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## **List of abbreviations**

SEA	Single European Area
PMDC	Project Monitoring and Delivery Committee
JMD	Joint Ministerial Decision
MCS	Management and Control System
AMIF	Asylum, Migration and Integration Fund
ISF	Internal Security Fund
YDEAP	European and Development Programs Division
FM	Financial Mechanism
AMIF	Asylum, Migration, and Integration Fund
ISF	Internal Security Fund
FRA	European Union Agency for Fundamental Rights
UDI	Norwegian Directorate of Immigration
PDP	Pre-Defined Project
DPP	Donor Programme Partner
NFP	National Focal Point
FMC	Financial Mechanism Committee
FMO	Financial Mechanism Office
PO	Programme Operator
PP	Project Promoters
MCS	Management Control System
BCF	Bilateral Cooperation Fund
APR	Annual Programme Report
RAO	Regional Asylum Offices
RIS	Reception and Identification Service

## Executive Summary

The On-Going Evaluation of the Asylum and Migration Program of the EEA Financial Mechanism for the 2014-2021 Programming Period is implemented in accordance with the regulatory obligation of each beneficiary state of the EEA 2014-2021 to carry out program evaluations, in accordance with Article 10.1 of the EC Regulation of the European Economic Area (EEA) Financial Mechanism 2014-2021. The meaning of evaluation is the systematic, objective, and independent examination of the design, implementation and / or results of programs and operations to determine the relevance, coherence, consistency, efficiency and effectiveness, impact, and sustainability of financial assistance. The On-Going Evaluation is formative and will cover programs that present potential deviations or other difficulties in relation to the design and timing of the Program Agreement. The purpose of the evaluation is to provide feedback on the implementation of the program and projects and in particular their elements, such as schedule, procedures, indicators, partnerships, initial results as well as their risks and mitigation. This feedback will identify strengths and weaknesses and will be used to improve, treat, redefine, or redesign and / or possibly suggest appropriate modification of the program.

As part of the on-going evaluation project, the Contractor utilized all available documents and data for the program and projects, which are either public or made available through the Program Promoters or the Program Operator. The Contractor conducted a teleconference with the Program Operator and had meetings with the Project Promoters of the predetermined projects (PDPs) that have inclusion acts and verified the course of their implementation as well as the quantitative data of implementation and management of these projects.

The main criteria of the On-going Evaluation are the compatibility and complementarity of the program and projects with the national and regional strategies, their effectiveness in achieving the set goals, the efficiency of the financial resources used and their proportionality in terms of its development, implementation and achievement of the result, the projected effects on their thematic area in the long run and the duration and sustainability of the interventions and their results.

The general sections of the evaluation analyzed and their content with the minimum points of analysis were:

*the Evaluation of the strategy* in the planning procedure of the program (the national and regional needs served by the implementation of the projects, the coordination, the relevance, and the complementarity with the European and National Policies as well as with the European funds, other financial instruments and sources of financing, the coherence of the strategy, the consistency in the implementation of the program in relation to its planning and description in the Program Agreement),

*the Evaluation of the intermediate implementation results* (the distribution of financial resources per PDP and the possibility of absorbing the total budget per project by the end of the financial period in April 2024, the evaluation of the system of results, progress and actual results in relation to the time plan and the quantified objectives achieved at Program level, the assessment of the initial planning for its reasonable and feasible targeting and the delays and other difficulties encountered during the implementation of the program and projects, risk analysis and risk management),

*the examination of the administrative capacity and the implementation procedures (the examination of the regulatory framework, the efficiency of the management system at program and project level, the administrative capacity and efficiency at the level of the Program Operator, the management provision according to the requirements of the regulatory framework, the risks in the implementation of projects and actions and the actions for the improvement of the quality of the management, implementation, monitoring and control systems, the quality of the management of the other management, implementation and control principles).*

### ***Evaluation of the strategy in program planning***

#### ***National and regional needs served by the implementation of the projects***

The program aims at ensuring well-functioning national asylum and migration management systems while at the same time assisting asylum seekers to exercise basic rights. The target group comprises Third Country Nationals (TCN) arriving at Greek territory with emphasis placed on unaccompanied minors and vulnerable groups. Moreover, the Programme contributes to strengthening the bilateral relations among national institutions playing key roles in the field of asylum and migration and Donor States partners

All the needs identified by the Program are served by the predefined projects (PDPs) and bilateral actions. However, for the reasons analyzed in the On-Going Evaluation, the strengthening of bilateral relations is under development as it is limited to the maturation of projects as none of the projects is in the implementation phase (except for premises rentals for PDP 2 and PDP 7).

The needs of the Asylum and Migration management systems in Greece are important as the country did not have a complete regulatory framework for Asylum and Immigration and the procedures were incomplete and non-standard, without the necessary systems to support them. The particularly increased flows of migrants highlighted the weaknesses of the systems at all levels, regulatory, administrative, coordinating, with the result that the country receives multilevel assistance from many organizations in terms of the capacity of the immigration and asylum systems (EEA, IOM, EASO, etc).

At the same time, in the last decade, apart from the increased pressure on the immigration and asylum system in both Greece and the EU, due to migration flows, two reform packages were carried out from 2016 onwards, making any support to the Greek system difficult and unsafe due to system variability.

Consequently, any actions and support initiatives in the system are part of strategies and / or programs which had a different time point of planning and implementation start-up, resulting in insufficient coordination.

#### ***Coordination, relevance and complementarity with European and National Policies***

In the field of capacity building of the migration and asylum system, many programs and actions are recorded, with different sources of funding, which, however, is not part of a more comprehensive plan with a specific time horizon.

The asylum and migration system in Greece was under great pressure from immigration flows in the mid-2010s, with the result that, on the one hand, some of the policies were designed before the peak of the immigration crisis in Greece (see AMIF and ISF 2014-2020 programs), on the other hand, the entire migration and asylum system is in a constant

operational and regulatory transition at both national and European level, a fact that affected the mix and timing of policies.

The GR-G Program was designed in the middle of the Programming Period of the two main programs on Migration and Asylum (AMIF, ISF) which reflect European and national policies in the field, considering both the gaps of the two programs in terms of strengthening administrative capacity, as well as the framework formed at the time of the planning of the actions it includes.

As the Project Promoters of GR-G are key operational arms of the asylum and immigration system in Greece, coordination is achieved with other actions planned and implemented by project promoters in other programs, adopting European and National policies. Because the gaps in the system are significant mainly in terms of staff, procedures and systems, the GR-G program covers significant gaps identified in the migration and asylum system to the abovementioned parameters.

From the AMIF and the ISF programs, some capacity building activities of the migration and asylum system are recorded, but they are relatively limited in number, yet they involve the recruitment of a relatively large number of staff

Following the signature of the Seat Agreement for the Hosting of the EASO Operational Office in Greece on 28 January 2020, EASO announced that the Agency's operations in Greece are expected to double in size to over 1,000 personnel in 2020.<sup>28</sup> Within this increase, the operational presence on the Greek mainland will increase by four times the level of 2019, including personnel being permanently deployed to eight new locations in Thessaloniki and Ioannina to support the country's regular asylum procedure. At the same time, the number of caseworkers will double on the islands (from approximately 100 to 200) and triple on the mainland (from approximately 30 to 100). EASO's operations in Greece in 2020 will translate to a financial commitment of at least €36 million.

The agreement foresees that EASO staff will support the Greek Asylum Service, the national Dublin Unit, the Reception and Identification Service and the Appeals Authority. The personnel will include caseworkers, field support staff, reception staff, research officers for the Appeals Authority, interpreters, and administrative staff. Moreover, on 12 May 2020, EASO and the Greek Government agreed to an amendment to the Greek Operating Plan, which allows for the Agency to facilitate the relocation of 1,600 unaccompanied children from Greece to participating Member States in the relocation scheme.

In 2020, EASO deployed 643 different experts in Greece. The large majority of them were caseworkers (263), followed by reception assistants (90), administrative assistants (55), operations assistants (51), registration assistants (43) and a series of other programme and support staff (e.g. security staff, coordination staff, legal officers, Dublin staff, info providers etc). As of 14 December 2020, there were still a total of 533 EASO experts present in Greece, out of which 191 were caseworkers, 83 reception assistants, 44 administrative assistants, 42 operations assistants and 29 registration assistants.

The HELIOS Program (Hellenic Integration Support for Beneficiaries of International Protection) is implemented by the International Organization for Migration (IOM) which receives direct funding for the program from the Directorate-General for Immigration and Home Affairs (DG HOME) of the European Commission.

It is a comprehensive intervention for all adult beneficiaries of international protection and their family members, who have been recognized since 1/1/2018 and who lived during their

recognition in the housing schemes of the reception system (ESTIA program, FILOXENIA program, Open Hosting Structures, K.Y.T, etc.).

The implementation of the program has started from July 1, 2019 and continues. The program is designed to be able to absorb the population of beneficiaries of international protection recognized in Greece. The possibility of providing housing support services to 5,000 households is foreseen, a number that corresponds to 11,200 people depending on the composition of each household. Potential beneficiaries of the program are all beneficiaries of international protection.

*Consistency in the implementation of the program in relation to its design and description in the Program Agreement.*

The design of the program has not changed significantly from the original design, even though it was carried out before the outbreak of the Covid-19 pandemic, which affected migration flows and processes (digitization) of asylum and immigration services in EU.

At the same time, in the year 2020, significant changes were proposed in the migration and asylum systems in the EU. The implementation of the GR-G Program, at the time of the preparation of the On-Going Evaluation, is at a very early stage. The inclusion acts of the projects have been issued after the 2nd half of 2021. Significant changes from the initial planning are not recorded. However, some minor changes are recorded, such as that PDP 4 "broke" into two PDPs (PDP 4 and PDP 8). Minor changes are also recorded in PDP 5, in the FRA object.

The main bodies of the asylum and migration system (Asylum Authority, Appeals Authority, First Reception Service), despite being subordinate authorities of the Ministry of Migration and Asylum after 2020, while initially of the Civil Protection, did not cause consistency problems.

***Evaluation of the intermediate implementation results***

*The allocation of resources per predetermined project and the possibility of absorbing the total budget per project*

*Allocation of resources per Pre-Determined Project (PDP)*

The analysis of the budget of the pre-defined projects shows that 57.04% of the PDPs eligible expenditures concerns PDP 2 and PDP 7 (PDP 2: Strengthening the Asylum Service and PDP 7: Strengthening the first reception conditions and services provided to Third-Country Nationals). This significant concentration of the eligible expenditures in two (2) PDPs is mainly because these PDPs account for 56.12% of the eligible expenditures related to the staff costs with fixed-term contracts. This percentage for the two projects is significantly higher than the total percentage budgeted for staff costs for the program (48.67%).

Also important is the total budget of the program for expenditure of other contracts, which amounts to 31.19% of the total budget of PDPs.

The other categories of eligible expenditure do not concern a large percentage of eligible expenditures in relation to the total budget of the pre-defined projects for which an inclusion act has been issued.

The structure of the budget, documented by the aims and objectives of both the PDPs and the program as a whole, carries serious risks of loss of eligible expenditures as there are



delays in staff recruitment (staff costs) which even in the case of resolution in the near future, will inevitably lead to loss of eligible expenditures as they (staff costs) have been budgeted for longer time (36 to 54 months) than the remaining time to the end of the program..

#### *Ability to absorb the total budget per project*

##### *Ability to absorb the budget of PDP 1*

Until March 2022, the PDP 1 had no expenditures. However, it is noted by the European & Development Programs Management Authority (YDEAP, the Program Operator) that an advance payment of € 42,000 has been given (although this amount has not been linked to some PDP expenditures).

A significant difference from the initial budget concerns the change in Sub-project 1, where initially there was a provision for appeals committee fees and during the project there was the decision to hire administrative staff with fixed-term contracts to assist the appeals committees that had already been set up and were in operation.

As staff eligible expenditures are an important part of PDP 1's budget, there is a significant risk of losing eligible expenditures. As other eligible expenditures categories are related to the staff recruitment, the risk for losing eligible expenditures in PDP 1 is even higher.

The project has been significantly affected by the two-year implementation of measures to address Covid-19, however, because the recruitment process has not started yet, the possibility of absorbing the initial PDP budget has a very high risk. The risk assessment of the on-going evaluation contractor concludes that there is a significant risk that eligible expenditures of € 659,950.00 to € 723,300.00 will not be absorbed (or 38% to 42% of the initial budget of the PDP1).

##### *Ability to absorb the budget of PDP 2*

PDP 2 is one of the two PDPs of the GR-G Program with the largest budget. It includes a significant budget for staff costs (€ 2,358,800.00). However, due to the delays in starting the recruitment process, the absorption of the PDP 2's initial budget is in a very high risk.

Based on the evaluator's risk analysis, it is very likely that eligible expenditures of € 1,251,488 (or 25.02% of the PDP's budget) will not be absorbed, even in the case where all procedures from today until at the end of the program will proceed smoothly, without delays.

It is noted that all the actions of the project, except for the provision of licenses for the QlikSense software in the asylum service, depend on the operation of the two regional offices in Athens and Thessaloniki, which depends on the staff recruitment process for the regional offices.

##### *Ability to absorb the budget of PDP 3*

The PDP 3 is behind the time schedule. In March 2022, the Partnership Agreements were signed with the projects' partners. The project is particularly important in terms of strengthening the capacity of the Greek asylum and migration system as it will organize data on asylum and migration and the way they are collected, processed, and utilized, while giving significant know-how to dealing with emerging conditions of increasing migration and refugee flows. The organization of the interpreter's registry at program level is also

considered important as it is an important aspect of the capacity of the migration and asylum system.

Because the actions envisaged in the PDP 3 are not particularly interdependent, it is estimated that PDP 3 can be implemented in its entirety without loss of eligible expenditures. However, actions related to the transfer of know-how, and which are directly related to the availability of the Ministry's staff, may lead to loss of eligible expenditures, due to the reduction of the required travel expenses, which are estimated not to exceed 30% of the PDP 3 budget for specific category of eligible expenditure (€ 286,217.00), ie € 85,865.10.

#### *Ability to absorb the budget of PDP 4*

The PDP 4 is behind the time schedule. Its implementation has not started, however, several maturation actions have been completed, such as the preparation of the requirements document for the staff (call for the expression of interest) that will be hired with fixed-term contracts as well as the TORs of the required goods and services. It is noted that PDP 4 was initially a comprehensive project in the field of services for unaccompanied minors, however due to the transfer of responsibility of unaccompanied minors to the Special Secretariat for Unaccompanied Minors, the project concerns only the telephone support line.

Also, in the case of PDP 4, it is estimated that not all staff eligible expenditures will be absorbed. According to the on- going evaluator's estimates for the risk of loss of eligible expenditures of PDP 4, approximately € 131,500.00 is not expected to be absorbed by staff costs. For the other categories of expenses, it is estimated that they will be fully absorbed.

#### *Ability to absorb the budget of PDP 5*

After many months of delays in the selection of the funding body, the change of the object that will be implemented by the FRA, the delays in the Partnership Agreement completion, the problems have been resolved and PDP 5 can start its implementation. Due to the nature of the project, the budget structure (a large percentage concerns the FRA) and the extensive experience of the FRA, it is estimated that there will be no loss of eligible expenditures for the PDP 5.

#### *Ability to absorb the budget of PDP 6*

Because for the specific PDP, there is not yet an inclusion act in the GR-G Program, it is estimated that the possibility of absorbing the eligible expenditures will not exceed 75% of the budget, ie € 450,000.00.

#### *Ability to absorb the budget of PDP 7*

Due to the high eligible expenditure in the category of staff costs and the significant to date - but also expected - delays in staff recruitment, it is expected that eligible expenditures amounting to € 919,668.00 will not be absorbed.

#### *Ability to absorb the budget of PDP 8*

Due to delays in the recruitment process of fixed contracts staff, which has been budgeted according to the inclusion act to the amount of € 454,290.97 (staff costs) and the usual procedure followed in these cases, a loss of eligible expenditures of about 30% of this category of expenditures is expected. In addition, because three rounds of evaluation of the hosting structures are foreseen in the PDP, and there are still significant delays in the start

of the project, it is expected that some of the actions of the first evaluation cycle will not be implemented.

#### *Ability to absorb the budget of the Program*

The program has significant delays. Maturation procedures for the launch of PDPs were significantly delayed due to the inclusion of key Project Promoters in the Ministry of Migration and Asylum (2020) and measures to reduce Covid - 19. However, there were delays due to minor changes in the initially planned PDPs. During the preparation of the evaluation, seven (7) inclusion acts were recorded by the evaluator.

The most important issue that was recorded during the on-going evaluation, is the choice of the Ministry of Migration and Asylum, to announce the Call for Expression of Interest for the fixed contract staff of all PDPs in one call. This approach creates without regulatory reason, significant interdependencies of the recruitment of staff with the progress of the individual PDPs.

However, this delay, which is significant and affects the forecasts for the absorption of the eligible expenditures for staff recruitment, is not the only one. At the time of the preparation of the on-going evaluation, not all Partnership Agreements had been completed (mid-March 2022). Also, no tender procedure had been initiated for the supply of equipment or services.

From the progress of PDPs to date, there is no clear picture of the management burden of individual PDPs. Because PDPs are not being implemented, the evaluator was unable to diagnose whether the administrative capacity of both the Program Operator and the Project Promoters is sufficient for the proper and timely management of the PDPs. Because the implementation time has been significantly shortened, in addition to estimating the loss of eligible expenditures due to delays in staff recruitment and due to staff recruitment interdependencies with other actions (eg staff training, operation of structures, etc.) it is estimated that eligible expenditures from other categories will be not absorbed until April 2024.

According to the evaluator, approximately 23% (€ 4,171,195.95) of the program eligible expenditures are expected not to be absorbed. The reasons that led to this assessment, is the long delay in the maturation of projects which has led to long delays in staff recruitment for PDPs and which in turn will lead to loss of eligible expenditures in actions related to staff recruitment.

#### *The evaluation of the system of results indicators*

Regarding the output indicators, it is estimated that they reflect almost all the outputs of the Program Projects (of the individual PDPs).

For the result indicators, the indicators that refer to the two calls of the Program, cannot record the results of the program. The process of evaluating the results of the program is a rather difficult process, as there are many programs and many sub-actions, which run simultaneously and aim to strengthen the administrative capacity of the migration and asylum system in Greece. For example, the reinforcement of the Appeals Authority, which could have the effect of reducing the average review time of appeals, can be done by a set of actions to strengthen the Appeals Authority, which overall leads to a reduction of the average time, without being clear which measures or actions led and to what extent the reduction of the average review time.

## Progress and actual results in relation to the schedule and quantified objectives achieved at Program level.

### *Implementation progress*

For the seven of the eight PDPs there are inclusion acts, however there are delays with the signing of some Partnership Agreements. Significant preparation has been done, in terms of project maturity, detailed description of actions, projects budgeting, elaboration of technical specifications for the required equipment, elaboration of the required qualifications for the recruitment of staff. in collaborations with PDPs partners, in finding the required premises for PDPs 2 and 7.

However, all the above have been done with a significant delay and in the next period the cooperation and implementation rates will have to change significantly to achieve at best an absorption of 75% of the initial budget of the program. The maturation time of the projects is considered relatively long (counted from the signing of the program agreement until the accession decision).

Regarding the first indications from the implementation of PDPs, the evaluation shows that the implementation rates are slow and are affected in the initial stage of implementation by the time-consuming procedures of recruitment and conducting competitive procedures for the supply of goods and services.

### **Real results**

From PDPs progress mapping, until the time of submission of the On-Going Evaluation, no results have been produced by the PDPs. This development poses a significant risk to the effectiveness of the program. However, significant maturation actions have been taken which ensure the implementation of many actions of the Predetermined Projects, with significant risks of loss of resources in projects that either include staff recruitment or staff recruitment that is a prerequisite for the implementation of other actions / actions.

### **Quantified results achievement**

Until the writing of the On-Going Evaluation Report, the objectives of the program have not been achieved. Significant and critical actions for the maturation of PDPs have been implemented by Project Promoters and the Program Operator (YDEAP), however for the reasons explained in the On-Going Evaluation, no goal has been achieved yet. At the same time, it is noted that several goals are expected to be partially achieved, due to the delay in ensuring the functionality of PDPs and consequently in the production of outputs and results.

### Risk analysis and management

This section presents the evaluators' risk analysis for the program and risk management actions.

Two key points of the risk analysis are the inclusion of the Asylum, Appeal, Reception, and Identification Services, from the Ministry of Civil Protection to the Ministry of Migration and Asylum, which was established in 2020 and the travel restriction measures to limit Covid-19. The specific points of analysis mainly concern the past years and in the opinion of the evaluator had a significant impact on the implementation schedules.

The main issue that puts in risk the program in terms of both the implementation and the absorption of program eligible expenditures, is the limited ability of the competent organizational units of the Ministry of Immigration and Asylum to proceed with the issuance of calls for the expression of interest for the staff recruitment with fixed-term contracts which are directly related to the implementation of the physical object of the PDPs, as well as to the tender procedures for goods and services directly related to the object of the PDPs.

The competent organizational units of the Ministry plan to issue a single call for the expression of interest for all fixed-term staff contracts that are provided in all PDPs of the GR-G. Something similar is planned for the tenders for equipment and other services. This approach has led to delays in the recruitment of fixed-term staff without any regulatory reason.

Because the program budget for fixed-term staff contracts is almost 50% of the total program budget and the contracts were budgeted for at least 36 months (in some cases 54 months) and the time remaining for the implementation of the PDPs is anticipated to be less than 18 months, there is a significant risk of losing (estimated) 50% of the staff eligible expenditures or about 25% of the Program budget.

Delays in staff recruitment also led to delays in other actions (for example, staff training) related to staff with fixed-term contracts. Although these actions can be implemented in a relatively short period of time after the recruitment of short-term contract staff, it is estimated that some will not be implemented within the PDPs and program schedule, further affecting the effectiveness of program PDPs, leading to significantly reduces absorption of program eligible expenditures.

In general, important issues are recorded in the cooperation of the PDPs partners, which are reflected in the delays in signing the Partnership Agreements. It is noted that even today some Partnership Agreements are pending. The problems of cooperation were attributed to previous reports of the Program to the restriction measures due to Covid-19 and led to the non-observance of deadlines for submission project fiches in the invitations of the Program Operator.

An important element that emerged from the evaluation was the slow pace of administrative, managerial, and operational actions and / or operations in the previous reporting periods. In all previous evaluation reports, there were clear reference of delays exposing to risk the implementation of the program. The actions for the improvement of the implementation pace were not considered (according to the previous evaluation reports - progress reports) as satisfactory.

The result is that today, after almost two (2) years of maturation procedures and with a remaining implementation time for the program of two years (until April 2024), there are inclusion acts for seven PDPs and for these there is minimum implementation progress. There is no inclusion act for PDP 6. Out of the 6 PDPs, the implementation has started in only two (PDP 7), while for all the others there is no progress in the implementation of the physical and consequently of the financial object. The appropriations are 42,000 for the act of the Appeals Authority.

#### *Risk Analysis for PDP 1*

By March 2022, the call for expression of interest for fixed-term contracts had not been issued. Given that 62.73% of the eligible expenditures of PDP 1 relates to staff costs which were originally budgeted for 34 to 37 months and the time from staff recruitment to completion of the operation in April 2024 will be significantly shorter, there is risk for 50%

of the budget relating to staff costs and 20% -30% of the budget for the other PDP 1 expenditure categories due to delays in staff reductions. 50% of staff costs are € 533,250.00 (1,066,500.00 X 50%) and 20% of other costs are € 126,700.00 (calculated at 20%) which can reach up to € 190,050.00 (with calculation at 20%). The evaluator's assessment is that there is a significant risk that eligible expenditures of € 659,950.00 to € 723,300.00 will not be utilized, (38% to 42% of the originally planned budget of the project).

### *Risk Analysis for PDP 2*

By March 2022, the recruitment process had not started. The specifications for the staff who will be hired with fixed-term contracts have been sent (25/6/2021) by the Asylum Service to the competent unit of the Ministry. According to the program manager (YDEAP), the specifications were expected to be sent to ASEP in mid-March 2022.

The budget for fixed-term contracts (staff recruitment) amounts to € 2,356,200.00. This budget has arisen with the assumption that the staff with fixed time contracts., will be reimbursed from 1/11/2021, until 29/2/2024 (28 months. However, because according to the planning of the Ministry, the call for expression of interest for the fixed time contracts staff will include all the staff of all GR-G PDPs and because the procedure will follow the ASEP recruitment framework, the evaluator estimates that in the best scenario the process (of recruitments) will be completed at the beginning of September 2022. This means that almost one year will be lost for each staff member.

The amount of 2,356,200.00 for staff was budgeted for 27 months for the compensation of a certain number staff. However, the time from the finalization of the recruitment procedures until the end of the program will be 20 months (from 1/9/2022 to 30/4/2024), an estimate that will lead to a loss of staff eligible expenditures of € 673,200.

At the same time, the two offices in Athens and Thessaloniki have been rented and rental expenses are created for PDP 2. The rent budget (total 880,000.00) has resulted from a calculation for a total of 34 months (01/06 / 2021-30 / 04 / 2024), ie average budget per month 25,882.35 € for both offices. According to YDEAP, the monthly rents for both offices are 10,000 (6,500 and 3,500) and are valid for 36 months, ie a total of 360,000.00 for the PDP 2 schedule. It is noted, however, that because the rents have been "running" since the beginning of 2022 (and not from 1/6/2021 as it was the original time schedule), the loss of eligible expenditures may be even greater, amounting to € 330,296.00. So, it is expected in this case to have a reduction in eligible expenditures (or loss of resources) of € 58,287.53

The remaining actions concerning the purchase of the necessary equipment for the regional offices, the teleinterpretation system, the extension and operation of the QlikSense system in the Asylum Service and the Appeals Authority are not affected by the delays in the schedule in terms of expenditure, however the any delay in supply and installation, affects the operation of the offices and consequently the results of the PDP.

The remaining actions of PDP 2 concerning the "Transfer of the target group to the Regional Asylum Offices of Athens and Thessaloniki" and the "Carrying out DNA tests, age determination and other necessary diagnostic tests", which have been calculated to start in the 3rd Month of 2022 by assignment process to an external contractor, have not started.

Consequently, apart from the significant risk of loss of eligible expenditures, the project may not be operational unless the recruitment of staff and the supply of goods and services directly related to the operation of the regional offices are completed. In addition, in terms of results, it is considered that the achievement of the indicators EOX\_Oo82 and EOX\_Oo83 is particularly precarious.

### *Risk Analysis for PDP 3*

PDP 3 includes two sub-actions. The Immigration and Asylum Observatory and the National Interpreters' Registry. Both operations are implemented with the same methodological approach: maturation study, legal framework for the establishment and operation, supply of information system and logistics infrastructure, studies (for the Observatory only) and evaluation report. Due to the physical object of the project, there is no significant risk of its timely and correct completion.

It is noted that the relevant specifications for the supplies have been drawn up. Also, the involvement of the partners (Norwegian Ministry of Justice and Security and the Secretariat for Integration and Diversity) with the provision of know-how and experts, significantly reduces the risk.

However, the delay in procurement (it is noted that the specifications for the procurement of equipment have been sent to the relevant department of the ministry in December 2021) and the signing of the Partnership Agreements in March 2022, make the PDP unusable from other PDPs. At budget level, it is not estimated that there will be a loss of resources.

### *Risk Analysis for PDP 4*

The project envisages the recruitment of staff for the support of the EKKA hotline, with a budget of € 531,500.00. The specifications for the staff have been completed, however because the process will follow the ASEP framework for staff recruitment, delays are expected. There is also a risk that the candidate will not show interest in the projected job descriptions. Based on the above and given that the above amount concerned 36 months for fixed-term contracts, the budget is expected to be reduced to € 400,000, which is estimated for staff costs.

The rest of the actions concern the procurement of services and goods which EKKA can implement relatively quickly as the technical specifications have been completed and the procurement budgets (tenders) are of low budget.

### *Risk Analysis for PDP 5*

Significant delays were recorded in the project, due to changes in the subject matter of the FRA but also the settlement of important management issues with the FRA. Due to the experience of the FRA, no risks are foreseen in the implementation of PDP 5. The Ombudsman has an ancillary and relatively simple role in the implementation of PDP 5.

The Partnership Agreement has been completed after several months of work and the smooth implementation of PDP 5 is expected. However, due to the delayed launch of PDP 5, there is a risk that some of the output indicators will not be met (EOX\_0005)

### *Risk Analysis for PDP 6*

For PDP 6, there is no inclusion act yet. The Project Promoter of PDP6, was the Hellenic Police in partnership with the Center for Security Studies (KEMEA), according to the Program Agreement (Annex I of the Amendment Decision of the decision no. 33393 / 27-03-2020 of the Minister of Development and Investments" Co-financing of the Program entitled: "Development of the management capabilities of the National Asylum and Migration Systems" (Program G - Capacity Building of National Asylum and Migration Management Systems), Issue B '2983 / 08.07.2021.

Due to the change of the Project Promoter (KEMEA instead of the Hellenic Police), procedural and technical steps have to be taken again (new Program Agreement) and there is a delay.

The budget of the operation is the smallest of all PDPs (€ 600,000.00), however despite the significant experience of KEMEA in the implementation of projects with a similar object, the risk is significant for the project implementation.

#### *Risk Analysis for PDP 7*

PDP 7, has significant risks in terms of the implementation of the physical object as it was originally provided. Initially there was a provision for staff through a competitive process, but this did not happen due to regulatory reasons. The staff recruiting process should be run through ASEP (Supreme Council for Civil Personnel Selection) procedures, for the recruitment of 40 executives with Fixed Term Contracts.

The specifications for the staff recruitment have been forwarded to the competent administrative unit of the Ministry of Migration and Asylum. And in this case, the Ministry intends to make the recruitments collectively for all PDPs of the GR-G Program. This approach has led to delays and is expected according to what has been done so far, to lead to the completion of the recruitment process in September of 2022 (evaluators' estimate).

In essence, the Pyrgos structure cannot be functional without the staff and will potentially be put into operation in September 2022, provided that the other supplies of services and goods related to the operation of the structure have been completed since then. The operating costs of the structure were budgeted starting on 1/10/2021. Because the rental started in December 2021, part of the eligible expenditures will not be used. There will be proportional reductions in the eligible expenditures related to the security services of the structure and the services for cleaning, disinfection, technical maintenance, etc.

Only from the category of staff costs and due to the significant delays in recruitment recorded to date, the time initially estimated for the employment of staff, will be significantly reduced (possibly by 12 months) and will lead to a loss of eligible expenditures of € 919,668.00. To these losses costs related to staff costs (e.g. staff training) can be added. Eligible expenditures losses are also expected from the abolition of the operation of the structure in Eleonas, Attica.

#### *Risk Analysis for PDP 8*

PDP 8 has a large amount (€ 1,136,200.00) which concerns staff eligible expenditures. The procedures for recruiting staff (call for expression of interest) have not started yet. In addition, the PDP is organized into three cycles of on-site inspections and two cycles of surveillance actions.

Due to the delays so far, the schedule of the above-mentioned cycles should be modified and implemented in 2/3 of the original schedule. PDP 8 includes many trips and individual actions and therefore requires very good coordination for the actions to be functional.

Delays in tendering procedures are a significant risk in terms of the schedule and, consequently, in terms of the implementation of the physical object. In the case of PDP 8 as well, staff recruitment and tender procedures are handled by the competent units of the Ministry of Immigration and Asylum.

#### ***Examination of administrative capacity and implementation procedures***



The regulatory framework of Programme Management is clearly defined and in part has been tested in practice as a large part of it is essentially part of the Management and Control System of the Programming Period 2014-2020 for ESIF in Greece. However, there was a delay in finalizing the management and control system.

The administrative capacity of YDEAP is expected to meet the requirements of the program as it has implemented in the past as a management authority and other programs. However, it is pointed out that due to the contraction of the implementation time of the program in the time remaining until April 2024, the workload for the next period when the implementation of the operations is expected to begin will be particularly increased.

YDEAP, in cooperation with Project Promoters and the partners of PDPs, has ensured the necessary conditions for the proper implementation of the projects, having ensured the observance of the regulatory framework, and having assessed the risks in the implementation of PDPs

However, from the development to date, the capacity and efficiency of the Program Operator cannot be evaluated in project implementation phase to date, as a relatively small part of the management has been carried out for each predetermined project and for the program, which reaches up to the inclusion acts so far. At this point of the life cycle of the implemented projects, the administrative capacity and efficiency of the program operator is considered satisfactory, without creating delays in the program.