanitarian sphere of northwest Syria: 1) providing humanitarian aid directly to local communities; and 2) facilitating and overseeing the implementation of relief and service provision projects implemented by humanitarian organizations.^{19,20}

The research concluded that the MDHA's General Directorate of Humanitarian Affairs had directly implemented several humanitarian projects in IDP camps, including extending water networks, sewage networks, paving camp roads, and distributing relief baskets to IDP camps and hard-to-reach areas.^{21,22} MDHA officials said that the development of the ministry's structure has helped speed up the issuance

¹⁹ Youtube. [Visual report explaining the work of the General Directorate of Humanitarian Affairs.](#)

²⁰ Youtube. [The SSG's Prime Minister's speech](#) during his meeting with the staff of the Ministry of Development and Humanitarian Affairs.

²¹ Youtube. [Visual footage of members of MDHA's General Directorate of Humanitarian Affairs](#) distributing food baskets in hard-to-reach areas (Hard-to-reach areas defined in this report as areas close to the frontlines).

²² Youtube. [Visual footage of members of MDHA's General Directorate of Humanitarian Affairs](#) distributing food baskets in IDP camps.

of permits to implement humanitarian projects, as the ministry's capacity has increased from 3 work permits per day in 2020 to 13 work permits per day this year.²³ In addition to issuing work permits, the MDHA's General Directorate of Humanitarian Affairs had played a significant role in overseeing the implementation of various service provision projects in IDP camps and communities.^{24,25}

An MDHA official said: "We in the Salvation Government seek to create an attractive, safe and comfortable environment for the work of humanitarian organizations."

Another MDHA official stated: "Our policy is to facilitate the work of humanitarian organizations and remove any obstacles they face, and we have communicated this to all the departments of the Salvation Government."

However, interviews conducted during this research indicated that only a small number of participants were able to list the required administrative steps for humanitarian project implementation in the SSG-controlled areas. The majority of participants did not know how to act if the organization faced a lawsuit or complaint, or faced obstacles, in SSG-controlled areas.²⁶ Currently, out of the 14 directorates only four have direct interactions with humanitarian agencies: the General Directorate of Humanitarian Affairs, Camps Affairs Directorate, Directorate of Association Affairs, and Legal Affairs Department. Each of the five directorate is taking a role in supporting, facilitating the work of I/NGOs as follow:

1. General Directorate of Humanitarian Affairs

MDHA's General Directorate of Humanitarian Affairs is the main entry point for national and international humanitarian organizations working, or planning to work, in SSG-controlled areas. The General Directorate of Humanitarian Affairs, also known locally as the *Blue Building*, consists of a general director, deputy, and six main directorates. While each plays a different role in the process of coordinating humanitarian projects in the areas of northwest Syria, only two of the six directorates currently have direct interactions with humanitarian agencies: the Department of Coordination and Direction and the sub-directorate that falls under the supervision of the MDHA's General Directorate of Humanitarian Affairs (shown in Figure 3).

²³ According to KIIs

²⁴ Youtube. [Visual footage of members of the Services Office at Sarmada sub-directorate](#) of the General Directorate of Humanitarian Affairs overseeing the implementation of WASH project in Taibat Al-Imam IDP camp in Kafr Losin areas.

²⁵ Youtube. [Visual footage of members of the Services Office at Atmeh sub-directorate](#) of the General Directorate of Humanitarian Affairs overseeing the paving roads at 15 IDP camps in Atmeh areas:

²⁶ According to KIIs

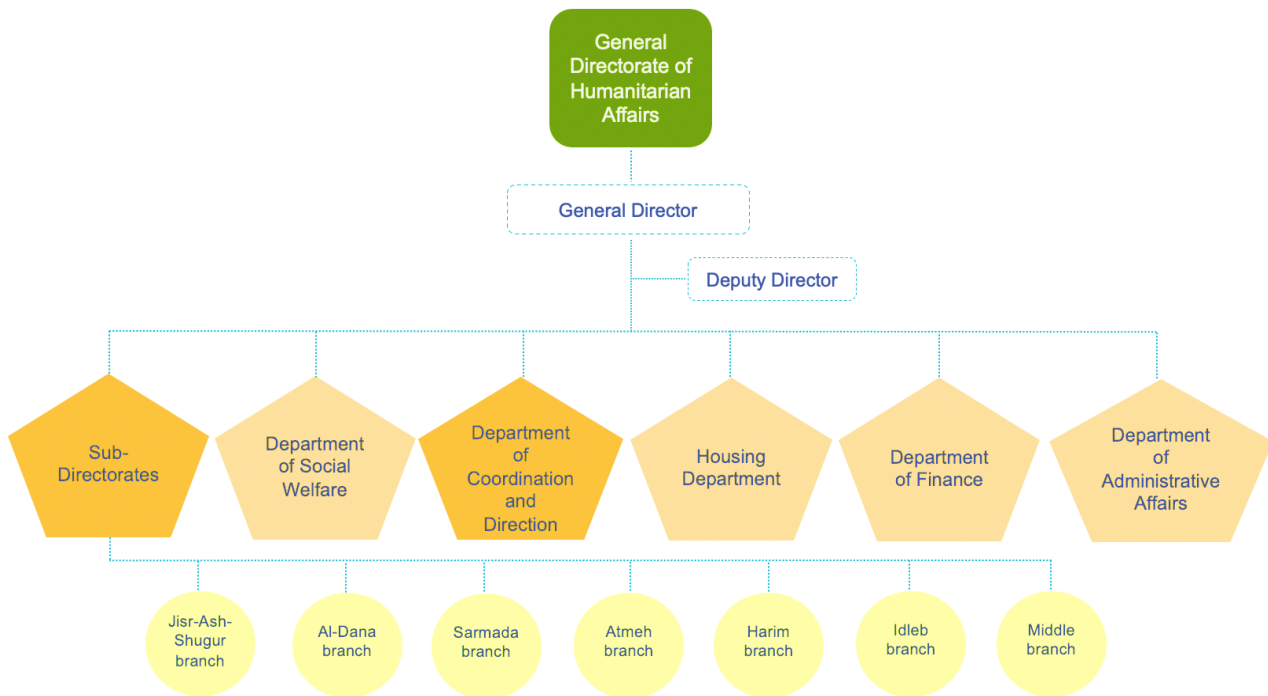


Figure 3. Current structure of the MDHA's General Directorate of Humanitarian Affairs; (Source: MDHA officials)

a. Department of Coordination and Direction

The Coordination and Guidance Department is the main entry point for international and national humanitarian organizations that wish to obtain licenses to implement humanitarian projects from the MDHA. The Directorate hosts the Project Management Unit (PMU), previously known as the Coordination Office, the first step in the process. The PMU structure contains a general manager, a deputy, and a number of coordinating officials, usually five to seven officers.²⁷ Each officer is assigned a specific list of I/NGOs to handle, and these lists are usually rotated between the officers every 6 to 12 months or upon request.²⁸

Local and international organizations cannot operate in SSG areas without obtaining a project implementation license, locally known as a *letter of no objection* from the MDHA's PMU. Interviews conducted during this research concluded that the process for obtaining the *letter of no objection* varies depending on two factors: the type of project (whether it is a relief assistant distribution or service

²⁷ KIIs concluded that there are five officers currently operating in the MDHA's Project Management Unit. The current general manager is known as Abu Ahmed and his deputy is known as Abu Osama.

²⁸ KIIs indicated that some officers may be difficult to deal with, and the I/NGOs ability to request a transfer is highly dependent on the I/NGO representative connections to the Department of Coordination and Guidance Director.

provision); and the location of implementation (whether it is in a community or an IDP camp). The PMU can issue a final *letter of no objection* for relief assistance projects targeting communities and only an initial *letter of no objection* for community-based service provision projects and IDP camp-based projects.

Interviews conducted during this research concluded that in order to obtain the *letter of no objection* for relief assistance projects targeting communities, the I/NGO representative must submit the intended project details including project duration, location, number of targeted beneficiaries, and adopted selection criteria to the I/NGO assigned officer at the PMU.²⁹ Project details and specifics could be subject for discussion, and possibly modification, depending on the subjective judgement of the officer and the I/NGOs tolerance policy. Interviews conducted show that the expected timeframe for obtaining a *letter of no objection* from the PMU does not usually exceed 1–2 days, and sometimes it is granted and certified on the same day. Participants indicated that officers at the PMU are more cooperative with INGOs than LNGOs and therefore the processing times for INGO's *letter of no objection* has been significantly shorter than LNGOs. Once permission is granted, the original document remains in the General Directorate records while a copy will be granted to the I/NGO representative and another will be distributed to the seven sub-directorates under the MDHA's General Directorate of Humanitarian Affairs supervision via an existing Whatsapp group.

Interviews conducted during this research concluded that for service provision projects targeting communities the I/NGO assigned officer at the PMU provides the I/NGO with an initial *letter of no objection* before transferring it to the Liaison Department at the Directorate of Associations Affairs for final approvals and coordinations (as explained in the [Directorate of Association Affairs](#) section), while projects targeting IDPs camps will be transferred to the Coordination and Direction Department at the Camps Affairs Directorate (as explained in the [Camps Affairs Directorate](#) section).

b. Sub-directorates

There are seven sub-directorates under the supervision of the MDHA's General Directorate of Humanitarian Affairs, each of which is considered the executive authority of the MDHA's General Directorate decisions and policies in areas that fall under its jurisdiction. Each sub-directorate is responsible for a set of subdistricts and IDP camps in which they are located as follows:

- Idleb sub-directorate including Ariha subdistrict;
- Al-Dana sub-directorate including Daret Azza;
- Sarmada sub-directorate including Kelly and Burdaqly;

²⁹ The required project details may vary depending on the project type. Local sources reported that details could include amount of vouchers for cash voucher projects; basket contents for food or NFI basket distribution projects; project phases and expected number of distribution days; number of beneficiaries, and their selection criteria.

- Atmeh sub-directorate including Qah, Atmeh, Deir Hassan, and Mashhad Ruhin;
- Harim sub-directorate including Armanaz, Qurqania, Salqin, and Kafr Takharim;
- Jisr-Ash-Shugur sub-directorate including Darkosh, and the coastal area;
- and the Middle sub-directorate (known as al-Wsta sub-directorate) including al-Foa.

Each sub-directorate includes a sub-directorate manager (hereafter referred to as branch manager), an office manager, and nine offices (shown in Figure 4), six of which have different roles and responsibilities towards humanitarian activities as following:³⁰

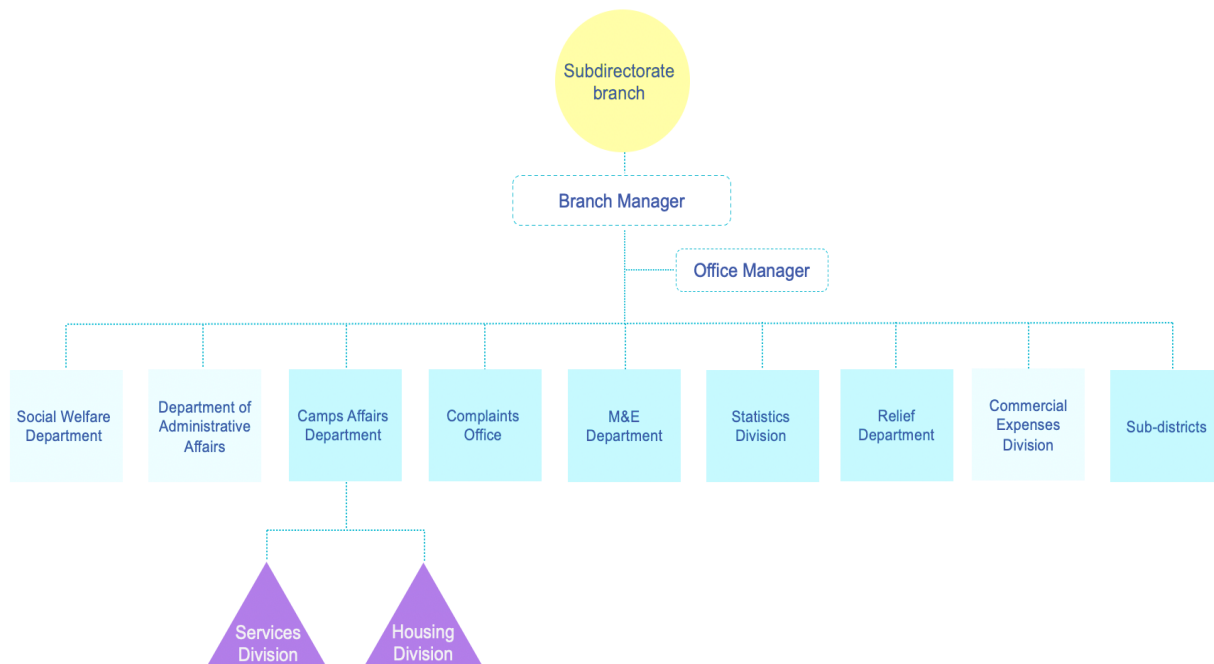


Figure 4. Internal structure of an MDHA sub-directorate. (Source: MDHA Officials)

i. Sub-districts

The sub-district office includes a number of Area Coordinators, each of whom is responsible for a number of villages and cities within the specified subdistrict. The number of Area Coordinators is determined by the number of the geographic areas that fall under the supervision of the sub-directorate. For example, Atmeh sub-directorate includes four Area Coordinators, one for each of Qah, Deir Hassan, Atmeh, and Mashhad Ruhin; while Sarmada sub-directorate includes two for Kelly and Burdaqly. Area Coordinators are the primary

³⁰ The powers and functions of the Social Welfare Office office are still vague. KIIs indicate that it deals with the affairs of the most vulnerable groups in society, such as widows, orphans, the elderly, and people with special needs and ensures that they receive adequate assistance, live in decent living conditions, and promote special care for severe cases of disability. However, there are no apparent interactions between the Social Welfare Office and I/NGOs operating in SSG-controlled areas.

interface between the I/NGO representatives and the remaining offices of the sub-directorate. For relief projects, and after obtaining the *letter of no objection* from the PMU, the sub-directorate branch manager will redirect the I/NGO representative to meet with the concerned Area Coordinator to get the required statistics – which are provided to the Area Coordinator by the sub-directorate Statistics Office.³¹

ii. Relief Department

The Relief Department at the sub-directorate level oversees the work of relief offices at the community level (also known as local council humanitarian offices) as well as administering relief projects funded by the SSG.^{32,33} However, community-level relief offices no longer have the same authority over the work of humanitarian agencies in northwest Syria. Prior to the emergence of the SSG, relief offices, being part of the local councils, were the main entry point for international and national humanitarian organizations working or planning to work in local communities. I/NGOs were required to coordinate with the community's local council and its relief office in order to obtain work approvals, need assessments, and beneficiary lists required to facilitate humanitarian work within the targeted community. This is not the case now.³⁴

The role of community-level relief offices role is currently limited to facilitating the I/NGO access at the community level and assisting I/NGOs representatives during field visits and beneficiary list verification process. Interviews conducted during this research indicated that the MDHA is currently considering a plan to form relief complexes on a subdistrict-level to replace community-level relief offices. A few participants indicated that the MDHA has already formed its first relief complex in Harim subdistrict, where all relief offices from towns and cities of Harim subdistrict were located in a one new building, however, HAT research was unable to confirm this.

iii. Statistics Office

The Statistics Office at the sub-directorate level is an office affiliated to the MDHA's Planning Directorate.³⁵ The office's main task is to conduct population surveys in the communities and IDP camps that fall under the coverage of the subdistricts and submit them to the district

³¹ For example, I/NGOs intending to work in Salqin will be directed to meet with the Salqin Area Coordinator in the Harim sub-directorate.

³² Youtube. [Visual footage of Harim sub-directorate Relief Department and M&E Department](#) at a food basket distribution in Dar al-Salam IDP camp in Harim area.

³³ Youtube. [Visual footage of the Middle sub-directorate Relief Department and M&E Department](#) distributing 2,400 food baskets to families in the towns of Shalaf, Ketyan, and Maaret Elnaasan:

³⁴ According to KIIs

³⁵ Youtube. [Visual report explaining the work of the MDHA's Planning Directorate.](#)

representative and the camp affairs office upon request.^{36,37} The interviews conducted during this research indicated that the data provided by the Statistical Office is usually too generic (unspecific or not detailed enough), sometimes meaning I/NGOs apply additional selection criteria to obtain lists of beneficiaries or conduct new demographic surveys.

If the statistics that the humanitarian organizations provide do not match the statistics provided by the Statistics Office, the work may stop until the statistics are cleared. For example, if the statistics of the Statistics Office indicate that Camp X contains 100 families, but the I/NGO field survey concludes that the camp includes 110 families, the camp manager must contact the Statistics Directorate to obtain clearance regarding this difference. The interviews indicated that the data clearance process aims to ensure that residents – I whether in camps or communities – are not registering their names in two different places to receive duplicated aid.³⁸

iv. Monitoring and Evaluation Office

The Monitoring and Evaluation Office (M&E Office) at the sub-directorate level monitors the implementation of I/NGO relief projects as well as SSG-funded projects. Interviews conducted during this research concluded that the sub-directorate's M&E teams are commonly assigned to monitor in-kind aid distribution projects both in IDP camps and in communities. MDHA's M&E teams are expected to conduct field visits during and after the implementation of relief projects and communicate directly with the I/NGO representative and the I/NGO assigned officer at the PMU with any issues.

v. Camps Affairs Department

The Camps Affairs Department at the sub-directorate level is considered the executive authority of the MDHA's Camps Affairs Directorate. The Directorate is responsible for supervising the implementation of all humanitarian projects, whether relief or service, within the IDP camps that fall within its coverage areas. The directorate includes two main divisions:

- **Housing Division:** is an office that coordinates closely with the Housing Department at the General Directorate of Humanitarian Affairs.³⁹ The Housing Division is responsible for providing tents to newly arriving families at IDP camps in its coverage areas,

³⁶ Youtube [Visual footage of members of the Statistics Office at the Jisr-Ash-Shugur sub-directorate](#) conducting population survey in Salah Al-Din IDP camp.

³⁷ Youtube. [Visual footage of the Statistics Office at Idlib sub-directorate conducting population survey in Idlib city.](#)

³⁸ According to KIIs

³⁹ Youtube. [Visual report explaining the work of the Housing Division](#) at the sub-directorate level:

counting the damaged tents in the camps, and supervising their replacement.⁴⁰ The Housing Division acts as an executive force of the General Directorate's Housing Department plans of IDP camps relocations and evacuations. The department is also responsible for conducting assessments of camp residents before and after the implementation of housing projects such as replacing tents with cement houses or moving the camp to a new location.⁴¹

- **Service Division:** The Services Division, also known as the Services Office, at the sub-directorate level is the executive office of the Technical Supervision Department at the Camps Affairs Directorate. The Services Division includes technical consultants, usually five to six consultants, with different technical backgrounds, that are tasked with conducting field visits during and after the implementation of service provision projects in IDP camps. The Services Division which acts as a M&E team for service provision projects is responsible for inspecting the project's materials, quantities, and implementation methods on site to ensure that they are in line with the approved project proposal.⁴² The technical consultants can also conduct evaluation visits to inspect and ask beneficiaries of the project efficiency after its implementation. If technical errors were found during or after implementation, the Services Division is expected to communicate with the I/NGO and its implementing contractor.

vi. Complaints Office

The Complaints Office is the designated department within the sub-directorate to receive complaints from locals concerning humanitarian aid. Interviews conducted during this research concluded that the only complaint mechanism in place is for locals to physically go to the complaint's office in the sub-directorate and complain – which does not provide anonymity.

Interviews concluded that the Complaints Office is equipped to handle various types of complaints related to humanitarian work, including but not limited to; corruption, poor implementation, and beneficiary selection fraud or unfair exclusion. The Complaints Office is expected to conduct an inquiry that includes interviews with all actors involved and take actions according to the severity of the complaint. If the complaints require judicial proceedings, the Complaints Office will direct it to the Legal Affairs Department at the General Directorate level,

⁴⁰ Youtube. [Visual footage of members of the Housing Division at the Middle sub-directorate](#) providing tents to newly arriving families at Mariam IDP camp in Maret Masrin area.

⁴¹ Youtube. [Visual footage of members of the Housing Division at the Sarmada sub-directorate](#) conducting relocation survey to assess IDP families ability to return to Kafr Losin IDP camp in the Sarmada area after completing camp constructions.

⁴² Youtube. [Visual footage of members of the Services Division at the Sarmada sub-directorate](#) overseeing the implementation of sewerage network project at al-Farja IDP camp in Kafr Losin area.

which in its turn will coordinate with the judicial and security entities present in northwest Syria.⁴³

2. Camps Affairs Directorate

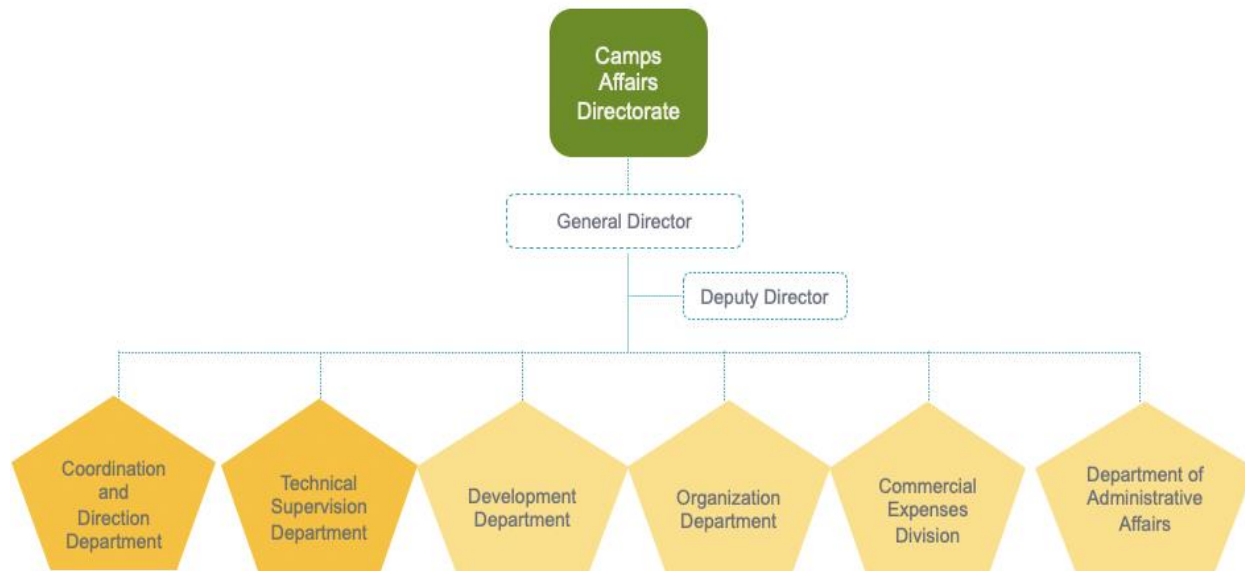


Figure 5. Current structure of the MDHA's Camps Affairs Directorate. (Source: MDHA Officials)

The Directorate of Camps Affairs is the directorate responsible for supervising humanitarian affairs within the IDP camps in SSG-controlled areas.⁴⁴ The directorate consists of nine departments (as shown in Figure 5), two of which have direct interactions with humanitarian agencies: the Coordination and Direction Department and the Technical Supervision Department; each has different roles and responsibilities as follows:

a. Coordination and Direction Department (دائرة التنسيق والتوجيه)

The Coordination and Direction Department (CDD) is responsible for coordinating humanitarian projects, whether relief or service provision, targeting IDP camps in northwest Syria. The CDD's primary role is to review project proposals and ensure that it does not conflict with the work plan of other directorates of the MDHA, such as the Housing Directorate, which could have plans to relocate

⁴³ KIIs indicated that that complaints of a sensitive nature such as security related, sexual harassment and abuse are usually transferred to the Legal Affairs Department.

⁴⁴ In late July 2019, the MDHA's Camp Affairs Directorate issued a decree exempting contractors and vendors working with international and local humanitarian agencies from paying a contracting fee. For more information please read HAT's [Flash Report, Syrian Salvation Government Imposition of Fees on Contractors](#).

the targeted IDP campsite to a new location. Respondents indicated that after obtaining the initial *letter of no objection* from the General Directorate's PMU office, the I/NGO representative is directed to the CDD at the Camps Affairs Directorate to discuss the details of the proposed project. The research concluded that if the CDD approves the project, it will be transferred to the Camps Affairs Department at the concerned sub-directorate if the project is for the provision of goods for relief, and to the Technical Supervision Department if the project is for the provision of services. In addition, the research concluded that the CDD could stop the issuance of the *letter of no objection* if the project conflicts with the work plans of the MDHA's housing and planning directorates.⁴⁵

b. Technical Supervision Department (دائرة الرقابة الفنية)

The Technical Supervision Department at the Camps Affairs Directorate is the central decision-making authority for humanitarian projects providing services, including for WASH and shelter, targeting IDP camps in northwest Syria. According to respondents, the Technical Supervision Department includes a manager and technical consultants, usually eight to ten consultants, with different technical backgrounds responsible for approving I/NGOs project proposals and overseeing the Service Division at the various sub-directorates of the General Directorate of Humanitarian Affairs.

For project providing services, after obtaining the initial *letter of no objection* from the PMU and CDD, the Technical Supervision Department's manager discusses the technical details of the proposed project including the project design, implementation methods, material type and quantity. Research concluded that projects with sophisticated technical details are referred to the technical consultant team for further inspections, while common, more simple projects can be approved directly by the general manager. Once the Technical Supervision Department manager's signature is granted on the *letter of no objection*, the original document remains in the Camps Affairs Directorate records, while a copy is granted to the I/NGO representative, and another circulated via WhatsApp group to the Service Division at the concerned sub-directorate.

Interviews conducted during this research concluded that the expected timeframe for obtaining the Technical Supervision Department's approval does not usually exceed 1–2 days, and it could be granted in the same day if the I/NGO representative has the technical knowledge, or accompanied with a technical expert, to respond to the technical consultants' inquiries. Several participants indicated that thus far, the Technical Supervision Department inquiries have been rightful ones that have successfully led to spotting technical issues in project design or material allocations that have been missed by the implementing partner or the I/NGO. Other participants reported that in some cases, members at the Technical Supervision Department suggested relocating the proposed project to other IDP campsites on the grounds that they are more in need.

⁴⁵ HAT Syria, [Weekly Report](#) including information on SSG plan to evacuate the IDPs from buildings in Idlib city, February 2021.

The Technical Supervision Department also has a role in monitoring and evaluating the implementation of humanitarian service provision projects implemented in IDP camps. The Department carries out monitoring and evaluating activities of service provision projects through the Service Division located at the sub-directorate level. The Services Office team of technical consultants are required to report technical errors found during or after implementation to the Technical Supervision Department, which in turn follows up with the I/NGO and its implementing contractor.⁴⁶

3. Directorate of Association Affairs

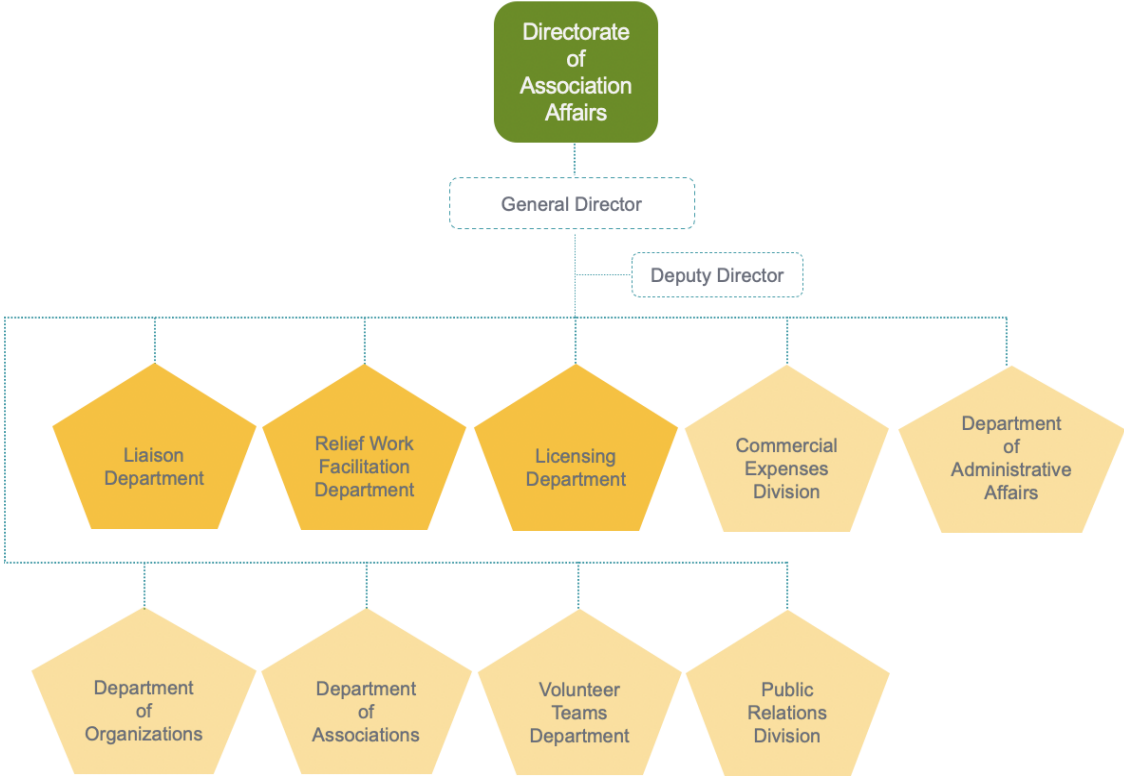


Figure 6. Current structure of the Directorate of Associations Affairs. (Source: MDHA Officials).

The Directorate of Organizations Affairs is the directorate concerned with solving all matters related to the affairs of humanitarian organizations, whether they are inquiries, directions, coordination and solving problems, or providing exceptional facilitation services. The directorate consists of general director, deputy, and nine departments (as shown in Figure 6). Only three of the nine departments have direct interactions with humanitarian agencies: the Licensing Department, Department of Relief work Facilitation, and the Liaison Department, each has different roles and responsibilities as follows:

⁴⁶ According to KIIs

a. Licensing Department

The Licensing Department of the Directorate of Associations Affairs is the authority responsible for registering and licensing local associations and volunteer teams emerging in areas under the control of the SSG. Humanitarian organizations registered in any country other than Syria only have to present their license to the Department of Licensing at the Directorate of Associations Affairs in order to obtain a work permit in all areas of the SSG. The process of registering and licensing local associations and emerging volunteer teams is an administrative process only, and does not include any financial fees. The interviews conducted in this research concluded that the local associations and volunteer team registration process does not entail financial fees, however, local associations and volunteer teams wishing to register within the Licensing Department must submit the following documents:⁴⁷

- Founding committee meeting minutes and the name of the assigned representative.
- Three copies of signed internal policy clarifying the following:
 - a. The association's name, provided that it is clear and does not lead to confusion with another association.
 - b. Name, title, age and profession of each of the founding members. Noting that the number of members should be at least ten;
 - c. The association's resources and how they will be used;
 - d. The association's internal structure;
 - e. Planned methods of financial control;
 - f. Rules for dissolving the association and the designated party to which the funds will be returned to or handed over in case of dissolution;
- Three copies of the association's articles of association.
- A title deed or a lease contract for the association's headquarters certified by the Real Estate Studies Office.
- A criminal record for members of the association with a copy of their ID card.

b. Department of Relief Work Facilitation

The Department of Relief Work Facilitation at the Directorate of Associations Affairs provides exceptions and facilitation services to humanitarian organizations operating in SSG-controlled areas. KII's indicate that the Department's services are free of charge and, more importantly, not obligatory, which means humanitarian agencies can choose to avoid them. The department includes two main

⁴⁷ According to the MDHA official document: "Documents and conditions required for licensing an association"

offices: the Protection and Safety Office and the Crossings Office, each of which provides different set of services as follows:

i. Protection and Safety Office

The Ministry of Development and Humanitarian Affairs announced the formation of the Protection and Safety Office as an office specialized in providing security awareness and field protection services for humanitarian organizations active in the areas of the SSG in early 2019. Participants indicated that the Protection and Safety Office was established in the wake of the arrival of large IDP numbers to the area and the occurrence of several incidents between humanitarian organizations and newly displaced families, who were overwhelmed by the lack of rapid response to their needs.

Participants indicated that the Protection and Safety Office has not been activated yet. Several participants indicated that they are aware of the Protection and Safety Office and its mandate, but they have not interacted with it so far. The Protection and Safety Office later issued a brochure explaining services offered by the office, which included the following:

- Formation of field teams to protect the facilities of humanitarian organizations
- Establishing a hotline with humanitarian workers via distributing two-way radios to allow direct communication in case of danger or emergency.
- Formation of a rapid intervention force to assist organizations in emergency situations.
- Providing security consultations with regard to personal security and conducting security and safety assessments for humanitarian organizations facilities.
- Connecting security and safety offices of various humanitarian organizations through holding periodic meetings to exchange experiences, discuss the security situation, and present incidents and threats that affect the safety of humanitarian organizations and their workers.
- Granting licenses for personal escorts and for carrying weapons, in coordination with the Ministry of Interior, to facilitate passage through military checkpoints, in addition to securing personal escorts for protection upon request.
- Issuing warnings of potential threats to the safety of humanitarian workers that are obtained from the competent authorities.
- Preparing periodic security reports that include updated security incidents related to humanitarian organizations and their related analyses and recommendations to be followed.

- Providing technicians to install surveillance cameras and advanced protection devices for facilities and mechanisms used in the humanitarian field.

ii. Crossings Office

The Crossing Office is concerned with facilitating the passage of relief shipments and humanitarian workers at border crossings and internal crossing points. Similar to the Protection and Safety Office, services provided by the Crossing Office are free of charge and non-compulsory. Interviews conducted during this research indicate that the office was only activated earlier this year. In early February, the Crossings Office launched its first service that aims to issue special ID cards for humanitarian workers to facilitate their passage at the various crossing points between SSG-controlled areas in Idlib and opposition-controlled areas in northern Aleppo.^{48,49} I/NGO workers wishing to obtain an MDHA ID card must submit a personal photo, a copy of the identity or passport, a copy of family book, and a copy of a valid work contract with a humanitarian organization.

Most humanitarian organizations considered this initiative a new attempt by the SSG to restrict the movement of humanitarian workers – however this was denied by SSG officials who instead claimed the initiative aimed to give humanitarian workers special dispensations to speed up their passage at the border crossings. Card holders will not have to queue, will not be searched, and will be allowed to use the crossings outside the specified crossing hours.⁵⁰ SSG officials clarified that the documents required to obtain the MDHA ID card are not intended to collect employment details, but rather are aimed at ensuring that MDHA ID cards are only obtained to humanitarian workers for the period of their employment.

c. Liaison Department

The Liaison Department is the main department in the Directorate of Organizations Affairs responsible for coordinating service provision for humanitarian projects such as health, education, shelter, water, and sanitation projects with other ministries of the SSG. The directorate includes seven liaison platforms, each of which is specialized in following up humanitarian projects with the relevant ministry in the SSG. Interviews conducted during this research concluded that the Liaison Department's main role lies in communicating with the MLAS Directorate of local councils for humanitarian-led service provision projects in communities.

The assigned liaison platform is responsible for transferring service provision projects from MDHA to the designated local council at the MLAS. Local sources have reported that the MDHA is currently

⁴⁸ Shaam network. [A breach of privacy and increased restrictions: Requests of information of humanitarian organizations](#), February 2021.

⁴⁹ Soureli news. [Humanitarian organizations threatened to stop work due to conditions of Hay'at Tahrir al-Sham](#), February 2021.

⁵⁰ Local sources indicated that SSG-controlled crossing points are open from 5:30 am to 7 pm on a daily basis.

considering a potential merger between the Directorate of Organizations Affairs and its various liaison platforms with the General Directorate of Humanitarian affairs and its Coordination and Guidance Department.

4. Legal Affairs Department

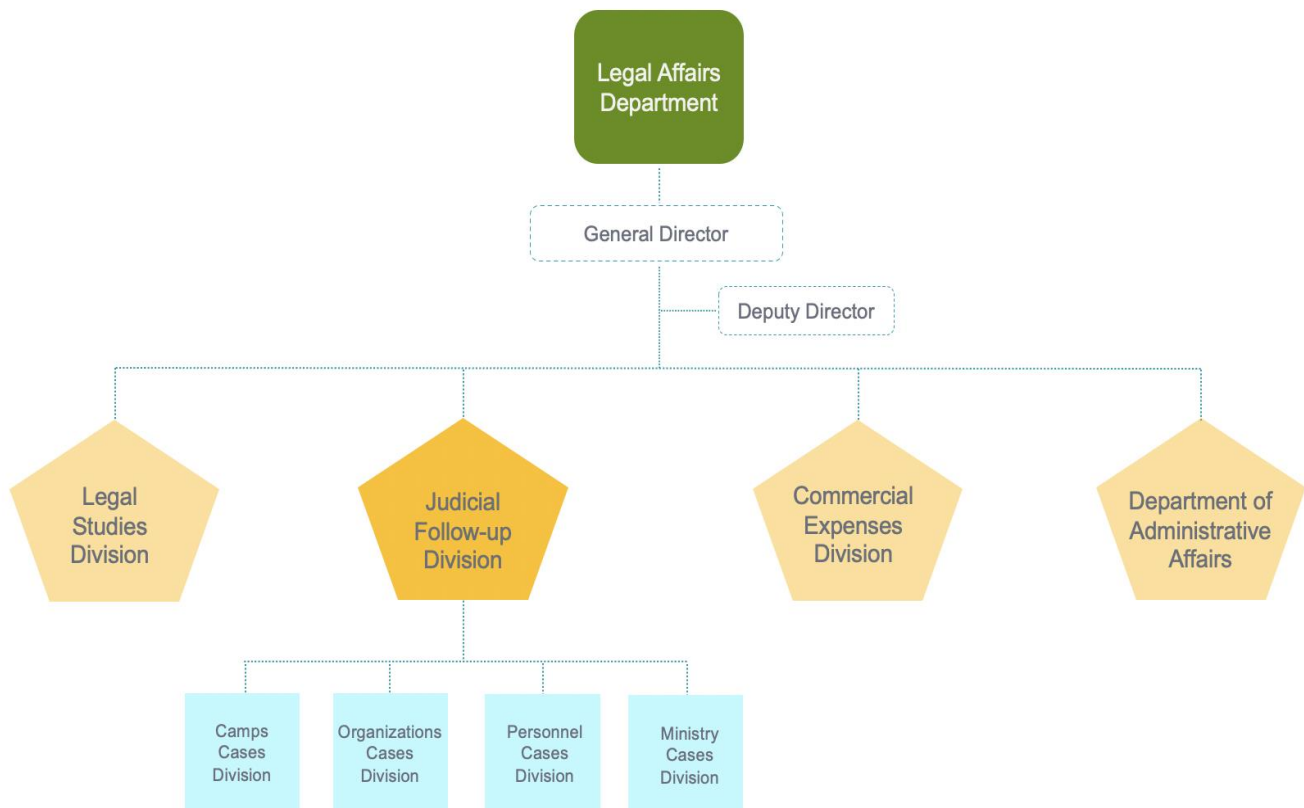


Figure 7. Current structure of the Legal Affairs Department. (Source: MDHA Officials)

The Legal Affairs Department of the MDHA’s General Directorate is the main interface between humanitarian organizations and the security and judicial entities in SSG-controlled areas of northwest Syria. The Department’s current structure includes a director, deputy, and four divisions specialized in the different areas of the law, one of which is relevant to the work of humanitarian organizations (as shown in Figure 7).

a. Judicial Follow-up Division

The Judicial Follow-up Department is concerned with legal affairs related to humanitarian organizations operating in SSG-controlled areas. The Judicial Follow-up Department includes four main offices, each with a specific jurisdiction, including Camps Cases Division, which is concerned with cases related to relief work in the IDP camps; Organizations Cases Division, which is involved in following legal matters against I/NGOs; Personnel Cases Division, specialized in following up on cases

brought against the individual workers of humanitarian organizations; and the Ministry Cases Division, which is concerned with following up claims brought against any department or worker at the MDHA.⁵¹

Interviews conducted during this research concluded that the process between the MDHA's Legal Department and the judicial entities of northwest Syria is still not defined. Although there is an agreement that gives the Department of Legal Affairs jurisdiction to intervene, and at times adjudicate, legal cases involving humanitarian agencies and humanitarian personnel, there is no mechanism for notifying the MDHA's Department of Legal Affairs after the case reaches the judicial entities in Idlib and western Aleppo.⁵²

Interviews indicated that once the MDHA's Legal Affairs Department is informed, its Judicial Follow-up Department communicates with the judicial entities to transfer the case to the MDHA's Department of Legal Affairs for decision making.⁵³ The interviews indicated that if the directorate fails to transfer the case to the ministry, it seeks to ensure that the court ruling does not harm discourage the concerned I/NGOs from working and therefore causing harm to the communities. Research also concluded that the MDHA's Legal Affairs Department mostly refrains from interfering on behalf of the I/NGO when and if the case against the I/NGO is related to security concerns and criminal activity. Figures 8 and 9 map the complexities of the administrative processes for humanitarian agencies, within the MDHA and also in the wider context of the SSG.

⁵¹ According to KIIs

⁵² For more information about Judicial entities in SSG-controlled areas, please read HAT Syria's [Security and Judicial Entities sections at the Consolidation of Hay'at Tahrir Al-Sham's Control in Opposition-Controlled Northwestern Syria](#) and [Consolidation of Salvation Government's Control in Opposition-Controlled Northwestern Syria](#) report.

⁵³ KIIs indicated that in one incident the MDHA's Department of Legal Affairs succeeded in reversing a judicial ruling against an INGO while in another incident it succeeded in releasing NGO workers from detention after transferring their case to the MDHA.

CONCLUSION

This research indicates that the administrative process for implementing humanitarian projects in SSG-controlled areas of northwest Syria has continuously evolved over the past two years. The Ministry of Development and Humanitarian Affairs (MDHA) has become the central institution responsible for humanitarian activities while the role of relief offices and local councils has been reduced. Tasks previously managed by relief offices (also known as local council humanitarian offices) at the community level are now managed by the various departments in the MDHA. The PMU of the General Directorate has become the main agency designated to issue work approvals for relief organizations, the Service Office of the General Directorate has become the agency responsible for service projects, while the Statistics Office of the MDHA sub-directorate is the body responsible for providing statistics and data to local organizations, while community local council involvement is limited to overseeing the implementation of service provision projects in the community.

The MDHA's current role involves issuing permits to implement humanitarian projects and monitoring and evaluating their implementation. There is no evidence suggesting that the MDHA is using its current mandate to interfere in humanitarian projects implemented in northwest Syria. The process of issuing a project implementation permit, locally known as a no-objection letter from the MDHA, varies depending on the type of project - whether it is a relief assistant distribution or service provision; and the implementation location - whether it is in a community or an IDP camp. The Project Management Unit (PMU) of the General Directorate of Humanitarian Affairs' Department of Coordination and Direction is the first stop for I/NGOs wishing to obtain a *no-objection* letter. The PMU can provide a final *no-objection* letter for relief assistant projects targeting communities and only initial *no-objection* letters for community-based service provision projects and IDP camp-based projects- whether its relief or service provision type. After obtaining an initial *letter of no objection* for community-based service provision projects the I/NGO representative will be directed to the Liaison Department at the Directorate of Associations Affairs, which in its turn will coordinate and facilitate the implementation with the Local Councils Directorate at the MLAS.

Camps-based humanitarian projects will be directed to the Camps Affairs Directorate. Camps-based relief projects (ie, for food and non-food distribution) will be granted a final *letter of no objection* at the Directorate's Coordination and Direction Department and transferred to the Camps Affairs Department at the sub-directorate level for facilitation. However, camps-based service provision projects (ie, WASH, shelter) must be directed to the Technical Supervision Department at the Camps Affairs Directorate before reaching the Services Division at the sub-directorate level for facilitation. (see Figure 9 for a full map of the process of receiving a *letter of no objection*.)

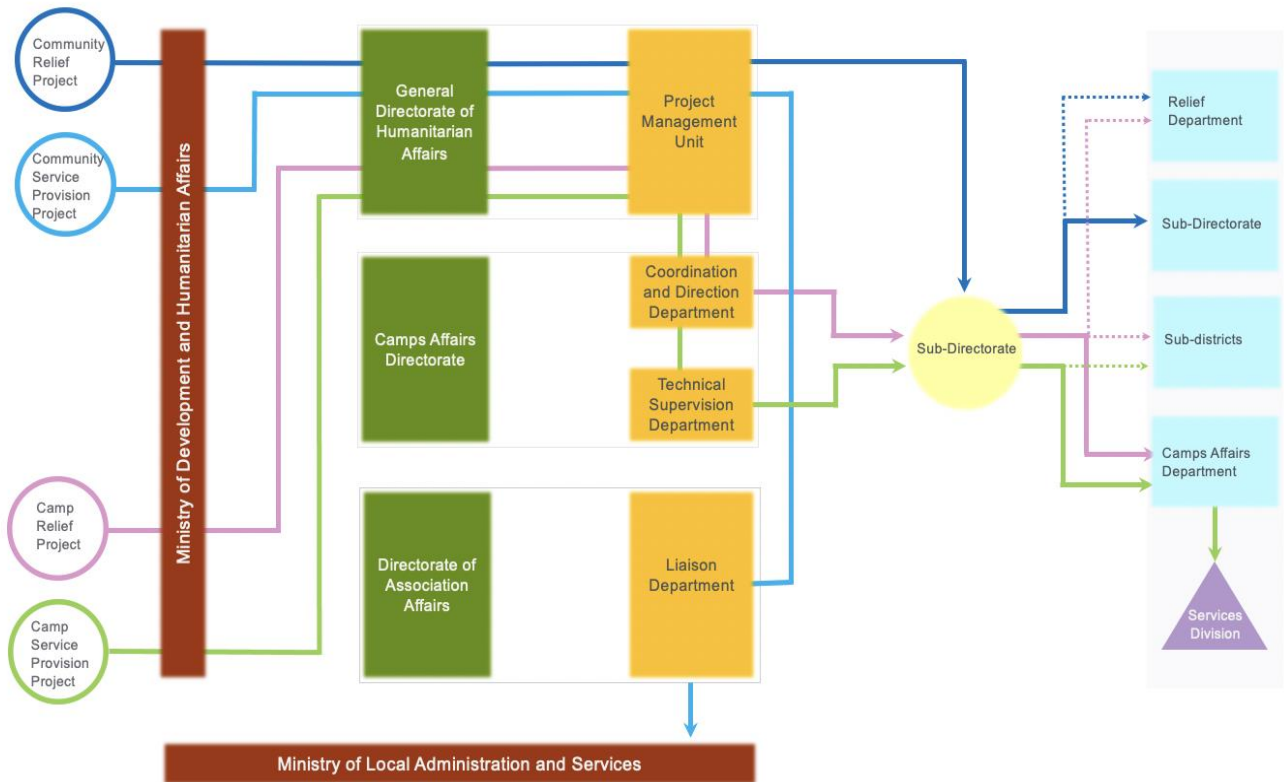


Figure 9. Explanatory chart showing the process of obtaining a letter of no objection from the MDHA, depending on the type of project and the location of implementation. (Source: MDHA officials).

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The Humanitarian Access Team (HAT) was established in Beirut in March 2015 in response to the collective challenges facing the remote humanitarian response in Syria. Successful humanitarian and development interventions require a nuanced and objective understanding of the human ecosystems in which these interventions occur. To this end, the HAT's most important function is to collect, triangulate, synthesize, analyze and operationalize disparate data and information. Since 2015, HAT analysis has provided a forward-looking template for international interventions in Syria, and facilitated an increasingly nimble, adaptive, integrated, and ultimately impactful international response to the Syrian conflict.

