ISF INTERIM EVALUATION REPORT

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SOMMARJU EŻEKUTTIV

Context:

The National Programme (NP) for ISF was launched in November 2015 and by the end of June 2017, 8 restricted calls for applications had been issued. Through these calls, six (6) projects have been approved under ISF borders and visa whilst thirteen (13) projects were approved under ISF police. This is equivalent to a commitment of 86%[1] of the ISF Borders and Visas and 57%[2] of the ISF Police.

In the period under review, the implementation of the programme was still in its early stages mainly due to the late adoption of the regulations and national programmes as well as the overlap with the closure procedures of previous programmes. In this regard, an effective assessment of the progress made in achieving the targets of the programme can only be made once the implementation of the programme reaches a satisfactory level. At the time of reporting limited progress was registered under Specific Objective 1 (Visa), although it is expected that overall implementation will gain momentum during 2018.

Since the adoption of the NP in 2015, apart from the updates to the NP relating to the introduction of the PNR system and the upgrading of existing consular posts and the establishment of new ones, no major changes in the development needs have been identified. In this respect, it is considered that the main strategic direction of the programme continues to apply to the current needs on the ground.

Methodology:

The interim evaluation has been conducted taking into account the feedback received from beneficiaries, policy makers, the RA as well as the stakeholders who sit on the national programme's Monitoring Committee. In this regard, a qualitative and quantitative[3] approach was adopted in the carrying out of this evaluation exercise in line with the relevant EC guidelines.[4]

Main findings:

The projects being implemented are addressing the objectives outlined in the National Programme which in turn was drafted based on an assessment of the needs for the 2014-2020 period. Furthermore, the NP and ongoing projects are addressing the priorities identified in the Policy Dialogue Meeting that was held at programming stage in June 2013. In this regard, the partnership principle was not only implemented at programming stage but is also being applied at implementation stage.

In addition, projects are coherent with relevant national policies on which the NP was drafted. These include the Draft Counter-Terrorism Strategy, the Draft Malta Integrated Border Management Strategy and the Crime Prevention Strategy for the Maltese Islands 2017-2021.[5] Although no projects had been approved under SO1 Visa as at June 2017, it is envisaged that projects in relation to Visa will take into account the draft National Visa Action Plan that aims to streamline the visa processes and increase efficiency and transparency.

Complementarity is observed between the projects being supported by the Fund as well as

with national initiatives and projects implemented through other funds. The fact that most Managing / Responsible Authorities related to the implementation of Union Funds are grouped under the same Ministry facilitated discussions in ensuring coherence and complementarity between the different programmes. Furthermore, coherence and complementarity are being ensured through the Inter Ministerial Coordination Committee (IMCC) which brings together all relevant stakeholders involved in the coordination, management and implementation of Union funds. These structures follow up on the coordination mechanisms which were also adopted at programming stage and which are applied at application and project selection stage.

Whilst it is still premature to measure the extent of which investments under ISF have brought added value due to the early implementation stages of the programme, the benefits of achieving further security, combating crime and securing border control, amongst others, is not only considered of added value on a national scale but to the Union as a whole. In this regard, ISF support to equip Malta with improved mechanisms within the sector also contribute towards further securing the EU's southern border. This is particularly important in the wake of recent turmoil in Northern African countries as well as the specific nature of the Fund which is targeted and aims to respond to the dynamics of the sector. Within this context, the Fund is also supporting a FRONTEX specific action.

Taking into account the nature of many interventions supported by the Fund, such as the purchase of equipment, it is expected that the positive effects of the projects supported by the Fund are likely to last beyond the scope of the Fund due to their expected durability and utilisation beyond the project. Furthermore, whilst implementation is still in its initial phases making it premature for an assessment as to whether the costs incurred are proportionate to the benefits achieved, projects are being implemented within budget and the human resource requirements originally envisaged. From a simplification point of view, during the implementation of the programme, the Responsible Authority(RA) continued to improve and simplify procedures however there is generally a need for more simplified procedures and application forms and the introduction of more simplified cost options.

Mid-term Review:

The RA submitted its contribution towards the mid-term review by 15 September 2017 based on discussions held with the relevant stakeholders in line with the regulatory requirements. The main changes are reflected in proposed additional funding of EUR 22,868,750 for ISF borders and EUR 16,720,000 for ISF police.

With respect to ISF borders and Visa, new actions related to the Schengen Information System (SIS) and the need for storage of visa documents are envisaged together with the provision of simulation rooms for the training of consular staff. Improving Malta's consular outreach and the interoperability of information systems controls undertaken at Malta's entry and exit points, amongst others, are also considered necessary.

With respect to ISF police, the acquisition of an Intelligence Analysis System Software and a Complimentary Data Processing System are being proposed together with new equipment related to border control. The provision of ad hoc training and action to protect critical infrastructure and equip workers to respond to major emergencies are also foreseen, amongst others.

Conclusions and recommendations:

Since the implementation of the NP is still in its initial stages, further efforts are necessary to speed up the implementation of the NP, including at project selection stage, in order to ensure that the milestones of the programme are reached. In this regard, further assistance at application stage should be offered to applicant organisations in order to provide the support that is required in the compilation of applications.

Lengthy procurement processes are also factors which are contributing towards the slow implementation of projects. In this regard, increased support to beneficiary organisations, particularly during the first six (6) months of project implementation, may also contribute towards facilitating the implementation of the project. Furthermore, appropriate training sessions focusing on procurement related to defence and security may also be explored by the RA. The introduction of additional simplification methods, particularly for beneficiaries, is also being recommended.

The demarcation between specific objectives may also hinder the swift implementation of the NP. The output of a number of interventions may contribute to more than one Specific Objective(SO) under both ISF-Borders and Visa and ISF-Police particularly in view of the close link between Border Management and Crime and risk prevention. The fact that such projects can only be funded through one SO is limiting the scope of the interventions. In this regard, efforts to facilitate implementation as well as strengthen the scope of the Fund and the results on the ground from a regulatory point of view may also be explored.

This issue is also relevant for the apportionment of investment costs whereby the use of infrastructure and equipment for interventions wider than the scope of the particular SO is leading to additional administrative burden. In this regard, further efforts should be undertaken towards introducing new methods which can further simplify implementation whilst taking into account the different realities of each Member State.

The simplification of procedures as well as further flexibility at the regulatory level are crucial elements to ensure a timely implementation of the Fund but also to enable Member States to respond to the different pressures on the ground which becomes particularly relevant due to the volatility of the sector.

- [1] The commitment excludes technical assistance.
- [2] IBID.
- [3] Such assessment was made through the data collection exercise carried out for the compilation of result and impact indicators as well as data regarding the financial implementation of the Programme.
- [4] Guidance on the Common Monitoring and evaluation framework for AMIF and ISF, May 2017.
- [5] Crime Prevention Strategy for the Maltese Islands 2017-2021 pg. 5.