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Internal Security Fund (ISF) 2014-2020

Portugal National Programme

Interim Evaluation Report

EXECUTIVE SUMMARY

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Secretaria - Geral do Ministério da Administração Interna

External evaluation experts:

Quatenaire Portugal, Consultoria para o Desenvolvimento, SA

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EVALUATION TEAM

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I. OBJECTIVES AND EVALUATION SCOPE

Internal Security Fund (ISF) 2014-2020 was created with the objective of promoting the implementation of the Internal Security Strategy, law enforcement cooperation and the management of the Union's external borders.

The ISF is composed of two instruments:

- **ISF Borders and Visa** – its general objective shall be to contribute to ensuring a high level of security in the Union while facilitating legitimate travel, through a uniform and high level of control of the external borders and the effective processing of Schengen visas (Regulation (EU) n.º 515/2014 of the European Parliament and the Council).
- **ISF Police** - with the general objective of contributing to ensure a high level of security in the Union, It shall contribute to the following specific objectives (a) crime prevention, combating cross-border, serious and organised crime including terrorism, and reinforcing coordination and cooperation between law enforcement authorities and other national authorities of Member States, including with Europol or other relevant Union bodies, and with relevant third countries and international organisations; (b) enhancing the capacity of Member States and the Union for managing effectively security-related risks and crises, and preparing for and protecting people and critical infrastructure against terrorist attacks and other security-related incidents (according to (EU) Regulation n.º 513/2014 of the European Parliament and of the Council).

Funding from ISF to projects that contribute for such objectives is carried through multiannual *national programmes*, for all the programming period and managed by authorities of each Member State, and *Union Actions*, managed by European Commission in the framework of Annual Work Programmes.

National ISF programme 2014-2020 for Portugal, the object of this interim evaluation, is organised in 5 specific objectives (SO) that will be implemented through a set of activities and operations inserted in 25 national objectives. The SO are the following:

ISF Borders and Visa

- SO1 – Support a common Visa policy
- SO2 – Borders
- SO3 – Operation support

ISF Police

- SO5 – Preventing and combating crime
- SO6 – Managing risks and crisis

The national ISF programme was approved through the Decision of European Commission in August 10, 2015 with allocation of € 38.649.172, 00 € of European fund for all the 2014-2020 period.

This evaluation is framed by the common monitoring and evaluation framework referred in n.º 3 of article 55.º of Regulation (EU) n.º 514/2014 of the Parliament and of the Council. It has an interim nature and the following objectives:

- To examine the implementation of the programme in the period 2014-2017, taking into account all operations approved until June 30, 2017.
- To evaluate the ISF national programme, in that period, under the following criteria: effectiveness, efficiency, relevance, coherence, complementarity, EU added value, sustainability, and simplification and reduction of administrative burden.

Interim Evaluation of National ISF Programme for Portugal 2014-2020

Required analysis is influenced by the initial delay in programme implementation, which implies a relevant gap comparing to programming. The following table shows the financial situation (approval and execution) in June, 2017, marking national objectives without any project approved and national objectives with projects being implemented.

	Specific objective . National objective	Programmed 2014-2020 (PR)	Approved (AP)			Executed (EX)	Fund paid to beneficiary (PY)	Financial Indicators (Fund) %		
		European Fund	N.º of approved projects	Eligible cost	Fund	Fund		Assignment rate (AP/PR)	Execution rate (EX/PR)	Implementation rate (EX/AP)
ISF - Borders and Visa	SO1.NO1 National Capacity	1.391.470,60 €	2	546.389,23 €	409.791,93 €	- €	59.126,51 €	29%	0%	0%
	SO1.NO2 Union acquis	487.500,00 €	0			- €		0%	0%	0%
	SO1.NO3 Consular cooperation	506.250,00 €	0			- €		0%	0%	0%
	SO1.AE1 Consular cooperation (specific action)	822.025,00 €	0			- €		0%	0%	0%
	SO2.NO1 EUROSUR	2.600.000,00 €	1	2.616.443,42 €	1.962.332,57 €	- €	883.050,00 €	75%	0%	0%
	SO2.NO2 Exchange of information	2.600.000,00 €	0			- €		0%	0%	0%
	SO2.NO3 Common Union standards	800.000,00 €	2	885.366,66 €	664.025,00 €	- €	132.805,00 €	83%	0%	0%
	SO2.NO4 Union acquis	800.000,00 €	0			- €		0%	0%	0%
	SO2.NO5 Future challenges	2.000.000,00 €	0			- €		0%	0%	0%
	SO2.NO6 National capacity	2.592.000,00 €	3	3.455.999,51 €	2.591.999,64 €	- €	450.932,05 €	100%	0%	0%
	SO2.AE2 Transport equipment (specific action)	234.000,00 €	1	312.000,00 €	234.000,00 €	- €	46.800,00 €	100%	0%	0%
	SO3.NO1 Operating support for Visa	1.925.000,00 €	1	1.036.418,21 €	1.036.418,21 €	- €	466.388,19 €	54%	0%	0%
	SO3.NO2 Operating support for borders	1.700.000,00 €	2	1.795.416,00 €	1.699.999,25 €	- €	679.124,59 €	100%	0%	0%
	Total - ISF - Borders and Visa	18.458.245,60 €	12	10.648.033,03 €	8.598.566,60 €	- €	2.718.226,34 €	47%	0%	0%
ISF - Police	SO5.NO1 C - Prevention and combating	4.396.197,55 €	4	4.295.860,87 €	3.221.895,66 €	- €	510.353,52 €	73%	0%	0%
	SO5.NO2 C - Exchange of information	3.663.319,80 €	3	1.975.012,00 €	1.481.259,00 €	- €		40%	0%	0%
	SO5.NO3 C - Training	1.483.032,86 €	3	905.082,00 €	678.811,50 €	- €	123.938,33 €	46%	0%	0%
	SO5.NO4 C - Victim support	399.301,59 €	1	75.555,70 €	56.666,78 €	- €	11.333,36 €	14%	0%	0%
	SO5.NO5 C - Threat and risk assessment	588.001,36 €	2	541.066,36 €	405.799,77 €	- €	41.159,95 €	69%	0%	0%
	SO6.NO1 R - Prevention and combating	1.632.926,83 €	0			- €		0%	0%	0%
	SO6.NO2 R - Exchange of information	1.745.726,83 €	1	491.999,95 €	368.999,96 €	- €	73.799,99 €	21%	0%	0%
	SO6.NO3 R - Training	453.538,04 €	0			- €		0%	0%	0%
	SO6.NO4 R - Victim support	387.215,37 €	0			- €		0%	0%	0%
	SO6.NO5 R - Infrastructure	1.569.476,83 €	2	2.092.000,00 €	1.569.000,01 €	- €	156.800,00 €	100%	0%	0%
	SO6.NO6 R - Early warning and crisis	641.015,37 €	1	320.390,00 €	240.292,50 €	- €	48.058,50 €	37%	0%	0%
	SO6.NO7 R - Threat and risk assessment	598.715,37 €	0			- €		0%	0%	0%
	Total FSI: Cooperação Policial	17.558.467,80 €	17	10.696.966,88 €	8.022.725,18 €	- €	965.443,65 €	46%	0%	0%
	ISF Technical Assistance	2.632.458,60 €	2	1.157.671,59 €	1.157.671,59 €	39.432,41 €	155.189,57 €	44%	1%	3%
Total		38.649.172,00 €	31	22.502.671,50 €	17.778.963,37 €	39.432,41 €	3.838.859,56 €	46%	0,1%	0,2%

Source: System of Information and Management of European Funds (SIMEF).

II. METHODOLOGY

According to terms of reference for the study and its methodologic interpretation, the evaluation approach consisted in (i) verification of transformation mechanisms subjacent to the “theory of change” (in what concerns mainly effectiveness, but also relevance, coherence and complementarity) and (ii) assessment of operational issues for the remaining evaluation criteria (efficiency, EU added value, sustainability, and simplification and reduction of administrative burden).

In the first case, the evaluation team mobilised in a more systematic manner the indicator body of the programme (both physic and financial), combined with some case study approach, documentary analysis (elements from the SIMEF) and interviews with all beneficiaries.

In the second case, the use of qualitative elements is more evident – interviews with Responsible and Delegate Authorities and beneficiaries, case studies, regulation and other document analysis. Some indicators, namely resulting from applications processing (SIMEF) and national statistics, were also used as a complement to efficiency analysis.

We should mention some constraints that conditioned the evaluation activities and results.

- The delay in programme’s beginning implied that the state of implementation of approved operation is still very initial, generating difficulties in getting steady information in terms of physical indicators. Evaluation

team opted for an approach based on approvals and potential results and effects, using targeted values referred in the operations financing contracts.

- Insufficiencies of the indicators system (common indicators and others) are not circumstantial, but structural – at the levels of concepts and methodology (still unstable), interpretation and quantification, and heterogeneous coverage of different objectives and typologies of intervention. Evaluators consider that the image obtained from these indicators might not depict the results actually achieved by the programme. In this field, as in others, this national programme lacks an *ex ante* evaluation and a more consistent internal design.
- The fragmentation of the programme is another critical factor, encompassing a great number of typologies and national objectives (corresponding to programme axis), financing complex projects and with high-value and diversified components. The effectiveness analysis is penalized, because the contributions of projects to some objectives are less important than they should be, not corresponding to the financing lines in which they have been registered.
- The analysis was also constrained by another element: quality and functional characteristics of the SIGFC. The slowness in accessing to the covered projects and the impossibility to carry out programmed research and extract transversal data (for example, synthetic tables concerning indicators, classification of procedures or deadlines associated to each phase) generated an exorbitant time in downloading files and parallel registration of data by the evaluation team.

III. MAIN GENERAL CONCLUSIONS AND CONCLUSIONS ASSOCIATED TO THE ANSWER TO EVALUATION QUESTIONS

In general terms, evaluation concluded that:

- The ISF national programme, involving its components of “Borders and Visa” and “Police Cooperation”, is targeted at a predetermined public, corresponding to national entities exclusively charged of those matters. So, it is an essentially closed programme whose programming phase allowed to identify the great majority of the relevant projects able to attain the established objectives. The management model itself is in line with this situation, involving a family of beneficiaries under the supervision of the Ministry of Internal Administration (in which the Responsible Authority is located) or of the Ministry of Justice (charged of the Delegated Authority through its Secretary-General).
- The internal structure of the national programme is very fragmented, which is in part contradictory with the existence of complex and multidimensional projects, contributing at the same time to several objectives. Several projects, financed under some NO, could be supported under other NO, inclusive under other SO.
- The WEB platform supporting managing procedures, through which the great part of the links with beneficiaries is established and work all the submission procedures, evaluation, decision and financial operations is not fully operational, although is under an incremental upgrading process. This observation is valid either from the point of view of management or the beneficiaries.

Concerning the conclusions determined by the answers to the evaluation questions, the evaluation concluded that:

a. Effectiveness

SO1 – Support to a Common Policy Visa

How did the Fund contribute to the achievement of the following specific objectives:

- *Support a common visa policy to facilitate legitimate travel;*
- *Provide a high quality of service to visa applicants;*
- *Ensure equal treatment of third-country nationals*

- *Tackle illegal migration?*

The approved projects have a significant contribution to achieve the objectives regarding the quality of the service and support the visa common policy. The contribution to ensure a better coverage of consulates and harmonised procedures in emitting visa between MS is less evidente and almost practically limited to the issue of implementing VIS through equipments, informatic systems and share of information. At the evaluation reference date, no contribution of the national programme to reinforce the cooperation between the MS active in third countries was observed. There are no projects specifically targeted at guaranteeing the application of the Union common practices regarding Visa, although in an indirect way some projects effectively contribute to this objective.

SO2 – Borders

How did the Fund contribute to the achievement of the following specific objectives::

- *Supporting integrated border management, including promoting further harmonisation of border management-related measures in accordance with common Union standards and through the sharing of information between Member States and between Member States and the European Agency for the Management of Operational Cooperation at the External Borders of the Member States of the European Union?*
- *Ensuring, on one hand, a uniform and high level of control and protection of the external borders, including by the tackling of illegal immigration and, on the other hand, the smooth crossing of the external borders in conformity with the Schengen acquis, while guaranteeing access to international protection for those needing it, in accordance with the obligations contracted by the Member States in the field of human rights, including the principle of non-refoulement?*

The evaluation estimates that some approved projects will significantly contribute to fostering the design, application and achievement of policies aimed at ensuring the inexistence of controls affecting persons crossing internal borders, although some lines/typologies have not yet been mobilised (information interchange, common norms and heritage of the Union). The contribution to the control of persons and to effective fiscalisation of crossing external borders is more evidente, corresponding to the main focus of the approved projects. There are no projects approved explicitly oriented to guarantee the application the commin acquis of the Union concerning borders management, although in na indirect way several approved projects contribute effectively to this objective.

SO5 – Preventing and combating crime

How did the Fund contribute to the following specific objectives:

- *Prevention of cross-border, serious and organised crime, including terrorism;*
- *Reinforcement of the coordination and cooperation between law enforcement authorities and other national authorities of Member States, including with Europol or other relevant Union bodies, and with relevant third Countries and international organisations?*

All the financing lines concerned with this SO already have approvals, contributing to the specific objectives concerned with technological, informatic and information capacity, human resources training, creation of networks focused on the share and interchange of experience and best practices and on the police cooperation and coordination between the authorities charged of enforcing the law, including Europol. It should be stressed that concerning some financing lines the approved projects anticipate a low coverage of programmed goals.

Concerning the implementation of measures targeted at signaling/identification and support of witnesses and victims of crime, including victims of terrorism, the programme's contribution is still very moderated.

SO6 – Risks crisis

How did the Fund contribute to improve the capacity of Member States to manage effectively security-related risks and crisis, and protecting people and critical infrastructure against terrorist attacks and other security-related incidents?

In Portugal, the identification and planning of critical infrastructures protection is very incipient. The national programme doesn't present yet approved projects able to contribute to overcome these difficulties. However, the evaluation collected evidence showing that the national programme will achieve the programmed goals concerning the protection of critical infrastructures. There is a set of approved projects that contribute in a relevant way to establish secure connections and an effective coordination between the institutions intervening in early alert situations and cooperation in case of crisis at the Union level, mainly through the interoperability of the several systems managed by national authorities, the preventive intervention concerning cybercrime and the physical conditions to manage crisis situations.

b. Efficiency

Did the Fund results have been achieved without excessive costs?

The evaluation question concerns a concept of efficiency focused on the allocations of human and financial resources and on the absorption of these resources by the SM, and not an evaluation of effective results – efficiency seen from the perspective of the cost needed to achieve the results themselves, linking the magnitude of funding allocated to projects and their quantified achievements.

From this point of view, the evaluation concludes that the results are being achieved through an allocation of human and financial resources that are in line, or slightly below, with the programmed values and with the predetermined management structure, although with a relatively high cost of technical assistance, comparing with other programmes (the AMIF national programme, whose management model is articulated with the ISF's model or the programmes supported by the European Structural and Investment Funds (ESIF) within the Framework of PT 2020). The ISF programme is small, supporting a very small number of projects and beneficiaries. So, the scale economies (measured, for example, through an indicator of funds allocated to technical assistance comparatively with funds allocated to approved operations) are more hardly to achieve than in more open programmes, financing projects in a significantly higher magnitude.

Independently from this global panorama, the evaluation identified a set of elements (analysing concrete procedures registered in SIGFC, for example analysis reports, and letters and in the interviews with Project promoters) generating significant inefficiencies in the process, suggesting that some phases of the whole cycle could be implemented with less effort, releasing resources for activities with lower dedicated resources, (for example for monitoring projects) and releasing resources for the beneficiaries themselves. Among those aspects, we should mention the stabilisation of the indicators system, the revision of some less-friendly SIGFC procedures, the simplification of some documentation requirements associated to payment demands, the harmonisation and diffusion of concepts and interpretations or the substitution of formal procedures, based on written communication, for more direct contacts between the RA, the DA and beneficiaries.

Beyond the mechanisms established by regulations, that we may consider as preventive, no concrete measures have been identified (inspections, audits) targeted at detecting, communicating and following up fraude situations and other irregularities. However, till 30.06.2017, the Inspeção-Geral de Finanças (national control authority) audited the ISF 2015 accounts and no irregularity has been detected.

c. Pertinence

Did the objectives of the ISF interventions correspond to real needs?

The evaluation team identified two types of elements confirming that the ISF national programme objectives are in line simultaneously with the European priorities and national needs and bottlenecks (regarding the framework of Visa, integrated management of borders and combating serious and organised crime and organised crime and risks and crisis management policies):

- *Top-down*: programming was in line with the relevant strategic and normative frameworks in Portugal. The programming rationale puts the programme in line with some of the established results; it may be checked that programming answers to real needs (although the ISF national programme may not tackle all the needs, considering the choices determined by the limitations of the budget available).
- *Bottom-up*: the programming tackles the operational bottlenecks identified by these entities, completing their investment and capacity improvement plans developed with national budgetary resources and other financing modalities. Again, national programme doesn't tackle all the bottlenecks, but its contribution to tackle these needs is very relevant.

The analysis of the data and priorities concerning internal security confirms that in Portugal there are no relevant needs – trends and problems that inspired the definition of priorities in the design and programming phase of ISF are still predominant. Admitting any significant divergence between actual needs and the answers of national programme, they will be generated by the level of approval and execution of the projects and not by programming options (that is to say, needs identified in 2014 will be not probably being duly overcome).

d. Coherence

Were the objectives established by national programme coherent with those established by other programmes financed with EU resources and corresponding to similar intervention fields? Coherence performance has been achieved during the Fund implementation?

The coherence between national and European programmes concerning borders and internal security (national ISF and Union actions, national AMIF and Union actions) has been achieved in programming phase, involving national and European authorities and also all the stakeholders leading projects to be financed by the ISF.

As far as other European financing instruments are concerned, the situation is distinctive. Whereas concerning Hercules III/ OLAF and Horizon 2020 we may identify examples of interventions articulated with ISF, with explicit notes in the ISF national programme text mentioning that complementarity, on the contrary no evidence of the evaluation of coherence with the EU Justice Programme has been found.

Two types of coordination mechanisms between ISF and interventions with similar objectives should be mentioned:

- Regarding the governance model of the Internal Affairs Funds (AMIF and ISF), the creation of the Coordination Interministerial Committee (complemented by a Technical Support Committee) that integrates representatives of several Ministries should in principle play that role. However, no evidence of results of the two meetings have been gathered by the evaluation team;
- Considering the submission and selection procedures of projects, coherence and complementarity of each Project with other projects and Funds should be demonstrated. The desk research analysis of the tenders reveals that neither the complementarity between projects is not in general well put into evidence by beneficiaries in the submission forms nor it significantly influences the decision of approving or not the

projects. This situation is very probably the result of the lack of competition in accessing the ISF national programme.

Independently from the programmed mechanisms being or not mobilised, the evaluation collected evidence that Project promoters are monitoring the different financial instruments and adapting their own strategic investment to the diversity of instruments. Potential situations of overlapping and contradiction between different projects are avoided through this activity, being also relevant to look for alternative funding alternatives.

e. Complementarity

Have the national programme objectives and implemented actions and those established by another policies, particularly those led by the State-Member, been complementary?

The complementarity with more general policies that are the framework for the undergoing interventions and are implicated by the ISF national programme (internal security, external policy and justice) has been implicitly taken into account in the programming phase, although without an explicit evaluation of those policies. Programming decisions (typologies of projects, priorities, values involved) have been and will continue to be conditioned by the strategic options established in each of the Portuguese sectorial policies and programming is in line with the objectives of those policies, within which they are complementary with other financial instruments, mainly national ones.

Concerning other national complementary policies (the National Plan of Reforms, administrative modernisation policies and national policies targeted at preventing risks and crisis broadly understood), there are no explicit references in programming phase (with the partial exception of administrative modernisation). However, the programming and investment plans of each beneficiary, principally when they have projects in different areas (as it is the case of SEF and GNR), take into account the complementarity between the different intervention areas.

f. EU Added Value

Did the EU support had any added value?

The added value associated to the ISF support is generated through the leverage of financial resources, the convergence between national and European priorities, the dissemination of good practices and the more effective implementation of European policies and legislation.

Although according to national authorities the implementation of actions was not in danger without the ISF support, they will be surely delayed, narrowed in terms of scope and without the guarantee that best solutions would be implemented. Without the initial joint programming and the need to adapt to a common reference framework, complementing the European strategic framework, the risks of assuming priorities and projects more in line with national and sectorial priorities and less with European policies would be higher.

At the Union level, some advantages could also be observed:

- The share of human and technical resources and the coordination of strategies at political and operative level between Portuguese State organisations and the European authorities.
- Some Portuguese experiments concerning the implementation of cooperation mechanisms between consulates targeted at combating illegal migration (regarding PALOP countries) or vigilance of maritime borders are particularly relevant to test solutions and disseminate good practices in all the European territory.
- Faster and more efficient implementation of European policies and legislation concerning Visa, Borders and Internal Security in general, taking into account the territorial characteristics of Portugal (atlantic front, with

a vast Economic Exclusivity Zone) and the integration of the country in CPLP space will reduce the European vulnerability to illegal migration and to the arrival and operation of organised crime networks, particularly concerning the drugs and human being traffic.

g. Sustainability

Will the positive projects financed by the ISF persist after ending the supported actions?

Two interpretations organize the answer to this question:

- One criteria considers the characteristics of the promoters (public authorities with exclusive competences in terms of borders, visa and police), of the projects (globally contributing to create conditions favourable to achieve mutual commitments assumed at the Union level), of the challenges ahead (increasingly relevant in terms of European and world priorities) and the effective magnitude of projects and their conservation and development costs (including the training, upgrade and operational costs). Concerning this dimension, the conclusion is that questioning the sustainability (that is to say ensuring the full use of equipments, technology and systems implemented) would mean to question the sustainability of the Portuguese State and of the Union. In this case and in normal circumstances, the sustainability of the projects after the ISF support will be necessarily achieved.
- From the perspective of the sustainability of the projects positive effects, the answer is not so assertive. The sustainability tests are not feasible (the programme implementation started only in 2016 and there are no projects closed). The analysis of this sustainability dimension depends on several factors (external and internal) – the type of adopted solutions, the changing stability of phenomena and challenges, the ability to optimise the operation, the guarantee of complete and integrated systems that are not objectively assessed in submission and follow-up phases.

h. Simplification and reduction of administrative charges

Have the ISF management procedures been simplified and the administrative charges for the beneficiaries been reduced?

In general terms, the evaluation concluded that there is no evidence of having been implemented robust mechanisms to achieve the objectives of simplification and of reduction of administrative costs, due to either national options or reglementary constraints.

Due to the magnitude and nature of projects expenditures the modality of simplified costs is not implemented. Bureaucratic procedures associated to expenditures justification are, in general terms, perceived by beneficiaries as excessive and not clear. Documents required and the periods to ask for complementary justifications, generating the communication between beneficiaries and the RA are high-consuming in terms of human and organizational resources. However, considering the inefficiencies of the indicators system and of monitoring mechanisms, the evaluation concluded that the simplified costs modality could not be effectively applied in the ISF national programme, because its implementation is based on a rigorous design and monitoring of the implementation.

The multiannual programming and also the broader incidence of the programme when compared it with financial instruments before 2014) are clearly more adapted to the type of projects submitted to ISF, which normally are projects of high and medium magnitude. These projects require, in many cases, a survey of the best solutions and make intensively appeal to public contracting. It is also a kind of programming that facilitates the planning of activities in time schedules that are more adjusted to internal procedures followed in beneficiaries, whose activity plans are multiannual, inducing a better management performance in a framework in which complementarity between projects and financing sources are multiple.

The broader architecture of ISF national programme (still comparing with financial instruments mobilised in previous programming periods) allows to finance complex projects, concerning the investment dimensions and their contribution to multiple objectives. However, the evaluation underlines a particular topic: the excessive segmentation of the financing lines (SO and particularly NO), which is in part in contradiction with the comprehensiveness of the programme. Taking into account the scope of the projects is sometimes difficult to assess if a specific project is more or less integrated in a certain NO or even in a given SO.

IV. RECOMMENDATIONS

The main recommendations formulated by the evaluation study are the following:

- *R1. Improve the SIGFC's functionalities and simultaneously introduce simplification procedures measures*

In order to make this recommendation operative it will be necessary to complete the evaluation of SIGFC's functionalities, introducing upgradings (capacity and speed, survey tools and generation of dynamic reports supporting the management and monitoring activity, save of forms to later correction and completing, save of beneficiaries profiles, etc).

This task that will complete and consolidate upgradings already being implemented or targeted, requires the involvement of DA, RA and beneficiaries and also experts in computing and information systems (to be achieved through outsourcing or Internal Administration and Justice Ministries' resources).

Simultaneously, it will be necessary to implement measures, albeit incremental and experimental, targeted at simplifying procedures (that may require, for example, some adaptations in regulations, changes in management team internal communication flows or in communication circuits with beneficiaries).

The RA will be charged of implementing this recommendation, in collaboration with the DA. The evaluation suggests that this recommendation could be implemented along 2018.

- *R2. Implement a systematic revision of the ISF indicators system*

The revision and stabilisation of the programme's indicators (national and European) system is urgent. The revision should encompass meta-information, methodology to calculate the indicators and the quantification of goals. It will be also necessary to clarify the distinction between indicators and goals associated to national programme outputs and results and those broader indicators associated to national and European policies.

This task is crucial in order to allow for a rigorous selection and follow-up of projects and for monitoring and evaluating the results achieved by ISF.

The revision, that will require work at the European level, should lead to the Elaboration of a Indicators Guide, with detailed sheets for each indicator, as it is indicated in the AMIF-ISF Beneficiary Guide.

This work should be done in line with the revision of the programme's goals and the updated quantification of the contribution of the already approved projects, in order to assess the real state of art in terms of results to be achieved.

The RA and the European authorities managing the Internal Affairs Funds are charged of implementing this task that should be accomplished along the year of 2018.

- *R3. Elaborate a systematic survey of the implementation level of the approved projects*

The so-called “cleaning operation” (already under way) will update the information about the expenditures already made and the components already implemented in the several operations and should be particularly aware of the adjustment of time schedules and indicators (executed and goals). The work will be concluded in the first quarter of 2018 and should lead to the revision and reorganization of the SIGFC’s information.

Based on the survey conclusions and on the preliminar revision of the indicators system, the announcements plan for next years should also be reformulated, oriented towards a results-based management – considering the achievement of goals as the first criteria of the reformulation.

The RA and the DA will be responsible for these works, which should be validated by the Technical Support Committee and by the Interministerial Coordinating Commission (new announcements plan). The recommendation should be implemented during the first quarter of 2018.

R4. Revision of analysis and approval procedures of submitted projects and of results-based monitoring

Till the end of the 1st semester of 2018 the already started revision of analysis and monitoring procedures of tenders should be developed in depth. Besides the simplification and cut back of administrative charges the revision should be done under a results-based orientation, releasing management resources in order to follow-up project and monitor their results.

Within the framework of this procedures revision the evaluation recommends the following orientations:

- a) Concerning new tenders announcements, the RA and DA should search for announcements models more in line with the short number of beneficiaries (invitations, previous preparation of projects), limiting competitive procedures to situations in which real competition between beneficiaries exists.
- b) The criteria associated with the contribution (measurable) of the projects to the results established by the programme should have first priority.
- c) It will be necessary to create not only more demanding rules to demonstrate the sustainability of the projects effects, but also mechanisms to ensure the ongoing and ex-post monitoring of the projects, using them explicitly in analysing the submissions.

These recommendations should lead to the revision of evaluation criteria and of the several programme’s manuals and technical orientation guides. The evaluation recommends that at least for some of the revision cases a benchmarking analysis concerning the European Structural and Investment Funds (ESIF) managed by the Portugal 2020.

The RA and the DA should implement this recommendation during the 1st semester of 2018.

- *R5. Prepare some structural reorientations of the national programme for next programming period (after 2020).*

The preparation of the next programming period should consider the need to revise some elements of the ISF programme’s architecture and design, mainly:

- a) Adopt a programming model avoiding the fragmentation of financing lines, assessing the nature, complexity and investment components of the projects to be financed and ensuring higher levels of internal coherence and a more performing monitoring of the projects effectiveness.
- b) Put forward a joint programming work between the national authorities involved in Internal Affairs Funds and in ESIF, in order to optimise the articulation between the several instruments able to contribute for borders, visa and internal security objectives, mainly regarding the risks integrated approach, administrative modernisation and empowerment of human resources.

These works should engage national and European authorities, implement the *ex-ante* evaluation of the programmes, guaranteeing that national specificities should be taken into account.

The recommendation should be implemented by national authorities involved in preparing Internal Affairs Funds and ESIF, and should happen in the inception phase of the next programming period of European funds.

