

EXECUTIVE SUMMARY OF THE FINAL REPORT

Evaluation study

Evaluation of the results and impacts of the projects co-financed
by the Norwegian Financial Mechanism 2009-2014
within the PL/15 Programme

Schengen cooperation and combating cross-border and organised crime,
including trafficking and itinerant criminal groups

A study conducted by the consortium of:

Infondo Sp. z o.o.

Eu-Consult Sp. z o.o.

Warsaw, December 2017

INTRODUCTION

The report presents the results of the evaluation study "Evaluation of the results and impacts of projects co-financed by the Norwegian Financial Mechanism 2009-2014 under PL/15 Programme „ Schengen cooperation and combating cross-border and organised crime, including trafficking and itinerant criminal groups”.

The evaluated PL/15 Programme was one of four programmes implemented within the “Schengen and internal affairs” of the second edition of the Norwegian Financial Mechanism 2009-2014. The PL/15 Programme aimed at improving the capacity of Polish services in the fight against cross-border and organized crime, including trafficking in human beings. This objective was to be achieved through the implementation of projects in the following areas (referred to as “outcomes”):

- development and improvement of structures, systems and technical equipment in order to improve the implementation of the Schengen acquis,
- improved capacity to prevent and combat cross-border and organized crime, including trafficking in human beings and itinerant criminal groups,
- Improved cooperation between the authorities and relevant stakeholders, including nongovernmental organisations, in assisting victims of trafficking.

The project promoters selected in the two calls for proposals implemented twenty four projects in 2014-2017. The basic activities of the projects were trainings, seminars, conferences and study visits. Moreover, some of the projects focused on development of structures and systems. In addition, the Department of Analyses and Migration Policy of the Ministry of Interior and Administration carried out two pre-defined projects related to counteracting trafficking in human beings. The activities were performed in partnership with the Council of Europe and the International Organization for Migration (IOM).

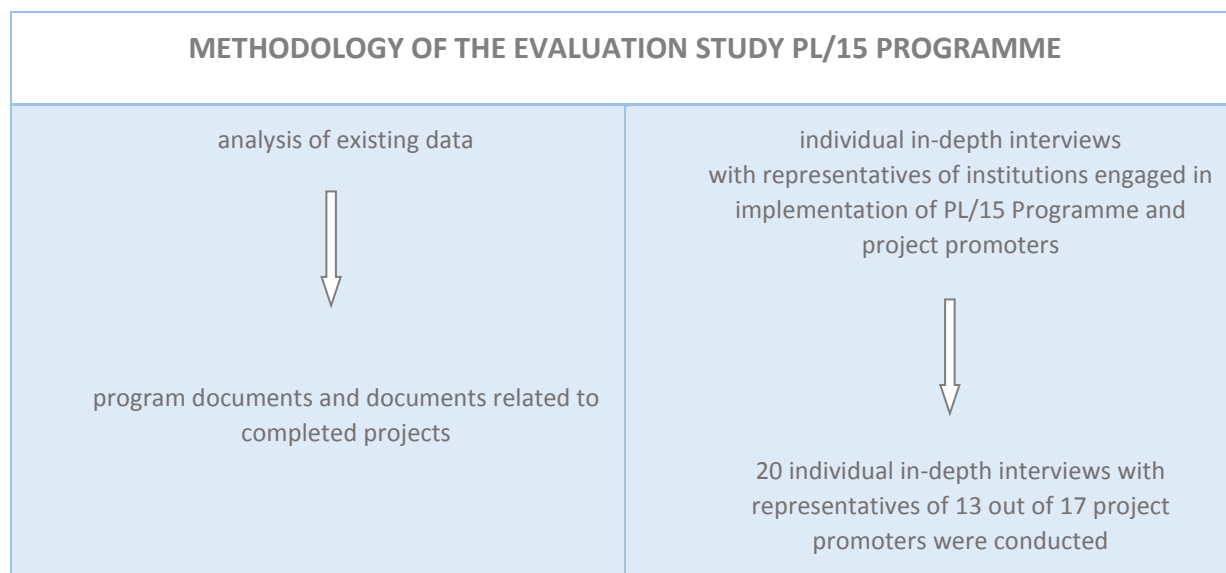
MAIN ASSUMPTIONS OF STUDY AND METHODOLOGY

The study was carried out at the request of the PL/15 Programme Operator, i.e. the Ministry of Interior and Administration, in the period from July to the end of September 2017. Its goal was to assess the effects of 26 projects under the PL/15 Programme, as well as the evaluation the PL/15 Programme management and implementation system - including the division of tasks and cooperation in this area between the Programme Operator (the substantive department of the Ministry of Interior and Administration) and the Supporting Institution (European Projects Implementation Centre of the Ministry of the Interior and Administration) - aimed at developing recommendations for possible changes, necessary for implementation in the NFM 2014-2021 Programme. The study was conducted using the following evaluation criteria:

- efficiency,
- effectiveness,
- sustainability,

- impact,
- relevance.

The evaluation methodology has been based on the Donor-State guidelines contained in the document "Evaluation Guideline - EEA and Norwegian Financial Mechanism 2009-2014". The evaluator used two basic methods, which are briefly presented in the table below.



In addition, an online survey was conducted with representatives of project promoters, a workshop, and so-called "non-participating observation" in the form of ensuring the presence of the evaluator at a meeting with the project promoter of the PL/15 Programme. At the meeting, the project promoters presented their projects. Case studies of three projects were developed i.e.:

No	Project promoter	Title of the project	Objective of the project
1	National School of Judiciary and Public Prosecution	Training the judicial authority and public prosecutor's offices personnel in combating and preventing cross-border and organised crime	Increasing the capacity of the prosecutor's office and the judges to prevent and fight cross-border and organized crime, including trafficking in human beings and itinerant criminal groups
2	Ministry of Finance - Department of Customs	Increasing the security and operational capabilities of the Customs Service in fight against cross-border crime and organised criminal groups	Increasing the ability of the services by improving professional skills and increasing the security of officers during their professional duties.
3	La Strada Foundation	Poland Network of Non-Governmental Organisations Against Trafficking in Human Beings	Establishing of a specialized network of organizations counteracting trafficking in human beings, in order to improve the quality and effectiveness of their work, professionalization of activities.

During the evaluation study, taking into account its objectives, the evaluator used techniques that were aimed at obtaining information that would help formulate answers to study questions. Study questions have been divided into six main areas:

- An assessment of the process of planning, deployment and implementation of the PL/15 Programme as set against the degree to which its results had been achieved;
- The effectiveness and efficiency of the management and control systems, the call for and evaluation of proposals, and the financial settlement of the PL/15 projects;
- The impact of the implemented projects on the development and improvement of structures, systems and technical equipment in order to improve the implementation of the Schengen acquis;
- The impact of the implemented projects on improving the capacity of services to prevent and combat cross-border and organised crime, including trafficking in human beings and itinerant criminal groups;
- The impact of implemented projects on improved cooperation between the authorities and relevant stakeholders, including non-governmental organisations, in assisting the victims of trafficking;
- The impact of implemented projects on the strengthening of cooperation/bilateral relations between Poland and Norway.

FINDINGS OF THE EVALUATION

The evaluator performed evaluation activities with respect to the management and control system in the units providing support for the PL/15 Programme on the side of the Ministry of Interior and Administration and the process of projects implementation and assessment of the results achieved by the project promoters.

Areas assessed positively by respondents and recommended for implementation in subsequent editions of the Norwegian Financial Mechanism.

In response to the questions what factors fostered the achievement of the assumed results - both during individual interviews and the questionnaire study, the following areas and specific solutions were mentioned:

- I. Area of Norwegian Financial Mechanism management system
 - a) proper identification of needs in the area of "internal affairs" at the stage of preparing conceptual assumptions of the PL/15 Programme - attractive, up-to-date, tailored to the needs of the Program and possible to conduct trainings / workshops / thematic conferences, resulting in great interest from potential participants;
 - b) flexibility of procedures, *inter alia* the selection of information and promotion activities for individual projects;
 - c) responding to the expectations of the project promoters, guidelines on management costs, including placing personnel management costs among direct costs.
- II. Program management area - institutions implementing the PL/15 Programme, especially:
 - a) clear division of tasks and responsibilities between the Program Operator and the

- Supporting Institution, laid down in the agreement signed between the institutions;
- b) organizing meeting and training for project promoters by institutions implementing PL/15, aimed at preparing projects promoters for the proper application for co-financing;
- c) reliable and on-time service, due diligence in the performance of official duties by employees of institutions implementing PL/15 Programme.

III. Area of projects implementation, especially the possibility of:

- a) prolongation of the final date of project implementation;
- b) introducing justified changes in project implementation plans/project fiches/projects decisions;
- c) use of savings for the implementation of the so-called additional activities in the project;
- d) implementation of project activities after the end of the eligibility period from the project promoter's own funds;
- e) raising any reservations and reporting on areas for improvement directly to the institutions implementing the PL/15 Programme during their monitoring visits;
- f) exchange experiences and establish so-called networking during meetings organized by institutions implementing the PL/15 Programme.

Areas identified during the evaluation as necessary for a deeper analysis prior to the introduction of solutions which will be implemented in the next edition of the Norwegian Financial Mechanisms and assessed by respondents as requiring improvement.

In response to the questions what factors caused the greatest difficulties in project implementation and had a negative impact on the time and efficiency of achieving the results set for the PL 15 Programme:

1. the time for project implementation of the project should be longer, which will allow to eliminate the accumulation of numerous trainings in a short time and to adjust the dates of training to the needs of participants and trainers;
2. insufficient involvement of the part of potential Norwegian partners;
3. national regulations regarding public procurement, including time-consuming selection of contractors for individual activities;
4. difficulties in acquiring highly qualified trainers;
5. the need to develop further cooperation between beneficiaries and institutions engaged in the PL/15 Programme, based on ongoing contact of responsible persons and their availability;
6. the necessity of improvement issues related to accounting and financial services for institutions implementing the PL / 15 Program, aimed at timely payment regulation for project promoters.

RECOMMENDATIONS

As a result of the conducted evaluation study Program PL / 15 " Schengen cooperation and combating cross-border and organised crime, including trafficking and itinerant criminal groups ", the evaluator has prepared an evaluation report. The findings of the prepared Report indicate that during the implementation of the Program, the Ministry of Interior and Administration, acting as the Programme Operator, together with the European Projects Implementation Centre of the Ministry of Interior and Administration in the role of Supporting Institution assured the effectiveness of the PL/15 Program implementation. Nevertheless, the evaluator has also identified areas, in which it is necessary to make changes.

The table below contains the main findings of the evaluator along with proposed recommendations and detailed solutions.

No.	Findings	Recommendations/Proposed solutions
1.	The agreement between the Norwegian Ministry of Foreign Affairs and the National Focal Point (NFP) followed by the agreement between the NFP and the Programme Operator (PO) were signed in 2013. This fact resulted in delays in the implementation of activities undertaken by the Programme Operator. Negative consequences were suffered by both the PO and the Supporting Institution as well as the beneficiaries (a tight schedule of activities - accumulating duties, for some of the beneficiaries it was impossible to carry out additional activities financed from the savings in the projects).	Proper preparation for negotiating the programme by Program Operator and the Supporting Institution, aimed at eliminating possible negative effects of delays occurring in areas in which the Programme Operator has no influence.
2.	The Program implementation system is friendly to final beneficiaries (no excessive regulations, relatively low number of guidelines compared to other European funds, greater freedom of PO and project promoters actions), which has impact on efficient implementation of the Programme and projects.	Continuation of the functioning management system of the Norwegian Financial Mechanism and solutions developed by the National Focal Point in the next Programme periods.
3.	Acquiring partners from donor states has often proved to be a difficult and multi-stage process. Often, the potential Norwegian partners, due to their previous commitments to other entities, were unable to conclude a partnership with beneficiaries from Poland.	It is advisable to grant beneficiaries of support by donor states in the process of acquiring partners from their countries.
4.	Proper management of institutional knowledge by the institutions managing the Program and on-going information to project promoters is crucial in the case of organizational changes.	Efforts to eliminate the accumulation of changes affecting the organization of work in the institutions managing the Program, and in the case of changes - to guarantee an effective communication system with the project promoters.

5.	The implementation of projects, in the opinion of project promoters, depends on the nature of cooperation with the project supervisor at PO and Supporting Institution. The availability of responsible persons is important.	Care for the availability of the project's responsible persons, including for communication, substitutions, effective monitoring of work.
6.	The precise definition of the scope of duties related to the Programme implementation at the level of specific job positions facilitates the introduction of management tools to improve the implementation of activities.	Continuation of the use of transparency tools within the scope of rights and responsibilities assigned to individual employees - care for updating job descriptions or ranges of their activities