



NGO  
MONITOR

---

# A Strategic Approach to Deradicalization of Palestinian Society

A 12-point strategic plan for  
recalibrating German development  
and humanitarian aid

---

June 2024



## Table of Contents

<b>Table of Contents</b> .....	<b>2</b>
<b>Executive Summary</b> .....	<b>3</b>
<b>Aid diversion in Gaza and West Bank: A snapshot across policy areas</b> .....	<b>5</b>
Hamas operative siphoned global church aid organization’s funds – World Vision..	6
United Nations Relief and Works Agency for Palestine Refugees in the Near East	
- UNRWA.....	6
United Nations Office for the Coordination of Humanitarian Affairs - UN	
OCHA-oPt.....	8
United Nations Children’s Fund - UNICEF.....	9
Terror Linked Palestinian NGO network.....	9
Possible Misappropriation of Dual-Use Goods for Hamas’ Purposes.....	10
Applying Domestic Standards to Foreign Policy.....	10
<b>Recommendations in Two Main Policy Areas</b> .....	<b>11</b>
Development and Humanitarian Aid.....	11
Transparency.....	11
Current State of Affairs.....	12
Best Practices.....	12
Recommendations.....	14
Eligibility and Vetting Criteria.....	15
Current State of Affairs.....	15
Best Practices.....	16
Recommendations.....	19
Accountability and Oversight.....	21
Current State of Affairs.....	22
Best Practices.....	22
Recommendations.....	23
UNRWA and Palestinian Textbooks.....	25
Palestinian Authority textbooks teach violence and antisemitism.....	25
Current State of Affairs.....	25
Recommendations.....	27
Accountability and Oversight: UNRWA’s internal procedures.....	31
Current State of Affairs.....	31
Recommendations.....	33
<b>Recommendations: A 12-Point Summary</b> .....	<b>34</b>
<b>Endnotes</b> .....	<b>35</b>



## Executive Summary

The **atrocities of October 7th reflect pervasive radicalization in Gaza and the West Bank**. Development funds have been diverted and misused to construct terror tunnels and military infrastructure. School textbooks contain antisemitic and anti-Israeli material. Hamas enriches itself at the expense of the civilian population and has held hostage the people of Gaza since 2007. Even UN organizations have connections to terrorist groups.

**Now is the time to act.** The German government is the second largest donor to the Palestinians, and this strategic relationship must now be leveraged. **A reordering and recalibration of development aid, in particular in a post-war scenario, must focus on concerted deradicalization of Palestinian society.** The German government has the capacity to make a decisive contribution, and turn aid into a proactive agent so that supported projects renounce violence and promote coexistence.

**Germany's commitment to Israel's security must also be applied to development and humanitarian aid.** Public funds must not be used and misappropriated to promote antisemitism and hatred, violence, and terror against Israel.

**The path to a peaceful, secure region is long, but the reconstruction of Gaza must mark the beginning of a paradigm shift in development cooperation.** The status quo is not an alternative.

**In this report, NGO Monitor, IMPACT-se, and DIG offer concrete recommendations for policymakers on how to improve transparency, vetting criteria, accountability, and oversight, as prerequisites for recalibrating development aid for the Palestinians.** The aim is to promote peaceful coexistence; support genuine human rights advocacy; and decisively combat hatred, terror, and antisemitism. By providing best practice examples from the USA and other European countries, the report demonstrates that improvements are both necessary and possible at all stages of development cooperation.

**Transparency is the basis for targeted development cooperation.** There is still a lack of sensitivity in ministries regarding complex cooperation with local organizations. In October 2021, Israel classified six Palestinian NGOs as terrorist organizations. Foreign Minister Baerbock subsequently announced a joint German-Israeli review of funding. In a press release from August 2022 and a response to a parliamentary inquiry in April 2023, the German government declared



that there would be no reassessment of the NGOs. It was only in February 2024 that the public learned through media reports that the Foreign Office and the Ministry of Development had already stopped cooperation with the six organizations, contrary to all public statements. Yet, there has been no official statement to date.

**Vetting criteria must be clearly defined and strategically oriented.** German funds should only flow to organizations and projects that pursue German external actions' strategic goals of two states in nonviolent coexistence, including its commitment to Israel's security.

**Control mechanisms and accountability must become more effective and efficient.** Past experience shows that existing control mechanisms based on self-reporting by grantees fail to address cases in which third parties alerted the German government to potential abuse, deeming them insufficient. Detailed criteria must be clearly communicated throughout the granting period, and compliance must be verified and confirmed.

**The German government must apply the same criteria to its contributions through various UN agencies.** For more than a decade, UNRWA, UNOCHA, and UNICEF systematically failed to prevent the diversion of development funds. Textbooks used by UNRWA incite violence and teach antisemitism. UNRWA employees even participated in the October 7th atrocities and hostage taking.

**The Bundestag needs to take on a confident supervisory role.** The BDS resolution of 2019, as well as parliamentary documents 20/9149 and 20/8736 after October 7th, called on the German government to urgently review support for the Palestinian territories and formulated criteria for financing. The Bundestag should play an even stronger role in formulating strategic goals for support and supervising funds.

**The Budget Code and yearly budget resolutions** in the areas of humanitarian aid, development cooperation, and the promotion of democracy should be adapted to prevent the funding of organizations that promote antisemitic, racist, and contemptuous concepts as well as content that is incompatible with human dignity and violates the free democratic basic order.

**In conclusion and particularly following the October 7th Hamas massacre, Germany's development policies and resulting financial and other support must take into consideration two fundamental principles to advance a peaceful future in the region:**

1. **\*Denial of Israel's right to exist should deem a project and/or a partner/entity ineligible:** Denying Israel's right to exist manifests itself in many



ways, including through the promotion of a so-called “one state” formula and a Palestinian “right of return” – which, if implemented, would effectually mean the elimination of Israel as the nation state of the Jewish people – as well as the “apartheid” libel, which is designed to delegitimize and undermine Israel’s existence as a Jewish state, and to promote BDS and lawfare campaigns targeting Israelis and its supporters.

2. **\*\*The definition of “terror ties” must include all relevant examples of aid abuse by terror elements, with particular emphasis on affiliation to designated terror organizations.** NGOs and NGO officials can be affiliated with terror groups in different forms, including convictions or jail time for terror-related offenses, public endorsement and glorification of terror entities, participation in events or delegations sponsored by a designated foreign terrorist organization, and simultaneously holding positions in a terror group and an NGO.

## **Aid diversion in Gaza and West Bank: A snapshot across policy areas**

Humanitarian efforts in war zones are inherently susceptible to extortion and theft by violent actors, including terrorist groups. In particular, Hamas has a history of raiding aid warehouses and convoys, as well as developing tax schemes and other forms of embezzlement designed to skim money off of international largesse. UN aid mechanisms in Gaza similarly suffer from corruption, compromising the integrity of imported materials.

For years, UN agencies and humanitarian NGOs have turned a blind eye to Gaza-based terror actors’ diversion of humanitarian aid to produce rockets, build terror tunnels and other instruments, and to personally enrich themselves at the expense of ordinary Gazans. The UN and NGO community has ignored, and in many cases openly covered up, the embedding and co-locating of Hamas weaponry within civilian infrastructure like schools, mosques, and hospitals.

Since October 7, there have been numerous further examples of aid diversion from the Palestinian people for the benefit of Hamas.



This section will present several case studies: Hamas siphoning aid through a global church aid organization (World Vision); the failure of UNRWA, UNOCHA and UNICEF to adhere to humanitarian principles to prevent aid diversion; examples of a terror affiliated NGO network supported through development and humanitarian aid; as well as examples on how textbooks used by UNRWA teach antisemitism and incite to violence.

### Hamis operative siphoned global church aid organization's funds – World Vision

On June 15, 2022, Mohammad El-Halabi was [convicted](#) in the Beersheva District Court of diverting funds and materials to Hamas for terror purposes. At the time of his arrest in 2016, El-Halabi was the head of operations in Gaza for World Vision – an international, church-based aid organization. Beyond the accusations leveled against El-Halabi, the verdict highlights World Vision's failure to properly supervise its operations in Hamas-controlled areas and protect its humanitarian aid from abuse. The judges criticized the NGO for its belief that internal processes could adequately identify embezzlement of the type that was proven to be done by El-Halabi.

The indictment describes how El-Halabi diverted World Vision aid materials to Hamas for the purpose of constructing and improving its terror tunnels. He was accused of having provided the group with “hundreds or thousands” of tons of iron, plastic tubing for improving communications and electrical infrastructure in the tunnels, and digging implements.

Following El-Halabi's arrest, Germany's Federal Ministry for Economic Cooperation and Development (BMZ) said it had [indefinitely frozen payments](#) totaling €1.5 million to World Vision. For its part, World Vision [stopped](#) working in Gaza.

### United Nations Relief and Works Agency for Palestine Refugees in the Near East - UNRWA

In January 2024, Israel alleged that at least 12 UNRWA employees participated in Hamas' October 7th atrocities against Israeli civilians, and [asserted](#) in March 2024 that “over 450 UNRWA employees are military operatives in terror groups in Gaza.” Additionally, a January *Wall Street Journal* article, citing Israeli intelligence sources, [reported](#) that “23% of UNRWA's male employees had ties to Hamas, a higher percentage than the average of 15% for adult males in Gaza, indicating a higher politicization of the agency than the population at large.” Furthermore, the



EU-designated terror groups, the Popular Front for the Liberation of Palestine (PFLP) and the Palestinian Islamic Jihad (PIJ) each have official unionized bodies of UNRWA employees.

The IDF (Israeli Defense Forces) has repeatedly reported military infrastructure and tunnel systems under UNRWA facilities, which they uncovered during operations in Gaza. Neither the UN nor UNRWA, which is exclusively responsible for Palestinians, provide answers as to whether members of terrorist groups are excluded from UNRWA's refugee status. [Unlike UNHCR](#), UNRWA apparently does [not](#) revoke the refugee status of (Palestinian) terrorists. Members of Hamas, PIJ, or PFLP, among others, therefore also receive UNRWA services. The Colonna report did not substantially examine these allegations. The German government's internal audit reports are classified for no apparent reason and therefore do not facilitate an understanding of the current policy.

As a special refugee agency, UNRWA has often been criticized. Unlike the UNHCR, it does not promote the integration of refugees and, above all, their descendants, but on the contrary, constantly expands its area of responsibility to more people. Its demand for a Palestinian "right of return" impedes any resolution of the conflict and the promotion of a two-state framework. Consequently, the demand that aid for Palestinians should be provided via other agencies and channels has been voiced for some time already.

Moreover, UNRWA's school curriculum [incites violence and inculcates hatred](#) of Jews. A March 2023 joint [report](#) by IMPACT-SE and UN Watch showed that "a sample of 82 UNRWA teachers and other staff affiliated with over 30 UNRWA schools who were involved in drafting, supervising, approving, printing, and distributing hateful content to students."

Similarly, a [January 2024 UN Watch report](#) revealed "A Telegram group of 3,000 UNRWA teachers in Gaza is replete with posts celebrating the Hamas massacre of October 7th minutes after it began, praising the murderers and rapists as 'heroes,' glorifying the 'education' the terrorists received, gleefully sharing photos of dead or captured Israelis and urging the execution of hostages.... UNRWA teachers regularly share videos, photos and messages inciting to Jihadi terrorism, and openly celebrating the Hamas massacre and rape of civilians."

UNRWA also [partners](#) with terror-linked NGOs that promote violence and anti-constitutional delegitimization of the Jewish State. For instance, UNRWA was an implementing partner on a 2021 [project](#) titled "Advocacy, monitoring and documentation of HR and IHL violations and related trends" with Al-Haq, Palestinian Center for Human Rights (PCHR), and Al Mezan. All three have multiple, clear links to



the PFLP; in February 2024 BMZ [reportedly](#) decided to cease support to Al-Haq (as well as five other PFLP-linked NGOs).

Likewise, in November 2023, Switzerland [announced](#) an end to funding for PCHR, due to the NGO's [problematic attitudes towards violence](#). (For instance, during the May 2023 Gaza conflict, PCHR published a statement in which it "[affirms the Palestinian people to resist the occupation by all available means, including armed struggle...](#)" After criticism and under pressure from donors – including the EU – this text was amended.)

(For more details on statements made by PCHR and Al-Haq officials supporting violence, see "[Al-Haq's Extremist Demonization of Israel after the October 7 Pogrom](#)," "[Al-Haq Staff: Justifying Violence and glorifying terrorists](#)," and "[PCHR Board Members Call for Violence Against Israelis](#).)

## United Nations Office for the Coordination of Humanitarian Affairs - UN OCHA-oPt

The Israel, West Bank, and Gaza branch of the UN's Office for the Coordination of Humanitarian Affairs (OCHA-oPt)<sup>1</sup> executes the UN's regional humanitarian response plan, facilitating and providing donations to dozens of NGOs and UN agencies. While other OCHA branches focus on delivering clean water, shelter, and other basic humanitarian necessities, OCHA-oPt defines success in numbers of press releases, reports, briefings, and lobbying activities.

The UN does not list any Palestinian terror groups on its terror list, which in practice means that OCHA-oPt is able to [coordinate with and fund terror-linked NGOs](#), including groups with ties to the PFLP. Several officials working for OCHA-oPt-partner NGOs have been arrested for their leading roles in carrying out terrorist attacks against Israeli civilians. The Palestinian NGO Network (PNGO) – which lobbies against anti-terror regulations and includes PFLP-linked groups among its members – is a key member of the OCHA-oPt Humanitarian Country Team (HCT).

OCHA-oPt is directly funded by several European countries, including Germany (€9.2 million in 2023) and the European Commission. It also receives indirect support from the US and other countries that provide unearmarked support to OCHA's central branch, which then transfers funding to OCHA-oPt.

---

<sup>1</sup> For the purposes of this analysis, the UN's designation "oPt" (occupied Palestinian territory) is retained. This is a political term used by the UN and many NGOs.





## United Nations Children's Fund - UNICEF

Terror-linked and pro-BDS Palestinian NGOs have also worked to abuse UNICEF structures to advance their agenda of delegitimizing Israel's right to exist. For years, these NGOs, organizational members of the UNICEF "working group," [have exploited children in advocating for the IDF's inclusion on the blacklist](#) published by the UN Secretary-General in its yearly report on "Children and Armed Conflict" (CAAC).

The CAAC report includes an annex listing "parties to armed conflict" (i.e. armed groups) that perpetrate these "grave violations." The annex is designed to generate "targeted measures against violators, including the possibility of sanctions." To date, the annex almost entirely consists of failed states, state-sponsored militias, and terrorist organizations such as ISIS, Boko Haram, the Taliban, and Al-Qaeda.

## Terror Linked Palestinian NGO network

At least €200 million in humanitarian and development aid from European governments, including Germany, has gone to financially support a network of 13 Palestinian NGOs with verifiable links to the PFLP, a EU-designated terror group.

Over the decades, but particularly following the Oslo agreements, PFLP activists created separate NGOs to address a variety of "human rights issues," ranging from women's rights, to access to basic medical services, and food security. As a result, this terror-affiliated NGO network gained immense credibility, particularly because it succeeded in associating its activities with the most critical democratic processes to determine sustainability of a future independent Palestinian state.

In some instances, the NGOs were founded by the PFLP itself; in others, PFLP members serve as staff, board members, and as key decision-makers and financial directors for the NGOs.

In total, solely using open sources, NGO Monitor [uncovered](#) over 70 staff and board members, as well as other officials, who hold positions in both the NGOs and the PFLP. The evidence tying these NGOs and their leadership to the PFLP includes statements from the PFLP acknowledging NGO officials as members, the alleged involvement of NGO officials in a string of terrorist attacks, indictments and convictions of NGO officials on terror-related charges, and participation in and support for PFLP activities.

In October 2021, the Israeli Ministry of Defense (MoD) designated six of them as terror organizations, and [claimed](#) that these NGOs had diverted humanitarian aid



funds from European donors to the PFLP and recruited members into the terror group. Israel's designation came after several of these NGOs' senior employees were arrested and accused of planning and carrying out the August 2019 terror attack in which a 17-year-old Israeli teen was murdered.

### Possible Misappropriation of Dual-Use Goods for Hamas' Purposes

For years, German institutions have provided development aid in Gaza. Research carried out by the broadcaster [ARD](#) shows that materials and know-how may have fallen into the wrong hands.

The materials, expertise and logistics used in the construction of rockets and tunnels by Hamas were the same as those used for German development cooperation projects financed by GIZ and KfW Development Bank. Pipes, canal rings, steel, and cement can be used for both civilian and terrorist purposes ("dual use"). The research points to deficits in the control of their end use.

### Applying Domestic Standards to Foreign Policy

The October 7 Hamas massacre ignited unprecedented anti-Jewish protests and assaults on German streets. Most of the verbal and physical violence against Jews was inspired by the events taking place during and following the massacre. Events in the Middle East, in other words, had a very direct impact on the Jewish community in Germany; a similar phenomenon has been observed around the globe.

Under the guise of promoting human rights, the PFLP has built up a network of NGOs that exploit official development funds from European states and the UN, as well as private donations in the West, for propagating terrorist propaganda. Many of the organizations and networks active in the region also serve as mouthpieces and force-multipliers in European countries for the political agendas of Palestinian terrorist groups, notably propagating the denial of Israel's right to exist.

One such NGO is "Samidoun," which has strong ties to the PFLP terrorist organization. The [German Domestic Intelligence Services](#) described Samidoun as a network founded by PFLP members with "high networking and mobilization potential" that is "not only popular with extremist Palestinian individuals, but also with Turkish right-wing extremists and within anti-imperialist or dogmatic German and Turkish left-wing extremism." Samidoun has been active in Germany since 2019 and has played a crucial part in antisemitic protests since then, including after October 7th.



Germany recognized the close relationship between the PFLP and Samidoun when a [ban](#) on the organization's activities and organization was imposed in November 2023, prohibiting Samidoun's activity throughout the country. Khaled Barakat, "the chief coordinator of Samidoun," lived in Germany in 2016-2019, but his application for an extension of his resident permit was rejected and a [four-year entry ban was imposed](#), "owing specifically to what the German Interior Ministry called Barakat's [proclivity for violent, antisemitic rhetoric](#)." In March 2022, the Berlin Administrative Court (VG Berlin) [rejected his appeal](#), finding that Barakat "is at least close to the PFLP," and that he "repeatedly participated in activities of the PFLP in Germany and/or appeared publicly under the PFLP label."

While Germany has taken a clear stance domestically, in the areas of foreign policy and development cooperation, it seemingly allows for similar partnerships between grantee NGOs and the PFLP. In addition to the NGOs already mentioned, Germany funded via the Gesellschaft für Internationale Zusammenarbeit (GIZ) the Association for Woman and Child Protection (AISHA), whose board members were active in the PFLP. Al-Haq and Defense for Children International - Palestine (DCI-P) were financed by Weltfriedensdienst with funds from BMZ, and the Palestinian NGO Network also received funds from GIZ. They all have clear links to the PFLP (for more detailed information, see NGO Monitor's report, "[German Funding in Light of the October 7 Massacre](#)") and promote the denial of Israel's right to exist\*.

The October 7<sup>th</sup> massacre and its aftermath highlight the dissonance between German authorities' assessment of the danger of terrorist affiliations within Germany and their anti-constitutional manifestations and similar activities outside the country. If affiliation to a designated terror group suffices to ban NGOs within Germany, the same methodology should be applied in the context of humanitarian and development aid and the support of foreign (Palestinian) NGOs.

## Recommendations in Two Main Policy Areas

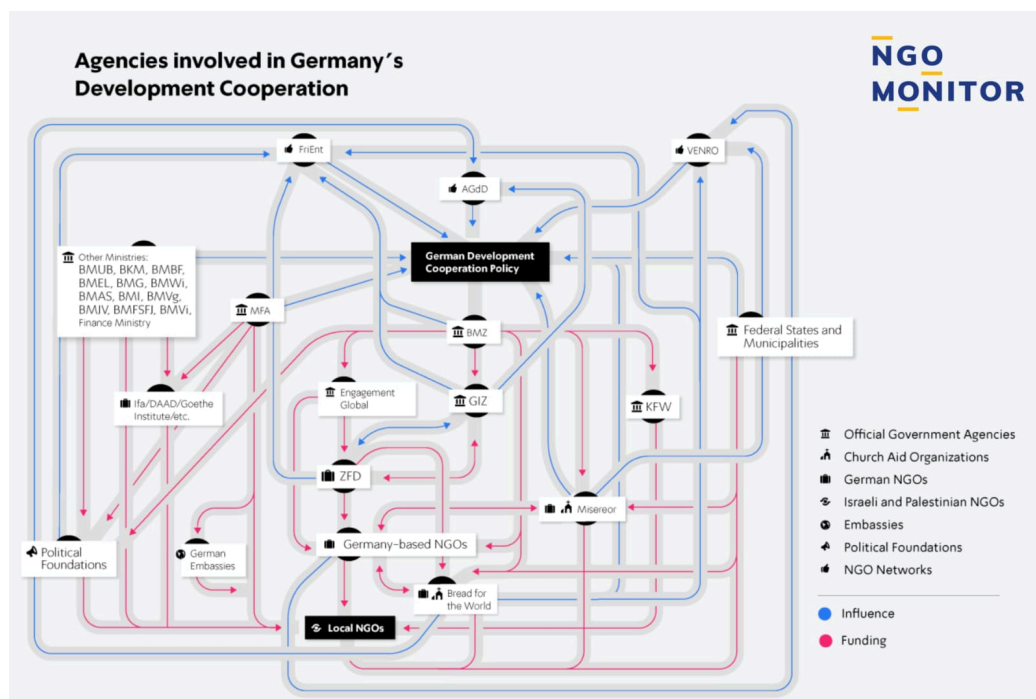
### Development and Humanitarian Aid

#### *Transparency*

Transparency is a fundamental pillar for achieving accountability within humanitarian and development aid frameworks. By openly sharing information regarding actions, decisions, and resource allocations, governments can create public trust and allow stakeholders to actively participate in decision-making processes, as well as to assess the effectiveness and efficiency of aid internationally.

### Current State of Affairs

Germany is a global leader in providing development aid (referred to as “cooperation” in Germany) and was the second largest bilateral donor in 2023 (after the US), allocating [\\$37 billion](#) to official development assistance. Yet, the country’s development aid system lacks even basic transparency and is highly decentralized. The Ministry for Economic Cooperation (BMZ) lists 34 groups involved in Germany’s development cooperation policy, including NGOs, political foundations, and church aid organizations, making it nearly impossible to follow the flow of taxpayer money (see NGO Monitor’s report “[Deutsche Entwicklungszusammenarbeit: Die Notwendigkeit nach Transparenz und Rechenschaftspflicht bei der Förderung von Nichtregierungsorganisationen](#)”).



### Best Practices



The European Commission runs the [Financial Transparency System](#) (FTS) database that features the names of the beneficiaries of funds awarded by the Commission every year. In the case of multiple beneficiaries of the same grant, FTS will list all of them, providing the amounts per beneficiary, if this information is available. In addition, the European Commission has a Freedom of Information (FOI) system that allows interested third parties to acquire additional information.

For example, Oxfam Novib is a recipient of a 2021–2025 grant, worth €3.4 million, from the EU. The project, “Building Economic Resilience in Gaza,” is implemented by four Palestinian NGO (Screenshot 1). Because the FTS does not provide details on the amounts allocated to each implementing partner, NGO Monitor filed an FOI. In response, the EU revealed that the Union of Agricultural Work Committees (UAWC), an NGO with links to the PFLP (as discussed in greater detail below), will receive up to €319,880 (see screenshot 2).

Contracted amount (EUR) (A)	Commitment additional amount (EUR) (B)	Commitment consumed amount (EUR) (C)	Total amount (EUR) (A+B)
3 350 000	0	1 669 475	3 350 000

Year	Project start date	Project end date	Project status
2021	07/09/2021	06/03/2025	Ongoing

Reference (budget)	Funding type	Expense type
SCR_CTR_423672.01.1	Grant	Operational

Geographical location	Action location	Beneficiary country
West Bank and Gaza Strip	West Bank and Gaza	Palestine 100%

ID	Name of beneficiary	VAT number of beneficiary	Beneficiary's contracted amount (EUR) in 2021	Beneficiary's estimated contracted amount (EUR)	Beneficiary's estimated consumed amount (EUR)	Source of (estimated) detailed amount	Benf. country	Postal code	NUTS2 Name	City	Beneficiary type	Non-profit organ...	Non-profit organ...	
1	AGRICULTURAL DEVELOPMENT ASSOCIATION	PT878489159	0,00	0,00	0,00	The request for each beneficiary was not available in our central accounting system ABC at the	Palestine	-	-	RAFHALLAH	ALFISH STREET	Private Companies	Yes	Yes
2	ASHMA ASSOCIATION FOR WOMEN AND CHILD PROTECTION	PT878489353	0,00	0,00	0,00	The request for each beneficiary was not available in our central accounting system ABC at the	Palestine	-	-	GAZA	FORHER PORT	Private Companies	No	Yes
3	ISLAM DEVELOPMENT CENTER (ISLAM CHARITABLE SOCIETY)	-	0,00	0,00	0,00	The request for each beneficiary was not available in our central accounting system ABC at the	Palestine	98978	-	RAFHALLAH	ALSHAM BULDUT BETH	Private Companies	No	Yes
4	STOCKING OXFAM NOVIB	NL803871237890	3 350 000,00	3 350 000,00	1 669 475,00	The request for each beneficiary was not available in our central accounting system ABC at the	Netherlands	2514-HD	Zuid-Holland	DEB HAAC	190,00 g	Private Companies	Yes	Yes
5	UNION OF AGRICULTURAL WORK COMMITTEES (UAWC)	PT8781709480	0,00	0,00	0,00	The request for each beneficiary was not available in our central accounting system ABC at the	Palestine	-	-	RAFHALLAH	AL	Private Companies	Yes	Yes

### Project “Building Economic Resilience in Gaza” featured on the EU FTS

Details on project “Building Economic Resilience for Gaza” External Inbox x

NEAR-B1@ec.europa.eu <NEAR-B1@ec.europa.eu> Wed, Mar 29, 2023, 6:18 PM

Dear Mr. Chebat,

We are coming back to you on your request for information below. As you are aware, as regards designated organisations such as UAWC, the EU took note of the listing of the six Palestinian organisations by Israel’s Ministry of Defence, some of whom were implementing activities with financing from the EU or its Member States. The EU took this seriously and looked into the allegations, seeking clarifications from the Israeli authorities. The Commission took precautionary measures in order to preserve the Union’s financial interests. Based on the information received, the internal assessment concluded that there was not sufficient suspicion of irregularities and or fraud affecting EU funds in the implementation of the EU funded projects with the concerned organisations. In full compliance with the applicable rules, and in the exercise of its competences, the Commission lifted the precautionary measures taken in this context. UAWC is implementing activities in the context of a contract with Oxfam (EUR 3.35 million), called the Gaza Economic Resilience programme, for a maximum amount of EUR 319,880. It is only after the end of the implementation of the action and after the contracting authority will have performed all due final eligibility checks that the exact amount can be determined.

Best regards,

NEAR B1 team

EU’s response to NGO Monitor’s FOI request on funding to UAWC as part of the “Building Economic Resilience in Gaza” grant



### Public consultations

The European Commission regularly invites stakeholders to participate in public consultations on European Union policy. For instance, in January 2024, the EC [announced](#) a public consultation regarding its upcoming “Comprehensive evaluation of the European Union Humanitarian Aid 2017-2022.” As detailed by the EC, “the objective of the consultation is to give respondents (humanitarian aid stakeholders and the general public) an opportunity to give their views on the upcoming challenges for the Commission in the humanitarian aid field, and on how the Commission can best fulfill its humanitarian aid commitments in light of such challenges.”



Ref. Ares(2023)346462 - 17/01/2023

CALL FOR EVIDENCE FOR AN EVALUATION	
<p>This document aims to inform the public and stakeholders about the Commission's work, so they can provide feedback and participate effectively in consultation activities.</p> <p>We ask these groups to provide views on the Commission's understanding of the problem and possible solutions and to share any relevant information that they may have.</p>	
<b>TITLE OF THE EVALUATION</b>	Comprehensive evaluation of the European Union Humanitarian Aid 2017-2022.
<b>LEAD DG – RESPONSIBLE UNIT</b>	DG ECHO – unit E1 (international and inter-institutional relations, legal framework), and E2 (programming, control and reporting)
<b>INDICATIVE TIMETABLE (PLANNED START DATE AND COMPLETION DATE)</b>	Q4-2022- Q4 2024
<b>ADDITIONAL INFORMATION</b>	<a href="#">European Civil Protection and Humanitarian Aid Operations   European Commission (europa.eu)</a>
<p><i>This document is for information purposes only. It does not prejudice the final decision of the Commission on whether this initiative will be pursued or on its final content. All elements of the initiative described by the document, including its timing, are subject to change.</i></p>	

### Recommendations

1. The implementing agency should make all relevant information (name of project; amount allocated; duration; implementing partners; location), including for German-funded UN frameworks and all other multilateral entities, publicly available.
2. In case restrictive measures are undertaken against any grantee, intermediary, or implementing partner, governments should make this information publicly available.



3. The process of filing Freedom of Information requests by interested parties should not entail financial expenses, and information released should be made publicly available.

### *Eligibility and Vetting Criteria*

#### **Current State of Affairs**

Over the years, there were many examples of radical Palestinian NGOs, supported through development funds, which justified violence and/or denied Israel's right to exist.

One such example is the Palestinian organization BADIL. In a December 2023 report titled "[The Palestinian People Have a Right to Armed Struggle by Virtue of their Inalienable Right to Self-Determination](#)," BADIL wrote that "It is important to note that the **establishment of the State of Palestine** on the pre-1967 borders does not realize the right to self-determination of the Palestinian people, and so **does not preclude the legitimacy of their collective acts in pursuit of self-determination**. Rather, **as long as their right to self-determination is not fully implemented by all and for all, the right to resist is activated**, irrespective of whether or not a state for (some) Palestinians has been created and is gradually recognized by members of the international community" (emphasis in original).

BADIL's positions are so radical that in 2020, the European Commission (EC) [canceled](#) a €1.7 million grant to the NGO because it refused to sign an anti-terror clause introduced by the EU in 2019 globally. BADIL was one of many Palestinian NGOs (involved in 11 projects) that refused to sign the new clause, resulting in [€14.3 million](#) that were not disbursed.

Despite this, BADIL continues to be funded through German development frameworks (until 2023 at least [by BMZ via Weltfriedensdienst](#); this is the only publicly available data).

As noted, some of the NGOs in question have links to EU designated terror organizations, such as the PFLP. Nevertheless, existing vetting mechanisms failed to deem them ineligible for public support through development aid. This problem is even further amplified when funds are channeled through United Nations agencies inasmuch as there is a fundamental difference between the lists of restrictive measures maintained by the EU and the UN: EU-designated Palestinian terrorists



groups – including Hamas, PIJ, and the PFLP – are not included on the United Nations Security Council Consolidated [List](#), meaning that UN rules do not prevent engagement with these terror groups or their members.

## Best Practices

In recent years, the EU and other European governments have introduced various policies, bringing more transparency and accountability to how development aid is provided to and/or through NGOs. Each of the examples presented here is a step in the right direction, but no single government has undertaken the necessary comprehensive and systematic revision of its NGO funding policies.

## USA

As part of [USAID partner-vetting mechanisms](#), potential grantees [must submit](#) the names of “key individuals.” These include board members, executives, program managers, and “Any other person with significant responsibilities for administration of USAID-financed activities or resources.”

In other words, USAID proactively vets secondary and tertiary grantees, ensuring that all those enjoying grant funds are screened for potential terror affiliation.

In 2024, an [Appropriations Bill](#) from the House of Representatives contained a section on “Assistance for the West Bank and Gaza.” A detailed paragraph on “Vetting” mandates that “Prior to the obligation of funds appropriated by this Act under the heading ‘Economic Support Fund’ for assistance for the West Bank and Gaza, the Secretary of State shall take all appropriate steps to ensure that such assistance is not provided to or through any individual, private or government entity, or educational institution that the Secretary knows or has reason to believe advocates, plans, sponsors, engages in, or has engaged in, terrorist activity nor, with respect to private entities or educational institutions, those that have as a principal officer of the entity's governing board or governing board of trustees any individual that has been determined to be involved in, or advocating terrorist activity or determined to be a member of a designated foreign terrorist organization: Provided, That the Secretary of State shall, as appropriate, establish procedures specifying the steps to be taken in carrying out this subsection and shall terminate assistance to any individual, entity, or educational institution which the Secretary has determined to be involved in or advocating terrorist activity.”



## European Union

### *Antisemitism*

On October 5, 2021, the European Commission published its “[EU Strategy on Combating Antisemitism and Fostering Jewish Life \(2021-2030\)](#),” which states, among other strategies, that the Commission and the High Representative will: “Ensure that **EU external funds**, in compliance with existing measures, **may not be misallocated** to activities that incite hatred and violence, including against Jewish people;” and “Incorporate the **fight against antisemitism into all their human rights strategies** and policies, taking into account the IHRA definition of antisemitism.”

This follows the January 2021 “[Handbook for the practical use of the IHRA Working Definition of Antisemitism](#),” published jointly by the European Commission and the International Holocaust Remembrance Alliance, which urged funding institutions to “reference the IHRA Working Definition of Antisemitism to support control and supervision mechanisms and to ensure that funding does not go to entities and projects that promote antisemitism or other forms of hate.”

### *Terrorism*

In 2019, the EU introduced [a new clause in its contracts with all NGOs globally](#), stipulating that “**Grant beneficiaries and contractors must ensure that there is no detection of subcontractors, natural persons, including participants to workshops and/or trainings, and recipients of financial support to third parties, in the lists of EU restrictive measures**” (emphasis added).

In July 2020, the European Commission High Representative and Vice President Josep Borrell clarified in an [answer](#) to a parliamentary question that this clause makes “**the participation of entities, individuals or groups of individuals affiliated, linked, or supporting terrorist organisations incompatible with any EU funding**. If there is clear evidence that any such entity or individual has made inappropriate use of EU funding, recovery and reimbursement of the funds is required and the grantee may lose eligibility for EU funding” (emphasis added).

### *Incitement to hatred and violence*

On November 21, 2023, the European Commission [released](#) the results of an internal [review](#) of all ongoing funding to Palestinians, which had been frozen in response to the October 7th Hamas massacre in Israel. Funds to NGOs implementing two EU-funded projects were suspended over “allegations of incitement to hatred and violence after the 7 October 2023 events.” Consequently, the Commission also [announced](#) “**the inclusion of relevant**



**anti-incitement contractual clauses in all new contracts and ensure the monitoring of their strict application at all times.** This could notably be performed through a third-party monitoring of the beneficiaries” (emphasis added).

## Switzerland

In 2017, FDFA introduced a new [clause](#) in the contracts with partner organizations prohibiting all forms of discrimination, including racism, antisemitism, incitement to violence and racial hatred. Any violation of this clause entitles the FDFA, for example, to terminate the external partner’s contract with immediate effect and demand repayment of the funds already disbursed.

The same year, the Swiss Parliament passed a legislation prohibiting “[development cooperation projects carried out by NGOs involved in racist, antisemitic or hate incitement actions.](#)”

In November 2023, Switzerland [announced](#) it would cancel contracts with three NGOs that had been receiving grants totaling a combined €600,000, over breach of the Swiss Federal Department of Foreign Affairs’s Code of Conduct. As [reported](#) by the Swiss public broadcasting organization RTS, citing the head of the Swiss Federal Department of Foreign Affairs, the decision was triggered by Palestinian groups’ apologetics for violence.

## Denmark

In 2018, the Danish Ministry of Foreign Affairs adopted [new funding guidelines for Palestinian and Israeli CSOs](#), with the goal of ensuring greater protection of human rights and prevention of discrimination, funding to terror-linked organizations, and funding to BDS (boycott, divestment, and sanctions) activities. The guidelines include compliance with the fundamental principles of human rights and a strict prohibition on grantee organizations or individuals listed on EU or UN sanctions and/or terrorist lists. Furthermore, grantee organizations may not use Danish funds to finance BDS activities. The guidelines include (translated):

1. “The organization must at all times **refrain from discrimination based on gender, race, ethnic origin or religion and from the source of violence and hatred.**”
2. “The organization must at all times comply with the fundamental principles of human rights defenders, including [in its] statutes, website and other external communications. This includes acknowledging that human rights are universal, indivisible, interdependent and interrelated regardless of gender, ethnic origin, nationality, religion, sexual orientation and other characteristics, and the will to implement, protect and promote human rights exclusively with non- violent means.”



3. “The **organization and members of its Executive Board and Board of Directors may not be autonomously listed on EU or UN sanctions and / or terrorist lists.** Furthermore, they **may not be members of entities or groups listed on these lists.** In addition, the organization may not provide funds or financial resources, directly or indirectly, for or in favor of persons, entities or groups listed in these lists.”
4. “The organization **must not use Danish funds to finance BDS activities.** Furthermore, the **organization may not outsource Danish funds to BDS activities.**”
5. “The organization's communication must be in line with Denmark's development cooperation efforts to combat poverty and promote human rights, democracy, sustainable development and promote peace and stability. Consequently, the **actions and communications of the organization must not interfere with the goal of Denmark’s commitment to Palestine to support the realization of a two-state solution for the Israeli / Palestinian conflict**” (emphasis added).

## France

On January 1, 2022, a “[contract of republican commitment](#)” for French associations and foundations that receive government funding came into force. This contract mandates respect for the laws and values of the French Republic and therefore disqualifies radical groups from receiving governmental funding. According to the contract, the association or foundation “Undertakes (in its activity, in its internal functioning as in its relations with third parties) not to provoke hatred or violence towards anyone and not to condone such acts. It is committed to rejecting all forms of racism and anti-Semitism.” A group breaching the contract will be defunded by the relevant French governmental authorities.

Additionally, in the context of anti-money laundering and counterterrorism, Agence Française de Développement (AFD) requires its French grantees to conduct a vetting process on final beneficiaries. This due diligence involves verifying the identity and trustworthiness of local NGO officials, including the NGOs’ treasurer.

## Recommendations

1. Introducing more detailed description of how defined strategic aid goals should be achieved through measurable actions
  - 1.1. Strategic goals should be in line with the official foreign policy concerning Israel, peace process and the conflict
    - 1.1.1. Political advocacy activity should focus on proactively developing and improving Palestinian society.
    - 1.1.2. Advocacy projects should focus on educational programs teaching the Holocaust and history of antisemitism; advance



- peaceful coexistence and reconciliation between Israelis and Palestinians to enable a sustainable two-state framework; economic cooperation; people-to-people peacebuilding; and shared community building.
- 1.2. Formulating measurable strategic goals that can physically improve the standard of living and well being of the recipients:
    - 1.2.1. Clean water, shelter, and other basic humanitarian necessities
    - 1.2.2. Specific types of services (e.g. practical educational courses, trainings, vocational retraining)
  2. Advocacy as a category of provided humanitarian aid must not promote antisemitism, hate speech, incite to violence, or deny Israel's right to exist in accordance to the standards stipulated by the German government. This should be applied where the German government has a direct relationship with the implementing partner/s, as well where there are intermediaries in disbursing aid and funding.
  3. Calls for proposals and project submissions
    - 3.1. The language and requirements in calls for proposals must be weighed carefully to make sure that aid is not used to advance initiatives that are inconsistent with Germany foreign policy, such as antisemitism, incitement to violence and/or denial of Israel's right to exist.\*
    - 3.2. Calls for proposals must be formulated in a way that clearly communicates the Strategic Goals.
      - 3.2.1. Calls for proposals should ask the applicants to declare that the project and/or any of its implementers shall not promote antisemitism, incite to violence, hate speech, and deny Israel's right to exist.\*
    - 3.3. Calls for proposals should ask the applicants to declare that the organization, its professional and lay team, contractors, and all involved in implementing the project shall not have any affiliation\*\* to designated terror entities.
  4. Holistic review of applicants/partners, not only proposed projects
    - 4.1. Project evaluations must not be limited to determining technical capacity, but must consider all aspects of the potential grantees' activities, as well as the status and activities of any project partners.
    - 4.2. NGOs should submit the names of all employees and board members to allow for background checks to ensure that none is affiliated\*\* to designated terrorist organizations and other violent actors. (See US and European Union (*Terrorism*) sections in the Best Practices chapter).
    - 4.3. Governments must not rely only on NGO self-reporting or statements from allied international NGOs. Officials must review publicly available information, including, but not limited to, a grantee's website and social media accounts, posts by leading officials at the organization, media



reports regarding the NGO and its officials, and documentation such as court records and filings with local regulatory bodies.

5. Checking against relevant terror lists
  - 5.1. In multilateral projects in which the German government is providing funding (e.g. those involving UN agencies, international and local bodies, etc), German or more restrictive terror standards should be applied.<sup>2</sup>
  - 5.2. For projects involving Israel, the West Bank, and Gaza, ensure on a rolling basis that selected NGO partners and their professional and lay staff are vetted against the [Terrorist Organizations and Unauthorized Associations List](#) published by the Israeli National Bureau for Counter Terror Financing.

### ***Accountability and Oversight***

Accountability and oversight are essential in ensuring that development aid is not diverted to terror or hateful actors. A comprehensive approach would need to include accountability on both the governmental and parliamentary level.

Detailed procedures should be put in place to ensure that executive branches responsible for aid distribution present regular reports, and parliamentary oversight would add an additional layer of scrutiny. This should prevent relying on “self-reporting” at all levels.

This is particularly important when taking into account that aid is delivered not only in the form of physical goods, but also as services and advocacy projects that are easier to abuse.

### **Current State of Affairs**

There is no regular, institutionalized oversight. Rather, development cooperation is dealt with on an ad hoc basis and upon request in the Committee for Economic Cooperation and Development and, usually, in the context of budget negotiations in the Budget Committee. As with any other topic, committee members and parliamentary groups can decide whether there are public or non-public hearings. There have been no recent hearings on the Palestinian Territories.

---

<sup>2</sup> The United Nations Security Council [Consolidated List](#) does not include Palestinian terror groups including Hamas, the PFLP, and PIJ, which are [designated by the EU](#) as terror groups.



## Best Practices

### USA

The US features a multi-tiered system of oversight, including within federal agencies and from congressional committees.

A number of committees in both the House of Representatives and the Senate hold regular hearings to scrutinize US foreign assistance programs. Both houses of Congress have committees dedicated to foreign aid (House Foreign Affairs Committee and Senate Foreign Relations Committee), subcommittees responsible for foreign aid in the context of budgetary and appropriations processes, and committees dedicated specifically to oversight.

Moreover, US ambassadors must be confirmed by the Senate, as do several key positions in the State Department and USAID.

As a result, federal agencies administering US assistance and related US policies are regularly the subject of congressional hearings and inquiry.

[USAID](#) and the [State Department](#) each have Congressionally-funded inspectors-general that audit these agencies, including by investigating waste, fraud, and abuse. In addition to the numerous reports and audits produced by these bodies, they also assist Congress in carrying out its oversight duties. For instance, USAID's Office of the Inspector-General (OIG) makes [semi-annual reports to Congress](#) and [participates in congressional hearings](#) related to foreign assistance.

### European Union

In May 2023, the European Parliament approved the 2021 discharge report, "[EU general budget – Commission and executive agencies](#)," one of the most important budgetary documents. The document clearly calls on the Commission to **"to ensure that individuals or groups affiliated, linked to, or supporting terrorist organisations are excluded from Union funding"** (emphasis added). The Parliament also called for "the creation of a public black list of NGOs, that have engaged in activities such as hate speech, incitement to terrorism, religious extremism supporting or glorifying violence, or have misused or misappropriated Union funds and are listed."

### Netherlands



In 2020, the Netherlands [introduced](#) new risk management procedures that include “explicit questions about how an organisation deals with employees or board members who may be part of organisations that are on the EU or UN sanctions list.”

In January 2022, the Netherlands [ended](#) its €13 million contract with the Union of Agricultural Work Committees (UAWC). In a letter to the Dutch parliament, Development Cooperation Minister Tom de Bruijn and Foreign Affairs Minister Ben Knapen wrote that an independent investigation commissioned by the government found, based on open-source, verifiable information, that 34 UAWC officials employed in the course of 2007-2020 had ties to the PFLP, some holding leadership positions in the terrorist group concurrent to their employment at UAWC. The ministers added that “the large number of board members of UAWC with a dual mandate is particularly worrying.” On January 31, 2022, the Dutch representative to the UN in Geneva [wrote](#), “The strong findings about individual-level ties between the UAWC and the PFLP, and the UAWC’s lack of candour about the situation before or during the review, constitute serious concern and sufficient reason in the Government’s view to terminate its funding to the UAWC’s activities.”

## Recommendations

1. Protection of aid
  - 1.1. Physical securing of goods, material and commodities from terror diversion, such as incidents described in the case studies section.
    - 1.1.1. An independent body should be created that would monitor the distribution of aid and ensure it physically reaches those in need.
    - 1.1.2. Tracking goods via electronic devices.
  - 1.2. Protection from embezzlement of funds
    - 1.2.1. Coordinate with Israel in order to make sure that vendors working with NGO grantees are not linked to terror designated entities.
    - 1.2.2. Access all the NGO grantees' receipts to make sure that material purchased by the NGO grantee with the project funds is priced at fair value and not overpriced.
  - 1.3. Protection of aid misappropriation for the purpose of radicalization
    - 1.3.1. The standards valid for the NGO grantee should apply to all their partners, contractors and subcontractors. For this purpose, NGO grantees should obtain waiver signatures from each such partner, committing not to promote antisemitism and hate speech, incite to violence, or deny Israel’s right to exist,\* in



accordance with the standards stipulated by the German government.

- 1.3.2. In case of arrests/indictments/convictions of NGO officials that take place during the grant period, grantees should be required to inform the donor governments.

## 2. Evaluation and Accountability

- 2.1. Make sure that public communication including social media by the grantee are in line with the official foreign policy concerning Israel, the peace process, and the conflict, and in accordance with the standards stipulated by the German government, notably on antisemitism, hate speech, and incitement.
- 2.2. Monitoring should occur at regular intervals during the duration of the grant period.
- 2.3. During the monitoring, the government should facilitate a process during which external interested parties can file submissions on the subject matter (see Best Practices sections).
- 2.4. Disqualify actors (organizations, individuals) contributing to radicalization and potential diversion to terror. (See European Union section *Incitement to hatred and violence* and Switzerland in the Best Practices chapter)
- 2.5. Independent reporting and evaluation
  - 2.5.1. The government should have independent investigative capacities to evaluate projects and grantees if substantial concerns arise during the grant period. (See Netherlands' case in Best Practices)
  - 2.5.2. Government should engage with its Israeli counterparts on a regular basis regarding any new evidence of terror or other violent activity by grantees or their personnel.
- 2.6. Government should have protocols and sanction mechanisms in place for:
  - 2.6.1. Suspension of funds
  - 2.6.2. Cancellation of contracts (See Switzerland's case in the Best practice section)
  - 2.6.3. Return of the grant or parts thereof
  - 2.6.4. Other restrictive measures
  - 2.6.5. Guidelines for determining when NGOs, whose contracts were canceled over violations, can be eligible for future grants
  - 2.6.6. Clear guidelines when list of such undertaken measures should be communicated to the relevant parliamentary body/ies

## 3. Parliamentary Oversight





- 3.1. Parliament should have independent oversight capacity in place to ensure that reports submitted by the implementing agencies can be evaluated in a substantial manner
- 3.2. During the period of independent evaluations, Parliament should facilitate a process during which external interested parties can file submissions on the subject matter. (European Union section *Public consultation* in the Best Practices chapter)
- 3.3. Parliament should demand a report from the government at least twice a year on any cases in which measures prescribed in the protocols and sanction mechanisms (from 2.6) were imposed.
- 3.4. Parliament should facilitate a discussion on the findings of the independent evaluation at least once a year in the relevant parliamentary body/ies (committees, sub-committees, plenary).

## UNRWA and Palestinian Textbooks

Authored by [IMPACT-se](#)

### ***Palestinian Authority textbooks teach violence and antisemitism***

#### **Current State of Affairs**

#### **Germany's Support for the Palestinian Ministry of Education and its Curriculum Development Center amidst rising concerns of teaching antisemitism and violence in textbooks**

Germany's financial support to the Palestinian Authority's (PA) Ministry of Education, particularly its contributions that reach the Palestinian Curriculum Development Center, raises serious concerns about the impact of perpetuation of antisemitism and violence. The funding, aimed at implementing the Ministry's [development strategy](#) that includes "**reforming and developing the education curricula**," is distributed to the general budget, making it fungible despite claims by the German government of being project-based for infrastructure and vocational education training. Moreover, funding of educational infrastructure that teaches hate or teacher training for teachers who teach hate is unjustified. A substantial additional portion of German funding to Palestinian education is its financial support channeled through the EU's [PEGASE](#) funding instrument. The main focus is on paying the salaries of Palestinian education civil servants including those involved in drafting, implementing, and teaching the curriculum.



Despite the extensive [overhaul](#) of the Palestinian Authority's curriculum between 2016 and 2018, with expectations of increased moderation, studies on the newly revised curriculum by the PA MoE supported by Germany reveal troubling trends. The curriculum, which underwent a complete rewrite for the first time since the Oslo Accords, has exhibited a radical shift, deviating from UNESCO standards and containing elements that promote violence, glorify terror, and spread antisemitism. Notably, the removal of content discussing peace agreements, historical acknowledgment of Jewish presence in Israel, and a two-state solution, along with an increase in materials inciting anti-Jewish hatred and violence in science and math textbooks, are significant concerns. The curriculum overhaul triggered debates in Germany over its support to the Ministry of Education, with the government nearly deciding to [stop financing](#) the Ministry in 2019. Reviews by the [U.S. Government Accountability Office](#) (GAO), [the European Union](#), the [UN's Committee on the Elimination of Racial Discrimination](#) (CERD), the [Swiss Foreign Ministry](#), the [Institute for Monitoring Peace and Cultural Tolerance in School Education](#) (IMPACT-se), and [UNRWA itself](#) demonstrate similar concerns.

Meanwhile, Belgium [cut all direct bilateral financial support](#) to the PA Ministry of Education in September 2018, and ended ties with the Ministry over the glorification of terrorists and terrorism through education utilizing Belgian funds. The funding cut was announced following the naming of two schools after terrorist Dalal Mughrabi, with the use of Belgian funds again, a year after Belgium temporarily [froze funds](#) for the same reason. Belgium consequently left the "Joint Financing Arrangement" (JFA) group - a basket of funds to finance the Palestinian Ministry of Education". As a result, the JFA countries were reduced from 5 to 4 and now include just Germany, Norway, Ireland, and Finland.

The content of the PA curriculum is also used by UNRWA unchanged in the Palestinian territories, which triggered [international reactions](#) raising concerns from the United Nations, United States, United Kingdom, Canada, Australia, Belgium, the Netherlands, Switzerland, Norway, Denmark, UNRWA, the Anti-Defamation League (ADL), the Conference of European Rabbis, and the Central Council of Jews in Germany.

Despite claims by the Palestinian Authority of curriculum revisions, [assessments](#) in 2020, 2021, and 2022 consistently found minimal changes, if any, with the problematic content persisting. The situation is exacerbated by the publication of new textbooks for the 2023-24 academic year, which replicated the problematic content identified in previous reports.



## Recommendations

### 1. Conditionality:

#### 1.1 Conditioning German Funding for Palestinian Education on Curriculum Reform:

Germany must address concerns over antisemitic and violence-promoting content in Palestinian textbooks using taxpayer money, in line with European Parliament resolutions. These resolutions called on the EU Commission to condition its contributions to Palestinian education based on a curriculum reform to align it with UNESCO standards to ensure compliance. Specifically, conditionality should be applied on German contributions to the Palestinian Ministry of Education and to the EU's PEGASE instrument that pays the salaries of Palestinian education civil servants including those involved in drafting, implementing, and teaching the curriculum on a comprehensive curriculum reform. This reform must entail the removal of content promoting violence and antisemitism, while incorporating values of peace and tolerance.

### 2. Oversight:

#### 2.1 Independent Monitoring:

An independent and transparent monitoring process should be put in place alongside funding conditions. This process will ensure transparency and accountability in the advancement of the curriculum modification, preventing the abuse of German taxpayer money.

#### 2.2 Preventing Fungibility

Contributions should not be allocated bilaterally and directly to the budget of the Palestinian Ministry of Education, but instead directly to designated and vetted project based suppliers to ensure aid is not diverted to curricula development of hateful content. Despite claims of aid to the PA Ministry of Education being project-based earmarked for infrastructure and vocational education training, it is nonetheless distributed to the general budget pie of the Palestinian Ministry of Education and from there to the Palestinian Curriculum Development Center – meaning this aid is fungible. Moreover, funding of educational infrastructure that teaches hate or vocational education training for teachers who teach hate is unjustified.

### 3. UNRWA teaches Palestinian Authority textbooks

#### 3.1 Current State of Affairs



## Teaching violence and antisemitism through use of Palestinian Authority textbooks as a “best practice”

Since as [early as the 1950s](#), UNRWA has faced criticism for hate and incitement toward Jews and Israel in textbooks and other educational materials used in its schools, and by its students. This has fueled concerns over transparency, oversight, and accountability of the organization by many in the international community.

UNRWA [states](#) on its website that it chooses to use the Palestinian Authority’s curriculum as “best practice” in Gaza, the West Bank and East Jerusalem. Nowhere in [the UN mandate](#) to UNRWA does it state that UNRWA is forbidden to use non-host curricula or alter problematic content in them.

A 2017 [revision](#) of textbooks used in UNRWA schools by the Palestinian Ministry of Education resulted in a systematic introduction of teaching materials that spread antisemitism, encourage violence, glorify acts of terror and martyrdom, and reject peacemaking across all grades and subjects while simultaneously removing content that supports peacemaking and a two-state formula. Multiple studies by governments and international organizations such as the [U.S. Government Accountability Office \(GAO\)](#), [the European Union](#), the [UN’s Committee on the Elimination of Racial Discrimination \(CERD\)](#), the [Swiss Foreign Ministry](#), the [Institute for Monitoring Peace and Cultural Tolerance in School Education \(IMPACT-se\)](#), and [UNRWA itself](#) all show the problematic nature of the PA curriculum.

UNRWA openly [acknowledges](#) that it does not amend or remove hateful content from PA textbooks used in its schools claiming that it “has no mandate to alter any host government curriculum or textbooks” as it’s a matter of national sovereignty. By UNRWA’s own definition, this means that UNRWA keeps problematic content within these textbooks intact. Accepting the use of host country textbooks as is, without revising passages violating UN principals, results in the proliferation of a hate education. This allows UNRWA to expose students to violent educational materials consistently in hard-copy textbooks in class or at home, despite any alleged guidance UNRWA says it provides only to educators on how to teach these hateful passages.

### 4. Best Practices

4.1 UN agencies face problems with hate and incitement in educational content produced in conflict environments. Humanitarian groups have proposed a specialized “refugee curriculum” that is politically unaligned to prevent escalation of conflict through education as [recommended by Carnegie Endowment](#) amid the conflict in Yemen. UNRWA can produce its own “refugee curriculum” for core subjects that is politically unaligned. The curriculum would be created by external, seasoned educators. Teachers



assigned to implement the curriculum would undergo a stringent vetting process.

4.2 The Jerusalem Municipality uses the same textbooks produced by the Palestinian Authority but replaces hate, violence and material that violates UNESCO standards with passages of peace, tolerance based on Islamic scripts and Arab culture. To produce this modified curriculum municipality edits the digital editions to surgically remove problematic content, it replaces the problematic material and then re-prints the textbooks free of hate. These textbooks are [freely available online](#).

## 5. Recommendations

Concerns over hate and incitement toward Jews and Israel in textbooks and other educational materials used in UNRWA schools have not been resolved, and consequently UNRWA's education offering is not fit for purpose. However, much can be learnt from this failure by any agency or organization that is tasked with delivering an educational curriculum in Palestinian schools:

Internal reviews of Palestinian textbooks:

5.1 Should the agency/ organization responsible continue using PA textbooks, it should make all its internal review procedures publicly available for external review. This includes the annual findings of its own reviews of the Palestinian curriculum that determine which textbook pages do not meet UN values, and any guide teachers use to skip or teach them differently. For each class and subject taught, the agency/ organization should publicly indicate which exact pages from the host government's textbooks are and are not taught in its schools, as well as which material is used as a substitute or supplement to these pages. If this content is not visible, there can be no real information about whether the agency/ organization is, or is not, teaching content that incites antisemitic hatred or violence. Such steps toward a basic level of transparency would be cost-effective to implement, and are the minimum that should be expected. Moreover, making this information public would restore immense confidence in the agency/ organization, both among donors and the general public.

5.2 Separate print runs of host country textbooks modified to adhere to UN values: This can be accomplished by acquiring host country textbooks in digital editions, and to re-write and then re-edit the textbooks to eliminate inflammatory passages. This will keep host country textbooks mostly intact, and in parallel will prevent students from being exposed to problematic drills and passages in hard copy editions both at school and at home. A similar model already exists in East Jerusalem.



### 5.3 Creation of a specialized UN “refugee curriculum” for quality education:

A specialized UN “refugee curriculum” should be created, which is politically unaligned, to prevent escalation of conflict through education. The politicization of education in conflict zones is a well-known issue, with immense sensitivities in relation to hateful or violent content found in host country textbooks used by refugees.

## 6. Transparency: UNRWA self-produced educational material

### 6.1 Current State of Affairs

#### **Production and proliferation of institutional, agency-branded, antisemitic and violent content self-created by UNRWA education departments and employees**

UNRWA publicly [states](#) that it produces its own self-created teaching materials to enrich and supplement host country textbooks, to ensure the agency’s alignment with UN values, transparency, and accountability.

However, in 2020-2023, agency-branded supplementary teaching materials produced, printed, and distributed by UNRWA to aid students were [found](#) to contain lessons that violate UN values. Although UNRWA [acknowledged](#) this problem in [2021](#) and claimed resolution by [November 2020](#), further reviews discovered persisting problems and most violations remain unchanged.

In 2022, UNRWA disavowed [hundreds of pages](#) of educational material, [claiming](#) that an unnamed website illegally utilized the agency’s logo and names of employees, and that the materials were not authorized for use in its schools. However, an examination of UNRWA school social media accounts revealed the use of these materials by UNRWA employees.

In March 2023, UNRWA educators creating and distributing content that incited antisemitism and glorified terrorism was highlighted in a [report](#) by IMPACT-se and UN Watch showcasing institutional teaching materials produced by UNRWA. Harnessing information from at least five separate and freely available open-source platforms, the report identified 82 UNRWA educators and staff affiliated with over 30 UNRWA schools, who are involved in drafting, supervising, approving, printing, and distributing dozens of pages of hateful content to students labeled for use between 2021-2023.

These materials were omitted from UNRWA’s online Digital Learning Platform (DLP), which UNRWA [claims](#) is “the only online source for UNRWA-approved learning



materials” that is “thoroughly vetted in a three-step process.” The DLP does not include teaching materials for many school subjects taught in UNRWA schools, which are part of the PA’s curriculum. Many of these subjects such as social studies, Islamic education, geography, history and national education are known to contain highly volatile content. Many problematic examples itemized in IMPACT-se’s multiple reviews of content self-produced by UNRWA in the Palestinian territories originate from these subjects. Moreover, most sections of the DLP contain no content at all, and the minimal amount of included material is frequently out of date. UNRWA’s online platform is not what students learn in class. The online education platform is used only for remote learning during a crisis when schools are shut down, such as during COVID or conflict, not in classrooms. While in class or at home, students still have and are instructed to use hard copy PA textbooks that UNRWA states it does not amend. UNRWA continues to [claim](#) to be “already addressing” many of these claims, without providing any evidence, results, or conclusions.

## 6.2 Recommendations

The agency/ organization tasked with education in Palestinian schools should commit to having all its self-produced teaching materials be fully transparent and publicly posted at all times, as an urgent priority. It must upload in open source all new enrichment materials that supplement host country textbooks in all subjects and grades across all its areas of operations. In addition, all teaching materials created by agency/ organization staff and education departments should be prepared and uploaded in advance of each academic year, for the entire upcoming school year and not as the year progresses, without the removal of content. This will further discourage the self-creation of materials not authorized for use.

### ***Accountability and Oversight: UNRWA’s internal procedures***

#### **Current State of Affairs**

#### **Failure and secrecy of UNRWA’s internal procedures aimed to ensure teaching materials adhere to UN values**

#### **Failure and secrecy of UNRWA’s [stated](#) “zero-tolerance policy for discrimination or for incitement to hatred and violence in its schools, educational materials, or in any of its operations”**

UNRWA claims to have robust internal mechanisms to ensure educational materials adhere to UN values and UNRWA’s stated [principles](#). These allegedly include internal reviews screening the PA curriculum, which are supposed to identify problematic



content and provide guidance to teachers to find alternative ways to teach those lessons through a “teacher-centered approach.” Unfortunately UNRWA refuses to disclose any evidence that these mechanisms do indeed exist or make public any of the findings and workings of its self-auditing procedures. The details of these mechanisms remain opaque, and the ongoing creation and prolonged use of problematic hateful materials by UNRWA staff themselves raises serious questions about the efficacy of said procedures. The opacity surrounding UNRWA’s teaching operations is not befitting of a UN humanitarian organization, and clearly the assurances of the organization are insufficient in addressing long-standing concerns over UNRWA education.

The findings of [multiple reviews](#) of UNRWA’s education program showcasing visual evidence from within UNRWA schools and classrooms by IMPACT-se contradict statements and promises made by UNRWA to donor nations in relation to the use and teaching of the PA’s curriculum; that the agency does not use [maps](#) that erase the existence of Israel; that it does not teach about the [glorification of terrorist](#) Dalal Mughrabi; that its [“neutrality officers”](#) ensure the prevention of teaching of hate; and that its own reviews of host country textbooks [identify](#) all pages of problematic content, flag them, and provide specific instructions to teachers to avoid them.

UNRWA refuses to disclose any documentation of its internal procedures, such as the results of its reviews of host country textbooks and key documents on its [Teacher-Centered Approach](#) (TCA), both of which ostensibly outline flagged material, and how it is to be dealt with in the classroom to adhere to UN values. This lack of transparency regarding what UNRWA flags and how they address it has fueled suspicion and hostility toward the organization, both among donors and the general public.

Vital textbook review criteria of societies in conflict relating to peacemaking and tolerance based on UNESCO standards for curricula analysis are not part of UNRWA’s PA textbook screening criteria that ignores aspects such as incitement to violence. This was also confirmed by the United States Government Accountability Office (GAO) report in 2019.

There is no existing evidence of [key documents](#) that UNRWA says it provides its teachers with instructions not to teach problematic content in specific pages or [guidance](#) on how to critically address objectionable content to ensure their teaching reflects UN values. If this content is not visible, there can be no real information about whether UNRWA is, or is not, teaching content that incites antisemitic hatred or violence. Moreover, UNRWA states that such guidance relating to problematic content is allegedly provided solely to teachers without directly exposing this critical information to its students.





UNRWA also claims that its teachers are required, in theory, to undergo mandatory [training](#) on neutrality, non-violence, tolerance, and conflict resolution. However, UNRWA [reported](#) to the US Government Accountability Office that its staff opposed being trained on such issues and intended materials “were not used in UNRWA classrooms.” The U.S. GAO report also found that the US Department of State erred by taking UNRWA’s claims at face value.

The refusal to undergo such training fuels concerns regarding UNRWA school staff who openly support violence and terror, or who are themselves members of terror groups. An [IMPACT-se report](#) identified at least 13 UNRWA staff who publicly praised the October 7 attack on Israel and [further research](#) demonstrated that at least three UNRWA staff participated in the massacre.

### Recommendations

1. Record completion of relevant teacher training: The agency/ organization tasked with education in Palestinian schools should publicly disclose the records of completion of what it states is mandatory teacher training on neutrality, non-violence, tolerance, conflict resolution and other relevant topics to assess implementation on the ground.
2. Breach of conduct: The agency/ organization must take disciplinary measures against staff violating agreed standards against incitement to hatred and violence. It should report to donor nations and make publicly available any breach of this policy, to incentivize quality education. For example, it should regularly report on the number of incidents of breach of conduct that have been identified. This would provide better oversight of any deficiencies in terms of school subjects, specific schools, and specific teachers who used unauthorized material or submitted material not in line with UN values. Reports evaluating the number of times unauthorized materials were produced, used, and circulated can help in assessing the proliferation of and reducing the frequency of such incidents.
3. Prior to appointment of staff, the agency/ organization should confirm with German authorities that vetting has been completed by the relevant financial authorities and that as a result, prospective employees do not appear on relevant sanctions lists. Consequently, funds from Germany will not be received as salaries by sanctioned individuals.
4. The agency/ organization should share a full and updated list of its staff (with relevant ID numbers and functional titles) and all appropriate information with the relevant Israeli authorities on a quarterly basis.



## Recommendations: A 12-Point Summary

1. **Adaptation of Budgetary Regulations** – The Budget Code and yearly budget resolutions in the areas of humanitarian aid, development cooperation, and the promotion of democracy should be adapted to prevent the funding of organizations that promote antisemitic, racist, and contemptuous concepts as well as content that is incompatible with human dignity and violates the free democratic basic order.
2. **Transparency** - The implementing agency should make all relevant information (name of project; amount allocated; duration; implementing partners; location) publicly available, including German-funded UN Frameworks and all other multilateral entities. This should include a free-of-charge Freedom of Information filing system.
3. **Vetting** - Strategic goals, Calls for Proposals, and Reviews of Applicants must all be in line with the official foreign policy concerning Israel, the peace process, and the conflict. Notably, advocacy as a category of provided humanitarian aid must not promote antisemitism, hate speech, incite to violence, or deny Israel's right to exist.\* This should be applied where the German government has a direct relationship with the implementing partner/s, as well where there are intermediaries in disbursing aid and funding.
4. **Vetting** - Call for proposals should demand that the applicants are to declare that the organization, its professional and lay team, contractors, and all involved in implementing the project shall not have any affiliation\*\* to designated terror entities. This should be applied where the German government has a direct relationship with the implementing partner/s, as well where there are intermediaries in disbursing aid and funding.
5. **Eligibility** – Governments must not rely only on NGO self-reporting or statements from international NGOs. Officials must review publicly available information, including, but not limited to, a grantee's website and social media accounts, posts by leading officials at the organization, media reports regarding the NGO and its officials, and documentation such as court records and filings with local regulatory bodies.
6. **Checking against relevant terror lists** – In multilateral projects in which the German government is providing funding (e.g. those involving UN agencies, international and local bodies, etc), German or more restrictive terror standards should be applied.
7. **Checking against Israeli terror lists** – For projects involving Israel, the West Bank, and Gaza, ensure on a rolling basis that selected NGO partners and their professional and lay staff are vetted against the [Terrorist Organizations](#)



- [and Unauthorized Associations List](#) published by the Israeli National Bureau for Counter Terror Financing.
8. **Accountability** – Ensure protection of aid, including diversion of physical goods, embezzlement of funds, or misappropriation for the purpose of radicalization.
  9. **Evaluation** – Regular screening of public communication including grantees' social media and ensuring it is in line with the official foreign policy concerning Israel, the peace process, and the conflict, and in accordance with the standards stipulated by the German government, notably on antisemitism, hate speech, and incitement.
  10. **Protocols and Sanction Mechanisms** – Defined measures such as suspension of funds, cancellation of contracts, return of the grant or parts thereof. These should be accompanied by clear guidelines for determining when NGOs, whose contracts were canceled over violations, can be eligible for future grants.
  11. **Oversight** – Government should present regular reports to the Parliament. Parliament should have independent oversight capacity in place to ensure that reports submitted by the implementing agencies can be evaluated in a substantive manner.
  12. **End use of dual-use goods** – In the financing and provision of dual-use goods, technical means should be employed to permanently guarantee the end use of corresponding products.

## Endnotes

NGO Monitor, "[Verdict in case of Mohammad El-Halabi/World Vision Diversion of Funds to Hamas](#)," June 16, 2022:  
<https://www.ngo-monitor.org/verdict-mohammad-el-halabi-world-vision/>

IMPACT-se, "[UNRWA Education: Textbooks and Terror](#)," November 2023:  
<https://www.impact-se.org/wp-content/uploads/UNRWA-Education-Textbooks-and-Terror-Nov-2023.pdf>

IMPACT-se, UN Watch, "[UNRWA EDUCATION: REFORM OR REGRESSION? A REVIEW OF UNRWA TEACHERS AND SCHOOLS CONCERNING INCITEMENT TO HATE AND VIOLENCE](#)," March 2023:  
[https://www.impact-se.org/wp-content/uploads/UNRWA\\_Report\\_2023\\_IMPACT-se\\_And\\_UN-Watch.pdf](https://www.impact-se.org/wp-content/uploads/UNRWA_Report_2023_IMPACT-se_And_UN-Watch.pdf)

UN Watch, "[Group of 3,000 UNRWA teachers celebrates Hamas massacre and rape](#)," January 10, 2024:

<https://unwatch.org/group-of-3000-unrwa-teachers-celebrates-hamas-massacre-and-rape/>

NGO Monitor, "[The UNRWA Constellation: Partnerships with UN Agencies and Terror-Linked NGOs](#)," January 31, 2024:

<https://www.ngo-monitor.org/reports/unrwa-constellation-partnerships-with-un-agencies-and-terror-linked-ngos/>

NGO Monitor, "[Al-Haq's Extremist Demonization of Israel after the October 7 Pogrom](#)," December 7, 2023:

<https://www.ngo-monitor.org/reports/al-haqs-extremist-demonization-of-israel/>

NGO Monitor, "[Al-Haq Staff: Justifying Violence and glorifying terrorists](#)," July 23, 2023:

<https://www.ngo-monitor.org/reports/al-haq-staff-justifying-violence-and-glorifying-terrorists/>

NGO Monitor, "[PCHR Board Members Call for Violence Against Israelis](#)," June 7, 2023:

<https://www.ngo-monitor.org/pchr-board-members-call-for-violence-against-israelis/>

NGO Monitor, "[Concerns about NGOs listed in UN OCHA-oPt's 'Flash Appeal' on 'Hostilities in Gaza and Israel'](#)," January 24, 2024:

<https://www.ngo-monitor.org/reports/un-ocha-opts-flash-appeal/>

NGO Monitor, "[Terror-linked and anti-Israel NGOs Exploit Children in Campaign to Blacklist the IDF](#)," June 4, 2023:

<https://www.ngo-monitor.org/reports/2023-caac-report/>

NGO Monitor, "[Clear and Convincing: The Links between the PFLP and the European Government-funded NGO Network](#)," February 1, 2023:

<https://www.ngo-monitor.org/reports/pflp-report/>

NGO Monitor, "[Deutsche Entwicklungszusammenarbeit: Die Notwendigkeit nach Transparenz und Rechenschaftspflicht bei der Förderung von Nichtregierungsorganisationen](#)," June 2019:

<https://www.ngo-monitor.org/nm/wp-content/uploads/2019/12/Germany%E2%80%99s-Development-Cooperation-System-in-German.pdf>