



A Strategic Approach to Deradicalization of Palestinian Society

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

Table of Contents

| | |
|---|-----------|
| Executive Summary..... | 3 |
| A Snapshot Across Policy Areas:..... | 5 |
| Dutch Development Aid Funding to NGO Projects:..... | 5 |
| Examples of Dutch-funded Projects..... | 6 |
| Project: Human Rights Programme Palestine..... | 6 |
| Al Mezan Center for Human Rights..... | 7 |
| Union of Agricultural Works Committee (UAWC)..... | 8 |
| Aid Diversion in Gaza and West Bank:..... | 9 |
| Hamas operative siphoned global church aid organization’s funds – World Vision.... | 10 |
| United Nations Relief and Works Agency for Palestine Refugees in the Near East - UNRWA..... | 10 |
| United Nations Office for the Coordination of Humanitarian Affairs - UN OCHA-oPt | 12 |
| Terror-linked Palestinian NGO network..... | 12 |
| Recommendations in Two Main Policy Areas..... | 13 |
| Development and Humanitarian Aid..... | 13 |
| Transparency..... | 13 |
| Best Practices..... | 14 |
| Recommendations..... | 14 |
| Eligibility and Vetting Criteria..... | 15 |
| Best Practices..... | 15 |
| Recommendations..... | 18 |
| Accountability and Oversight..... | 19 |
| Best Practices..... | 20 |
| Recommendations..... | 21 |
| Recommendations: A 12-Point Summary..... | 23 |
| Endnotes..... | 25 |

Executive Summary

The **atrocities of October 7th reflect the pervasiveness of radicalization in Gaza and the West Bank.** Development funds have been diverted and misused to construct terror tunnels and military infrastructure. Non-governmental organizations (NGOs) regularly publish 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 agencies have connections to terrorist groups.

Now is the time to act.

The Dutch government is one of the largest donors 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 current Dutch 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.

The Netherlands commitment to a two-state solution 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.

Vetting criteria must be clearly defined and strategically oriented. Dutch funds should only flow to organizations and projects that pursue the Netherland's foreign policy' goals of two states in nonviolent coexistence, including its commitment to Israel's security. **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 offers 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. Through best practice examples from other European countries and the United States, the report demonstrates that improvements are both necessary and possible at all stages of development cooperation.

Transparency is the basis for effective and accountable development cooperation.

Often, there remains a lack of sensitivity within government ministries regarding the complexities of cooperation with local organizations. Since 2021, the Dutch government's Development Aid Portal (www.nlontwikkelingshulp.nl) has removed the names of implementing organizations for several projects in areas designated as "Palestinian territories." The portal no longer displays the names of implementing partners or NGOs receiving Dutch funding for numerous projects in these areas.

Vetting criteria must be clearly defined and strategically oriented. Funding should align with donor governments' strategic goals, including promoting nonviolent coexistence and 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 grantees fail to address abuse and potential ties to terror. The episode discussed below, involving long-time Dutch support for an NGO with links to an EU-designated terror group, highlights this problem.

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

Legislatures must exercise effective and proactive oversight. Congressional and parliamentary supervision is a crucial component of effective and accountable development policy, and can assist in ensuring that taxpayer funds are used transparently and in a manner consistent with policy goals.

The budget process, especially in the areas of humanitarian aid, development cooperation, and democracy promotion, should be adjusted to **prevent the funding of organizations that espouse antisemitism, racism, and hate speech**, as well as other content incompatible with human dignity or violating basic democratic principles.

Development policies must incorporate two fundamental principles:

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. Similarly, the promotion of the “apartheid” libel - which is designed to delegitimize and undermine Israel’s existence as a Jewish state - should also be disqualifying.

2. **When assessing prospective grantees for potential “terror ties,” which would deem a project and/or partner/entity ineligible, evaluators must take into account 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.

A Snapshot Across Policy Areas: Dutch Development Aid Funding to NGO Projects:

Since 2020, the Netherlands has provided almost EUR 50 million to NGOs and civil society organizations involved in the Arab-Israeli conflict. Many of these groups actively advocate for the dissolution of Israel as a Jewish state, in stark opposition to the Dutch government’s stance on a [negotiated two-state framework](#).

Following the October 7th atrocities, the Netherlands pledged an additional [€10 million in humanitarian assistance for Gaza](#). According to the Minister of Development, these funds are intended for food, water, and medical care for Gaza’s inhabitants. The Dutch contribution is earmarked for unnamed NGOs and UN organizations, and the Palestinian Red Crescent Society.

However, the Dutch government’s Development Aid Portal (www.nlontwikkelingshulp.nl) has removed the names of implementing partners and other NGOs receiving Dutch funding. Multiple projects list implementing organization(s) under the label [No data available](#) or an ambiguous [Donor Country-Based NGO Group](#). In addition, documentation about projects is censored and listed as **“BEMO NIET BESCHIKBAAR VOOR PUBLICATIE.”**

Examples of Dutch-funded Projects

Project: Human Rights Programme Palestine

- [Project in PALESTINIAN ADMIN. AREAS](#) (2024-2026)
 - Sectors: Human Rights
 - Budget: €3 million
 - Implementing organisation(s):DONOR COUNTRY-BASED NGO
- [Sawasya III – Reinforcing equal access to justice for all Palestinians](#) (2024-2028)
 - Sectors: Legal and judicial development
 - Budget: €23.25 million
 - Implementing organisation(s):UNDP
- [Project in PALESTINIAN ADMIN. AREAS](#) (2020-2025)
 - Sectors: Civilian peace-building, conflict prevention and resolution
 - Budget: €2.6 million
 - Implementing organisation(s):Donor Country-Based Ngo Group
- [Project in Ramallah](#) (2018-2024)
 - Sectors: Legal and judicial development
 - Budget: €17.37 million
 - Implementing organisation(s): United Nations Development Programme (UNDP)
- [Project in Ramallah](#) (2020-2023)
 - Sectors: Civilian peace-building, conflict prevention and resolution
 - Budget: €328,116
 - Implementing organisation(s): No organisation name specified
- [Project in Ramallah](#) (2020-2021)
 - Sectors: Civilian peace-building, conflict prevention and resolution
 - Budget: €152,000
 - Implementing organisation(s): Multiple Parties
- [Project in Ramallah](#) (2019-2021)
 - Sectors: Multisector aid
 - Budget: €5.95 mln
 - Implementing organisation(s): No organisation name specified
- [Project in Palestinian admin. Areas](#) (2017-2021)
 - Sectors: Civilian peace-building, conflict prevention and resolution
 - Budget: €999,480
 - Implementing organisation(s): Donor Country-Based Ngo Group
- [Project in Palestinian admin. Areas](#) (2021-2024)
 - Sectors: Civilian peace-building, conflict prevention and resolution

- Budget: €299,750
- Implementing organisation(s): No organisation name specified

[Al Mezan Center for Human Rights](#)

In 2023-2025, [Al Mezan](#) received an unspecified amount from the Netherlands Representative Office (NRO) in Ramallah for “[Civil Society Organizations for Inclusiveness, Democratic Governance and Human Rights- phase II.](#)”

- In 2017, Al Mezan director Issam Younis participated in a panel discussion on “[The requirement for supporting and the success of the national \[Palestinian internal\] reconciliation.](#)” The panels included multiple representatives of Palestinian terror groups, such as Hamas Political Bureau head in Gaza Yehya Al-Sinwar, PFLP Political Bureau member Kayed Al- Ghoul, and PIJ Political Bureau member Khaled Al-Batsh. Issam Younis addressed the panel together with Yehya Al-Sinwar.
- Al Mezan is highly active in [anti-Israel lawfare campaigns](#), exploiting courts and international legal bodies to seek arrest warrants against Israeli government officials, file lawsuits against companies and governments doing business with Israel, and lobby for cases against Israelis at the International Criminal Court (ICC).
- A number of Al Mezan officials and employees are members of the Popular Front for the Liberation of Palestine (PFLP) and Hamas, terrorist organizations designated as such by the [EU](#), [US](#), [Canada](#), and [Israel](#).
- In October 2023, in the aftermath of the brutal Hamas atrocities of Oct. 7, Al Mezan was a signatory on a statement calling for “[Immediate Action from the International Community to Stop Israel’s Reprisals against Palestinian Civilians.](#)” Al Mezan described the attacks as: “Palestinian armed groups engaged in an operation in response to escalating Israeli crimes against the Palestinian people...We call on the Prosecutor of the International Criminal Court to expedite the investigation into the Situation in Palestine...we call upon the UN Security Council, Third States, and UN Member States to immediately intervene with all necessary means to cease Israel’s attacks against the Palestinian people, and to impose sanctions and an arms embargo on Israel. ... and the dismantling Israel’s apartheid regime.”
- In May 2022, Al Mezan was a [signatory to a flagrantly antisemitic report](#) submitted to the UN Human Rights Council’s permanent Commission of Inquiry against Israel. The submission [presented](#) a blatantly false historical account that denied Israel’s right to exist, categorized Israel’s very existence as illegal, and labeled Zionism as a form of racism, demanding that the Commission “Recognise

and Address Zionist Settler Colonialism and Apartheid as the Root Causes of Israel's Ongoing Violations.”

- In February 2021, Al Mezan [published a report](#) falsely claiming that Israel uses dams and floodgates to “redirect the flow of natural water away from the Gaza Strip,” and that when the dams are at risk of overflowing, Israel “open[s] their gates-without prior warning- resulting in sudden flows of water into Palestinian farmlands in the ARA, causing huge damages not only to crops but also to houses as well as other properties.” This claim has been proven demonstrably false. In 2015, Al Jazeera and Agence France Presse (AFP) [were forced to retract](#) stories that repeated the allegation after it became clear that there are no such dams in all of southern Israel that can be opened. A 2015 [AFP news report](#) shows that the “dam” in question is, in fact, a short step that is barely one meter high.

[Union of Agricultural Works Committee \(UAWC\)](#)

- In 2013-2021, UAWC received [approximately](#) €11.7 million from NRO's [Water Resource Management program 2017-2020 \(LWRM\)](#).
 - According to heavily redacted [documentation of the project](#) (available on the website of the Dutch Parliament), “The [PA] ministry of agriculture (MOA) plays a crucial role in the project,” and “is co-chairing the Steering Committee” and its staff “participates in all tenders’ technical evaluation.”
- UAWC is identified by Fatah as an official “[affiliate](#),” and by [USAID-engaged audit](#) as the “agricultural arm” of the PFLP. According to academic scholar Glenn E. Robinson, UAWC was founded in 1986 by “[agronomists loosely affiliated with the PFLP](#).” For more information on UAWC's PFLP ties, read NGO Monitor's report “[Union of Agricultural Work Committees Ties to the PFLP Terror Group](#).” On October 22, 2021, the Israeli Ministry of Defense declared UAWC a “[terror organization](#)” because it is part of “a network of organizations” that operates “on behalf of the ‘Popular Front’.”
- On February 2, 2017, diplomats from NRO, including “Head of Cooperation” Henny de Vries, met with senior officials from UAWC to sign an \$11.5 million grant agreement. As seen in a picture posted on the [Representative Office's Facebook page](#), UAWC representatives to the signing ceremony included individuals currently standing trial or [incarcerated due to their involvement in PFLP activities](#), as well as another official associated with jailed PFLP leader, Ahmed Sa'adat.

- On July 20, 2020, [the Dutch government announced it was freezing funding to UAWC](#) over the NGO's close links to the PFLP. An internal government audit concluded that Dutch funds were used to pay the salaries of two UAWC employees – Samer Arbid¹ and Abdel Razeq Farraj – arrested and indicted for their alleged roles in an [August 2019 bombing that murdered an Israeli civilian](#).
- In August 2021, the Dutch government allocated [€26.439](#) to a private company to conduct a further external review of UAWC. In January 2022, the Dutch Foreign Minister announced that it would [cease all funding](#) to UAWC after the investigation determined that UAWC had 34 employees with ties to the PFLP in 2007-2020, 12 holding leadership positions in the terrorist group concurrent to their employment at UAWC. In reporting to parliament, Ministers de Bruijn and Knapen added that “the large number of board members of UAWC with a dual mandate is particularly worrying.”

Aid Diversion in Gaza and West Bank:

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 diversion of humanitarian aid to produce rockets, construct terror tunnels and other installations, and enrich members of Gaza-based terrorist organizations at the expense of local civilians. The UN and NGO community has ignored – and in many instances covered up – the embedding and co-locating of Hamas materiel and infrastructure within civilian complexes such as schools, mosques, and hospitals.

This section will present several case studies: Hamas siphoning aid through a global church aid organization (World Vision); the failures of UNRWA, UN-OCHA 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 of the use of UNRWA textbooks to teach antisemitism and incite to violence.

¹ On August 30, 2020, the [PFLP referred to Arbid as a “prisoner and commander.”](#) and “one of the heroes of the Bubeen operation” – referring to the August 2019 bombing.

Hamas 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 Gaza operations for World Vision – an international, church-based aid organization. Beyond the specific crimes for which El-Halabi was convicted, 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.

El-Halabi’s June 2022 conviction reveals that Hamas had instructed him to join World Vision, so that he could divert the NGO’s resources to the terrorist organization. Likewise, according to the conviction, he recruited a senior Save the Children employee in Gaza, so that the latter would provide Hamas with intelligence, including “the identities of individuals appointed by the United States to sensitive positions in international organizations in the Gaza Strip” (translated from the original Hebrew by NGO Monitor). The charge sheet lays out a litany of other violations. While at World Vision, El-Halabi provided building materials to Hamas for constructing and concealing military installations – including tunnels – procured weapons, collected intelligence on Israeli positions, diverted funds, hired Hamas members, and manipulated the World Vision tender process to benefit Hamas.

Moreover, according to the conviction, El-Halabi ensured that “the majority” of World Vision-funded packages of “food and hygiene products, blankets, etc.,” were “regularly provided” to members of Hamas military units, including during periods of armed conflict with Israel.

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 the Hamas-orchestrated 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 2024 *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, different UNRWA employee unions are affiliated with internationally-designated terrorist organizations – including the Popular Front for the Liberation of Palestine (PFLP) and Palestinian Islamic Jihad (PIJ).

Israel has repeatedly uncovered military infrastructure and tunnel systems under UNRWA facilities.

Like other UN agencies, UNRWA does not screen its employees or beneficiaries for membership in and other links to Palestinian terrorist organizations such as Hamas, PIJ, and the PFLP.

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 deny Israel’s right to exist. 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, the Palestinian Centre for Human Rights (PCHR), and Al Mezan. All three have ties to the PFLP, and in 2021, Israel designated Al-Haq as a terrorist entity. Likewise, in February 2024, [Germany decided to end funding to Al-Haq](#), and [Switzerland announced](#) the end of its [support to PCHR](#) in November 2023. (Notably in May 2023, 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 West Bank and Gaza branch of the UN's Office for the Coordination of Humanitarian Affairs (OCHA-oPt)² 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 by its NGO partners.

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 – has served as a key member of the OCHA-oPt Humanitarian Country Team (HCT).

OCHA-oPt is directly funded by several European countries 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.

Terror-linked Palestinian NGO network

In the past decade, at least €200 million in humanitarian and development aid from European governments has gone to financially support a network of 13 Palestinian NGOs with links to the PFLP.

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

² 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.

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.

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.

Best Practices

The European Commission maintains 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. Additional information is obtainable through Freedom of Information requests.

Public consultations

The European Commission regularly invites stakeholders to participate in public consultations on EU policy. For instance, in January 2024, the Commission [announced](#) a public consultation regarding its upcoming “Comprehensive evaluation of the European Union Humanitarian Aid 2017-2022.” According to the Commission, “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> | |
| TITLE OF THE EVALUATION | Comprehensive evaluation of the European Union Humanitarian Aid 2017-2022. |
| LEAD DG – RESPONSIBLE UNIT | DG ECHO – unit E1 (international and inter-institutional relations, legal framework), and E2 (programming, control and reporting) |
| INDICATIVE TIMETABLE (PLANNED START DATE AND COMPLETION DATE) | Q4-2022- Q4 2024 |
| ADDITIONAL INFORMATION | European Civil Protection and Humanitarian Aid Operations European Commission (europa.eu) |
| <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 donor-funded UN frameworks and all other multilateral entities, publicly available.

2. When sanctions for violating the terms of an award are applied against any grantee, intermediary, or implementing partner, governments should make this information publicly available.
3. The process of filing Freedom of Information requests should be free of charge, and information released in this context should be made publicly available.

Eligibility and Vetting Criteria

Best Practices

US

As part of [partner-vetting mechanisms](#) applied by USAID in certain regions of concerns, 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 receiving taxpayer 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, *inter alia*, 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” (emphases added).

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 [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 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 [funding guidelines for Palestinian and Israeli NGOs](#), 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**” (emphasis added).
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” (emphasis added).

4. “The organization **must not use Danish funds to finance BDS activities**. Furthermore, the **organization may not outsource Danish funds to BDS activities**” (emphasis added).
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 extremist 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 found in breach will be defunded.

Additionally, in the context of anti-money laundering and counterterrorism, the French government’s development agency, 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.

Recommendations

1. Ensuring aid policies and strategies are aligned with foreign policy and have measurable outcomes.
 - Aid goals should be in line with official foreign policies concerning Israel, the peace process, and the conflict.
 - Advocacy must not promote antisemitism, hate speech, incite to violence, or deny Israel’s right to exist in accordance with donor government standards.
 - All programs must include clearly-defined and measurable goals in order to evaluate their effectiveness.
2. Calls for proposals and project submissions
 - Calls for proposals must clearly communicate the donor government policy and development goals in the region.

- Calls for proposals must demand that applicants declare that the project and/or any of its implementers shall not promote antisemitism and/or hate speech, incite to violence, and deny Israel's right to exist.
- Calls for proposals must demand that applicants 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.

3. Holistic review of applicants and partners

- Project evaluations must consider all aspects of potential grantees' activities, including secondary or tertiary partners, and not be limited to determining technical capacity.
- NGOs should submit the names of all employees and board members to allow for background checks to ensure that none is affiliated with designated terrorist organizations and other violent actors. (See US and European Union (*Terrorism*) sections in the Best Practices chapter.)
- Governments must not rely on NGO self-reporting or statements from allied international NGOs. Rather, government officials must independently review publicly available information, including, but not limited to, a grantee's website, publications, 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.

4. Checking against relevant terror lists

- In multilateral projects in which a donor government is providing funding (e.g. those involving UN agencies, international and local bodies, etc), the more restrictive terror standards should be applied.³
- For projects involving Israel, the West Bank, and Gaza, donor governments should ensure that NGO partners and their professional and lay staff are vetted against the [Terrorist Organizations and Unauthorized Associations List](#) Designation of Individuals 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-linked or hateful actors.

³ 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.

Government agencies administering and funding aid should publish regularly updated reviews of projects, as well as of the government's broader development strategy. Parliaments should exercise effective oversight, including through committee hearings and questions to ministers, as well as via legislative and budgetary procedures.

Best Practices

US

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 appropriations, 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 for Dutch officials responsible for grantmaking 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 PFLP-linked 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
 - Goods, material and commodities must be secured from terror diversion. An independent body should be created to monitor the distribution of aid and ensure it physically reaches those in need. Where useful, technological solutions (e.g. electronic trackers) should also be employed.
 - Standards must be established to counter embezzlement of funds. This includes coordinating with Israel to ensure that partners and vendors are not linked to terror designated entities.

2. Evaluation and Accountability
 - Monitoring should occur at regular intervals during the duration of the grant period.
 - The government should have independent investigative capacities to evaluate projects and grantees if substantial concerns arise during the grant period. Donor

governments should also engage with Israeli counterparts on a regular basis regarding any new evidence of terror or other violent activity by grantees or their personnel.

- Government should have protocols and sanction mechanisms in place for: Suspension of funds; cancellation of contracts; return of the grant or parts thereof; guidelines for determining when NGOs, whose contracts were canceled over violations, can be eligible for future grants.

3. Congressional/Parliamentary Oversight

- Funding agencies should present regular reports to oversight bodies, such as Congress or Parliament. Likewise, these bodies should have independent capacity in place to ensure that reports submitted by the implementing agencies can be evaluated in a substantive manner.
- Oversight bodies should facilitate a process by which external interested parties can file submissions on the subject matter.

Recommendations: A 12-Point Summary

1. **Budgetary Regulations** – The budget process, especially in the areas of humanitarian aid, development cooperation, and democracy promotion, should be adjusted to prevent the funding of organizations that espouse antisemitism, racism, and hate speech, as well as other content incompatible with human dignity or violating basic democratic principles.
2. **Transparency** - Implementing agencies should make all relevant information – such as name of project; amount allocated; duration; implementing partners; location; scope of work; summaries of activities – and oversight reviews publicly available, including for funds provided via UN frameworks and other multilateral entities. Governments should also institute free-of-charge Freedom of Information filing systems.
3. **Application Process** - Strategic goals, Calls for Proposals, application reviews, and other components of government-funded projects – whether managed by government agencies or by an intermediary (e.g. the UN) – must be consistent with policies concerning Israel, the peace process, and the conflict. Specific explanations of how projects meet those goals should be provided. Of particular note, advocacy components must not promote antisemitism or hate speech, incite to violence, or deny Israel’s right to exist.
4. **Affiliation** - Governments should demand that prospective grantees declare that the organization, its professional and lay team, contractors, and any party involved in implementing the project shall not have any affiliation to designated terror entities. This should apply when the government has a direct relationship with the implementing partner/s, as well where there are intermediaries in disbursing aid and funding.
5. **Due Diligence**– 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. Officials must also all applicants holistically, rather than merely on the basis of technical capacity.
6. **Counterterror Regulatory Coherence** – In multilateral projects with the UN or other international bodies, the more inclusive counterterror standards, including restrictive lists, should be applied.
7. **Consulting Israeli Counterterror Information** – 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 preventing diversion of physical goods, embezzlement of funds, or misappropriation for the purpose of radicalization.
9. **Evaluation** – Regular screening of public communication including grantees’ and leading officials’ social media and ensuring it is consistent with government policy concerning Israel, the peace process, and the conflict, and in accordance with government standards on antisemitism, hate speech, and incitement.
10. **Protocols and Sanction Mechanisms** – Governments should define measures, such as suspension of funds, cancellation of contracts, and 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** – Funding agencies should present regular reports to oversight bodies, such as Congress or Parliament. Likewise, these bodies should have independent capacity in place to ensure that reports submitted by the implementing agencies can be evaluated in a substantive manner.
12. **Verification of Dual-Use Items** – Technical solutions and other monitoring mechanisms should be employed to prevent the abuse of dual-use items for non-humanitarian purposes.

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