

RESEARCH REPORT



Civic Spaces in Syria's First Year of Transition: Challenges, Ambiguities and Future Opportunities

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Cover photo: a banner installed by civic activists at the gates of the Syrian People's Assembly after the attacks in Suwayda. The banner reads: "The blood of one Syrian is forbidden to another". Photo taken by Zeina Shahla on 17 July 2025. All other images may be subject to copyright. Getty Images ©2026

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Executive Summary

Recommendations

- ▶ Most emerging civic initiatives in Syria lack access to reliable funding and have limited experience with donor agencies, underscoring the need for flexible, localised financing mechanisms that simplify bureaucratic procedures, prioritise small- and medium-scale initiatives, and strengthen institutional capacities through partnerships with larger Syrian non-governmental organisations (NGOs), inside the country and in the diaspora. Alternative funding approaches could include leveraging UN agencies such as UNDP for small grants; expanding already existing funding mechanisms with a whole-of-country approach; and partnering with established Syrian NGOs to incubate smaller initiatives, ensuring predictable support and lighter compliance burdens suited to local actors.
- ▶ Bottom-up peacebuilding and social cohesion remain the most urgent challenges of Syria's transitional phase, compounded by weak judicial institutions and enduring sectarian violence. Civil society-led initiatives for intercommunal dialogue are emerging in divided communities such as Homs and Tartous, yet they face poor institutionalisation, isolation, and a lack of financial support. Strengthening these efforts requires dedicated support channels to build institutional capacity, provide resources, and connect them with local and international expertise in peacebuilding and transitional justice, thus moving resources and know-how to local initiatives to scale up, coordinate, and sustain their work.
- ▶ Empowering micro, small, and medium enterprises (MSMEs) can drive a bottom-up economic recovery centred on civilians' needs while fostering civic values, social cohesion, and greater inclusion of women. Donors, national authorities, and international policymakers should encourage collective action through trade unions; support women-led businesses as vehicles for gender equality and fair labour standards; incentivise MSMEs' community contributions through targeted tax relief; and foster partnerships between civil society and MSMEs, where enterprises provide resources and CSOs deliver training and capacity-building to expand impact and resilience.

General Overview

- In the early post-Assad period, civic engagement surged as communities filled governance gaps; delivering relief, basic services, and inter-communal dialogue. That opening has narrowed since the March 2025 coastal attacks, which deepened sectarian divides and spread violence to areas such as Suwayda. Simultaneously, the transitional government's rushed, centralised, and exclusionary approach, marked by selective disarmament and tolerance of allied armed groups, eroded trust and revived perceptions of injustice and authoritarian tendencies.
- Civil society organisations (CSOs) are reclaiming public venues and advocating for a new NGO framework based on acknowledgement rather than restrictive licensing to reduce political interference. Yet fieldwork and interviews indicate the transitional authority is sidestepping organised civil society in favour of one-to-one consultations, refusing to clarify CSOs' role and instead elevating *Al Mujtama' al Ahli* ("communal society") grounded in religious, sectarian, and tribal ties. This shift marginalises civic actors and privileges loyalty and identity over organisational capacity and participation.
- Constraints on CSOs, especially beyond humanitarian relief, are tightening across three fronts: regulative (inconsistent registration and overlapping mandates between the Ministry of Labour and Social Affairs and the General Secretariat for Political Affairs); spatial (selective authorisation for public events, limiting justice and human rights work); and political (exclusion from core transitional forums such as the National Dialogue Conference and the Constitutional Declaration Committee). Since March 2025, restrictions have intensified, with authorities obstructing human rights and justice initiatives unless they directly support economic revival, often via security hurdles or stigmatisation.
- In addition to the previous state-led constraints, civil society actors also face a number of institutional challenges stemming from the post-Assad aid landscape. Those include major donors' rigid due diligence requirements and their limited familiarity with newly emerged grassroots actors, which continue to constrain effective localisation.

- Furthermore, the risk-averse standards of many donors often exclude smaller or newly formed civic initiatives that lack extensive track records or the capacity to meet onerous compliance demands. As a result, organisations most embedded in local communities – and potentially best positioned to deliver meaningful change – are disproportionately locked out of critical funding.
- A parallel dynamic sees Idlib-based relief and medical leaders moving into government roles or attending national fora personally; many organisations are relocating to Damascus, fuelling perceptions that these networks now wield disproportionate influence. Economic elites play an ambivalent role, contributing to high-profile funds like the Syria Development Fund, which is often seen as influence-buying, while withholding significant investment amid opaque governance, absent strategy, and instability.

Introduction

The fall of the Assad regime on 8 December 2024 marked a significant political and social turning point in Syria. What many Syrians had long dreamed of as a moment of liberation quickly gave way to uncertainty, as the country entered a turbulent and fragile transition. In the first few weeks, the new transitional authorities, led by Haya't Tahrir al-Sham (HTS), declared a number of transitional arrangements. In quick succession, the new authorities launched a two-day National Dialogue Conference in February and pushed through an Interim Constitutional Declaration by mid-March, setting a five-year framework for transition.

The early weeks were marked by cautious optimism. For the first time in decades, Syrians, particularly those residing in areas formerly controlled by Assad, debated openly in public spaces, and civic initiatives proliferated across cities like Aleppo, Hama, Homs, and Damascus. Volunteer groups began filling governance vacuums, organising relief distribution, neighbourhood clean-ups, and small-scale dialogues on political rights and justice mechanisms.

However, the promise of a 'new Syria' was further weakened by a wave of mass killings along the Alawite-majority coast during 6–9 March 2025, where the main responsibility lay both with remnants of Assad's regime militias and with the transitional government's own security forces. The event, widely referred to as the Coastal Massacre, ignited cycles of revenge and deepened sectarian fragmentation. The sectarian unrest quickly spread to Suwayda, where clashes between Druze factions, Bedouin tribes, and the transitional authority's forces escalated into extrajudicial killings of civilians, displacement, and calls for wider tribal mobilisation across the country.

Meanwhile, the state-building process was rushed, excessively centralised, and widely perceived as exclusionary and identity-driven. The transitional government invoked the doctrine of state monopoly on violence to demand the disarmament of local armed actors, while at the same time tolerating, and in some cases colluding with, allied non-state armed groups. Such measures have significantly undermined trust in the transitional authorities and fuelled perceptions of selective justice.

Drawing on insights from our team's recent field visit to Syria and semi-structured interviews with twelve civic actors and five government officials, three primary factors appear to underpin the apparent expansion of civic initiatives so far. First, there exists a collective sense of civic responsibility among local communities to address the governance and political vacuum left by the Assad regime's collapse. This reflects a sense of urgency to maintain basic services and prevent the total disintegration of state institutions, thereby mitigating the risk of chaos and retaliatory violence.

Secondly, the reclamation of civic spaces and the participation of civil society actors in the public sphere underscore the role of civil society in the transitional phase in a clear and unambiguous manner. By doing so, they aim to limit the capacity of the emerging authority in Damascus to suppress civic spaces once it consolidates political and military control over the country.

Thirdly, there is a concerted effort to establish a new de facto regulatory framework governing civil society organisations, including NGOs. This framework seeks to empower these organisations to operate, organise, and mobilise without the requirement for prior governmental licensing or censorship, but rather through a notice of acknowledgment process, which would significantly curtail future political interference in civil society activities.

However, the majority of our key informants and interviewees have indicated the transitional authorities' gradual imposition of a series of formal and informal constraints that are significantly limiting the operational autonomy of certain CSOs. These restrictions predominantly affect groups operating outside the scope of humanitarian aid and emergency relief, thus undermining broader civic engagement and accountability efforts. Overall, these constraints fall into three main categories: regulative, spatial, and political.

Regulative constraints principally pertain to newly introduced, often inconsistent policies governing the registration processes of both national and international NGOs. These policies grant the state considerable discretion to intervene in the internal configurations, missions, and financial structures of these organisations. Several interviewed civil society actors reported growing ambiguity over the division of roles between the Ministry of Labour and Social Affairs (MoLSA) and the Ministry of Foreign Affairs' domestic political arm, the General Secretariat for Political Affairs (GSPA).

While MoLSA has reportedly been open to registering CSOs/NGOs, the GSPA is widely perceived to informally intervene in the process through political vetting applications and influencing which organisations are approved, delayed, or refused.

Spatial constraints, on the other hand, manifest through stringent requirements for prior authorisation before events—especially events that are political in nature—can be held in venues such as universities, hotels, or state-operated cultural centres. Typically, these approvals are routed through security apparatuses and the GSPA, which enforce the rules in a highly selective manner, making it considerably more challenging for initiatives focusing on justice, accountability, advocacy, and political empowerment to conduct their activities.

Political constraints mainly target the political participation of civil society actors that do not fall under the relief umbrella. Many such organisations find themselves excluded from critical transitional forums and processes, including the National Dialogue Conference and the Constitutional Declaration Committee.

This precarious context is exacerbated by the recent wave of retaliatory and sectarian-driven violence in Syria's coastal areas and the southern province of Suwayda. Such turbulence underscores the urgency of mobilising and supporting civic actors and initiatives, especially those dedicated to fostering social cohesion, local peacebuilding, and inter-communal dialogue. Adequate organisational capacity, financial support, and technical expertise are indispensable if these entities are to operate effectively within conflict-affected regions and address the emerging needs of vulnerable populations. Although security restrictions have impeded access to many of the most severely affected localities on the Syrian coast and in Suwayda, a number of informal grassroots initiatives, including crowd-funded emergency relief efforts and other individual actors working on social cohesion and peacebuilding, have been able to provide critical, albeit insufficient and small-scaled, assistance to impacted communities.

In the next sections, we will provide a general overview of the main types and operational focus of some of the pre-existing as well as newly emerged civic actors, followed by an overview of the multifaceted challenges and constraints they are facing. We conclude with a set of policy recommendations tailored for donor agencies and international NGOs (INGOs).

Main Types of Active Civic Groups

To demonstrate the dynamics of civil society in the post-Assad transitional period, this section outlines Syria's evolving civic ecosystem. Within this ecosystem, civic actors may be broadly categorised into four groups, distinguished by their operational priorities, institutional capacities, and the nature of their social and political affiliations and identities. These categories also reflect the extent to which actors are either privileged or marginalised under the emerging arrangements of the transitional authorities, thereby shaping their opportunities for influence, resilience, and sustainability in the current context.

Existing and Established Syrian CSOs/NGOs Active in Areas Previously Controlled by the Assad Regime

If we discount the organisations closely tied to the former Assad regime, there are numerous well-established entities that possess deep roots within local communities and demonstrate extensive awareness of social, economic, and cultural conditions on the ground. Under the previous regime, these organisations were forced to maintain a low profile, prohibited from collaborating with Syrian and international counterparts operating in opposition-controlled territories, and constrained in their capacity to secure international donor funding. Their overall activities remained predominantly humanitarian-oriented, with limited political engagement. However, with the departure of the Assad regime, these organisations now benefit from unprecedented opportunities to diversify their programming, broaden the range of public events they organise, and access external support networks, including those located in the diaspora. Several organisations have already capitalised on these new openings, rapidly evolving to address emerging social and economic challenges.

Over the past few months, some of these CSOs/NGOs have significantly expanded the scope of their work, bringing new people and previously less-visible actors into the fold. Their efforts now extend across multiple sectors, including youth economic empowerment, achieved through events that introduce young people to cutting-edge business innovations, primarily in the tech industry, and link students within the country to peers abroad. Other CSOs have started to informally organise inter-communal dialogues across various cities, mostly through low-key actions that do not attract the attention of the security forces or the GSPA, while advocating for fair, inclusive transitional justice mechanisms and peacebuilding initiatives. Other NGOs are now more focused on the provision of educational support for individuals with disabilities and youth who have discontinued their formal education.

Nonetheless, since March 2025, many of these civic actors have reported a noticeable tightening of restrictions on their activities, particularly in areas extending beyond relief provision and economic initiatives. A female civil society activist – who had previously organised numerous 'underground' civic actions under the former regime – observed that: "it seems that unless you are bringing in money or foreign funding to contribute to the country's economic revival, the new authorities will deliberately curtail your access, either through security constraints or by reinforcing the stigmatisation of being labelled an Assad sympathiser."

Existing and Established Syrian CSOs/NGOs Active in Areas Previously Held by the Opposition

The collapse of the Assad regime and the consequent elimination of cross-line border crossings – particularly those connecting the north-western region with areas formerly under Assad regime control – has prompted the rapid relocation of numerous NGOs, especially relief and medical NGOs previously operating in Northwest Syria and headquartered in southern Türkiye. Many of these entities are institutionally robust, with comparatively greater access to international donor resources than any other organisation examined in this report.

Despite enjoying extensive donor support, these NGOs often lack the same depth of grassroots connections in their newly targeted regions compared to local organisations and initiatives that have been active there for longer periods. Nevertheless, their capacity to secure large-scale and ongoing international funding, combined with their substantial track record of service delivery in the northwest—including territory once under the authority of HTS in Idlib—has granted them considerable influence with the transitional authorities. In some cases, these NGOs are serving as key contact points between some civil society actors and the transitional authorities, facilitating some form of coordination on the ground.

Notably, several senior managers from these relief and medical organisations have been appointed to senior government positions, either as ministers, civil servants or government advisors. Others were invited to the National Dialogue Conference, albeit in their personal capacities and not as civil society representatives.

Another emerging trend amongst these organisations is the reallocation to main urban centres in major cities, namely Aleppo and Damascus, with significantly more presence in the latter compared to any other area in Syria. A male medical professional affiliated with a prominent Syrian NGO remarked that "if you were part of the humanitarian and relief 'club' in Idlib, you are now regarded as an influential figure within the new government."

Newly Emerging Civic Initiatives, Groups and Informal Networks

These are predominantly spearheaded by a younger generation of civil society actors who managed to navigate the stringent security and regulatory limitations under the old regime, often maintaining a low profile while undertaking discreet civic and political endeavours. Most of these initiatives now focus on interrelated themes of social cohesion, local peacebuilding, and grassroots-level inclusive dialogue.

A key factor driving their peace-oriented mission stems from the escalation in sectarian-driven violence since December 2024, which was tragically illustrated by the extrajudicial killings of civilians in the Alawite-majority coastal districts surrounding Jableh, Baniyas, and Lattakia.¹ These emergent initiatives aim at targeting the local populations most affected by communal tensions, aiming to foster dialogue and mitigate the factors that perpetuate violence.

Despite their increasing potential, many of these locally grounded efforts operate with minimal external support, often lacking formal coordination with similar organisations in neighbouring regions. Moreover, civic actors have increasingly been subjected to discrimination, hate speech, and physical intimidation from hard-line supporters of HTS. On 18 July 2025, for example, a group of young activists staging a peaceful sit-in outside the parliament calling for an end to sectarian-driven violence were violently assaulted by individuals believed to be loyalists of the new authorities.² One participant recounted: "despite the heavy security presence around the parliament, which initially gave us a sense of safety, security officials were nowhere to be seen when we were attacked by men wielding sticks and even a sword."

As a result, they face a range of significant challenges, including social and political discrimination, underdeveloped institutional structures, restricted access to donor agencies, and limited capacity to scale up their programmes. These constraints hinder their ability to sustain and expand current peacebuilding activities or to forge broader alliances.

Civic Activities Within the Business Sector

The Syrian business sector has historically played a pivotal role in supporting civic activities and, in some instances, may be viewed as a civic actor in its own right. Prior to the protracted conflict, numerous businesspersons provided financial and in-kind assistance—such as food parcels—to economically disadvantaged families, often through licensed charitable organisations or trusted informal networks. These mechanisms were adept at reaching the most vulnerable segments of society, thereby maximising the impact of support. In addition to direct aid, a number of business owners frequently prioritised job security for their employees by maintaining salaries despite a deteriorating economic environment and diminishing profit margins. Such initiatives not only sustained household incomes but also contributed to preserving social cohesion during a period of significant instability.

However, this involvement should be distinguished from the activities of crony business figures who used their financial resources to support pro-Assad NGOs primarily as a means to secure political favour and material benefits. By contrast, small and medium-sized enterprises often extended assistance to civil initiatives driven by a genuine desire to enhance the welfare of local neighbourhoods and strengthen national resilience. Importantly, many businesspersons engaged in these acts of assistance discreetly, reflecting a social norm that emphasized safeguarding the dignity and privacy of recipient families.

The prolonged 14-year conflict in Syria has severely eroded the capacity of the business sector to maintain this vital role. Nevertheless, with the fall of the Assad regime, there exists a renewed possibility for revitalising commercial activity and harnessing the sector's potential to contribute more substantially to civil society efforts. The Syrian diaspora of business professionals, in particular, is well-positioned to establish new ventures that generate employment opportunities, thereby promoting long-term support for vulnerable groups. Equally significant, expatriate entrepreneurs can provide critical financial and technical resources to civil society initiatives and organisations within Syria, playing a more direct and far-reaching role in bolstering the nation's social and economic recovery.

Since March 2025, the involvement of Syria's economic elites has fluctuated. On one hand, many prominent business figures have been actively contributing to fundraising campaigns launched by the transitional authorities. The most significant initiative, the Syria Development Fund, was introduced by Ahmad al-Sharaa, head of the transitional authorities, in September 2025. The campaign reportedly raised around USD 60 million,³ drawing pledges from Syria's wealthiest business actors, including well-known cronies of the former Assad regime.⁴

A businessperson who attended the launch event described the atmosphere as highly political, noting: "These pledges had less to do with genuine support for recovery and more with buying influence. It felt like an auction for loyalty, where former regime cronies sought to reposition themselves as allies of the 'New Syria'."

On the other hand, many Syrian business actors have grown increasingly discouraged by the absence of transparent economic governance and the lack of a coherent policy framework or long-term vision.⁵ Two interviewed businesspeople noted their hesitation to commit significant investments in what they described as a "shady," "ambiguous," and "unsustainable" economic environment. Instead, a number of key informants indicated that they are adopting a cautious "wait-and-see" approach, opting to provide only small-scale financial contributions to humanitarian and relief activities, usually channelled through prominent and well-established Syrian NGOs.

The Multifaceted Realities for Civil Society

The newly emergent civic space is already becoming increasingly contentious, with clear indications of imposing exclusionary political behaviour and restrictive measures by the transitional authorities. Some of these measures, which are expected to affect legal, political, and accessibility aspects, can be traced to the historical practices of HTS in managing CSOs/NGOs in Idlib, particularly since 2017. Additional evidence is derived from the political conduct of the transitional authorities and the policies currently in place.

HTS-Civil Society Relationship: Historical Context

The relationship between HTS and civil society in Idlib can be categorised into three primary modes of interaction, shaped by the type and scope of NGO/CSO activities.

The first mode is characterised by a competitive yet complementary relationship with organisations operating in the health sectors. The health sector in Idlib was already well-established prior to HTS military control over Idlib, driven by collaboration between the Idlib Health Directorate, Syrian medical organisations, and international donors. This partnership granted the Health Directorate significant autonomy in managing the region's healthcare system. Although HTS has attempted to assert dominance over the health sector, it quickly recognised that direct control would jeopardise international funding, given HTS's proscription as a terrorist entity. Consequently, HTS adopted a strategy of tacitly acknowledging the independence of the Idlib Health Directorate, allowing medical organisations substantial operational freedom. However, this has resulted in competition with the Ministry of Health under the Salvation Government, which has been relegated to a secondary role in public health provision.

The second mode involves support and cooperation with relief organisations, particularly those operating in IDP camps. HTS permitted these organisations considerable leeway, aiming to reduce its own financial burden and fill its gaps in addressing dire humanitarian needs. This approach also facilitated indirect relationships between HTS and international donors.

The third mode is exclusionary, targeting CSOs that do no focus on service provision, such as women's rights groups, political and economic development initiatives, and human rights organisations. In Idlib, these organisations faced increasingly restricted operational margins, exemplified by the closure of women's centres, security-related constraints, and arbitrary arrests of media and human rights activists.

Transitional Authorities and Civil Society Relationship: State-led Constraints and Limitations

HTS's previous modes of interaction continue, to some degree, to shape the relationship between the transitional authorities and civil society today. This has produced a contentious and contingent partnership between the new ministries and sectoral governance NGOs—such as medical and education actors; a transactional relationship and relatively wide margin of tolerance for relief organisations, especially those with prior ties to Idlib; and the systematic marginalisation of other CSOs and civic actors operating beyond the realm of service provision. These modes of interaction have been translated in the form of political, regulative, security and accessibility constraints.

Emerging political indicators reveal the political leadership's refusal to engage with CSOs as collective entities, preferring instead to meet with individuals in their personal capacities. Moreover, the new administration has thus far neglected to explicitly recognise any clear role for civil society in the transitional period, while constantly emphasising the role of Al Mujtama' al Ahli, translated into 'communal society' or 'traditional society', which is based on patrimonial relations such as religious, sectarian or tribal ties.

This political marginalisation has manifested in several forms, most notably in the exclusion of CSOs and prominent civic actors from participation in the controversial National Dialogue Conference. The conference was widely perceived among Syrians as hastily conceived and as privileging ascriptive forms of representation—such as religious and tribal affiliation—and awarding political loyalties, while neglecting to recognise the organisational capacities of civil society.

Upon interviewing some civil society actors who participated in the National Dialogue, a senior manager of an advocacy CSO, shared that "Several civic actors were invited to the Conference at the last minute, mainly due to international pressure." Another participant indicated that "the invitations were issued based on our personal and individual identities, influenced by our perceived religious, sectarian or regional affiliations." Moreover, according to one female participant, who occupies a senior position in a Syrian civil society alliance, "We cannot say that civil society organisations were represented in the conference. All of my civil society colleagues were invited because of their individual social identities and not their role or affiliation with the wider civil society".

A deeper examination of some of the personal profiles of these participants reveals that the majority of them occupy senior managerial positions in relief-based organisations which had been previously active in the province of Idlib. The unclear and unspecified selection criteria of participants raised several questions about the autonomy of the Preparation Committee of the Conference and the boundaries of political interference by the transitional authorities.

In terms of the legal and regulative new reality of civil society, the transitional authority has been adopting various policies aimed at regulating CSO operations while simultaneously curbing their autonomy. For instance, on 29 December 2024, the Ministry of Labour and Social Affairs (MoLSA) issued a directive prohibiting the activities of any non-governmental organisation "without prior authorisation from the ministry". These organisations were granted a one-month window to submit the required documentation, including a non-conviction certificate for each member and proof of an official bank account. The directive specified that "licences would be issued temporarily for a six-month period," after which "the organisation's performance would be assessed before licence renewal." Furthermore, the ministry's sub-directorates were empowered to "make the necessary amendments" to an organisation's structure and operational methods, aligning them with pre-existing laws governing private associations and institutions under the former regime. Organisations that had previously obtained licences from the Salvation Government in Idlib were required to reapply for authorisation, as illustrated in Appendix 1. Consequently, the Directorate of MoLSA in Suwayda, for instance, issued a directive mandating the suspension of all NGO activities until the organisations secured formal approval from the ministry, while emphasising that any failure to meet these conditions would prompt legal actions from the directorate.

Another source of regulations primarily targeted at international organisations is the Humanitarian Action Coordination (HAC). The precise nature of the HAC, as well as its affiliation with the transitional authority and the caretaker government, has been deemed "fuzzy" and "unclear" by the majority of our key informants. Established in 2020 in the province of Idlib as a "non-profit organisation", the HAC was ostensibly separate from the then Salvation Government.

Nevertheless, from 2020 until late 2024, it was charged with issuing permits to humanitarian actors, coordinating directly with the Office for the Coordination of Humanitarian Affairs (OCHA) clusters and other UN agencies, and overseeing the facilitation of humanitarian convoys through the Bab al-Hawa border crossing. Many in the humanitarian sector perceived it as a "non-profit arm of HTS's Salvation Government" because of the opaque regulatory framework that failed to clarify its legal status or define its operational boundaries.

The lack of clarity concerning the HAC's current role remains unresolved. One respondent, who has worked in the relief sector for a decade, referred to the HAC as a "quasi-governmental institution directly affiliated with the Ministry of Social Affairs, tasked with regulating and coordinating humanitarian efforts specifically those related to INGOs". Another key informant described the HAC as "yet another *de facto* institution with increasing power over the NGO sector, with little accountability or clarity". These comments illuminate the prevailing uncertainty surrounding the HAC's mandate, funding mechanisms, and degree of autonomy from the transitional authorities.

On 19 March 2025, the HAC published two handbooks detailing policies and procedures intended to "organize and develop humanitarian work [...] and enhance effective coordination among various stakeholders, including international organizations, UN agencies, and local organizations", as referenced in Appendix 2. According to these documents, which "serves as a regulatory framework for the activities of international organizations" through the "office of the Humanitarian Action Coordination (HAC)" and "the relevant ministries," all international organisations are now obliged to submit a "licensing application" to the Ministry of Foreign Affairs. This application must outline the organisation's structure, funding sources, and annual plan. Once each application is approved, the Ministry and one of the international organisation's national partners sign a general Memorandum of Understanding (MoU). Although this MoU confirms the overall partnership, it does not automatically permit the organisation to undertake specific projects. Instead, each project undergoes a further layer of approvals to "ensure it does not conflict" with existing projects.

Furthermore, the new regulations strictly limit an international organisation or its national partner's ability to perform independent needs assessments. Rather than conducting their own assessments, organisations must submit a "needs assessment request" to the HAC. The HAC then determines whether the requested information is already stored in "The Needs Bank," a database accessible solely to the HAC and the Ministry of Social Affairs. If the relevant data is unavailable, the Ministry of Social Affairs is responsible for "approval and execution" of the assessment. This approach restricts organisations' capacity to directly evaluate the needs on the ground, thereby concentrating authority within the HAC. Although the professed aim is to streamline efforts and avoid duplication, the new regulations reinforce the HAC's power, while many in the humanitarian community continue to question its transparency, accountability, and independence.

Many key informants have expressed their support for organising and coordinating the work of multiple national and international organisations inside the country. They also have acknowledged that such coordination should also include the relevant ministries and technical directorates. However, they also indicated that the current regulations and processes are confusing, leading to many uncertainties regarding which state institution is responsible for such coordination, and through which channels.

These opaque and strict regulatory frameworks might serve as an important indicator reflecting the transitional authorities' intent to exert control over and curtail the independence of civil society. By enforcing strict compliance and complex bureaucratic procedures, albeit arbitrarily, the new authorities are constraining the recently acquired freedom of associations. Furthermore, these measures undermine civil society's collective call for the establishment of a new regulatory framework that enables NGOs, CSOs, and civic initiatives to operate through a notice of acknowledgement process. Such a framework would bypass the restrictive and excessively burdensome registration requirements that can only be met by pre-existing, well-established NGOs.

Other constraints on civil society activity include the rejection of numerous events and conferences in key public venues—namely hotels, universities, and state-managed cultural centres by the MoFA's domestic political arm GSPA. Closer examination of these rejections reveals that the majority of cancelled events had a political dimension, whether explicit or implicit, with some directly addressing human rights and transitional justice issues. In a public statement published by four prominent human rights organisations (Appendix 3), an event entitled "Implementing Transitional Justice in Syria and the Role of International Bodies and Institutions," scheduled for 27 February 2025, was abruptly cancelled. The organisers reported that "a sudden decision to prevent the meeting from being held was issued without any official explanation, despite having fulfilled all necessary coordination procedures."

According to a statement issued jointly by the Syrian Center for Legal Studies and Research, the Syrian Archive, Al-Shar' Media Foundation, and the Caesar Justice Files, "Despite having obtained official approvals and unofficial confirmations for the closed-door workshop, we were informed by the management of the [Hotel] that they had received a decision to ban the workshop without providing any explanation or justification." This episode underscores a recurrent theme among civil society actors, whereby last-minute prohibitions—or vague policy directives—undermine the implementation of events deemed politically sensitive.

Six months later, one of the co-organisers of this rejected event, a Syrian-German citizen, was unlawfully detained by the General Security upon leaving the country. His detention, without a warrant or an official acknowledgement of his whereabouts, sparked a widespread social media campaign, mainly led from the diaspora. This campaign, alongside external pressure from a number of European countries, led to his release 48 hours later.⁶

These measures highlight broader challenges for civic organisations seeking to engage in public discourse on governance, justice, and human rights. By hindering open dialogue in pivotal spaces, such restrictions may deter the emergence of a robust civil society capable of contributing to an inclusive transition. As such, further investigation into the institutional processes governing these rejections is necessary to fully understand how state power, regulatory ambiguity, and private sector compliance converge to restrict civic engagement and stifle political discourse.

Institutional Challenges

In addition to the major constraints and limitations imposed by the transitional authorities, CSOs/NGOs, particularly those established in post-Assad period, encounter a range of institutional challenges stemming from the post-Assad aid environment, which impede their development and sustainability. The most significant of these is access to international funding, mainly due to sanctions-related financial barriers, such as the absence of a functional banking system or alternative internationally recognised financial institutions, resulting in overcompliance procedures that further constrain the flow of funds.

The inflexibility of major donors in terms of due diligence requirements add additional layers of complication. Although there has been a gradual shift towards localisation, the overcomplicated procedures and limited familiarity with grassroots organisations frequently result in a narrow pool of recipients. In particular, smaller or newly formed civic initiatives often struggle to meet complex reporting requirements or demonstrate track records that satisfy donors' risk-averse standards. As a consequence, those initiatives most embedded in local communities—and potentially best positioned to drive meaningful social change—may find themselves excluded from critical funding opportunities.

Another pressing challenge relates to the weak institutional and technical capacities of many emerging civic actors. More than a decade of conflict and repression have left a legacy of inadequate training, limited digital infrastructure, and a destruction of vital infrastructure, specifically in the energy sector. In numerous areas, power shortages can persist for the majority of the day, making organisational operations exceedingly difficult. This has led many CSOs to concentrate their activities in Damascus, where electricity supply is somewhat more reliable compared to other regions that were previously controlled by the Assad regime.

While the transitional context offers new possibilities for civic engagement, the combination of insufficient funding mechanisms, stringent donor protocols, limited capacity-building opportunities, and weak infrastructure collectively limits the ability of CSOs to deliver programmes and engage with local communities.

Main Priorities and Recommendations

Flexible Funding Channels

The majority of emergent civic spaces and initiatives, whether institutionalised or informal, lack access to appropriate funding channels and have minimal to no prior interaction with donor agencies, including limited knowledge of donor due diligence procedures. Therefore, a flexible funding mechanism is urgently required. Such mechanisms should involve less complex bureaucratic processes to address urgent funding needs, be tailored to the actual needs of local communities, prioritise medium- and small-scale civic initiatives and organisations, and encourage collaboration with larger, well-established NGOs. Note that all of these support channels should be geared towards effective localisation, which entails investing in the institutional capacities of local partners.

Given the current status of Syria's banking sector and the challenges of providing direct funding from donors, we propose the following alternative approaches:

1. **UN Agencies:** Leverage agencies like UNDP, which have a history of providing small grants and flexible funding. These agencies now operate with a wider margin to identify local partners, free from the political interference of the previous regime. Funding could include small grants programmes capable of directly transferring cash to small projects while building capacity in reporting, planning, and monitoring.
2. **Expand Established Mechanisms:** Rely on and expand existing mechanisms, such as the Aid Fund for Syria (AFS), while adopting a whole-of-Syria approach with an emphasis on localising aid delivery and service provision.
3. **Partnerships with Syrian NGOs:** Partner with well-established Syrian NGOs with a proven track record of successfully receiving funds directly from donors. These organisations can act as incubators for newly established small-scale initiatives, providing mentorship and logistical support over a fixed period of time. These partnerships should foster the emergence of locally-driven initiatives and invest in their institutional capacity.
4. **Trust Fund for Civil Society and Small Businesses:** Establish a specific Trust Fund to support civic initiatives and small and micro businesses, managed by a private bank or a consortium of private banks still operating in Syria. This trust fund would ensure greater financial access and sustainability.

Prioritising Social Cohesion

Amidst a lack of trust in judicial institutions and the absence of a comprehensive plan for transitional justice—including mechanisms for accountability for human rights violations and reparations for victims—the issue of civil peace and national reconciliation has emerged as the most pressing challenge in the current transitional phase. These challenges are compounded by the societal fragmentation and sectarian violence inherited from a conflict that spanned more than a decade. In particular, areas with a diverse sectarian composition, such as parts of Homs Governorate and several coastal regions of Syria, including Latakia, Baniyas, Jableh and Tartous, continue to witness daily acts of violence and retaliatory actions. In recent months, the severity and frequency of such retaliatory violence have escalated, further entrenching divisions.

Despite these challenges, networks and initiatives focusing on civil peace and community dialogue are beginning to emerge. However, these efforts are hindered by a lack of institutionalisation, prolonged geographical isolation from other Syrian regions, and limited financial support necessary for their sustainability. These constraints impede their ability to operate effectively and to expand their reach and impact.

Therefore, it is imperative to establish dedicated channels to support these initiatives. This support should include developing their institutional capacity, equipping them with necessary resources and connecting them with local and international expertise. Engaging experts in civil peacebuilding, transitional justice, and addressing legacies of past conflicts—both from within Syria and internationally—will be critical to strengthening these initiatives and ensuring their long-term impact.

Supporting the Civic Role of Medium and Small Businesses: ⁷

Empowering Micro, Small and Medium Enterprises (MSMEs) in Syria has the potential to give agency to the people, to aid a sustainable bottom-up economic recovery that is focused on the needs of civilians, and to nurture civic values and new trends such as the increased role of women in the sector. Empowered MSMEs are more capable of contributing to social enterprises that enhance social cohesion, and thus, sustainable peace. Some practical recommendations include:

- ▶ **Promote collective action among MSMEs** by supporting the formation of independent unions to protect the rights of enterprises and their workers. These unions could be developed gradually, beginning with improved coordination strategies among groups of enterprises to enhance their bargaining power with markets, suppliers, and local authorities.
- ▶ **Support women-led businesses** to establish their own business. This is an important vehicle for empowering women and setting a new business standard for pay and working conditions that are equitable and respect women's needs. These businesses play a key role in shifting civil and social norms towards greater justice and gender equality.
- ▶ **Encourage the public authorities to provide tax relief for cash and in-kind donations from MSMEs** to help the community and reduce poverty. Additionally, since providing jobs is the most important role MSMEs play in poverty reduction, they need to be seen by humanitarian actors as a key agent in offering more sustainable poverty reduction mechanisms and taking people out of the aid cycle.
- ▶ **Encourage a structured, complementary relationship between civil society and MSMEs.** Empowered enterprises can offer financial and technical support to new and small civil society initiatives and organisations. In return, civil society organisations (CSOs) can play a vital role in providing training and capacity-building opportunities for less empowered enterprises.

Appendixes

Appendix 1: The Ministry of Social Affairs and Labour directive to non-governmental organisations



29/12/2024. Translation highlights: The Syrian Ministry of Social Affairs and Labor issued a directive to its provincial directorates requiring stricter monitoring of associations and NGOs. The circular emphasises the need for intensified field inspections, regular activity and financial reporting, and strict adherence to the legal purposes for which these organisations are licensed. It prohibits unauthorized political, religious, or foreign activities, ensures funds are used only for approved objectives, and requires prior approval for public events or campaigns. Directors are instructed to coordinate with security authorities when violations occur and to submit monthly reports to the ministry, with accountability for any negligence in oversight.

Appendix 2: The Humanitarian Action Coordination's (HAC) general regulations to international and national non-governmental organisations

19/03/2025

General Guidelines for the Handbook on International Non-Governmental Organizations (INGOs) for Humanitarian Work in the Syrian Arab Republic	
	
 General Framework	<ul style="list-style-type: none"> This handbook serves as a regulatory framework for the activities of INGOs during the current phase. It is subject to review and updates due to evolving circumstances and developments to ensure the public interest. The handbook outlines the procedures for registering and licensing INGOs to operate within Syria. It clarifies the role of the national partner as the primary intermediary between these INGOs and governmental entities through the Office of the Humanitarian Action Coordination (HAC). Projects are based on the Needs Bank and are implemented in coordination with HAC and the relevant ministries.
 Licensing of INGOs	<ul style="list-style-type: none"> Organizations submit their licensing applications directly to the Ministry of Foreign Affairs and Expatriates or through the national partner. Licensing requires the submission of documents, including the organizational structure, sources of funding, and the organization's annual plan. Upon approval, a framework Memorandum of Understanding (MoU) is signed between the organization and one of the national partners.
 Projects Registration and Approval	<ul style="list-style-type: none"> INGOs submit a project concept note (Project Card) to the national partner for review. The national partner forwards the project to HAC to ensure it does not conflict with other initiatives. Upon approval, the implementing partner is designated, and a project agreement is signed.
 Needs Assessment	<ul style="list-style-type: none"> INGOs submit a needs assessment request to the national partner, which is then referred to HAC. If relevant data is available in the Needs Bank, it is provided directly to the organization. If the data is unavailable and a new assessment is required, the request is presented to the relevant ministries for approval and execution.
 Projects Implementation	<ul style="list-style-type: none"> INGOs are linked to the relevant stakeholders based on an approved implementation model. Contact points are designated to ensure coordination and address any issues during execution.
 Project Closure	<ul style="list-style-type: none"> Upon project completion, final reports are submitted to the national partner and HAC, followed by the closure and handover process with the relevant governmental authorities.
 Dispute Resolution	<ul style="list-style-type: none"> Contact points are engaged to resolve issues during project implementation. If resolution is not possible, the dispute is escalated to HAC through the national partner for appropriate action.

Appendix 3: A statement issued by four Syrian human rights organisations addressing the banning of a transitional justice event in Damascus



بيان توضيحي بخصوص منع عقد ورشة عمل في دمشق

بإسناد أن نعلن عن إلغاء لقاء ورشة العمل المقرر عقده اليوم 27 شباط، وذلك نتيجة لتغير ظروف منع انعقادها من دون تقديم أي توضيحات رسمية، ولم استكمل جميع الترتيبات بالتنسيق مع الجهات المعنية.

بالتنظيم من المركز السوري للدراسات والأبحاث القانونية، والأرشيف السوري، ومؤسسة الشارح للإعلام، ومفاتيح بيسر للعدالة، لقرار عقد ورشة عمل مغلقة تحت عنوان "تطبيق العدالة في سوريا ودور الهيئات والمؤسسات الدولية" اليوم 27 شباط/أغسطس 2025، بحضور ومشاركة العديد من المنظمات الحقوقية السورية والدولية بما فيها منظمات دولية غير حكومية وأطراف من حكومات مختلفة، وهيئات الأمم المتحدة المعنية بملف العدالة والتوافق في سوريا، وجهات الإغاثة الأوروبية المتضررة في محادثات تتعلق ببرنامج مراكبة في سوريا، بمشاركه وزارة العدل وتنسيق مع وزارة الخارجية في الحكومة السورية.

على الرغم من استحساننا على الموافقات الرسمية والتأكيدات غير الرسمية لانعقاد ورشة العمل المغلقة، إلا أننا أبلغنا من إدارة فندق الخزانة في دمشق - مكان انعقاد اللقاء - باستلامهم قرار منع عقد الورشة المقررة من دون توضيح المصدر أو الأسباب الموجبة، وبعد تواصلنا مع وزارة الخارجية السورية، والتأكيد على إيماننا بالقوانين والإجراءات المبرمة، لم إلا أننا بأنه لا يمكن عقد هذا النشاط لعدم وجود موافقة رسمية.

وبعد الاستعانة من المشاركين أوفاء الجراء والمتخصصين السوريين وغير السوريين، نرغب بتوضيح ما يلي:

لقد طرح فريق المركز السوري للأبحاث والدراسات القانونية وشركاه على وزارة العدل في منتصف شباط/كانون الثاني 2025 رفضهم بعقد ورشة عمل مغلقة في دمشق لدعم المبادرات المرتبطة بالعدالة الانتقالية والتي سبق أن أسعدتنا ومشاركنا فيها من تنظيم شركة أهرن، وألقى هذا الطرح ترحيباً من وزارة العدل وتلقياً كتاب موقع من وزير العدل يربح ويؤكد استعداد الوزارة لاحتواء الورشة المغلقة.

وكما وصفت، بأن كتاب من إدارة المنظمات الدولية والوحدات في وزارة الخارجية يحمل رقم 876 أرسل إلى وزارة العدل يومس الوزراء برعاية الورشة وتوجيه دعوات رسمية لجهات الدولة المدعوة وسهّل دخول الضام من الخارج، وأكّدت وزارة العدل استلامها لتكتاب ووزن في جوان/الوزراء تحت الرقم 1910 بتاريخ 23 شباط 2025. والأسباب غير معروفة تم سحب موافقة وزارة العدل من المشاركة يوم أمس الأربعاء، 26 كانون الثاني من دون إيذات أي مغاير على استمرار انعقاد الورشة المغلقة نتيجة عدم إرسال الدعوات الرسمية من الجهات الحكومية، انطردت العديد من المنظمات والجهات الدولية من الحضور شخصياً، وأكدوا مواقفهم على الحضور عبر الإنترنت، والذي كان قد تم تنسيقه في قاعة الاجتماعات التي تستضيف المشاركين.

خلال الأسابيع الماضية، قمنا بتنسيق الأمور الوضعية بشكل كامل، بما فيها الاجتماعات 35 شخص، وإكمال مسؤوليات عالية لضمان سير انعقاد الورشة المغلقة بشكل انفرادي، بما فيه التنسيق الداخلي في سوريا مع الحكومة السورية، حيث أرسلنا دعوات رسمية إلى وزارة الداخلية ووزارة الإعلام ولم تتلق أي رد بخلاف وزارة العدل التي أكتت حصودها، ثم تراجعت عنه مساء يوم أمس الأربعاء، ولمّك أننا لم نرسل أي دعوة لأي جهة سورية أو غير سورية من دون تنسيق مسبق والحصول على الموافقات اللازمة من الجهات المعنية داخل الحكومة.

نحن المنظمات الحقوقية، نؤكد أننا نعوّل الدفاع عن حقوق الإنسان ودعم مسار العدالة الانتقالية ونحن نطبق العدالة، ونرغب بتوضيح هام أن الوضوح والشفافية في العلاقة بين مؤسسات الدولة والمجتمع المدني والمعي بشكلان حجر الأساس لضمان سيادة القانون وإحراز حريات التعبير، إن قرار منع عقد اللقاء بشكل مغاير، وغير إلزام إذا كان منعاً للعدالة بدلاً من معاقبة الجهات المعنية، يشكل انتهاكاً صارخاً للحقوق الأساسية، ويمثل نقياً صريحاً منصفاً لمسار العمل المدني بدعته من الحق في التجمع السلمي، وإغالة متعددة أسرار العدالة والشفافية، هذا الأمر التنسيقي يحسب نقياً لغرض صناديق الشفافية والشفافية، فبعد فرض منطق العدالة والإنصاف المدعاه الانتقالية، ونؤكد أننا بدأنا عملية قبل يوم التمر على تحرير سوريا 8 كانون الأول، 2024، وإبراز إصدار بيان رسمي من الحكومة السورية والسلطات المعنية بشكل فاعل، موقع رسمياً إلى الجهات المعنية، وإرسال رسائل اعتذار رسمية إلى الجهات التي تمت دعوتها، ومنهم من وصل إلى دمشق صباح اليوم، ولدينا كونا العيبة بالمعنى الضمني.

... تتلى ...

17/02/2025. Translation highlights: The organisers—the Syrian Centre for Legal Studies and Research, the Syrian Archive, al-Shar' Media Foundation, and the Caesar Files for Justice—announce that their closed workshop, "Applying Justice in Syria and the Role of International Institutions," scheduled for 27 February 2025 in Damascus, was banned. Despite prior coordination, written confirmations, the Foreign Ministry later claimed there was no formal approval. The event was to include Syrian and international human rights groups, UN bodies, European prosecutors. The organisers, who had completed logistics for 35 participants and coordinated with relevant ministries, condemn the move as a violation of basic rights, a deliberate restriction of civic space and peaceful assembly, and an obstruction of accountability efforts. They reaffirm their commitment to human rights and transitional justice, and call on the Syrian government to issue an official explanation and apologies to the invited participants.

Endnotes

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⁷ The majority of these recommendations are derived from our previous report "The Role of MSMEs in Syria in Poverty Reduction and Peacebuilding: Challenges and Opportunities". For more details, see: <https://peacerep.org/publication/role-of-msmes-in-syria-poverty-reduction-and-peacebuilding/>



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