

**Mid-term evaluation of the
Polish Programme
Asylum, Migration and
Integration Fund
and Integration Fund for the
period 2021-2027**

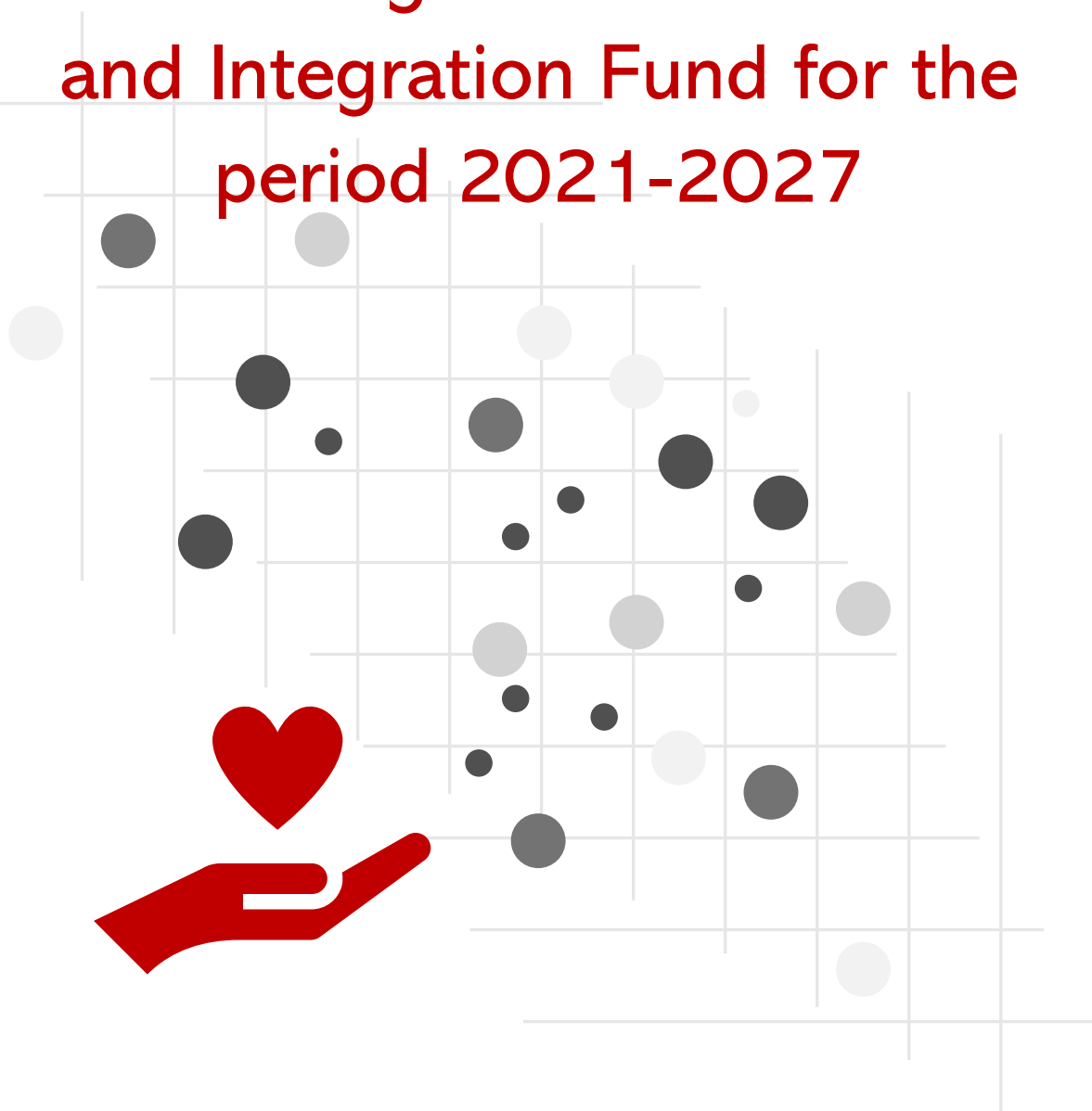


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List of abbreviations used

| Abbreviation | Explanation |
|--------------|--|
| AMIF | Asylum, Migration and Integration Fund |
| CIC | Alien Integration Centres |
| COPE | European Projects Service Centre of the Ministry of Interior and Administration |
| CS | Specific objective |
| EAV | <i>European</i> added value |
| FAMI | Asylum, Migration and Integration Fund |
| IPI | Individual Integration Programme |
| IP | Intermediate Body |
| IZ | Managing Authority |
| KG SG | Border Guard Headquarters |
| MRiPS | Ministry of the Family, Labour and Social Policy |
| MIAA | Ministry of the Interior and Administration |
| NMF | Norwegian Financial Mechanism |
| TCN | Third-country nationals |
| SG | Border Guard |
| UAC/UAM | <i>Unaccompanied Children (Unaccompanied (Migrant) Children/ Unaccompanied Minors)</i> |
| UDSC | Office for Foreigners |
| EU | European Union |
| WESA | Common European Asylum System |

Summary

The activities under FAMI focus on the development of the infrastructure for handling TCNs, the development of the ICT system, the development, simplification and unification of the asylum system, the increase of competences of the staff in charge of migration, asylum and integration procedures, cooperation with other countries. A significant part of the Fund's financial allocation was foreseen for direct support to foreigners arriving in Poland. The intervention designed within the framework of individual specific objectives of FAMI responds to current challenges and needs in this area. Assumptions regarding the scope of the Fund's intervention were developed in cooperation with institutions responsible for the implementation of migration policy in the country and cover a broad spectrum of activities in line with current challenges and needs. Research conducted for the purpose of the evaluation confirmed that the provisions of the programme are flexible enough to adapt the scope of undertakings to the needs arising from the current situation.

The analysis of the logic of the support offered under FAMI 2021-2027 showed that the activities foreseen to be implemented, under the three specific objectives, enable the achievement of the objectives set under the Programme. During the in-depth interviews, respondents emphasised that FAMI 2021-2027 enables them to implement effective actions in the field of asylum, legal migration and integration and return of third-country nationals to their homeland.

The new requirements related to the General Regulation introduced by the EU, resulted in the integration of security and migration funds into a new system for monitoring, reporting and evaluation - the CST2021, thus the biggest shortcoming of the CST2021 is that this system was introduced top-down and is not tailored to FAMI's needs. Thus, the Fund can only use the opportunities that CST2021 offers it. No major problems with the indicator system were identified during the conducted evaluation. The system was assessed by the respondents of the in-depth interviews as correctly set up.

The intervention undertaken under FAMI is consistent with activities financed from other sources, including the Norwegian Financial Mechanism 2014-2021 under the 'Home Affairs' Programme, from which projects on improving the efficiency and quality of the migration and asylum management system are implemented, as well as activities resulting from grant agreements with Frontex. Activities consistent with the FAMI Intervention are also undertakings implemented in cooperation of Polish services managing migration and asylum with Third Countries, where the Polish side transfers its knowledge and experience to its partners through study visits, joint trainings and conferences. Also consistent with the objectives and planned activities of FAMI are projects implemented under the Thematic Instrument, i.e. an additional pool of funds granted by the European Commission. Polish entities received support for the implementation of projects within the framework of specific activities. These concerned support for Ukrainian citizens to function independently in Poland and the modernisation and equipment of centres for foreigners. In addition, support for refugees from Ukraine who entered Poland after 24 February 2022 is primarily financed from the State Fund for War Refugees from Ukraine. A portion of the funds managed by the Fund was provided by the European Commission as part of what is referred to as 'emergency assistance' under the AMIF (Asylum, Migration and Integration Fund) - more than EUR 68 million have been allocated to Poland in 2022 under this framework. It should also be pointed out that FAMI is consistent with activities financed from the state



budget, implemented under statutory obligation by the Border Guard, Provincial Offices, the Office for Foreigners and State Labour Inspectorate.

Introduction

The main objective of the mid-term evaluation was to confirm that the implementation system and the Fund are adequate to meet the objectives and will deliver:

- their achievement at a reasonable cost,
- adequate support to meet changing needs,
- the added value of EU-level intervention, consistent with other sources and modes of funding.

As the implementation process of the Polish FAMI 2021-2027 Programme is currently at a relatively early stage, the mid-term evaluation focused on procedural issues, assessing the Fund's continued relevance and improving the implementation process. Nevertheless, one of the objectives of the mid-term evaluation was also to prepare the ground for the subsequent ex-post evaluation, in particular by checking whether the monitoring and evaluation modalities currently in place will allow, in the future, to collect and generate sufficient information to measure the impact of the programmes until June 2029 in the context of the preparation of the future Multiannual Financial Framework.

The scope of the completed evaluation study is identical to the scope of activities that are implemented in Poland with the support of FAMI funds as defined in the Polish FAMI Programme. It includes the following specific objectives:

- I. *Common European Asylum System (CEAS)*
- II. *Legal migration and integration*
- III. *Return*

Objective IV. *Solidarity and fair sharing of responsibility* is not being implemented in Poland and was therefore not included in the scope of the study.

The scope of the evaluation covered the Fund's programming and implementation activities from the beginning of the programming period until December 2023, thus the study covered data recorded up to 31 December 2023 and reported to the European Commission by 31 January 2024.

The evaluation is based on five evaluation criteria:

| | | | | |
|-----------------|---------------------|------------------|-----------------|----------------------|
| A. Relevance | B. Effectiveness | C. Efficiency | D. Coherence | E. EU added value |
|-----------------|---------------------|------------------|-----------------|----------------------|

These criteria are reflected by adopting a five-part structure for this report presenting the results of the evaluation.

Description of the methodology used

The contractor used a diverse methodological instrumentation in the execution of this contract, including both information gathering and analysis methods:



Source: own work ECORYS Polska sp. z o.o.

The desk research analysis included:

- **FAMI policy paper:**
 - Polish Asylum, Migration and Integration Fund Programme 2021-2027;
- **Guidelines related to the implementation of FAMI:**
 - Handbook for the Beneficiary of a Project under the Asylum, Migration and Integration Fund;
 - Manual of Implementation Procedures at MA and IB;
 - Description of the management and control system;
- **FAMI implementation reports:**
 - Annual implementation reports for financial year 2022;
- **Documents relating to the area supported by FAMI:**
 - Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund;
 - Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and the financial rules for these Funds and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Financial Support Facility for Border Management and Visa Policy;
 - Draft Background Note - April 2023, Webinar of 19 April 2023 on the key elements of the mid-term evaluation and evaluation plans Home Affairs Programmes 2021-2027;
- Previous FAMI evaluation reports;
- Information on FAMI available at <https://www.gov.pl/web/dfe-mswia/wdrazane-fundusze-europejskie>.

Given that FAMI is currently in the early stages of implementation, this method was the primary source of data analysed and evaluated. Nonetheless, the Research Team also undertook in-depth interviews with FAMI implementers and the entities that constitute the Fund's beneficiaries. A total of 8 in-depth interviews were conducted as part of the study, including:

- Individual in-depth interviews with staff of institutions involved in FAMI implementation, including representatives:
 - Ministry of the Interior and Administration (Department of European Funds) -1 interview;
 - Ministry of Family and Social Policy (Department of Social Assistance and Integration) - 1 interview;
 - Centre for European Projects Services of the Ministry of Interior and Administration - 1 interview;
- Individual in-depth interviews with staff of organisations that have been and will be beneficiaries of FAMI-funded projects:
 - Office for Foreigners - 1 interview;
 - Border Guard Headquarters, Board for Foreigners - 1 interview;
 - provincial offices - 3 interviews.

In addition, a qualitative benchmarking exercise was carried out to highlight best practices at the level of both the Fund and the projects it supports.

Reconstructing and describing the intervention logic

FAMI has three specific objectives, which include **I. Common European Asylum System (CEAS)**, **II. Legal migration and integration** and **III. Return**. Underlying these objectives are challenges and threats, which are also defined in the Programme. Among the main - and most significant - challenges related to the Programme's objectives is mass migration into the territory of the Republic of Poland, which intensified in mid-2021. (It should be mentioned, however, that intensive migration had been taking place in Poland since 2014, when the annexation of Crimea by the Russian Federation took place - except that at that time it was staggered; since mid-2021 there has been an intensification related to the fact that an unusually large number of TCNs tried to enter the territory of our country in a very short period of time). Initially, it was due to the **refugee crisis on the Belarusian border with the EU**, when the Belarusian authorities organised a mass smuggling of refugees from Middle Eastern countries, mainly from Iraq, Afghanistan. At that time, thousands of people from these regions, mainly young men, entered the territory of Poland (and the Baltic States). Migration took place illegally - without the required permits, as well as at points not intended for crossing the state border (through forests, across rivers). After the Russian Federation triggered a full-scale war in Ukraine, **the problem of war refugees** - this time legal - was intensified as a result of Ukraine being engulfed in armed conflict.

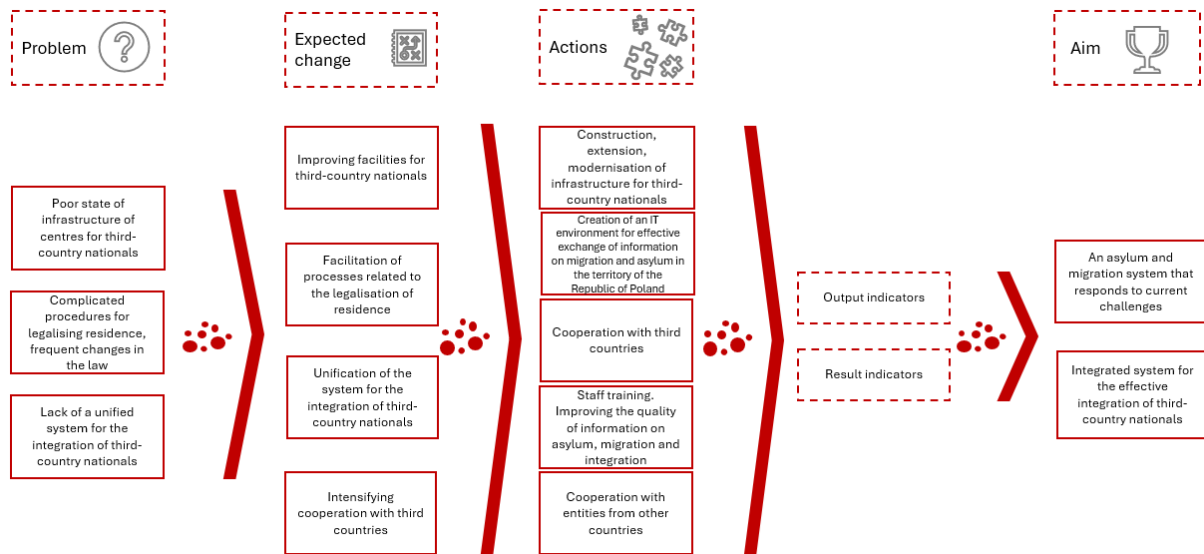
Among the main needs that FAMI identifies are:

- renovations to the centres where TCNs are housed;
- increasing the reception capacity of centres;
- streamlining migration procedures;
- Supporting the capacity of the asylum system in terms of infrastructure and services in the reception of TCNs;
- improving services for applicants for and beneficiaries of international protection;
- improving current and implementing new technological solutions within the asylum system;
- continuous improvement of staff competence;
- improving the quality of information on migration trends in Europe;
- ensuring a uniform structure for TCN integration in the provinces;
- strengthening cooperation with third countries.

Activities under FAMI are therefore focused on the following blocks of issues: **development of infrastructure, development of the ICT system, development, simplification and unification of the asylum system, increasing the competence of staff responsible for migration, asylum and integration procedures, cooperation with other countries**. Under CS 2, the operation of Foreigners' Integration Centres is supported, which is an activity directly aimed at integration of TCNs in Poland and creation of a unified integration structure.

A diagram of the logic of intervention is presented below.

Scheme 1. Logic of intervention

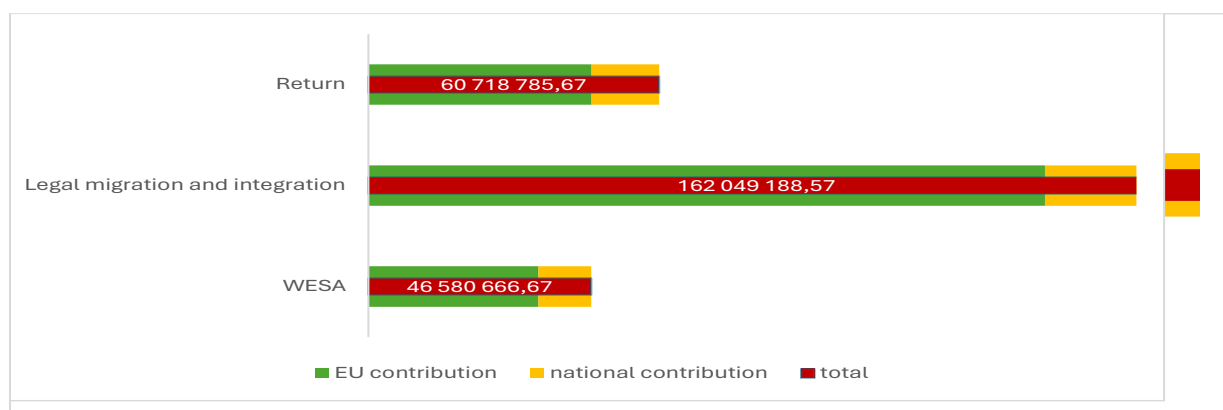


Source: own study.

A total of EUR 282,756,372.34 is planned for the implementation of the measures, of which EUR 236,869,922.00 is the EU contribution and EUR 45,886,450.34 is the national contribution.

A varying amount of funding was intended for each objective. Overall, the average funding rate was 83.8%, while for CS 3, approximately 76% of the value of the projects to be funded was the funding that could be obtained. As can be seen from the programme, the largest amount of funding was intended for Objective II - L legal migration and integration.

Graph 1. Value of funds allocated to FAMI implementation by specific objectives [in EUR]



Source: own compilation based on the FAMI programme document.

The degree to which the stated objectives are achieved is measured by indicators, which are divided into output and result indicators. Given that the **first call under FAMI was not announced until autumn 2023**, it is not reasonable to present the values of the indicators achieved so far. Given the period of preparation of this evaluation, the cognitive value associated with presenting the current status of indicator implementation may be residual - as activities are only in the early stages of implementation

- no indicators have been reported to have been achieved. Instead, the Research Team decided to undertake an analysis of the indicators - both output and result indicators in order to examine whether they are relevant to the objectives set for FAMI.

The Fund has identified the following **output indicators**:

WESA Objective 1:

- Number of participants supported including number of participants who received legal aid;
- Number of participants supported including number of participants receiving other types of support, including receiving asylum information and assistance;
- Number of participants supported including number of vulnerable participants supported;
- Number of trainees;
- Number of newly created places in reception infrastructure in line with the EU acquis;
- Number of newly created places in reception facilities in line with the EU acquis, including number of newly created places for unaccompanied minors;
- Number of refurbished/upgraded reception facilities in line with the EU acquis;
- Number of refurbished/upgraded places in reception facilities in line with the EU acquis, of which number of refurbished or upgraded places for unaccompanied minors.

Objective 2 Legal migration and integration:

- Number of participants covered by pre-departure measures;
- Number of local and regional bodies supported to implement integration measures;
- Number of participants supported including number of participants in language courses;
- Number of participants supported including number of participants in civic awareness courses;
- Number of participants who received support including the number of participants who received personalised career counselling;
- Number of information packages and campaigns to disseminate knowledge on how to migrate legally to the Union;
- Number of participants receiving information or assistance in applying for family reunification;
- Number of participants benefiting from mobility programmes;
- Number of integration projects with local and regional bodies as beneficiaries.

Objective 3 Return:

- Number of trainees;
- Number of pieces of equipment purchased, including the number of ICT systems purchased or upgraded;
- Number of returnees who received reintegration assistance;
- Number of detention places created;
- Number of upgraded or refurbished places in detention centres.

In addition, the Fund has identified the following **outcome indicators**:

WESA Objective 1:

- Number of participants who find the training useful in their work;

- Number of trainees who, three months after the training, confirm that they are using the skills and competences acquired during the training;
- Number of persons placed in alternative accommodation to detention including number of unaccompanied minors placed in alternative accommodation to detention;
- Number of people placed in alternative accommodation to detention including number of families placed in alternative accommodation to detention.

Objective 2 Legal migration and integration:

- The number of language course participants who, following the language course, have improved their knowledge of the language of the host country by at least one level according to the Common European Framework of Reference for Languages or its national equivalent;
- Number of participants who believe that the activity had a positive impact on their integration;
- Number of participants who have applied for recognition or assessment of their qualifications or skills acquired in a third country;
- Number of participants who applied for long-term resident status.

Objective 3 Return:

- Number of returnees who returned voluntarily;
- Number of returnees who were expelled;
- Number of returnees placed in alternative accommodation to detention centres.

The analysis carried out confirms that there is a link between the actions identified and the objectives and challenges to which the Fund aims to respond. In addition, the identified output indicators are in correlation with the result indicators and follow logically from the actions that are planned in the FAMI. Therefore, it should be assessed that the **intervention logic has been drawn up correctly**.

State of play (progress of implementation of Fund operations from a procedural, financial and practical point of view)

The Asylum, Migration and Integration Fund is an EU financial mechanism that is a continuation of an identical intervention from 2014-2020. In the 2021-2027 perspective, its operation is regulated by *Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund*.

The Polish FAMI programme was approved on 12 December 2022; its establishment was preceded by consultations with a wide range of individuals and institutions responsible for asylum, migration and integration issues. The Fund's budget comprises EUR 282,756,370.16, of which EUR 236,869,922 is the EU contribution.

In the framework of FAMI, a call for proposals by the European Commission for specific actions (dot *specific actions*) took place in May 2023. As a result of this call, 2 projects received funding in Q4 2023: project of the Department of Public Administration of the Ministry of Interior and Administration "Together to Independence", CS2 (contribution of FAMI: PLN 84,149,255.34) and the UdSC project "Improving reception conditions for applicants for international protection in Poland" CS1 (FAMI contribution PLN 34,999,930.63). These projects will be included in the FAMI Programme.

In addition, the MA announced two calls under the non-competitive procedure:

- Specific objective 2 - Legal migration and integration (call budget: PLN 100 674 000). Call limited to covering support for actions at the regional level concerning the admission of third-country nationals.
- Specific objective 3 - Return (call budget: PLN 182 508 755.48). Non-competitive call covering the organisation of forced returns.

In the first case, the beneficiaries could be voivodeship offices, while in the second - the Border Guard Headquarters and the Border Guard Academy. In the case of the first call for proposals, the amount which could be obtained by the beneficiaries differed within individual voivodeships. The amounts are shown on the map below.

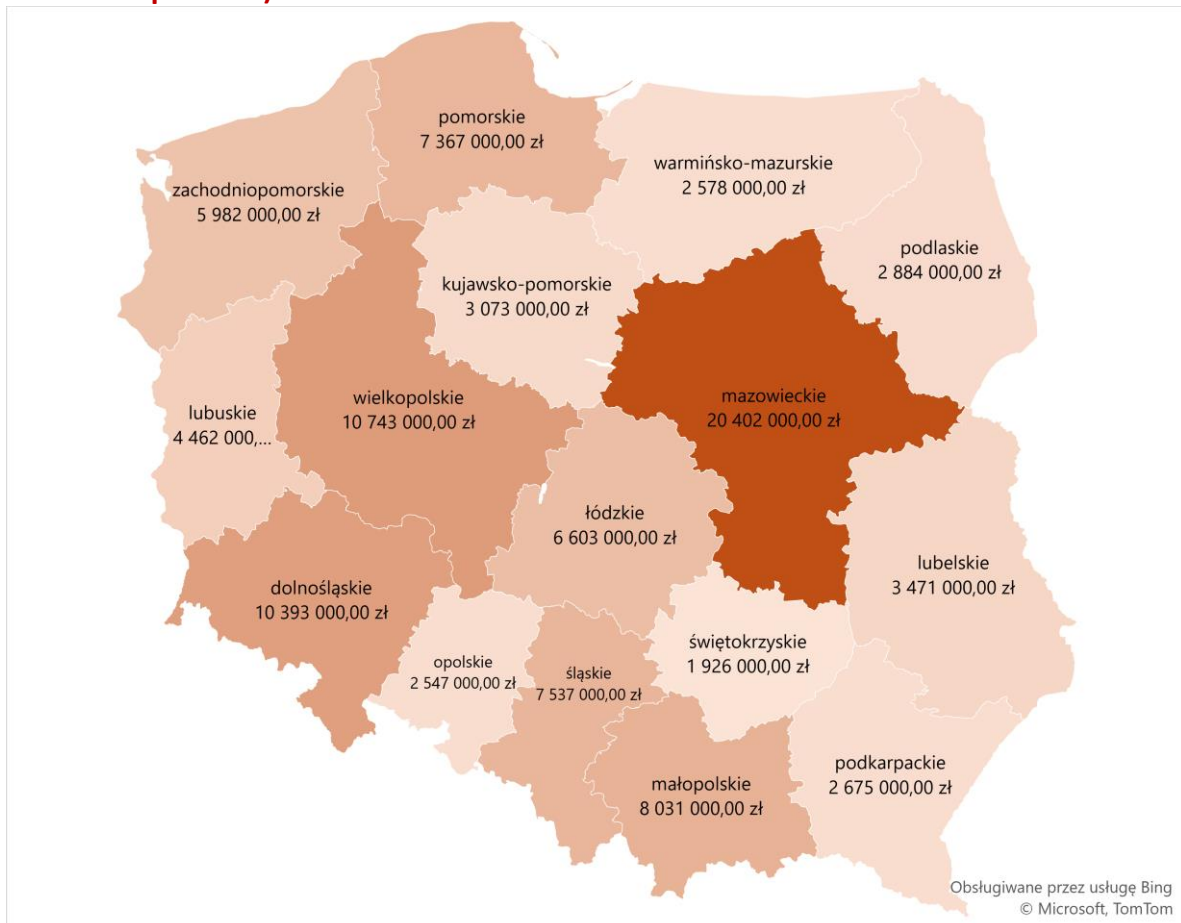
Each voivodeship office had guaranteed PLN 1,000,000 as part of the call, while the remaining amount due to a given voivodeship office was based on: the number of applications for residence legalisation accepted in a given region, the number of decisions made in cases of granting a permanent, temporary or long-term EU resident permit and the number of persons registered on the basis of the so-called 'specustawa'.

As the analysis shows, the amounts disbursed under the two calls covered **approximately 23.2% of the total allocation of funds**¹. The current schedule of calls for 2023 and 2024 indicates that, in addition

¹ The value has been converted into PLN using the conversion rate of 1 EUR = 4.3214 PLN as at 13 February 2024 (the date of signing the contract for the execution of this contract).

to the calls described above, 7 more calls are planned, under which as beneficiaries are identified: KGSG, UDSC, public or private entities, local government units' provincial level.

Map 1. Distribution of funds between voivodeships in the call for actions implemented under CS 2 - legal migration and integration (Q4 2023, concerning the restricted call for voivodeship offices)



Source: own compilation based on selection rules.

Given the initial stage of the Fund's implementation, the indicators have not yet been achieved. This was confirmed by in-depth interviews with FAMI implementers:

The programme was approved at the end of 2022, the whole of 2023 we were working on procedures and a new management system with joining the IT system, so at the moment we have 4 calls in progress, we don't have any signed contracts yet, so it is difficult to talk about achieving the goals of such programmes at the moment.

Source: in-depth interview with FAMI implementer.

Moderator: To what extent have FAMI's objectives, as measured by indicators, been achieved so far?

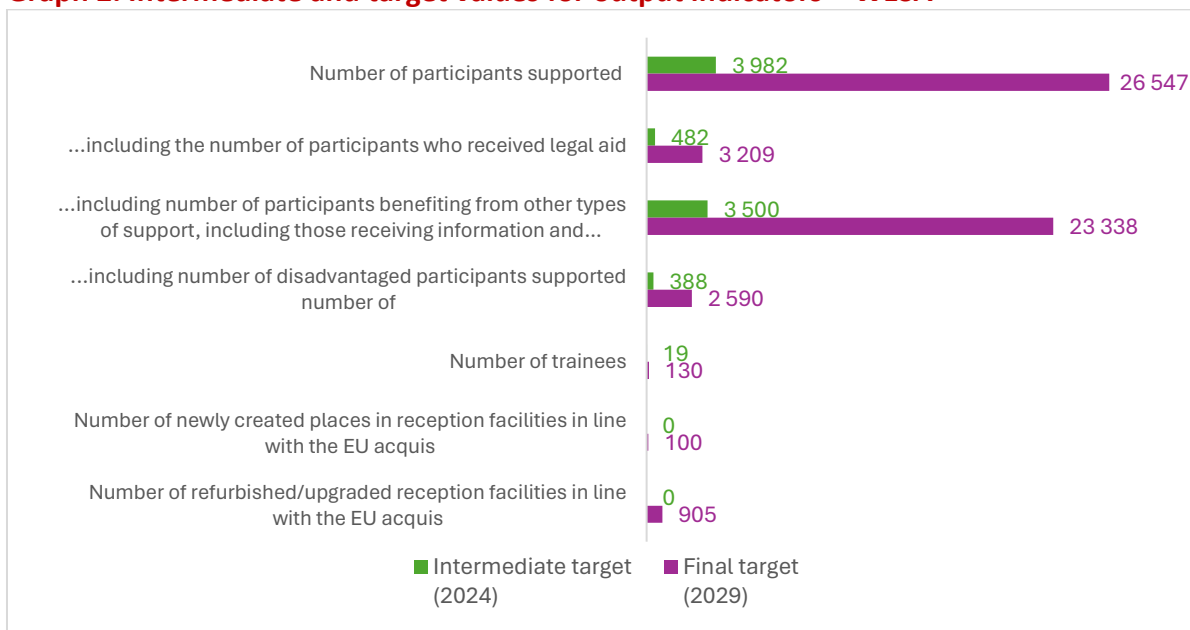
Respondent: (...) It is not possible to answer this question and also there is no signed agreement or financial contract for the implementation of any project.

Source: in-depth interview with FAMI implementer.

Indicators with intermediate and target values to be achieved are presented below. As demonstrated above, no intermediate values have been achieved to date, so the only way to show the Fund's potential is through the target values planned to be achieved in the programme.

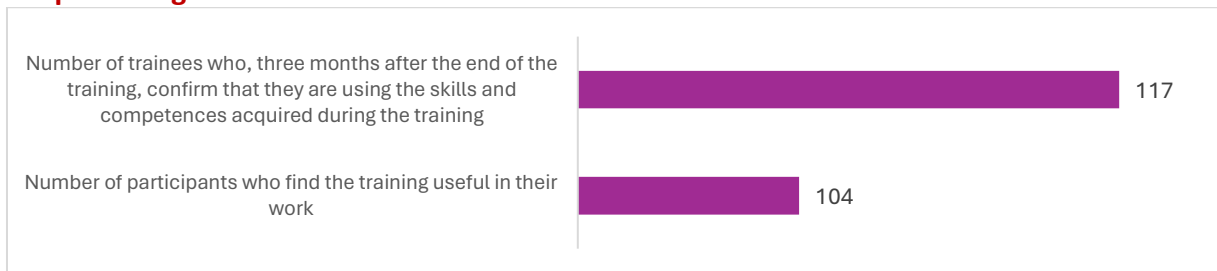
The charts below show the intermediate and target values of the output indicators and the target values of the result indicators in the WESA specific objective.

Graph 2. Intermediate and target values for output indicators – WESA



Source: own compilation based on the FAMI programme document.

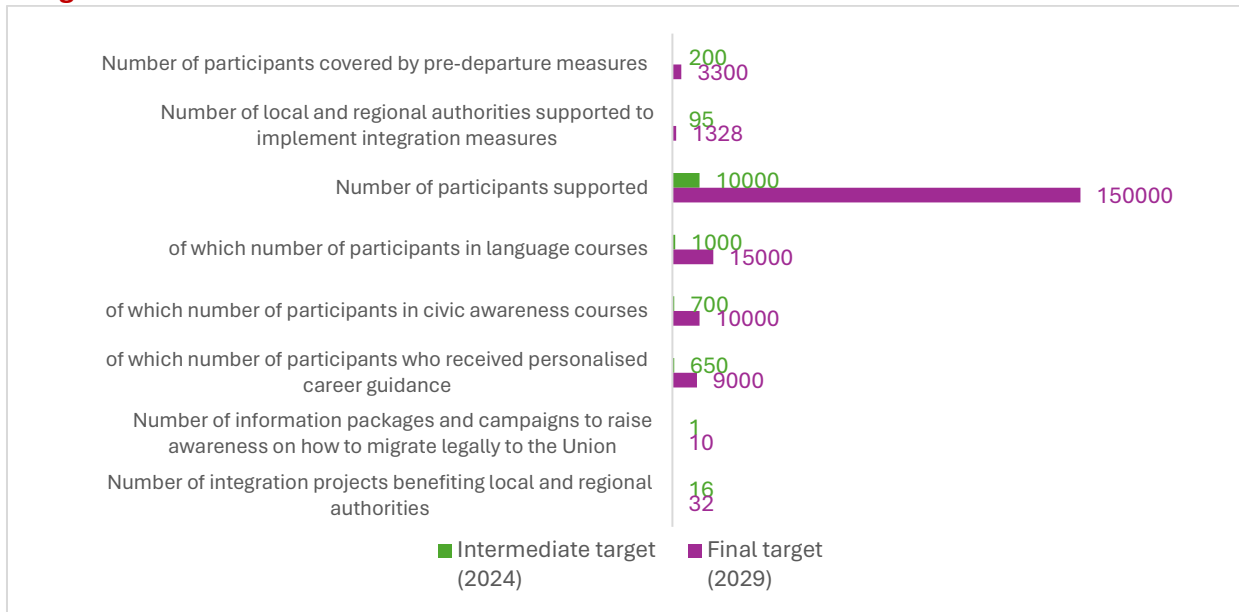
Graph 3. Target values for result indicators – WESA



Source: own compilation based on the FAMI programme document.

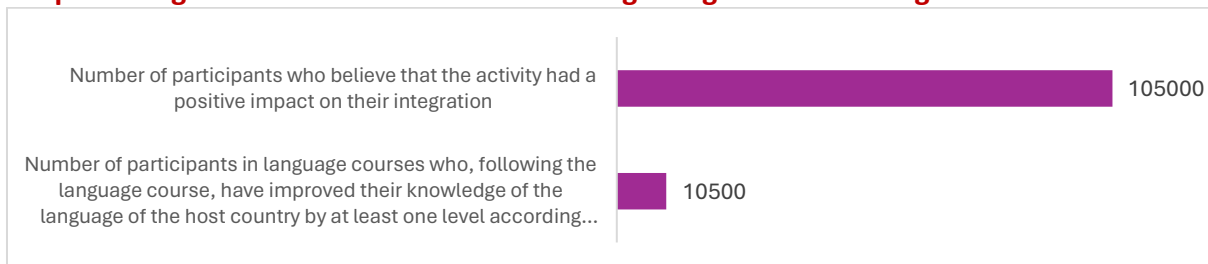
The charts below show the intermediate and target values of the output indicators and the target values of the result indicators for the specific objective legal migration and integration.

Graph 4. Intermediate and target values for output indicators - legal migration and integration



Source: own compilation based on the FAMI programme document.

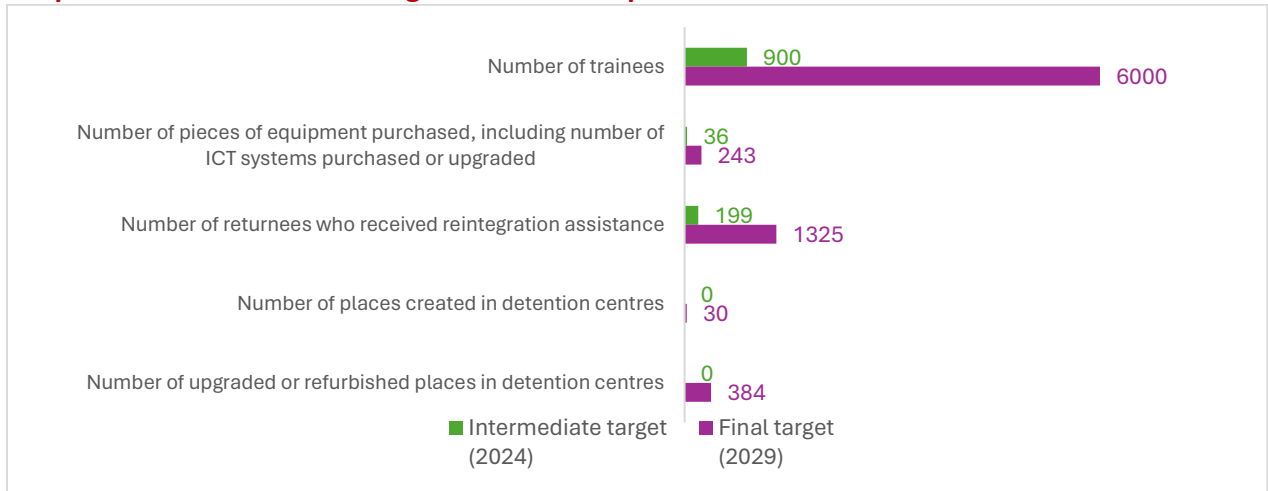
Graph 5. Target values for result indicators - legal migration and integration



Source: own compilation based on the FAMI programme document.

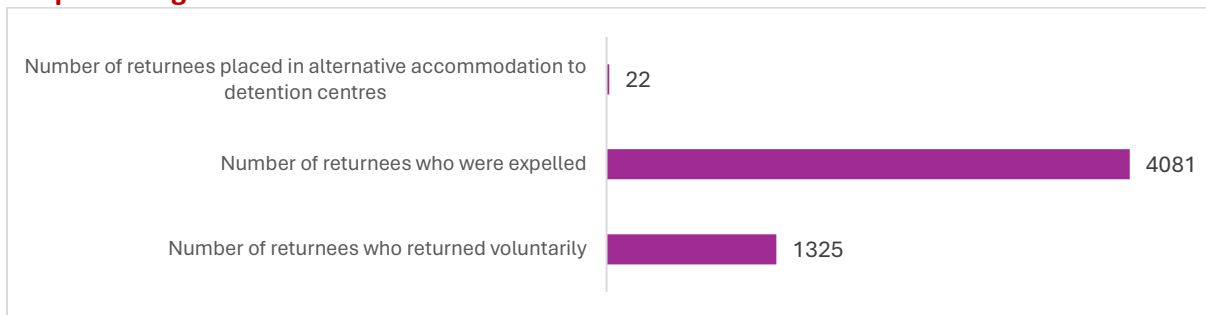
The charts below show the intermediate and target values of the output indicators and the target values of the result indicators in the specific objective of return.

Graph 6. Intermediate and target values of output indicators – return



Source: own compilation based on the FAMI programme document.

Graph 7. Target values for result indicators – return



Source: own compilation based on the FAMI programme document.

The state of implementation at the time of this evaluation (Q1 2024) dictates the following conclusions:

- At the current point in time, the achievement of the milestones for CS 1 - WESA is at risk. Indeed, so far the indicators are not being achieved.
- The call carried out under CS 2 - Legal Migration and Integration, including the regional nature of the actions, allows us to conclude that the achievement of the milestones of the indicators does not appear to be at risk.
- The call for CS 3 - Return has so far consumed a significant amount of funds (about 70%). The Research Team is of the opinion that the implementation of the project will achieve the milestones set.

The achievement of the milestones is extremely important given the provisions of Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund. Article 17 of this document indicates that if, by the end of 2024, at least 10 per cent of the initial programme allocation can be covered by payment claims, Member States will be able to apply for additional funding for their asylum, migration and integration activities. Failure to reach these figures will result in no additional funds being due to Poland.

(...) if a Member State certifies an amount worth 10% of the allocation in 2024, it can receive an additional allocation, this is written in the regulation, but at the moment, given the delays we have had... The regulations were approved very late and we are afraid that, unfortunately, we will not be able to achieve this 10% allocation at FAMI, but we are accelerating very much now.

Source: in-depth interview with FAMI implementer.

It should be noted, however, and this also emerges from the above excerpt from the interview, that the issue of not reaching the threshold of 10% of expenditure certified by applications for payment is not due to the slowness of the institutions implementing the Polish FAMI, but to the relatively late adoption of the regulation at EC level and the necessity to create a new fund management system in Poland. Nevertheless, failure to reach this value will result in additional funds not being due to Poland.

Evaluation results according to criteria, questions and specific objectives

A. Suitability

1. To what extent is the Fund responsive to changing needs?

A diagnosis of the migration situation in Poland carried out for FAMI in 2021, found that there are unmet needs and challenges in the country to ensure an adequate system of functioning migration policy. Poland is currently a migration and emigration country, there are still noticeable groups emigrating from Poland, but the interest from newcomers is high enough to compensate for the population losses incurred in recent years². Given the recent events related to the migration and refugee crisis on Poland's border with Belarus, as well as the armed conflict in Ukraine, as a result of which Poland has received the largest number of war refugees and continues to receive them, the implementation of investments to ensure adequate migration procedures, infrastructure and services to handle TCN has become a priority. It is essential to ensure adequate skills, knowledge and competencies for the staff handling TCN.

The social profile of migrants in Poland has significantly evolved. While there are still migrants at the early stages of their journey, requiring what might be referred to as adaptation rather than integration, there are also those who arrived in the initial phase of 2014/15, when Poland was beginning to emerge as a destination country for migration. These people are already more or less around the point where they could apply for recognition as a citizen, so we have a whole cross-section, of course, with the dominant group of people who are in our country really as much as before the outbreak of the war in the twenty-second year and

² Migrants in Poland. Europolis. Warsaw, November 2022.

there the refugee group. Of course, that is the dominant one, while we also have earlier migrants and we also have later migrants, very recent arrivals to Poland.

Source: in-depth interview with FAMI implementer.

Responding to the needs and challenges of migration policy are the specific objectives of the FAMI Fund, i.e. 1) Common European Asylum System (CEAS), 2) Legal Migration and Integration, 3) Return, which are tailored to the needs of key institutions and the needs and problems faced by migrants. The activities under FAMI are a continuation of the interventions implemented in the 2014-2020 financial perspective, focusing mainly on the development of infrastructure for the handling of TCNs, the development of the ICT system, the development of the simplification and unification of the asylum system, the enhancement of the competences of staff in charge of migration, asylum and integration procedures, cooperation with other countries. A significant part of the Fund's financial allocation was provided for direct support to foreigners arriving in Poland, inter alia in the field of integration.

(...) we will allocate more resources to integration, because there are a lot of these people to integrate. What changes is the number of asylum seekers, the number of people to be integrated and the number of people returning. However, in the activities that we have inscribed - they do not change in principle, so the programme is flexible enough that we can implement these activities as needed.

Source: in-depth interview with FAMI implementer.

Possible undertakings to be implemented under particular specific objectives are the result of consultations with groups of stakeholders and are adapted to the priorities of migration policy in Poland. Partners at the level of preparatory works on the Programme included a wide range of entities, in particular competent public services and institutions at the central and voivodeship level. During the preparation of the Programme, proposals for activities, comments from non-governmental organisations were also requested.

The intervention designed under each of FAMI's specific objectives responds to current challenges and needs in the field. During the interviews conducted for the mid-term evaluation, no additional needs were identified that were not addressed by the Fund's scope of support.

2. To what extent can the Fund adapt to changing needs?

Assumptions concerning the scope of intervention of the Fund were developed in cooperation with institutions responsible for the implementation of migration policy in the country and cover a broad spectrum of activities in line with current challenges and needs. Interviews conducted for the evaluation study confirmed that the provisions of the programme are flexible enough to adapt the scope of undertakings to the needs arising from the current situation.

(...) as a general rule, the programme allows for the implementation of any action allowed by the fund, and the time and circumstances and needs are chosen at the moment we start implementing any action, (...) therefore we can put the emphasis where it is currently needed.

Source: in-depth interview with FAMI implementer.

In general, the problems to which the Fund responds remain the same and arise from the actual needs of providing asylum, migration and TCN integration, as well as related national and EU legislation and the need to adapt the Polish system to European systems.

B. Effectiveness

3. To what extent is the Fund on track to achieve its objectives?

The Asylum and Migration Fund 2021-2027 in Poland pursues three thematic objectives: 1) Specific Objective 1: **Common European Asylum System (CEAS)**; 2) Specific Objective 2: **Legal Migration and Integration**; 3) Specific Objective 3: **Return** (Specific Objective 4: Solidarity is not implemented in Poland and is therefore outside the scope of the study).

The individual thematic objectives implement actions to respond to emerging challenges in the areas that concern them and, in doing so, are also intended to contribute to the Fund's main objective and, inter alia, to increase the effectiveness of the management of migration flows; to implement, strengthen and develop a common asylum policy and a common immigration policy.

Given that the first call under FAMI was launched in autumn 2023, **the level of achievement of individual result and output indicators currently stands at 0. However**, in answering the research question posed above, **it is reasonable to analyse the logic of the support offered under FAMI 2021-2027 in** order to verify whether the actions assumed under the individual specific objectives enable the achievement of the objectives planned under them.

Within the framework of the three aforementioned thematic objectives, the implementation of activities was planned to contribute to the reduction of barriers identified in each area. **Supporting the capacity of the asylum system under FAMI** consisted of activities implemented under CS1. Thus, under CS1, the implementation of activities was planned to contribute to, inter alia:

- increasing the skills and qualifications of staff in the field of comprehensive TCN, intercultural communication, identification of vulnerable groups, country of origin information, anti-discrimination, increasing the employment of staff, including translators
- developing appropriate methods of identifying vulnerable groups and increasing access to tailored activities for TCN from vulnerable groups
- the development of appropriate methods of identifying minors and additional activities and resources tailored to the specific needs of unaccompanied minors
- further development of the Migration Analysis Centre
- improving reception conditions for TCNs by developing reception and asylum facilities
- improving the living conditions in the network of centres designated for TCN and ensuring the safety of their residents
- the provision of modern IT systems to improve the work of the services and the operation of the TCN
- increase cooperation with third countries in order to build their capacity for effective migration management in priority areas from the point of view of Poland

- operational support.

The support offered under CS1 has targeted a variety of areas. Firstly, the activities implemented under specific objective 1 **are intended to support staff working with refugees. Within the framework of CS1, support has therefore been targeted at increasing the competencies of staff working with TCNs** in terms of, inter alia, providing them with comprehensive services. In order to be able to provide a comprehensive service to refugees, it is reasonable to increase the skills of the staff working with them, e.g. in terms of intercultural communication, identification of vulnerable groups, information about their countries of origin, anti-discrimination. All of the above-mentioned activities can be implemented within the framework of CS1 FAMI 2021-2027. As part of increasing access to quality staff, it is also possible to recruit more, specialised staff, especially translators.

Secondly, the activities carried out under CS1 also aim to **support refugees in residence, including vulnerable persons**, by, inter alia, increasing access to services, infrastructure appropriately tailored to their individual needs. This measure makes it possible, among other things, to provide adequate medical care, psychological support for TCN, to adequately retrofit the premises with, among other things, a range of products for children and to adapt the infrastructure to the needs of people with disabilities. In addition to measures aimed at improving access to services and increasing access to quality infrastructure for people with special needs, it is also possible to implement capacity-building training for staff working with people with special needs. Activities implemented under CS1 are also intended to support unaccompanied refugee minors. Through the implementation of these activities it will be possible, on the one hand, to protect TCN children from violence and, on the other hand, awareness-raising activities for staff working with minors will be carried out. Support under CS1 is also aimed at improving the reception and living conditions of TCNs and thus contributes to their sense of security. Under this action, it is possible to provide, inter alia, material and non-material support to third-country applicants for international protection or those under temporary protection. It is also planned to expand the network of centres designated for TCNs by, inter alia, increasing the number of security personnel, renovation, maintenance and modernisation works, adapting the facilities to current legislation and retrofitting them. In addition, within CS1, it is planned to provide modern IT systems to improve the work of the services and the operation of the TCN. Thanks to the planned improvements, it will be possible to speed up the process of processing applications for international protection or to ensure the smooth issuing of certificates confirming temporary protection.

Within CS1, **activities are also planned to support the further development of the Migration Analytical Centre**, whose main task is to provide analyses, reports and statistics necessary, inter alia, for the implementation of the statutory tasks of the Head of the Office for Foreigners³. The activities planned in this aspect are to be particularly targeted at external users and their implementation is to, in particular, improve the quality of data, which will facilitate its use and enable research, analysis, providing expertise relevant to the asylum system. In addition, CS1 also plans to **increase the level of cooperation with third countries**, which is expected to contribute to increasing the effectiveness of migration management in priority areas from the point of view of the Republic. CS1 also assumes the

³ Office for Foreigners, Migration Analysis Centre No. 1/3-2017/BK-FAMI: <https://www.gov.pl/web/udsc/migracyjne-centrum-analityczne-nr-13-2017bk-fami> (accessed 07.03.2024).

implementation of operational support, the beneficiaries of which may include the Border Guard, Voivodeship Offices, the Office for Foreigners.

The analysis of the support logic therefore shows that the support offered under CS1 is comprehensive and extensive. The planned activities under the specific objective cover both refugees themselves and the staff working with them. In addition, activities aim to provide expertise, facilitate access to qualitative data, build international contacts to enable, among other things, more effective management of the migration system. CS1 also implements operational support, which provides funding for, inter alia, the Border Guard, UDSC and UW, thanks to which both the reception and asylum system and the technical capacities, competencies and qualifications of the Polish migration services will be strengthened. The implementation of activities supporting various areas will have a positive impact on the qualitative implementation of the objective set for CS1.

FAMI 2021-2027 Specific Objective 2 was to strengthen **and develop legal migration and promote effective integration**. Thus, under CS2, a number of activities were planned including:

- carrying out research and analysis as well as information campaigns
- strengthening and developing legal migration to Poland by facilitating smooth integration TCN by providing, inter alia, non-vocational training to increase employability, orientation courses, Polish language courses, assistance in finding accommodation
- building the capacity of migratory bodies through, among other things, the development of human capital, construction and development of national information systems, development of the functionality of the Migration Analysis Centre, development of capacities to collect, analyse and disseminate data on migration flows and procedures, monitoring and evaluation of the implementation of migration strategies, construction and development of tools to enable rapid response to changing statistical and analytical needs
- implementation of joint actions with selected third countries and support to third countries
- increasing the social integration and self-sufficiency of TCNs by, inter alia. Expanding integration infrastructure, creating a network of Centres for the Integration of Foreigners (CIC), training integration assistants, increasing the competence of foster care workers, providing counselling and assistance on issues of legalisation of stay, implementing educational measures for young people and adults, supporting self-empowerment and self-sufficiency, measures supporting the integration of children of TCNs, measures targeting students and graduates who are TCNs, measures targeting the host society (in the framework of the activities carried out, it is possible to include close relatives of persons covered by the above-mentioned integration measures, which further enhances their positive effect).
- operational support

Specific Objective No. 2 assumes both support for, inter alia, integration into the local community of persons from third countries residing in the territory of Poland and support for third countries and persons residing in their territories, but also supports, inter alia, conducting research and analysis covering the thematic scope of the Fund, or enhances the capacity of migration authorities to provide

quality services. CS2 beneficiaries can therefore carry out activities in a variety of areas, which can contribute to providing comprehensive support in the field of migration and integration.

Firstly, CS2 **supports the conduct of studies and research in the thematic area of the fund and additionally supports the implementation of information campaigns.** The information campaigns will be conducted in several languages and will serve, on the one hand, to disseminate knowledge about the rules of entry and stay and, on the other hand, to cover the issues of legal migration. Thus, the information activities carried out will be addressed both to migrants, but also to Polish services, e.g. employment services. The activities assumed under CS2 also focus on the development and improvement of systems and their digitisation. Thanks to their implementation, it will be possible, inter alia, to create modern helpline systems or consultation points for foreigners, and this **will increase the ability to provide quality services by migration authorities.** In this area, CS2 also assumes support for the staff working in migration authorities, e.g. enabling the delivery of training sessions, or developing the functionality of the Migration Analysis Centre, in order to better diagnose and forecast migration trends (a similar measure was assumed by CS1, however in its case it was focused on increasing the availability and quality of data and expertise processed by the MCA). CS2 also assumes the possibility of receiving **operational support**, the main beneficiaries of which may be the Ministry of Family and Social Policy, the Office for Foreigners and Provincial Offices.

CS2 also implies the **implementation of direct support to migrants.** Migration may take place for a variety of reasons including economic ones. CS2 therefore provides support for migrants who wish to take up legal employment in the Republic of Poland. Activities carried out in this aspect provide support for the recognition of diplomas and TCN qualifications obtained in countries of origin, on the other hand, they are aimed at developing resources for recruitment abroad, in line with the demand of the Polish labour market. CS2 also envisages the provision of training, courses to increase the employability of migrants. For effective integration, it is also important to bridge the language barrier among migrants, which can be achieved through the implementation of Polish language training courses funded by CS2 FAMI. CS2 also supports the social integration of migrants and their empowerment. In this aspect, hard activities are carried out, i.e. expansion of integration infrastructure, training activities for both migrants and the staff working with them, activities aimed at the host society, but also practical activities integrating migrants, e.g. through the creation of a network of Alien Integration Centres. The positive effect of integration measures will be able to be amplified and include a wider group of recipients, as it is possible to include close relatives of the persons included in the integration measures.

Specific objective 2 also implies **actions in favour of third countries.** In this aspect, joint actions with selected third countries may be implemented concerning, inter alia, analysis of migratory phenomena or support to third countries in legal migration and integration management.

The analysis of the support logic shows that the actions planned for implementation under specific objective 2 comprehensively cover all aspects worthy of support in order to be able to effectively strengthen and develop legal migration and promote effective integration. The support offered under CS2 is extensive, covering both the authorities acting for migrants and the migrants themselves as well as third countries. This planned logic of support will help to achieve the goal set for CS2. The largest number of activities are directed towards education (implementation of training, courses) and

integration (especially practical integration) of migrants, and the implementation of these activities is key to the objective set for CS2.

The activities carried out under CS 3 were intended to contribute to **the prevention of irregular migration and to promote and contribute to effective initial reintegration in third countries**. To this end, under CS 3 it is possible, inter alia:

- development and infrastructure for the stay of third-country nationals in border guard centres
- providing TCN with return counselling, medical, psychological, legal and language care, material support
- identification of vulnerable groups
- implementation of return operations, both voluntary and forced, including readmission
- training of staff in the smooth and efficient conduct of return operations
- expansion and improvement of border guard training facilities
- training for SG personnel
- creation and equipping of SG agglomeration facilities
- preparatory actions on return
- assisted voluntary return, family tracing and reintegration activities
- capacity-building in partner third countries in the field of return, readmission and reintegration of their own nationals, as well as detention and alternative measures
- information and promotion activities in third countries to raise awareness of legal migration channels and the risks of illegal migration
- conducting information campaigns to provide reliable and factual information on the risks of irregular migration and smuggling of migrants
- operational support.

Specific Objective No. 3, similarly to CS1 and CS2, assumes the implementation of a number of extended activities addressed to various groups of recipients. It assumes the implementation of both activities addressed to Polish services, i.e. border guards, information activities, as well as activities directly addressed to migrants and third countries, aiming in particular at increasing the effectiveness of return or reintegration operations.

Important from the point of view of counteracting irregular migration is the **support for relevant services, i.e. border guards**. As in the case of the other specific objectives, CS 3 assumes the implementation of operational support targeted mainly at border guards, through which it will be possible to strengthen operational, technical, competence and qualification capacities among Polish migration services. CS3 also assumes the implementation of staff training in, inter alia, efficient and effective conduct of return operations, or management and implementation of procedures. CS3 additionally assumes the expansion and improvement of the base of the Border Guard dedicated to conducting trainings. Infrastructural activities, i.e. creation and equipping of border guard posts, are also carried out.

Crucial from the point of view of both tackling irregular migration and reintegration in third countries is the **implementation of activities directly targeting migrants**. Under the specific objective, in this aspect, it is possible to implement return operations (voluntary and forced, including readmission),

assisted voluntary return activities (i.e. family tracing), or providing TCN with return counselling, medical, psychological, legal, linguistic and material support. Infrastructure activities are also carried out, i.e. the development of infrastructure for the stay of third-country nationals in border guard centres. Also important from the point of view of the CS3 objectives is the identification of vulnerable groups so that assistance adequate to their needs can be developed and provided. Such activities can also be implemented under CS3.

It is also crucial for the implementation of the objective under the specific objective No. 3 to **target third countries directly**. Possible actions to be carried out, in this respect, include, inter alia, capacity building in partner third countries in the field of organising return, readmission and reintegration of their own nationals and detention and alternative measures, cooperation with authorities and institutions in third countries to undertake return operations, both voluntary and enforced, or the implementation of actions in third countries aimed at providing adequate assistance to TCNs.

Under specific objective 3, **information activities** may also be **carried out**. Information activities may be carried out both in Poland, but more importantly in third countries. CS3 assumes carrying out campaigns providing information on threats related to irregular migration and smuggling of migrants, as well as information and promotion activities raising awareness on legal migration channels, especially directed to third countries.

The analysis of the support logic shows that the support available under specific objective no. 3 enables the implementation of a comprehensive and extensive support, contributing to the achievement of the CS3 objective. The support covers both key groups from the point of view of achieving the objective, i.e. third countries or migrants, but also Polish migration services, e.g. border guards. Activities carried out under CS3 both strengthen the capacities of the Polish migration services and increase the effectiveness of return or reintegration operations, as well as enhance the capacities in third countries in the area of return or help to provide assistance in their territories appropriate for TCN. Activities carried out under CS3 also provide, relevant to the stated objective, information on, inter alia, the risks of irregular migration and raise awareness of legal migration channels.

The analysis of the in-depth interviews conducted as part of the evaluation also shows that the scope of support offered under FAMI 2021-2027 enables beneficiaries to implement effective actions in the field of asylum, legal migration and integration and the return of third-country nationals to their homeland, which make up the implementation of the individual objectives set out in the Programme.

One of the beneficiaries, planning to implement support aimed at increasing the level of legal migration and integration, assessed that the activities planned by him fall within the scope of activities assumed under CS2 and thus he can implement them under FAMI 2021-2021. Thus, in the future he plans to implement effective support activities, especially for the integration of migrants, i.e. vocational training for TCNs, language courses for migrants, teaching also the professional language, he also plans to implement training for teaching staff in schools and public administration. Thus, within the framework of FAMI 2021-2027, it can undertake effective measures, which are in line with Specific Objective 2.

We actually rate quite highly how we can start to take action, thanks to this Programme.

Source: in-depth interview with a FAMI beneficiary.

However, the currently formulated support logic does not take into account the possibility of implementing a single project that would fit into more than one specific objective. The implementation of a larger project, combining several CS, was according to one beneficiary more convenient. Currently, it is only possible to split a larger project, which fits into the implementation of several CS, into smaller separate interventions. In contrast, in the previous perspective, a single project could consist of a budget allocated to more than one specific objective. However, beneficiaries are able to overcome this challenge by dividing a larger project into several smaller interventions.

The only thing that worries me personally, from a more practical point of view, is that it is currently not possible in the new perspective to implement a single project that relates to the two specific objectives of the Asylum, Migration and Integration Fund. Previously, this was possible. (...) However, at the moment it is not really possible, because one project can relate to one specific objective. So here, of course, we will have to adapt to this and perhaps simply divide such projects in half and implement them as separate interventions. That is the plan. But it would probably make it easier if we could actually implement both of these objectives in one project.

Source: in-depth interview with a FAMI beneficiary.

In summary, the actions envisaged for implementation, under the three specific objectives of FAMI 2021-2027, enable the achievement of the objectives set within the Programme. The analysis of the logic of FAMI 2021-2027 has shown that within the framework of the individual CS a number of comprehensive and extended activities have been assumed, covering various areas and groups of support recipients, which enables the achievement of the objectives set within the Programme. During the in-depth interviews, respondents emphasised that FAMI 2021-2027 enables them to implement effective actions in the field of asylum, legal migration and integration and return of third-country nationals to their homeland. The only difficulty identified by the evaluation is that in the current financial perspective, it is not possible to implement a single project falling under several specific objectives. However, this is not a difficult barrier to overcome. Beneficiaries are able to overcome this challenge by dividing a larger project, into several smaller interventions.

4. To what extent is the monitoring and evaluation system adequate to provide information on progress towards achieving the Fund's objectives?

The description of the management and control system drawn up for the Asylum and Migration Fund, the Internal Security Fund and the Financial Support Facility for Border Management and Visa Policy for the period 2021-2027 specifies that all information exchange between beneficiaries and the Managing Authorities of the Programmes shall take place through the **Central Telecommunication**

System – CST2021. ⁴CST2021 is a new system, a successor to the ICT system SL2014, which was not used in the management of FAMI in the previous financial perspective 2014-2020.

CST2021 is dedicated to two groups of users: the first group - **external users**, e.g. beneficiaries, applicants, advertisers or bidders; and the second group - **institutional users**, i.e. Implementing Authorities, Programme Managing and Intermediate Bodies, but also Audit Authorities, Co-ordination Bodies, etc.

The CST2021 includes several modules, among others, the **application "CST 2021 - Projects" European Social Fund Monitoring System "SM ESF"**, the **application "WOD2021 - Grant Application"**, **"SZT2021"**, i.e. **Identity Management System for CST2021**, **Competitiveness Database "BK2021"**, **"LSI"**, i.e. **Local Information System**, **CST 2021 Certification**, **e-Controls**, **"SR2021" Reporting System**, etc. Institutional users have rights to **all applications** included in CST2021. External users, on the other hand, have access to only **four of its modules**, i.e. the **application "CST 2021 - Projects" European Social Fund Monitoring System "SM ESF"**, the **application "WOD2021 - Grant Application"** and the **Competitiveness Database "BK2021"**.

The individual CST2021 modules that beneficiaries are given access to perform specific functions:

- **The application "CST 2021 - Projects"** enables the handling of the project settlement and control process in electronic form. It also provides the possibility of full communication between the beneficiary and the institution supervising the project implementation. This application is used to conclude subsidy agreements and annexes to agreements, and to submit payment applications.
- **The European Social Fund Monitoring System** is used to support the process of collecting and monitoring data of entities and participants receiving support under projects implemented with the European Social Fund Plus for the financial perspective 2021-2027. The main objectives of the ESF SM are: (1) monitoring of entities and participants receiving support under projects; (2) management of users involved in the implementation of projects; (3) communication and exchange of information.
- **The "WOD2021 - Grant Application" application** enables the preparation of a grant application template, the management of the call, the preparation and submission of the grant application, the registration of the assessment of the application documentation. In addition, it ensures automatic transfer of data from the grant application to the CST 2021 Projects.
- **The competitiveness database 'BK2021'** supports the implementation of the principle of competitiveness through the publication of an announcement as well as a search, within which bidders have the opportunity to ask questions, get answers from advertisers and also submit their offer.

In case of any problems with the operation of the CST2021 system, both the external user, i.e. e.g. the beneficiary, and the institutional user, i.e. e.g. the Managing Authority of a given Programme, have access to interactive educational materials for CST2021, created by the Ministry of Funds and Regional

⁴ Department of European Home Affairs Funds, Description of the Management and Control System of the Asylum, Migration and Integration Fund, Instrument for Financial Support for Border Management and Visa Policy, Internal Security Fund 2021-2027, September 2023, Warsaw.

Policy and published on the website: <https://instrukcje.cst2021.gov.pl/>. Instructions for the applications included in the CST2021, i.e. WOD2021 or BK2021, among others, are published on the quoted website. Additional system instructions for CST2021 are also published, inter alia, on the website of the Centre for EU Transport Projects: <https://www.cupt.gov.pl/strefa-beneficjenta/cst2021/>.

The logic of the new monitoring and evaluation system (CST2021) is therefore transparently presented to all interested parties, and information about it can be found, inter alia, on the gov.pl portal. In the event of any problems, beneficiaries or institutions involved in the coordination and monitoring of individual Programmes may use the Programme Manual for CST2021, which is available online. CST2021 also provides the possibility of performing all functions important for the monitoring and evaluation of individual Programmes, i.e. recording data on programmes along with the required dimensions, e.g. objectives, indicators, categories of regions, codes of intervention types; carrying out the procedure of selecting projects and their subsequent settlement; handling project controls; implementing certification processes, including the creation of applications for payment to the EC; it also provides the possibility of reporting.

The CST2021 system has been created as a result of the new requirements that the *Common Provisions Regulation*) has imposed on the Funds in the field of migration, border protection and security since the new Financial Perspective, i.e. it is **something completely new for both the institutions implementing FAMI and the beneficiaries of the Fund**. Thus, in order to be able to assess in more depth the appropriateness of the CST2021 system for providing information on progress towards the Fund's objectives, it is also important to know the perspective of those directly benefiting from the aforementioned system. **Thus, beneficiaries and institutions involved in the implementation, deployment, coordination of FAMI 2021-2027, during the in-depth interviews conducted as part of the evaluation, were asked whether the monitoring and evaluation system was, in their opinion, adequate.** The following conclusions can therefore be drawn from the analysis of the interviews.

During the interviews, respondents emphasised that the CST2021 system is more tailored to the needs of the Structural Funds, and they differ significantly in their specifics from FAMI 2021-2027. For example, the system dictionaries are strictly prepared for the Structural Funds. For this reason, it was necessary to adapt the reporting system to, among other things, adjust the project reporting requirements to the capabilities of the newly introduced system, and this operation was time-consuming. Training on the new system was necessary and, despite this, **its operation can still pose problems and difficulties**. In addition, the system is something new for both FAMI beneficiaries and the Managing Authority of the Fund. Thus, when beneficiaries report to the MA, they are often unable to obtain full information on the difficulties reported. Trainings on the operation of the CST2021 system were only conducted internally, **therefore it would be reasonable to realise trainings, which could respond to any arising difficulties with the operation of CST2021 e.g. by an external entity for beneficiaries or institutions implementing the Fund, which would express such a need.**

We all trained ourselves on the training version from the owner of the system, he did not train anyone, we only had a manual, so everyone went through the training version from the announcement of the call, submission of the application through the assessment and approval of the project, then there are the controls,

there is the reporting and all this awaits us, so the system is difficult and we have to cope with the problems we encounter there, the beneficiaries also have problems and they also ask us what to do, and we are not quite able to answer.

Source: in-depth interview with FAMI implementer.

The advantage of CST2021 is that it can be operated 24/7, which is why it was decided to use it. However, with the introduction of this system, control over what data has to be entered there has been lost, this is imposed top-down and follows the logic of the system. **The CST system is not ideally suited to the needs of FAMI**, it does not collect all the information needed, especially the important information from the point of view of working on this Fund. Among other things, it does not collect beneficiary billing data, it only collects information on certified expenditures, while it does not collect information on financial flows. It is a system tailored more for reporting than for working purposes. **For this reason, it was decided to operate, in addition to CST2021, a second internal system to ensure that the data needed to work on the Fund can be entered.**

As a result, we have a system that we cannot decide what goes into it, which was made for the Structural Funds, which have developed their way for decades and we have developed our way, and now we have to fit in somehow.

Source: in-depth interview with FAMI implementer.

Some **beneficiaries during the in-depth interviews indicated that the CST2021 system did not cause them any major problems.** The training on the use of CST2021 organised by the Ministry of Interior and Administration was enough for them to be able to currently use the new system without any problems. Respondents expressing such an opinion sometimes already used CST2021 for submitting applications, reporting on their projects under other funds. However, they also note that the CST system is not particularly tailored to the needs of security and migration funds, but this barrier did not cause them difficulties in preparing their grant application and submitting the relevant documents in the system. At this point in time, most beneficiaries have been able to use the CST2021 function allowing them only to submit a grant application, they do not yet know what the subsequent process will look like e.g. reporting on their projects, **so difficulties with operating the new system may only arise in the future.** Some of the beneficiaries in the interviews assessed their current experience with the new system, especially related to writing grant applications, as positive. They emphasise that, **thanks to CST2021, the application process is more digitised and requires less effort to prepare the documentation needed for submission.**

Our experience has been positive, the paperwork here is shorter, there is less paperwork, it is more digitised, but it is a new programme, we need to get to know it.

Source: in-depth interview with a FAMI beneficiary.

One of the beneficiaries during the in-depth interviews also stressed that the currently **more digitised reporting, application process associated with the introduction of the new system is a positive change, mainly because each person involved in reporting can have an overview of the whole process.** He stressed, however, that of course introducing a new solution, and including learning the new system, could take time and increased work.

(...) it is positive that it is (...) in one place, it is sent electronically. This seems to us to be a positive thing, although, of course, like every new thing, it required us to adapt, to work a little differently, but the fact that every person has access and can modify and introduce changes is a positive thing.

Source: in-depth interview with a FAMI beneficiary.

Also important from the point of view of **adequacy** of the monitoring and evaluation system is the **creation of an adequate and comprehensible system of indicators**, necessary for reporting the progress of work carried out under individual projects. At the stage of evaluation, the majority of beneficiaries interviewed in-depth within the framework of the evaluation **did not report any problems related to e.g. understanding the definitions of individual indicators, problems with measuring them or their adequacy**. Some of the beneficiaries even emphasised that the system of indicators is well prepared - the indicators are measurable and their definitions are understandable. However, the project work is currently at a preliminary stage, so the difficulty of reporting on some indicators may arise only later. On the other hand, the principles for measuring indicators are comprehensively and extensively described in the manual for the beneficiary (e.g. in subchapter 5.1.2. Principles concerning measurement of indicators in the project), and this may dispel any doubts that may arise in the future.

The beneficiaries mentioned only that it is worth focusing particular attention on the aspect of reporting the number of final project participants. Respondents to the interviews indicated that it is worth being vigilant in reporting this aspect, so that the main indicator showing the number of final beneficiaries is not inflated by the fact that a given person received several forms of support within one project, which may result in being counted several times as a participant in one project. Such an action may overestimate the value of the reported main indicator. The beneficiary's handbook emphasises this fact and states that *"If within one project the same person receives various forms of support, this person should be counted once in a given indicator. Thus, if a person receives several forms of support, he/she may be shown in several relevant sub-indicators, but in the main indicator he/she will be counted once"*⁵.

Sometimes it can be problematic that such a foreigner can only use the assistance provided by the Fund once. And here one simply has to be careful not to duplicate these people, right, so that these indicators are not inflated by the fact that some person participated several times in some activity or their various activities related to support. So I don't think we had any major difficulties in collecting some data for the purposes of reporting.

Source: in-depth interview with a FAMI beneficiary.

In summary, the new requirements of the EU's General Regulation resulted in the introduction of a new system for monitoring, reporting and evaluation - CST2021 - within the security and migration funds. During the ongoing evaluation phase, the system was mainly used for grant applications and learning how to use it, as it is a new system for both beneficiaries and FAMI implementing institutions. **The**

⁵ COPE MSWiA, Handbook for the Beneficiary of a project financed under the Asylum, Migration and Integration Fund for 2021 - 2027, February, 2024, Warsaw.

biggest shortcoming of CST2021, is that the system was introduced top-down and is not tailored to the needs of the Fund. Rather, the CST system is tailored to the needs of the Structural Funds. During the in-depth interviews, beneficiaries claimed that the introduction of CST2021 will bring positive changes mainly because the system enables the digitisation of the entire application process. Difficulties with the handling of the new system by beneficiaries may arise in the future when the impression of the Fund is more advanced. In addition, **no major problems were identified with the indicator system** during the evaluation. The system was assessed by the respondents of the in-depth interviews as correctly set up.

5. How is it ensured that relevant partners are involved at all stages of programming, implementation, monitoring and evaluation?

The programming phase fell between 2020 and 2022 and involved a **wide range of stakeholders**. In the initial stage of preparing the draft Programme, stakeholders responsible for migration-related issues, e.g. **public services and institutions at central and provincial level**, were involved.

Subsequently, **representatives of regional authorities, economic and social partners, entities representing civil society (associations and foundations), as well as universities and research organisations** were invited to consultations. The draft Programme was also consulted with **beneficiaries of the previous financial perspective**, including the Office for Foreigners, Border Guards, Ministry of Finance, Ministry of Justice, Voivodes, NGOs, intergovernmental and international organisations and others.

In an effort to remain **participatory**, the MA also published the draft Programme on the ministerial funds website, so that potential applicants could also refer to the draft FAMI Programme.

The final stages of the programming were **intra- and inter-ministerial consultations and the referral of the draft Programme to the Inter-Ministerial Team for European Home Affairs Funds for approval**.

A joint **Monitoring Committee for the FAMI, MA and FBW 2021-2027 funds** has been established, which will ensure complementarity between the different funding mechanisms. The Committee is tasked with supporting MA at every stage, from programming, implementation, monitoring to evaluation. Representatives of interested third sector organisations have also been invited to participate in the work of the Monitoring Committee, so that the partnership principle can be effectively implemented. An invitation to nominate representatives to become members of the Monitoring Committee was received from: - Joint Government and Local Government Commission, Social Dialogue Council, Council for Public Benefit Activity, or international organisations - IOM Warsaw Office, UNHCR - Representation in Poland, Government Plenipotentiary for Disabled Persons' Affairs, Government Plenipotentiary for Equal Treatment, Conference of Rectors of Academic Schools in Poland, Central Council of Research Institutes.

By the time of the survey (February 2024), the Monitoring Committee had met twice, allowing it to adopt the Committee's rules of procedure and select the methodology and criteria for project selection. The work of the Committee was assessed positively in the qualitative study.

At the initial stage of implementation (February 2024), as indicated in the qualitative study, **a meeting was organised involving voivodship marshals, representatives of regional social assistance centres and voivodship labour offices to discuss the recruitment guidelines for the creation of Centres for the Integration of Foreigners (CICs) in the regions.** It is important that the various actors involved or potentially involved in the implementation of the projects are in contact and informed about, among other things, the guidelines for obtaining support. The implementation system of CIC in the provinces is based on the involvement of the regional social assistance centres or the provincial labour offices. There is no top-down decision of the MA on this issue, the choice belongs to the marshal office of each voivodship, which gives the possibility of handing over the CIC implementation system to an entity with greater capacity, experience. The MA has an important advisory role for the beneficiaries at the stage of submitting grant applications, the IB stays in touch with the beneficiaries throughout the whole project duration supporting them in case of problems, collecting information on progress and dealing with project settlements.

Effective management of European funds requires experience, appropriate involvement of human resources and definition of procedures. Taking into account the experience of the 2014-2020 financial perspective, the **MA has delegated part of the tasks to COPE** which has the corresponding experience in: assessing applications, concluding agreements with beneficiaries, supervising the implementation of projects co-financed with external funds, clearing and monitoring/controlling and recovering amounts irregularly paid.

6. To what extent are horizontal principles respected and promoted within the Fund?

Beneficiaries of the Asylum, Migration and Integration Fund 2021-2027 are required in their projects to comply with the so-called horizontal principles in the following three areas:

1. **sustainable development** (activities should protect the environment and biodiversity),
2. **equal opportunities and non-discrimination** (actions assume equality of all social groups, i.e. ethnic, national, religious or persons with disabilities),
3. **gender equality** (activities assume equal access and development opportunities for women and men).

FAMI beneficiaries emphasise that the projects they undertake in the framework of the funded projects are neutral or in line with the above principles. The lack of positive impact on the **sustainability principle** is due to the low contact with the ecosphere and natural diversity, according to the interviewees. However, they are unanimous in pointing out that they try to ensure that the renovations they carry out in the institutions do not have a negative impact on the environment, and therefore follow the principles of waste segregation and disposal. The conservation and renovation works are also aimed at adapting the facilities to the needs of people with disabilities, i.e., removing architectural barriers (including the addition of lifts to the buildings) and marking them appropriately (e.g. with Braille monitors), which is in line with the policy related to **equal opportunities and non-discrimination**. In addition, an important point implementing the principle of equal opportunities is the establishment in many regions of Foreigners' Integration Centres, i.e. places for adaptation, activation and providing foreigners with information on current trainings and courses. The interlocutors

also point out that the training courses and calls for applications are addressed equally to women and men, which fulfils the principle of **gender equality**.

7. To what extent does the Fund contribute to the communication and dissemination of opportunities and achievements?

Applicants agree that they do not find it difficult to obtain information about current calls for proposals. The Ministry's websites, which contain announcements about the possibility of obtaining subsidies, are clear and understandable. An additional advantage is that the Ministry of the Interior and Administration sends letters (written information) to individual beneficiaries with an invitation to participate in a dedicated (non-competitive) call for proposals.

On the other hand, the information and promotion activities carried out in the projects must, as pointed out by the interviewees, comply with the guidelines recorded in the 'Handbook for the Beneficiary of a project financed under the Asylum, Migration and Integration Fund for 2021-2027'. In this document, beneficiaries are obliged to place information boards at the project site or posters/electronic displays informing about the activities undertaken (samples of boards and posters are included in the aforementioned manual). In addition, beneficiaries are obliged to appropriately mark with stickers the equipment, means of transport, etc., which were purchased under the Asylum, Migration and Integration Fund. FAMI funds may also be allocated by applicants for the procurement and financing of the following items:

- press articles,
- films,
- publications, brochures, leaflets, stands,
- conference/workshop materials,
- invitations/programmes/agendas for meetings/conferences organised by the Beneficiary,
- attendance lists,
- certificates/diplomas confirming completion of the training/course,
- presentations prepared for the meetings,
- promotional material (pens, pads of paper, etc.)

As the implementation of the projects has not yet started, the evaluation was based on the experience of previous years. The communication and visibility rules described in the handbook did not cause problems for respondents in the previous perspective (2014-2020). The beneficiaries are experienced in information and promotion issues, which is a good prognosis for the projects carried out under FAMI 2021-2027. They know, how to describe information boards, what to include on posters and how to properly label purchased materials and equipment. In addition to the activities mentioned above, they are constantly active on social media, where they post information about their activities. Thus, it can be assumed that the promotional aspect will not be an obscure and difficult issue for them once the implementation of the projects starts.

C. Performance

8. To what extent does the Fund support cost-effective measures?

Cost-effectiveness is one of the **basic elements of assessing the eligibility of expenditure** under the Programme and is listed in the 'Beneficiary Handbook' alongside conditions such as being in line with the objectives of the fund or the necessity of the expenditure to implement the activities. This makes potential beneficiaries aware of the importance of cost-effectiveness from the outset.

The cost-effectiveness of each funding application is assessed by two experts. In the case of a non-competitive selection procedure (monopolists in certain fields of activity such as UdSC or border trażc) where the experts are unsure of the reasonableness of the costs or their magnitude, **these issues are refined with the applicant until satisfactory cost-effectiveness is obtained.**

The aforementioned manual for beneficiaries also informs potential beneficiaries that it is not possible to settle costs related to transport, travel and subsistence which exceed the rates specified in the regulation of the Minister of Labour and Social Policy of 29 January 2013 on receivables to which an employee employed in a state or local government unit of the budgetary sphere is entitled on account of business travel (Journal of Laws of 2013, item 167, as amended). This makes potential beneficiaries obliged to follow certain maximum rates and avoids cost increases in projects.

The regulations of individual calls for proposals contain **provisions aiming at ensuring cost-effectiveness**, e.g. the provision in the regulations of call for proposals FAMI.02.01-IZ.00-001/23 concerning specific objective 2 - Legal migration and integration. The call is by definition for projects in which assistance is targeted at third-country nationals. However, the refurbishment of premises or buildings that will also benefit EU citizens is allowed, with the proviso that all funding in this case does not come from FAMI. Such a condition implies that the fund will finance such actions only in a proportion that corresponds to the convergence of with the objectives of FAMI, which may translate into greater cost-effectiveness.

State budget units are obliged to prepare quarterly reserve and budget reports for the Ministry of Finance. Such frequent reporting of the budget allows for constant monitoring of expenditures and, if necessary, **quick reactions in case of cost-effectiveness problems.**

The qualitative research shows that quarterly reporting is a labour-intensive activity for some state budget units, involving, among other things, the reporting of personnel expenses, which are variable. This task, as highlighted in the qualitative study, does not pose substantive difficulties, but is time-burdening.

9. To what extent is the Fund's management and control system efficient?

Article 71(1) of Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Fair Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and the financial rules for these Funds and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Financial Support Facility for Border Management and Visa Policy (OJ.L 231, 30.6.2021, pp. 159-706) (hereinafter: General Regulation) requires Poland to fulfil the management, control and audit requirements of the Funds.

The aforementioned regulation defines the institutions that should operate in the national management, control and audit system for the Asylum, Migration and Integration Fund (FAMI), the Internal Security Fund (ISF) and the Financial Support Facility for Border Management and Visa Policy (FGV). They are:

- Managing Authority (Article 71(1) of the General Regulation);
- Audit Authority being a public authority (Article 71(2) of the General Regulation);
- Intermediate Body designated by the Managing Authority (Article 71(3) of the General Regulation);
- Monitoring Committee for the implementation of the programmes (Article 38(1) of the General Regulation);
- FAMI Funds Officer, IZGW and FBW for monitoring the fulfilment of the horizontal basic conditions listed in Annex III of the General Regulation.

On the basis of Resolution No. 126/2022 of the Council of Ministers of 7 June 2022 on the designation of the competent authorities operating within the management and control system of the Asylum, Migration and Integration Fund, the Internal Security Fund and the Financial Support Facility for Border Management and Visa Policy under the Integrated Border Management Fund for 2021-2027, the Department of European Funds of the Ministry of Interior and Administration (DFE) was appointed as the **Managing Authority (MA)**.

The DFE is an organisational unit of the Ministry of the Interior and Administration. The DFE, as MA, is responsible for all issues related to the management of FAMI. The Managing Authority (with the support of the Intermediate Body) is at the same time the Body which performs the tasks of expenditure accounting.

The Intermediate Body (IP) was the European Project Service Centre of the Ministry of Interior and Administration (COPE MSWiA).

The Audit Institution for FAMI is the Head of the National Fiscal Administration. The tasks of the Audit Institution are carried out through the Department of Audit of Public Funds of the Ministry of Finance and the 16 Chambers of Fiscal Administration.

There is also an important role in the management and control system:

- **Monitoring Committee**, established by Order No. 4 of the Minister of Interior and Administration of 3 March 2023 on the establishment of the Monitoring Committee for European Funds for Migration, Borders and Security 2021-2027,

- **Plenipotentiary of the Minister of the Interior and Administration for European Funds for Migration, Borders and Security at the Ministry of the Interior and Administration** (Order No. 33 of the Minister of the Interior and Administration of 13 December 2022).

This structure of the management and control system ensures that the **principle of separation of functions** between and within the programme institutions is respected.

In the document *Description of the management and control system. Asylum, Migration and Integration Fund. Financial Support Facility for Border Management and Visa Policy. Internal Security Fund 2021-2027*⁶ details the organisation and procedures for the functions and tasks of the various institutions, as well as a description of the electronic system, the Central Information and Communication System (CST2021).

The organisational structure of the Programme management and control system is **clear to the beneficiaries**. They are aware of the rules of application, implementation of support as well as the institutions of the Programme. In none of the interviews was there a negative opinion regarding these aspects of the management and control system.

When assessing the efficiency of the FAMI management and control system, an important element is the implementation of information and publicity activities. From the perspective of FAMI beneficiaries, the system is effective in this respect. Information on planned calls is provided sufficiently in advance and is formulated in a way that does not raise any major questions:

The information [is] very clear, it arrives - it seems to me, at least we have such a good experience, we are always very quickly (...) informed.

Source: in-depth interview with FAMI beneficiary

This is due to the experience of cooperation in the previous perspective, during which the beneficiaries had the opportunity to get to know the institution itself as well as individual staff members. They also learnt the paths of contact for specific issues. Also important are the solutions applied and improved over time in terms of the means and channels of communication used, such as the well-thought-out architecture of the COPE website:

*We follow the Ministry's website and the Project Service Centre and information about calls for proposals appears (...). There are no problems here.
(IDI - FAMI beneficiaries)*

Beneficiaries also emphasise that, in the case of a closed call, they additionally receive written information - in time to prepare their application.

In addition, as noted by the respondents, COPE also supports them when questions arise regarding, for example, the provisions of the competition documentation. Beneficiaries willingly contact COPE staff to obtain information or advice or to dispel doubts that arose at the project preparation stage:

Any concerns, questions or problems, were dealt with in real time, we were never left on our own and we were always supported and felt looked after.

Source: in-depth interview with FAMI beneficiary

⁶ <https://www.gov.pl/attachment/934471bc-c1f5-42dd-8f4d-a7e389c6ad53> (dostęp: 26.02.2024 r.).

It must therefore be considered that FAMI beneficiaries are well informed and have support from the IP at the application stage.

While the information and publicity system, as well as the cooperation with the IB, are clearly rated positively, another element of the Programme's management and control system, i.e. the IT solutions used in the Programme, already has much more mixed assessments.

For the implementation of the Structural Funds in Poland in the financial perspective 2021-2027, the ICT system CST 2021 is used, which includes several applications (including WOD2021, SL2021, SM ESF and BK2021)⁷.

FAMI beneficiaries have so far had the opportunity to use the system mainly for preparing applications and applying for funds. They evaluate the application procedure through CST 2021 - WOD2021 positively. At the same time, however, they are concerned about how reporting during the implementation phase will function:

Our experience has been positive, the paperwork here is shorter, there is less paperwork, it is more digitised, but it is a new programme, we need to get to know it. The nature of our projects (...) is specific and let's hope that the system can handle (...) and everything will be fine.

Source: in-depth interview with FAMI beneficiary

Any concerns are mainly due to unfamiliarity with the system. Beneficiaries expect difficulties in use, the need to recognise new functionalities, etc.

One of the problems, according to the beneficiaries, may be the lack of appropriate solutions for entering data into the SL2021 application in the case of projects that are partly implemented by subordinate units. Due to the lack of possibility to enter data on activities implemented by these units directly into the system (application), it is necessary to develop other ways of reporting:

We intend to do it in such a way that [subordinate units] (...) will report to us on paper and we will merge, verify and translate it into the system afterwards.

Source: in-depth interview with FAMI beneficiary

Such a solution reduces the efficiency of the system and generates additional administrative burdens on the part of beneficiaries, who emphasise that they will have to do the work of documenting project expenditure twice, so to speak.

A certain threat to the efficiency of the management and control system may be insufficient staff capacity, especially in the current - initial - implementation phase. As the respondent - a representative of the FAMI implementer - points out:

This is our problem, because at the moment, the team for managing the three new funds, and we are still finishing the ones from the previous perspective, is the same. Someone was employed, and someone unfortunately left afterwards, so these staff resources were quite small, (...) when we started working on the new funds, 3, 4 years ago, we were already signalling that there were not enough of

⁷ <https://www.gov.pl/web/popcwsparcie/system-teleinformatyczny-w-perspektywie-finansowej-2021-2027-w-ramach-obsługi-funduszu-europejskiego-na-rozwoj-cyfrowy-2021-2027-ferc> (accessed 27.02.2024).

us. It is going to take a lot of work to create new records, new funds, but it is only recently that we have been able to hire a few more people for these activities.

Source: in-depth interview with FAMI implementer

The assessment of the management and control system from the side of the FAMI beneficiaries is positive, the system is efficient, but there are elements that reduce its efficiency. Among these, the most important are the ICT solutions provided for use during the project implementation phase. At the same time, it should be emphasised that the FAMI Programme was approved on 12 December 2022, as a result of which there is currently no information on the progress in achieving the objectives of the Programme, so it is not possible to assess the degree of achievement of the assumed indicators, as well as other factors determining the efficiency of the management and control system, such as the speed of signing grant agreements and, subsequently, of verifying and settling payment claims.

10. To what extent is there scope for further simplification in the implementation of the Fund? In what way?

Further simplification in the implementation of the Fund may concern several aspects:

- 1) quarterly reporting by state budget entities - the preparation of such quarterly accounts is time-consuming for these entities, so it is worth considering possible simplification of this process (reducing the scope of data provided to the necessary minimum) or its automation;
- 2) Functionalities of CST 2021 on the side of implementers (IPs) - IP representatives point to insufficient information collected by the CST:

The system (...) does not collect all the data we need to work. Therefore, instead of having a communication channel and one system, a communication channel with the beneficiaries (...) as we have had until now, we will now have two IT systems. We are just setting up a local IT system to collect the information we need that is not in the CST.

Source: in-depth interview with FAMI implementer

In this context, simplification would consist in extending the CST system with a module that would allow the collection of all the information necessary for the MA/IP to efficiently implement the fund.

The implementers (representatives of I Z/IP) also see other possibilities for further simplification of certain mechanisms, improving the efficiency of the project implementation process on the part of the beneficiaries. Among the proposals is the adoption of a simplified method of accounting for projects:

We have been consulting with each other in recent months on the possibility of using a simplified accounting method introduced by Organisation for Migration, as such a method has become available.

Source: in-depth interview with FAMI implementer

Both beneficiaries and MA/IP representatives stress that more precise proposals for possible simplifications will be possible to indicate at a later stage of the Fund's implementation, i.e. implementation and reporting of projects of the current financial perspective.

D. Coherence

11. To what extent is the Fund coherent with initiatives supported in its policy area (asylum, migration and integration), in particular under the Thematic Instrument, using different implementation modalities.

Coherence with the FAMI intervention is demonstrated by initiatives funded by the **Norwegian Financial Mechanism 2014-2021** under the Programme "Home Affairs" for thematic area No. 18 "Asylum and Migration". The implementation period of some of the projects was 2021-2024. The objective of the Programme was to support the functioning of national asylum and migration management systems and to ensure the right to seek asylum, inter alia by:

- support for national asylum and migration management systems, including voluntary return;
- services to support asylum seekers in exercising their fundamental rights (psychological and legal assistance, provision of comprehensive information to migrants and asylum seekers);
- activities in the area of voluntary return, including in particular training courses, workshops for officers and for staff in direct contact with migrants;
- assistance to unaccompanied minors and other groups with special needs.

Among others, the Programme has implemented the project "Protecting children, including unaccompanied asylum-seeking children", implemented by the Office for Foreigners from 2021 to 2023⁸. In addition, the project "Enhancing the effectiveness of voluntary return activities" will be implemented until the end of April 2024, led by the International Organisation for Migration, with the Border Guard Headquarters and the Office for Foreigners as partners⁹. These projects are **consistent with the objectives and activities of FAMI**, primarily in terms of **improving the efficiency and quality of the migration and asylum management system**.

FAMI gives us the opportunity to provide training on the topic of return, the Norwegian Financial Mechanism has also given us the opportunity to offer training on controlling the legality of stay, controlling the legality of employment, this is a very broad area and there is a great need on our part to train people on this topic.

Source: in-depth interview with a FAMI beneficiary.

It is to be expected that projects implemented under FAMI **will also be coherent with activities financed from the next edition of the NMF**, which will be launched in 2024. These activities will concern trainings, workshops and study visits on migration. In addition, projects implemented under FAMI will be consistent with activities resulting from grant agreements with Frontex.

FAMI-funded activities under the Country Programme are also potentially coherent with those implemented under the Union Actions (*union actions*) **Thematic Instrument**, i.e. an additional envelope allocated by the European Commission, to fund projects aimed at supporting transnational actions in the field of asylum, migration and integration. The 2023 Call for Proposals for the funding of

⁸ ['We protect children, including unaccompanied asylum-seeking children' project](#), (accessed 11.03.2024).

⁹ [Increasing the effectiveness of voluntary return activities NMF/PA18/015 - Office for Foreigners - Gov.pl Portal \(www.gov.pl\)](#), (accessed 11.03.2024).

projects to support transnational actions in the field of asylum, migration and integration (AMIF-2023-TF2-AG-CALL) was announced and carried out, where funding could be sought for actions covering 6 thematic areas:

- Promoting social sponsorship programmes for the integration of people in need of protection;
- Integration and inclusion at regional and local level;
- Supporting integration in the education of children and young people;
- Multilateral initiatives to integrate migrants into the labour market;
- Promoting complementary work-related pathways;
- Supranational action to support Member States in protecting migrant children.

The call resulted in the co-financing of several projects in which Polish institutions and organisations were partners. These projects are consistent with the directions of FAMI's support in the field of migration management and integration of foreigners.

Within the area of Integration and Inclusion at regional and local level, the project 'Consolidating, innovating and disseminating effective integration practices in Europe', led by the Eurocities network and with the Municipality of Lublin as one of the partners, received funding. The project is about supporting local authorities to increase the effectiveness of their integration strategies for migrants and refugees through three thematic areas of cooperation, covering early integration measures in the labour market, local housing support instruments to help refugees and other newcomers to become independent, and One Stop Shops¹⁰.

Within the area of Supporting Integration in the Education of Children and Young People, funding was awarded to the project 'ACT and connect for Integration: language learning & cultural awareness', whose partners are Jagiellonian University and the Mikołaj Rej Foundation for the Support of Polish Culture and Language. The project aims to support and strengthen the integration and inclusion of children and young people from migrant backgrounds in the education system of host countries by bringing together expertise from seven European countries, and by consolidating links between universities and NGOs involved in activities concerning migration and education.

On the other hand, under the area Transnational actions to support Member States in the protection of migrant children, funding was awarded to the project 'Empowering guardianship systems to improve the guidance of UAC', of which the Association for Legal Intervention is a partner. The project responds to the need to strengthen the support offered to guardians of unaccompanied migrant children in Greece, Italy, Poland, Cyprus, Croatia and Belgium. The improvement of care systems will be achieved through transnational exchange of experiences, mutual learning and through targeted knowledge transfer from the Netherlands.

In addition, under the Thematic Instrument, Polish institutions were also granted funds under the so-called specific actions. Support was granted to two projects - 'Together to Independence' and 'Improving reception conditions for applicants for international protection in Poland'. The first concerns support for Ukrainian nationals to live independently in Poland for an average of 9 months, develop

¹⁰ [Funding & tenders \(europa.eu\)](https://europa.eu), (accessed 12.03.2024).

greater personal resourcefulness and restore their independence, including by eliminating language barriers. The second aims to modernize and equip centres for foreigners. Both projects are in line with the objectives of FAMI and will be included in the National Programme after final approval.

Activities coherent with the FAMI Intervention are also **undertakings carried out in cooperation of Polish services managing migration and asylum with Third Countries**, within the framework of which the Polish side transfers to its partners its knowledge and experience through study visits, joint trainings and conferences organised with representatives of services responsible for border protection and migration management. This type of cooperation is carried out, among others, with representatives of the services of Ukraine, Iraq or Vietnam. In addition, the Office for Foreigners carries out projects concerning the exchange of experiences within the European Migration Network (e.g. on the procedure for admitting refugees, on detention in the broad sense of the term, on the functioning of information systems or on the inclusion of refugee children into the education system).

In addition, one should point out the coherence of FAMI with **activities financed from the state budget** and implemented under the statutory obligation by the Border Guard (preventing and counteracting illegal migration by, inter alia, controlling the legality of stay and employment and identifying, analysing and combating migration threats, including crime related to illegal migration, assisting voluntary return and organising forced return), Provincial Offices (issuing decisions on the legality of stay), the Office for Foreigners (issuing decisions on the legality of stay), the Office for Foreigners (issuing decisions on the legality of stay), the Office for Foreigners (issuing decisions on the legality of stay) and the Office for Foreigners (issuing decisions on the legality of stay). Foreigners (granting and depriving foreigners of international protection, asylum and temporary protection, processing appeals in cases of legalisation of stay and obligation to return, maintaining information systems on migration) and State Labour Inspectorate (inspections and preventive actions on the legality of employment). In addition, support for refugees from Ukraine who entered Poland after 24 February 2022 is financed by the **Assistance Fund for War Refugees from Ukraine**, established under the Law of 12 March 2022 on Assistance to Ukrainian Citizens in Connection with the Armed Conflict on the Territory of Ukraine. The Fund finances, among other things, the provision of reception facilities, the payment of family, upbringing and social assistance benefits to refugees from Ukraine, medical care and support to local government units in the field of education. Part of the resources available to the Fund have been transferred by the EC under the so-called **FAMI emergency assistance** - in 2022, some EUR 68 million have been allocated to Poland under these measures (in addition to which additional support of over EUR 76 million has been transferred under the IZGW)¹¹. The estimated value of funds necessary to cover the expenses related to benefits for refugees from Ukraine in the first half of 2024 is over PLN 6 billion¹².

As far as integration measures are concerned, foreigners who have been granted refugee status or subsidiary protection in Poland may benefit from assistance provided for a period of up to 12 months under the so-called **individual integration programme (IPI)**. Assistance under the IPI is granted on the basis of an application submitted to a starosta via a Poviats Family Assistance Centre. In addition, support for foreigners is provided in two **Foreigners' Integration Centres**, which were established under the

¹¹ [Almost PLN 700 million from the EU to support refugees from Ukraine - Ministry of Interior and Administration - Gov.pl Portal \(www.gov.pl\)](#), (accessed 12.03.2024).

¹² [Assistance Fund for War Refugees from Ukraine](#) (accessed 20.03.2024).

project "Building structures for integration of foreigners in Poland - Stage II - Piloting of Foreigners' Integration Centres", financed from FAMI 2014-2020 funds. Integration activities carried out in the Centres are addressed to third-country nationals with regard to integration into Polish society, inter alia through labour market advice, learning the Polish language, cultural assistance and specialist advice (e.g. legal, psychological)¹³. Support for further development of the network of Centres for Integration of Foreigners throughout Poland is foreseen under FAMI 2021-2027.

In addition, additional funds supporting the Polish services responsible for migration management are also made available under the **Programme for Modernisation of the Police, Border Guard, State Fire Service and State Protection Service in 2022-2025** (inter alia, expenditure on equipment and personal accessories for officers, construction investments, strengthening of the full-time staff of uniformed services, strengthening of the motivational system of officers' emoluments).

12. To what extent is the Fund coherent with other EU funding sources (including other home affairs funds) and in particular with EU external action?

The FAMI Programme assumed that activities would be consistent with those undertaken under the Cohesion Policy, including in particular the European Social Fund+. It was assumed that ESF+ would complement FAMI through actions targeting the integration (including in the labour market) and employment of TCNs and support for TCN children immediately upon their arrival. For ERDF, on the other hand, it was planned that the fund would complement FAMI's activities, e.g. by providing support for (temporary) reception infrastructure, social housing or social infrastructure for migrants, refugees and persons receiving or applying for international protection. Complementarity was assumed to occur in particular between ESF+ activities and CS2 Legal Migration and Integration implemented under FAMI.

The analysis of the documents¹⁴ of the national and regional programmes co-financed by ESF+ and ERDF shows that the assumptions on complementarity between FAMI and the Cohesion Funds are reflected in the implementation of both interventions. FAMI activities are coherent with Priority Objective 4 of the Partnership Agreement, i.e. Europe with a stronger social dimension¹⁵. The strongest link was identified with CP4.I Supporting socio-economic integration of third-country nationals, including migrants. Under CP4.I at the national level, it was assumed to develop a standard of service for foreigners by public employment services, as well as to implement tools providing comprehensive information on the principles of employment and work in Poland¹⁶. In turn, at the

¹³ [FAMI - Ministry of Family, Labour and Social Policy - Gov.pl Portal \(www.gov.pl\)](https://www.gov.pl), (accessed 07.03.2024).

¹⁴ RACCOON, FE, FERS.

¹⁵ Partnership Agreement for the implementation of the cohesion policy 2021-2027 in Poland, Warsaw, 30 June 2022

¹⁶ Activities will be implemented under FERS. The first calls for proposals for the development of a system for the service of foreigners by public employment services and for supporting labour migration management processes are scheduled for June 2024.

regional level, the scope of activities under CP4.I varies. Intervention under CP4.I will be/is being implemented under 15 regional programmes¹⁷.

In its basic scope, support under CP4.I is directed towards social and professional integration, which includes mainly: counselling, guidance, mentoring; vocational training; training for employers; Polish language courses (including specialised ones); civic, legal, psychological, anti-discrimination counselling; integration activities for third-country nationals and the host society; cultural assistance in contacts with institutions; support for the development of persons working with third-country nationals, as well as institutional capacity building and strengthening of inter-institutional cooperation for TCN. In this area, interventions at regional level complement FAMI's CS2 with a component related to professional integration.

In most regions, the establishment/support for the operation of Centres for the Integration of Foreigners (CICs) and support in finding housing was also planned. The concept and piloting of CICs were developed within the framework of two projects: "Building structures for the integration of foreigners in Poland" and "Building structures for the integration of foreigners in Poland - stage II - piloting of the Centres for the Integration of Foreigners" co-financed with the funds of PK FAMI 2014-2020¹⁸. Currently, CICs are co-financed with EU funds at the regional level, so the coherence between FAMI and FE for 2021-2027 has been preserved. It is worth mentioning that within the framework of FAMI implemented in the financial perspective 2021-2027 at the national level, trainings for NGO staff related to CICs are planned¹⁹. Outreach activities targeting NGOs are also planned, which will then reach the final recipients of the CIC. From the national level, i.e. within the framework of FAMI, there are also information and promotion activities on CIC addressed to the provincial marshals. There are also plans to launch a competition for the creation and operation of CICs, which will be co-financed from the FAMI budget.

On a slightly broader level, CP4.I also offers social services for people with special needs and their families, in particular supported housing e.g. in the European Funds for Lower Silesia (FEDS), European Funds for Opole (FEOP) programme. In this way, EU support at the regional level complements the FAMI measures, which do not provide services in the form of supported housing or social housing. The issue of housing services for TCN is developed later in this chapter, as these services are also co-financed from other priority objectives. In addition, some regions organise work placements for TCN, especially for refugees e.g. under FEDS, European Funds for Podkarpackie (FEPK), or support for diploma nostrification and confirmation of qualifications and skills e.g. under FEDS, FEOP, European Funds for Western Pomerania (FEPZ). In some regional programmes, e.g. FEOP, FEPK, European Funds for Kuyavia and Pomerania (FEKP), European Funds for Lubuskie (FELU), comprehensive support for families is also planned, e.g. extracurricular activities for children; funding

¹⁷ With the exception of the programme European Funds for Podlaskie 2021-2027, where measures for the social integration of third-country nationals are implemented under CP4.H - Supporting active social inclusion to promote equal opportunities, non-discrimination and active participation, and to enhance employability, in particular of disadvantaged groups.

¹⁸ The projects were implemented by the Ministry of Family and Social Policy in partnership with local governments of the Opolskie and Wielkopolskie Voivodeships. Based on the "Guidelines for the establishment of Foreigners' Integration Centres.

¹⁹ Based on IDI.

of access to recreation and leisure facilities; summer and summer camps for children; psychological support; remedial classes at schools; and adaptation of the educational system and pre-school education centres to the needs of children from third-country nationals' families.

Attention should also be paid to other ESF+ CPs that are coherent with CS2 FAMI i.e. CP4.E²⁰, CP4.F²¹, CP4.K²². Some of the actions planned under the above CPs do not target only migrants but include this group within broader actions e.g. targeting children with special needs.

Under CP4.E in the European Funds for Social Development (FERS) programme, educational activities are planned for staff of the education system and TSUs, e.g. on up-to-date knowledge of learning and teaching processes (including children and young people with migrant experience) and Polish language courses for teachers from Ukraine. Similar activities are also planned within the framework of the FELU, i.e. raising the competence of vocational and educational counsellors to work with children whose parents are migrants. It is worth noting that support for educational staff supporting the integration process of third-country nationals can also be implemented within the framework of FAMI, so there is potential for these activities to strengthen their effects and lead to synergies.

An element of the intervention implementing CP4.F at the national level (FERS) will be activities for psychological-educational counselling centres, i.e. training and support in working with children and their parents and other adults arriving from Ukraine, support for people with migration and refugee experience, support for learning the Ukrainian language and the creation of experience exchange groups between psychological-educational counselling centres, schools, Polish and Ukrainian kindergartens. In turn, 12 regional programmes have planned activities targeting school and kindergarten teachers and children themselves, whose guardians are migrants. Projects targeting teachers will primarily include in-service training in the skills and competences necessary to work with children with special educational needs, including those with migration experience. Projects targeting children, on the other hand, will focus on improving their language skills, cultural adaptation, broad integration activities targeting all pupils in schools attended by children with migrant experience. In this way, the activities initiated under FAMI, i.e. the promotion of mutual

²⁰ Improving the quality, inclusiveness and efficiency of education and training systems and their links to the labour market - including through the validation of non-formal and informal learning, to support the acquisition of key competences, including entrepreneurial skills and digital competences, and by supporting the introduction of dual training and vocational preparation systems.

²¹ Promote equitable access to and completion of good quality, inclusive education and training, particularly for disadvantaged groups, from early childhood education and care through general and vocational education and training to higher education, and adult education and learning, including facilitating learning mobility for all and accessibility for people with disabilities.

²² Increase equitable and timely access to good quality, sustainable and affordable services, including services that support access to housing and person-centred care, including health care; modernise social protection systems, including supporting access to social protection, with a focus on children and disadvantaged groups; improve accessibility, including for people with disabilities, efficiency and resilience of health systems and long-term care services.

²² Annex III para. 3(l) of Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund. with a particular focus on children and disadvantaged groups; improving accessibility, including for people with disabilities, efficiency and resilience of health systems and long-term care services.

relations and dialogue between third-country nationals, the host society and public authorities, including through consultations with third-country nationals and intercultural and interfaith dialogue²³ are reflected and continued at local level.

Under CP4.K, regional programmes assume that migrants will be one of the groups supported by social and health services that target vulnerable people, e.g. those at risk of poverty. In this way, support at the regional level is complementary to FAMI activities targeting vulnerable groups²⁴.

Consistency has also been noted between the activities of FAMI and the three CPs implemented with ERDF funds in the regional programmes, i.e. CP4.III²⁵, CP4.II²⁶ and CP4.IV²⁷. Under CP4.III in the three programmes²⁸ it is possible to carry out construction works and equipment of social infrastructure for the socio-economic integration of TCN, including migrants. It has been indicated that these activities should be carried out in conjunction with ESF+ actions in the framework of the development of social and health services (CP4.K) and in the framework of actions targeting third-country nationals (CP4.I). Expansion/reconstruction/adaptation of housing infrastructure for migrants can also be an element of the intervention implementing CP4.III. In turn, in the Opolskie and Podkarpackie Voivodeships, the intervention under CP4.II is implemented, which envisages investments aimed at adapting educational institutions to the needs of different groups, including persons from migrant families. These investments consist primarily of subsidising the infrastructure of language learning rooms, day care centres and other places for the integration of children, parents and the school community. In addition, one region, i.e. the Zachodniopomorskie voivodeship, is implementing CP4.IV, which explicitly provides for the creation of housing infrastructure for migrants, refugees and persons receiving or applying for international protection. In addition, multicultural centres and hostels for TCN are also being created under this objective. In view of this, the ERDF fund is complementary to the FAMI measures, which in the area of housing provide housing improvements, but in a network of centres for TCN.

In summary, most of the actions implemented under the ESF+ national and regional programmes are consistent with those undertaken under FAMI. It is worth noting that some actions can be implemented under both FAMI and Cohesion Policy, e.g. support to the recognition of diplomas and qualifications obtained in countries of origin, actions strengthening the involvement of local authorities and NGOs, actions targeting the host society, or actions targeting education professionals. These actions have the potential to reinforce their effects and lead to synergies.

²³ Annex III para. 3(l) of Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund.

²⁴ Ibid. points a-m.

²⁵ Promote the socio-economic inclusion of marginalised communities, low-income households and disadvantaged groups, including people with special needs, through integrated interventions including housing and social services.

²⁶ Improve equitable access to high quality and inclusive education, training and lifelong learning services through the development of accessible infrastructure, including by supporting resilience in distance and online education and training.

²⁷ Supporting the socio-economic integration of third-country nationals, including migrants, through integrated measures including housing and social services.

²⁸ European Funds for Lubuskie, European Funds for Lubelskie, European Funds for Łódzkie.



UNIA EUROPEJSKA
FUNDUSZ BEZPIECZEŃSTWA
WEWNĘTRZNEGO



UNIA EUROPEJSKA
FUNDUSZ AZYLU,
MIGRACJI I INTEGRACJI

E. EU added value

13. To what extent does the Fund generate EU added value?

European added value (EAV) is an increasingly important criterion for assessing the soundness of actions funded by the EU budget. EAV refers to the additional value created by the fact that an action has been financed by the EU budget rather than by the budgets of individual Member States. The additional value is generated by the establishment of a single framework for the action, which leads to the pursuit of the same objective and can also create economies of scale. Also within the Fund's implementation reports, EAV is defined as *generating results beyond what would have been achieved by Member States acting alone*²⁹.

EAV is generated at several levels, taking into account, inter alia, the impact on the reduction of social inequalities, the sharing of the costs of actions between the EU and Member States, or a coherent approach to achieving EU objectives. At the same time, it is an ambiguous value, difficult to examine because of its interdependence (it is not known what scale of effects would occur if EU Member States were to implement the actions in question alone). Analysing the available studies on EAV, the Study Team concluded that, within FAMI, the most relevant issues to be investigated when assessing the generation of added value are:

1. Implementation of EU legislation into the Polish legal order;
2. The occurrence of economies of scale;
3. Cross-border cooperation to learn about best practices and decision-making processes in other countries;
4. Addressing cross-border threats and challenges;
5. Networking of cooperation within the Fund - both at national and international level.

Added value can relate to diverse groups. In the case of FAMI, the priority group towards which added value is identified is the **final beneficiaries of the projects (recipients of project activities)**.

The Implementation Report indicates that due to the approval of the FAMI Programme on 12 December 2022, *there have been no activities in or concerning third countries to date*³⁰. The assessment of EAV can therefore be done by referring to the expertise of the members of the Study Team and their assessment of the potential impact of the Fund on the various aspects that are part of EAV.

EAV from the point of view of the end user

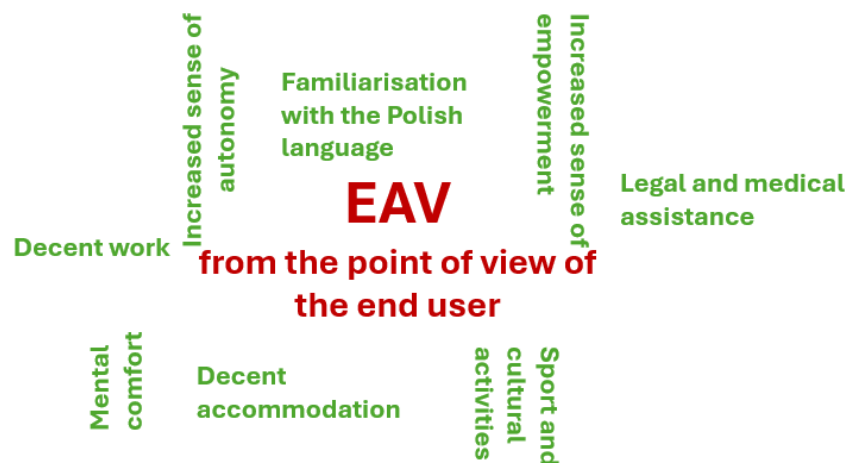
Based on the results of the implementation of FAMI 2014-2020 so far, it can be concluded that the main effect that the EAV resulting from FAMI will have in the current financial perspective (2021-2027) is to provide minors arriving in Poland with a safe environment in which they can function; the feeling of comfort and security of staying in Poland is also an important effect that is noted in adults. From the migrants' point of view, it is also important to take up a job that is compatible with their predispositions,

²⁹ Annual Implementation Report on the Asylum, Migration and Integration Fund to be submitted by Member States to the Commission in accordance with Article 35 of Regulation (EU) 2021/1147, 1 January 2021-30 June 2022, p. 4.

³⁰ Ibid.

experience and education. Thus, there is a shift away from the image of the TCN as a person who takes up poorly paid, unattractive, often physical jobs. This is facilitated by the refugees' familiarisation with Polish legislation and language. All this influences the refugees' sense of independence and self-sufficiency. Refugees are also offered better accommodation, which affects their sense of dignity. The value-added factors indicated help to raise the dignity of the refugee and his self-perception, which influences the overall perception of the situation in which he finds himself.

Scheme 2. EAV from the point of view of the end user



Source: own study.

EAV from the perspective of the beneficiary

However, EAV is generated not only towards the final recipients of project activities, but also towards the beneficiaries. In this context, it is important to point out the acquisition of new experience by project implementers, as well as the strengthening of the capacity of the body concerned to undertake specific activities. There is also an improvement in the quality of project management as a result of new experience. New partnerships are formed as a result of the activities, which contribute to the implementation of further project activities. Over time, the spectrum of activities is broadened by the beneficiaries as a result of increased capacities. Language competences also improve as a result of the activities, thus strengthening the quality of the human capital available on the regional labour market. The benefits are two-sided in this sense - not only human capital gains, but also potential employers who employ immigrants. A separate benefit is the issue of cooperation between Polish authorities and authorities from third countries.

Scheme 3. EAV from the perspective of the beneficiary

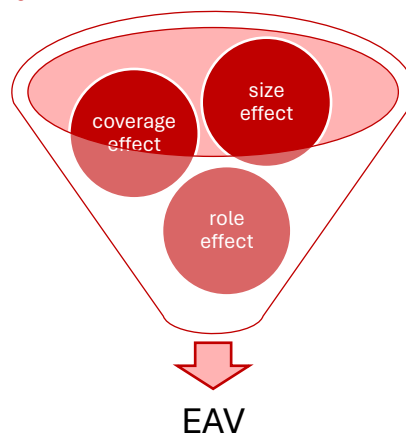


Source: own study.

EAV levels

EAV within the Fund can be assessed by three key criteria, which are **size effect**, **reach effect** and **role effect**.

Scheme 4. EAV components within FAMI



Source: own study.

The size effect includes additional activities that have been undertaken within the framework of FAMI and have so far included the renovation, modernisation and retrofitting of buildings. In addition, activities were organised, i.e. psychological support, language courses, preparation for the Polish labour market or activities aimed at the integration of migrants generating added value for the final recipients.

The outreach effect is linked to the widening of the range of people targeted for support. If it were not for the intervention, the ultimate beneficiaries would not have received support. In addition, the support benefited the citizens of Poland as a host country - in this sense, the possibility of raising

competencies of the Border Guard employees as bodies benefiting from the support as beneficiaries should be pointed out.

The role effect, on the other hand, determines how the intervention affects the beneficiaries - the institutions and organisations entitled to benefit from it. The support allowed for the optimisation of procedures related to the provision of services to foreigners. The special role of FAMI in the creation of EAV in the case of Poland should be emphasised. This is because Poland is the eastern external border of the EU, therefore all Member States will benefit from the activities undertaken under the specific objective of Return.

Added value - migration

In terms of migration, the Fund's added value is training for representatives of third countries. In interviews with beneficiaries, cooperation with, among others, Ukraine and Vietnam was highlighted.

We are also training representatives from third countries. The idea is that they, with our knowledge and experience, should deal with migration in a similar way as we do. That way, we do not have to deal with these challenges in such a way. We train Ukraine very strongly and until the war, we trained them strongly (...) and they drew very strongly, precisely with this hope that they would cope in such a way with the foreigners coming in, that we would have less work at the border. The war came and all that got cut off, but now we are rebuilding that experience of ours again (...).

Source: in-depth interview with a FAMI beneficiary.

Added value - asylum and integration

Moreover, if it were not for the support, Poland would carry out the activities described above to a very narrow extent. It is very likely that the assistance would be based only on granting protection to foreigners under the national legislation to a minimal extent. Thus, it would be impossible to carry out all activities surrounding migrants with care and support. It should be pointed out that without resources the assistance would be at a basic level. This was confirmed by in-depth interviews with implementers. They indicated that, in the context of the war behind the eastern border, the most important measures were those for the integration of foreigners who, from 2022 onwards, began to arrive in Poland in large numbers fleeing the consequences of the armed conflict in Ukraine.

Until there was full-scale Russian aggression against Ukraine, as far as I know, in practice we did not have central measures in Poland, which were FAMI funds dedicated to the integration of foreigners. Poland did not have any policy, there were programme documents, but these either did not have an operational dimension. Certainly, no money for integration of foreigners followed from the budget, so FAMI was the only source of integration of foreigners, plus in the area of returns they were a very strong support for the Border Guard.

Source: in-depth interview with FAMI implementer.

The interviews proved the decisive importance and added value of FAMI in the current geopolitical situation for the integration of foreigners. The effect of the fund's role already mentioned above should be emphasised here. The integration of foreigners - e.g. in the context of language courses, their

introduction to the Polish labour market or to the Polish education system - is currently the biggest challenge. As the in-depth interviews proved, the respondents were less concerned about the issues of asylum and return, for which funds from the state budget were provided (although, as indicated, they were still minimal in relation to needs).

Added value - return

An important element that can be assisted by FAMI in the run up to 2027 is the establishment of cooperation with Iraq. This is primarily related to the refugee crisis on the border with Belarus. The Belarusian regime has, since mid-2021, been undertaking a procedure to destabilise the EU's eastern border along, inter alia, the Polish-Belarusian section through the smuggling of irregular migrants from Iraq, Afghanistan and other Middle Eastern countries. The willingness to cooperate with Iraq is therefore a reaction to an observed problem. As the following quote shows, FAMI is succeeding in establishing the beginnings of such cooperation, which may bode well for the future.

We also want to cooperate with Iraq, also from Iraq we have a great number of foreigners in guarded centres and the pressure from Belarus is predominantly on Iraq. And here we also have some successes, because the state agrees to take these foreigners back (...). At first it was poor, we could not organise charter flights there, now this cooperation seems to be going a little better and this is what the project of international cooperation with third countries is all about.

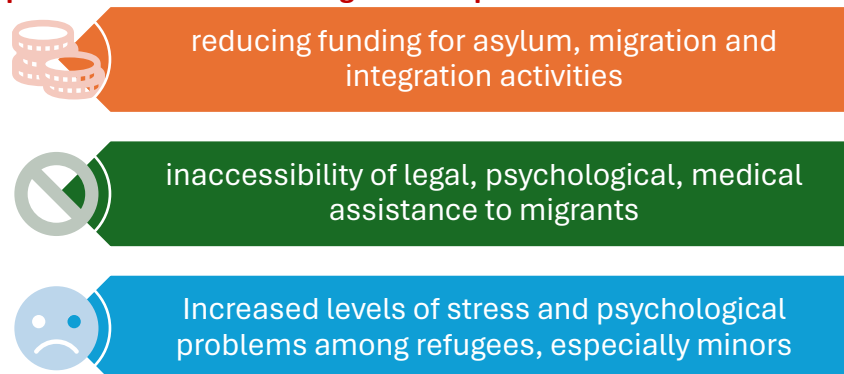
Source: in-depth interview with a FAMI beneficiary.

As security challenges evolve, the beneficiaries plan to engage in cooperation with other countries, i.e. Egypt or Somalia, following the example of existing cooperation and lessons learned. This cooperation will respond to emerging threats that are identified and monitored on an ongoing basis.

Summary

As demonstrated in this chapter, FAMI's role for Poland, as well as for the EU as a whole, is invaluable. FAMI creates added value on three levels - generating size, reach and role effects. The impact of the discontinuation of the Fund's funding would be felt both by the state as the delivery agent, by the beneficiaries and by the final recipients of support themselves.

Scheme 5. Implications of discontinuing FAMI implementation



Source: own study.

As a country on the eastern external border of the EU, Poland has an important role to play in ensuring a coherent EU migration policy. Therefore, EAV within FAMI should be assessed as high.

Conclusions, suggestions and recommendations

Although FAMI is only in the initial phase of implementation, the added value of the fund should be assessed very highly. In the absence of this instrument in the current geopolitical realities (war in Ukraine, large wave of Ukrainian refugees in Poland), especially the issue of integration of foreigners would be a pressing problem for which there would be no financial resources. The implementation of the Fund will reduce the level of stress among foreigners and facilitate their adaptation to the Polish reality by providing the necessary assistance to those arriving in Poland.

FAMI was implemented with a long delay, as it was only at the end of 2022 that the Polish programme was approved. Therefore, assessing the degree of achievement of the objectives is difficult. Given that the delay affected not only Poland, but all countries, it is recommended that Poland participate in discussions with the EC on removing the obligation to make 10% of certified expenditure under the programme by the end of 2024 in order to receive additional funds from the facility's reserve and replacing it with an obligation to contract 10% of the funds within the basic allocation.

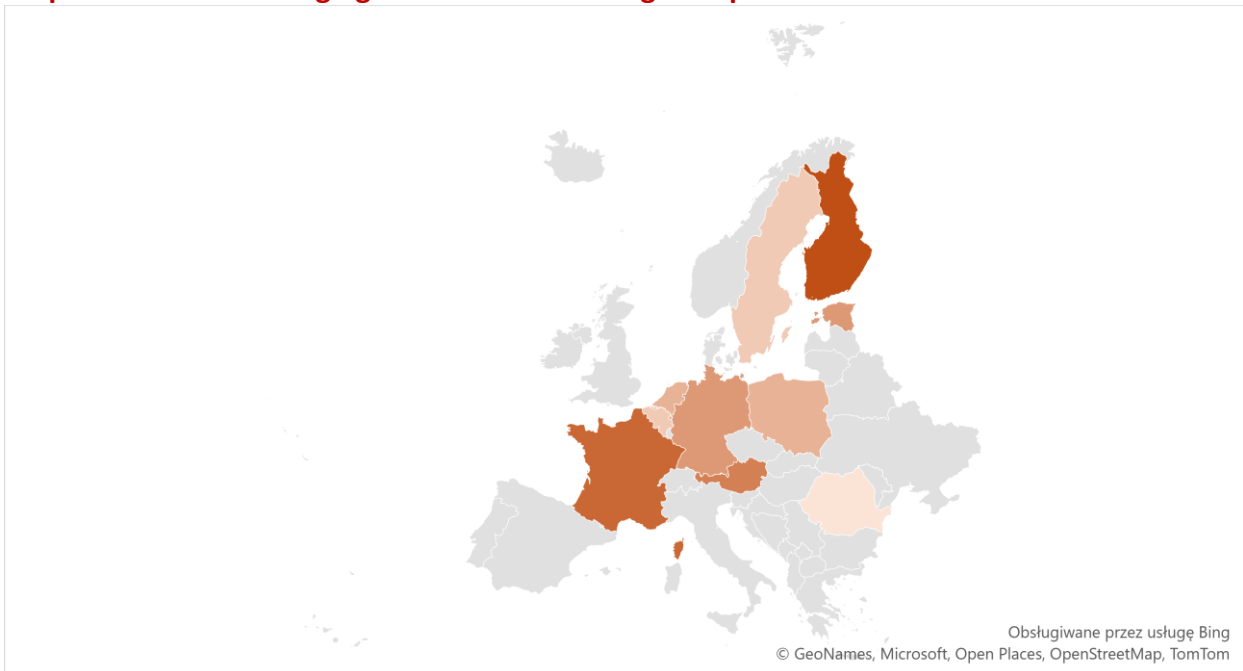
The analysis of the in-depth interviews and the logic of the Programme shows that the activities foreseen to be implemented, under the three specific objectives of FAMI 2021-2027, enable them to achieve the objectives set by the Programme. FAMI 2021-2027 enables them to implement effective actions in the field of asylum, legal migration and integration and the return of third-country nationals to their homeland. The only difficulty identified by the evaluation is that, in the current financial perspective, it is not possible to implement a single project falling under several specific objectives. However, this is not a difficult barrier to overcome. Beneficiaries are able to overcome this challenge by dividing a larger project, into several smaller interventions.

The biggest currently identified shortcoming of the CST2021 monitoring and evaluation system is that it is not tailored to the needs of the Asylum and Migration Fund. However, the upside of the introduction of CST2021 is that the system has enabled the digitisation of the entire application process. Difficulties for beneficiaries to operate the new system may arise in the future when the FAMI 2021-2027 impression is more advanced.

Examples of good practice

Good practices related to the implementation of Polish FAMI include participation in an informal working group. The group consists of representatives of the institutions of the 10 EU Member States implementing FAMI in their countries and meets once or twice a year. Members of the group include - apart from Poland - Austria, Belgium, Estonia, Finland, France, the Netherlands, Germany, Romania, Sweden. These countries are shown on the map below.

Map 2. Countries belonging to the FAMI Working Group



Source: own compilation based on individual in-depth interviews with implementers.

Although the group's meetings occur relatively infrequently, only twice a year, Programme implementers expressed satisfaction with its existence, as reflected in the in-depth interviews.

We have a very intense exchange of experiences, opinions and it is very interesting.

Source: individual in-depth interview with FAMI implementer.

Poland's participation in this group allows for the exchange of experience, discussion of problems and ways of solving them, as well as discussions on possible simplifications.

(...) we have been consulting with each other in recent months on the possibility of using a simplified method of accounting Organisation for Migration, as such a method has emerged. We have also consulted on the level of funding in projects depending on who is a member of the partnership.

Source: in-depth interview with FAMI implementer.

(...) the added value of this group is that we can lobby together for some action in the European Commission, if we see that something is not working and could be better, then we can come together in the Commission and negotiate something.

Source: in-depth interview with FAMI implementer.

As the above quote shows, the added value of the existence of the Working Group is that it strengthens the voice of the Member States in the EU forum, allowing them to lobby states for the adoption of certain solutions.

Cooperation with other countries from the beneficiary level is also highly valued. It takes place either in the form of conferences/seminars or in the form of study visits at different levels (governmental bodies, local authorities). From the beneficiaries' level, all forms of cooperation are of high interest and add value to the practice of the services and authorities responsible for asylum, migration and integration. Study visits and joint conferences allow for the implementation of good practices observed in other countries.

(...) employees had the opportunity to look at systems for handling foreigners' cases and to implement solutions of this kind in our country. For example, a module for handling cases of foreigners was created on this basis in the previous perspective, which was an analogy of what we saw in other countries. There was also a study visit by representatives of local governments, who in turn are just overseeing the issue of education. (...) surely these are valuable events that add value. They are not just a tick-box activity, there is some benefit to be derived from them.

Source: in-depth interview with a FAMI beneficiary.

Beneficiaries participating in the qualitative research pointed, inter alia, to good practices related to the organisation of centres for the integration of foreigners modelled on those operating in other countries, the implementation of a system for serving foreigners analogous to that in other countries, and the issue of exchanging experiences related to the integration of children and young people and their adaptation to the conditions of the Polish education system.

Additional centres for the integration of foreigners are currently being developed and are something that also functions in Austria and Germany, and we are also building on these experiences.

Source: in-depth interview with a FAMI beneficiary.