

Detailed response to Panorama allegations

Panorama allegations	Adam Smith International response
1. That extensive corruption on AJACS was brought to the attention of ASI	Despite making this sweeping allegation, Panorama provides not a single example of corruption. The programme appears to have relied for its information on a former AJACS staff member, Tarek Al-Khahil, who was dismissed in April this year for unethical conduct, including stealing from the UK government. Mr Al-Khalil was established to have been overcharging, to have charged for per diems when not in the country, to have bullied and harassed colleagues, and to have manipulated procurements. After Mr Al-Khalil was dismissed, two of his close associates resigned. Subsequently, an extortion attempt was made, with a threat to take material to the media if the cash demand was not paid. ASI informed Panorama of this, and asked it to verify the integrity of its sources, but Panorama has not done so. The only complaints of corruption received by ASI were confined to the areas in which Tarek Al-Khalil and his close associates worked. Earlier this year, ASI thoroughly investigated and documented these complaints which appeared to be mischievous made out of self-interest. ASI has reason to believe that the above individuals are conspiring with at least one staff member formerly employed by the third party monitor, with a view to undermine the AJACS project, especially procurement processes. • A third party monitoring report produced in February 2017 made claims about quality of materials used in construction projects funded by AJACS at the same time as the former staff members were seeking to influence various procurements away from the lowest technically-qualified bidders and towards more expensive bidders. • The report contained statements from a local councillor that he denies having made; he claimed that the February report attaches “false statements” to him. • One of the five ‘sub-standard’ projects detailed in that report did not exist and as such was never funded by AJACS. • The other four projects were reviewed favourably by an engineer commissioned by AJACS following the third party monitoring report. The quality of materials in each case were assessed as ‘good’ or ‘very good’. • The engineering review assessed a further 17 projects and identified 19 out of the total 21 projects to have been suitable and delivered to specification. It is not true to state that the complaints raised by these members of staff were not dealt with satisfactorily, nor is it evident that any undue pressure was put on communities to withdraw the complaints.
2. That ASI continued to provide funding to stations and police officers that did not exist, in particular at Koknaya	Across 15 third party monitoring reports over more than 3 years that have reached every community the project has worked in, stipend inconsistencies have been noted in only two communities, Koknaya and Kafr Diryan. ASI inherited a stipends system from the Integrated Community Security Programme the predecessor to AJACS, and introduced a new system to allow the FSP to administer

stipend distribution in Syria that has increased financial oversight over the process. That is:

- The FSP submits their payroll to AJACS.
- AJACS analyses this against donor engagement criteria and tracks key changes such as:
 - Number of police officers disaggregated by gender and paygrade. This list also includes the number of active stations, total stipends and operational costs.
 - Names of new and relocated officers.
 - Names of officers whose paygrades have been changed, and officers that have been suspended, died or have resigned.
- AJACS compares the FSP list of station commanders and deputies and checks their vetting validity dates. Any beneficiary who does not have prior vetting or whose vetting will expire in the next two weeks, will be resubmitted for vetting.
- Payment requests for each station will only be made if the minimum vetting requirement is met.
- AJACS prepares a monthly stipend memo for donor approval. No payment is effected without explicit donor consent.
- AJACS works with vetted and registered local cash transfer systems to transfer the approved funding into Syria and to the relevant FSP Headquarters.
- Once the FSP confirms receipt of stipends from cash transfer systems, the AJACS Finance Field Officer will be present at the station to witness the handover and verify identity. AJACS has a record of every individual verification finding since the onset of the new system in July 2016.

FSP officers do die in the line of duty, most recently in a Russian airstrike on Al-Atarab on 14 November 2017 when 13 officers were killed. There are very few examples where deceased officers have been found to have remained on a stipend list after they died. When this did happen, often it was because the stipend was either paid to the family of the deceased officer or to a family member who had replaced the deceased officer.

Since June 2016 ASI has re-assessed 84 communities and identified seven deceased officers in Idlib and a further seven deceased officers in Aleppo. It must be noted that this totals 14 officers out of a total of circa 3,400 today. These numbers (on any interpretation) are extremely low, largely because of the controls that ASI has in place to respond to these issues. It should be noted here that the ongoing conflict, the economic pressure on families caused by the death of a working male, and the absence of a Death Benefits Fund that could provide for the families of deceased officers, the issue of deceased officers is contentious with the FSP command.

ASI received two warnings from third party monitors about irregularities at Koknaya. These were preceded by a stipend verification report that highlighted an issue. However, there were stipend verifications before and after the first third party monitor warning that showed a high degree of presence by the FSP. Following the second report, however, ASI moved quickly to review the status and suspend the station, which the FSP decided to close down shortly afterwards. Our funding governments were informed and gave guidance throughout the process. The details of this case are as follows:

- On 12 December 2016 ASI visited Koknaya station as part of a routine stipend verification of the November stipend distribution. Over 30 officers failed to attend and it was therefore agreed that the station would be revisited the

	following month. It should be noted that of the 15 stations visited, Koknaya was the only one with a significant issue vis-a-vis attendance. • ASI was unable to carry out the follow up visit Koknaya in January 2017 due to violent clashes in the area. • In mid-February 2017 ASI re-visited the Koknaya station. All 54 officers listed on the stipend list were accounted for and presented valid ID. • In March 2017 the third party monitor raised concerns about irregularities. • In mid-April 2017 ASI returned to the Koknaya station to verify the March stipend distribution. On that occasion, 49 out of 50 officers were verified with a complete ID check. • In August 2017 a third party monitor visited Koknaya for a follow-up visit and identified concerns that Koknaya officers were located in Hazzanu. Following this, FSP Command moved 11 officers to Hazzanu station. • In September 2017 ASI suspended the payment of stipends to Koknaya. In October 2017 all remaining officers relocated to Hazzanu station and ASI introduced a mandatory three-month verification requirement. In the specific case of Koknaya station, it is clear that ASI acted appropriately and in accordance with its procedures, and took action as soon as an issue was identified.
D3. That 'bags of cash' were taken into Syria	At no time were AJACS staff or beneficiaries carrying bags of cash into a war zone. Cash payments were only provided to FSP representatives. It was common practice for the FSP representatives to use local cash transfer systems to transfer the funds into Syria. Local cash transfer systems provide a facility where cash is deposited in one location, and withdrawn in another. There is no functioning bank system outside of regime controlled areas. As a result of this, it is common for organisations in this sector to use methods such as these local cash transfer systems. ASI has ensured that appropriate systems and checks are in place to ensure that the risk of any cash payments being misappropriated is minimised. These include enhanced in-country verification of the stipend distribution to FSP stations, e.g. stipend verification reports and field monitor observation of payments. ASI has repeatedly alerted donors to the use of local cash transfer systems and they have full knowledge of the above practices. ASI continues to investigate alternative methods for sending money through to Syria on an on-going basis but at present none are practicable. There is no incentive to ASI to use these cash transfer systems, other than programme necessity. ASI does not profit from the provision of funding to the FSP; the cost of providing stipends, equipment and grants are passed directly to the UK government with neither profit nor indirect costs applied.
4. That money from police stipends was being appropriated by the armed group Nour al Din al Zinki ("Zinki")	When ASI first began working with the FSP in October 2014, Zinki was not a proscribed group, i.e. it was not designated as a terrorist organisation). Indeed, it was not put on any restricted listing until May 2017. Some of the donors supported FSP stations that had relations with Zinki before the commencement of AJACS, under its predecessor programme, ICSP. ASI was aware of Zinki interference in stations throughout 2015. In December 2015, observing increased attempts by Zinki to interfere with FSP stations, ASI recommended the suspension of stipends and operating costs to the nine stations in areas controlled by Zinki. ASI highlighted the risks in relation to these payments but the funding governments

	elected to continue to support the nine FSP stations. This was done to encourage the FSP to push back on Zinki interference, and avoid retreating in the face of extremist encroachments. At this point, there was a genuine and widely held concern that if AJACS stopped all funding in the Zinki-dominated area of Western Aleppo, then the likely effect would be the return of Jabhat al Nusra to the region and a withdrawal of accountable safety and security services from ordinary people. During early 2016, evidence from the field demonstrated that the FSP was able to resist Zinki efforts to interfere. However, in August 2016 ASI's research and reviews of high-risk communities identified a return of Zinki's influence in the nine FSP stations. This led to a discussion with donors on 4 August 2016 and the subsequent suspension of support to FSP stations on 11 August 2016. Throughout the project, ASI and its donors regularly reviewed support to Zinki-dominated communities. ASI identified the risks and provided advice to the donors. However, in all circumstances, whether the relevant entity is proscribed or not, the decision about whether to proceed with a particular project or community is a decision for the donors.
5. That ASI were aware of close cooperation between the Free Syrian Police and courts and detention centres controlled by Zinki that stand accused of human rights abuses	AJACS has strict guidelines in place to ensure that there are appropriate standards regarding the treatment of people in police custody, who are not subject to formal detention. According to these guidelines, the FSP may hold suspects in custody (held under arrest or confinement while a case is being investigated) or on remand (kept in custody on the order of a judge, pending trial) without breaching donor red lines. Training on human rights and care in custody has put appropriate safeguards in place. Under Syrian state law, the police are not responsible for the management or administration of prisons, nor for their policies and operating standards. ASI is not aware of any human rights abuses that have taken place under the authority of any of its funded officers. There is one reference to the FSP in the court at al-Qassimiya in an Amnesty International report, 'Abductions, Torture and Summary Killings under Armed Group Rule in Aleppo and Idlib, Syria', where it describes how an FSP officer provided information against a detainee and took said detainee to a cell. The officer was not alleged to have been involved in torture. AJACS does not provide support to any court and the FSP operates in the absence of a regularly constituted court system. Given the requirement for a judicial function to complement a police service, the FSP has at various times cooperated with irregular tribunals, taken on judicial functions directly by providing alternative dispute resolution (ADR) services, or maintained a focus on basic community policing service delivery and avoided functions requiring court involvement. In fact, the FSP is now the most widespread provider of ADR in northern Syria, with high satisfaction rates amongst the public. ASI does not dispute that Zinki has a strong influence over the court at al-Qassimiya, but there are wider issues at stake that the BBC is failing to take into account because of a lack of understanding of the context in which decisions were taken. The judgment made by AJACS's donors was that AJACS should treat the risk of co-operation with the al Qassimiya court with the FSP by continually reinforcing the need to avoid such actions. Withdrawing support was deemed to be a poor move strategically at the point when the conflict was greatly heightened in Aleppo, and in the knowledge that withdrawing support for the trained and accountable police force would make matters worse by leaving a security vacuum that would be filled by Zinki. AJACS and the FSP also concentrated on those methods of arbitration and dispute resolution that would not require a case to be heard in a court.

	ASI has continued to fund a small number of police stations that are still using the court at al-Qassamiya. This is following a direct request from the FSP, and due to the need to maintain an independent FSP presence where possible and avoid retreating in the face of armed or extremist group pressure to leave a security vacuum that armed or extremist groups are able to fill unopposed. This has occurred with the full consent of funding governments. ASI has strict guidelines in place to ensure that anyone being detained by organisations/groups that receive funding are treated fairly and humanely. ASI supports the future implementation of an effective and independent court system in Syria and is working with its partners to try and achieve this.
6. That AJACS funds were paid to Jabhat al Nusra sympathisers	ASI has never knowingly paid AJACS funds to Jabhat al Nusra ("JN"). However, there were two occasions of unknowing diversion of non-UK AJACS funds on a contract that was held by a partner firm. The first occasion occurred in early 2016. It related to an AJACS's payment of \$900 to FSP operations to fund six officers at the Kafr Diryan station, who were subsequently discovered to have been imposed on the station by JN. It is vital to note that: • the issue was detected in less than two months; • AJACS ceased payments to the station and officers in question immediately upon identification of the issue; • the funding to the Kafr Diryan station in question was not reinstated; • these individuals had never been listed on the AJACS stipend, list but were instead paid directly from the Idlib provincial command costs; • the value of such funds was \$900, to be understood in the context of over \$20 million of support provided directly to the FSP to date under AJACS; • the funding was not provided by the UK; • the funding did not flow through a contract held by ASI; • no support was provided beyond 31 March 2016 and there has been no discussion between AJACS and the donors about the possibility of reinstatement of the station since; and • ASI does not profit from the provision of funding to the FSP. The second occasion occurred in June 2016, when an AJACS research report identified that an individual who was imposed by a JN emir as Kafr Diryan's station commander after the suspension of AJACS support had been moved to Hazzanu Traffic Centre. His name appeared on a stipend sheet from April to June 2016, over which time he received \$900. Again, this funding was not provided by the UK and did not flow through a contract held by ASI. Once his affiliation was detected he was replaced immediately. Since the incident in Kafr Diryan, AJACS has identified 13 cases where AJACS engagement criteria were likely to be breached; in each case AJACS has acted quickly to suspend support, before any infiltration occurred. ASI has no evidence of any further instances of infiltration. This is as much evidence of our risk management systems working effectively to identify infiltrators as it is of infiltration. As a result of the Kafr Diryan experience, AJACS launched a review of high risk communities, increased its research resources and changed some of its internal processes. This included dismissing some field researchers who were proving unreliable, adapting some of the field research techniques to protect the identities of field staff, and imposing a system of routine re-evaluation of all communities on a rolling basis.
7. That ASI was aware	The BBC cite two examples in which the FSP were entangled with courts affiliated with

that the Free Syrian Police was cooperating with human rights abusers	extremist organisations. In both instances ASI acted properly and in close collaboration with donors to respond. ASI became aware of the extremist affiliations of the Dar al-Qadaa Court in Hreitan in January 2015. In the spring and summer of 2015 local councils in Hreitan, Anadan and Kafr Hamra all made statements requesting the presence of the FSP in these stations, which are in the same region as this court. ASI received assurances that the stations did not co-operate with the Dar al-Qadaa Court and maintained support. In September 2015 the court in Hreitan ordered the execution of three prisoners. As soon as it became aware of this, ASI immediately reported to the donors and halted support to all three stations and communicated the reasons to Aleppo FSP Command. Support was soon resumed, with donor approval, once ASI was confident the stations were not cooperating with the court. In order to avoid involvement with the justice system AJACS has given the FSP the skills to resolve disputes without recourse to courts and now the most widespread provider of ADR in northern Syria, with high satisfaction rates amongst the public. As soon as ASI became aware of the various sentences to stoning that were handed down by the Jund al-Asqa court in Saraqib in December 2014, it immediately advised funding governments and began an investigation. This was less than five weeks after ASI assumed responsibility for implementing AJACS. The investigation concluded that both stations at Saraqeb and Sarmin were not being sufficiently transparent, and, given the significant presence of JN and Jund al-Aqsa in both communities, support to both was suspended in February 2015. Upon further investigation, AJACS identified that both officers alleged to have been active for the FSP in Saraqib were not formally officers under FSP control and were thus removed permanently.
8. That AJACS lacks scrutiny and accountability	AJACS is tightly governed and managed under the close supervision of its six donor governments. Risks are documented formally in a risk register that records the assessment of probability and impact, and categorises them as programme, legal, reputational and security. A composite risk index is calculated to rank the risks and determine how they will be assessed. This is consistent with FCO best practice and has been tested over a number of years in highly complex operating conditions. AJACS is highly regarded by other donor governments working in Syria alongside the UK Government. The project's donors have grown from four to six over the lifetime of the project. In quarterly reviews, donors have consistently rated the project highly for its responsiveness, governance and operational effectiveness. It has been widely praised, including by the Foreign Secretary, and in local and international media (including BBC earlier this year). It has become an example of UK leadership among other donor governments. The programme is exhaustively reviewed by independent monitors. In the October 2017 annual review of AJACS, completed by the project's third party monitor, 598 of 708 key informants were either satisfied or very satisfied with the services of the FSP. They quote informants talking about the "professionalism" of the FSP and the "trust" that they have built within their communities. Of the 158 beneficiaries of FSP services interviewed, 141 (89%) reported satisfaction or a high level of satisfaction, with one community member describing how "the strong would eat the weak" within his village were it not for the FSP.