

“Follow th€ Money II”

Assessing the use of EU Asylum, Migration and Integration Fund (AMIF) funding at the national level 2014-2018



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INTRODUCTION

The Asylum, Migration & Integration Fund (AMIF) 2014-20 aims to contribute, via financial assistance, to the effective management of migration flows and to the implementation and development of a common EU approach to asylum and migration. The AMIF reflects the efforts to simplify and streamline the implementation of the European Union budget in the area of home affairs.¹ For the 2014-2020 period, approximately 88% (€2.39bn) of the total AMIF resources of €3.1bn were allocated to Member States implementing multiannual national programmes approved by the European Commission.²

On 12 June 2018, the European Commission submitted an interim evaluation of the AMIF to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, the conclusions of which drew on the interim evaluation reports prepared by Member States on the implementation of their AMIF national programmes during the 1 January 2014 to 30 June 2017 period.

Additionally, on 12 June 2018, in the context of the new Multiannual Financial Framework for 2021-27, the European Commission published its *Proposal for a Regulation to establish the Asylum and Migration Fund*, the successor Fund to the current AMIF.

The first 'Follow the Money' study, published in January 2018, assessed the programming and design of national AMIF funds from a civil society perspective.

This second 'Follow the Money' study presents:

- A comparative critical analysis of the use of AMIF funding at the national level during 2014-18, drawing on the outcomes of national and European interim evaluations of the Fund and the perspectives of civil society and other actors involved in national AMIF implementation.
- Detailed case studies assessing national AMIF implementation in four Member States (Bulgaria, Estonia, Germany and Spain).
- A critical overview of the use of AMIF emergency assistance to implement actions in Member States during 2014-18.

Based on this analysis, this study presents:

- Recommendations on the implementation of the proposed Asylum and Migration Fund for 2021-27 at the national level, addressed to Member States.
- Recommendations on programming, monitoring and evaluating national implementation of the proposed Asylum and Migration Fund for 2021-27, addressed to the European Commission.

This study has been produced in the framework of the strategic partnership of the European Council for Refugees and Exiles (ECRE) and the UN Refugee Agency (UNHCR), established in 2016 to develop and promote discussions on the future of the Common European Asylum System (CEAS).

¹ Recitals 2-3 & 7, Regulation (EU) No 516/2014 of the European Parliament and of the Council of 16 April 2014 establishing the Asylum, Migration and Integration Fund, amending Council Decision 2008/381/EC and repealing Decisions No 573/2007/EC and No 575/2007/EC of the European Parliament and of the Council and Council Decision 2007/435/EC. (hereafter 'Regulation 516/2014'). April 2014 establishing the Asylum, Migration and Integration Fund, amending Council Decision 2008/381/EC and repealing Decisions No 573/2007/EC and No 575/2007/EC of the European Parliament and of the Council and Council Decision 2007/435/EC (hereafter 'Regulation 516/2014')

² Article 15(1a), Regulation 516/2014

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EXECUTIVE SUMMARY

'Follow the Money: A report on the use of AMIF funding at the national level 2014-18' presents a comparative critical analysis of the use of AMIF funding at the national level during 2014-18, drawing on the outcomes of the national and European interim evaluations of the Fund and the perspectives of civil society and other actors involved in national AMIF implementation. It builds on the findings of the first *Follow the Money* study, published in January 2018, which assessed the programming and design of national AMIF funds from a civil society perspective.

In light of the European Commission's *Proposal for a Regulation to Establish the Asylum and Migration Fund*, published in the context of the new Multiannual Financial Framework for 2021-27, this second *Follow the Money* study presents:

- Recommendations on the implementation of the proposed Asylum and Migration Fund for 2021-27 at the national level, addressed to Member States.
- Recommendations for programming, monitoring and evaluating national implementation of the proposed Asylum and Migration Fund for 2021-27, addressed to the European Commission.

Chapter 1 introduces the methodology for the study's supporting research, undertaken during June-December 2018, which encompassed:

- **Desktop analysis** of interim evaluations of the AMIF, produced by Member States and the European Commission.
- **Online surveys.**
- **Detailed case studies of national AMIF implementation** in four Member States (Bulgaria, Estonia, Germany and Spain), including 18 one-to-one interviews and one online focus group.
- **Consultation on preliminary findings with the ECRE membership** at the ECRE Annual General Conference (Belgrade, November 2018).

Chapter 2 presents key aspects of the AMIF 2014-20 relevant to assessing the Fund's performance at the national level. It describes the AMIF's central objectives (or 'priorities') on asylum, legal migration and integration, return, and solidarity and responsibility-sharing, and sets out the key central principles of the Fund. Of note here is the Partnership Principle, a new requirement introduced by the AMIF which obliges Member States to organise national partnerships and involve them in the preparation, implementation, monitoring and evaluation of AMIF national programmes, in addition to the requirement that support from the AMIF be complementary to other national, regional and local interventions.

The chapter goes on to describe co-financing arrangements for AMIF actions at the national level, before setting out the initial AMIF budgetary allocations to Member State national programmes for 2014-20 and briefly presenting the framework for AMIF emergency assistance. The chapter concludes with a short summary of the timetable for AMIF implementation, noting the significant delays caused by late agreement from both the Fund's legal base and individual Member State AMIF national programmes.

Chapters 3-8 include recommendations, addressed to both the European Commission and to Member States, for the remainder of the AMIF funding period and the implementation of the proposed Asylum and Migration Fund during 2021-27, as relevant. Additionally, this study concludes with recommendations that have arisen from the detailed case studies on national AMIF implementation in Bulgaria, Estonia, Germany and Spain, which are included throughout the text.

Chapter 3 provides an overview of the interim evaluation of the AMIF. It presents the respective evaluation responsibilities of Member States and the European Commission, sets out the common monitoring and evaluation framework outlined in the Fund's legal base, and describes the requirements for national evaluations carried out by Member States. It notes the availability of national AMIF interim evaluations for 26 of the 27 Member States implementing AMIF national programmes (the report for Croatia was not agreed upon during the research period), and the publication by the European Commission of a report on interim

evaluation of the AMIF for the European institutions in addition to an additional external evaluation of the Fund.

It goes on to provide a critical analysis of the methodologies employed in carrying out the national AMIF interim evaluations, noting the differing national approaches to the selection of evaluators, while incorporating feedback from AMIF beneficiary organisations and wider stakeholders. It then presents the limitations of the data included in national reports, attributing these to a number of factors, including a lack of sufficient progress in implementation on which to base evaluation conclusions, incomplete Member state reports, and the nature of the evaluation questions included in the common monitoring and evaluation framework.

Recommendations in this area include amending the common monitoring and evaluation framework and its associated guidance, mandating specific time periods within which national evaluation reports must be published, and publishing responses to national evaluation conclusions at both the national and European levels.

Chapter 4 critically analyses national AMIF expenditures during 2014-17. It concludes that overall progress in spending national AMIF funds is slow, with the majority of Member States recording less than 25% of their approved expenditure during the first half of the Fund's implementation period. There is, however, a clear upward shift in the rate of expenditure when committed (rather than solely approved) AMIF funds are considered.

In terms of the balance of national AMIF spending across the asylum, integration and return priorities, this chapter notes the emphasis on the return priority at the European level (43% of all approved expenditures) and the lowest overall expenditure on integration (26.4%). At the national level, AMIF spending priorities vary considerably: six national programmes focus heavily on a single priority, and just five demonstrate balanced spending across the three priorities.

At the midway point of the AMIF, just one Member State has spent more than 30% of their programmed expenditure on a single priority, and there is a clear disconnect between the required programme allocations for asylum (20%) and integration (20%), and actual spending under national programmes to date.

Recommendations in this area include ensuring balanced spending across AMIF priority areas throughout the programming period, alongside the introduction of a formal approval process where Member States wish to exceed programmed spending for a single priority area.

Chapter 5 examines the types of organisations implementing AMIF funds at the national level. At the European level, Member State authorities are the single largest beneficiary of national AMIF funds, and the largest beneficiary for actions under the asylum and return priorities. Civil society organisations are the second largest beneficiary, albeit at just over half the rate of Member State authorities, and are most active in implementing actions under the integration priority. 'Local public authorities' implement actions under all three AMIF priority areas, but predominantly under the integration priority.

At the national level, the types of organisations implementing AMIF funds vary considerably. Six Member States have allocated more than 50% of all national AMIF resources to Member State authorities, including two entirely state-led programmes, while the participation of civil society organisations ranges from no participation at all to implementing 91% of all AMIF funds. 'Local public authorities' participate in 15 AMIF national programmes, most notably in Italy and Portugal.

Recommendations in this area include mandating minimum allocations of national AMIF resources to civil society organisations (28%) and local/regional authorities (5%), and limiting allocations to national authorities to 40% of overall resources.

Chapter 6 critically analyses the use of AMIF emergency assistance to support actions in Member States during 2014-17. It presents the legal framework for the use of AMIF emergency assistance, and charts the substantial increases in the overall financial envelope for this funding in response to the increased number of arrivals into Europe from 2015 onwards.

The chapter goes on to present the level of AMIF emergency assistance funding provided for actions in Member States during 2015-17, and the broad areas of activity for emergency assistance actions implemented by Member State authorities. A key finding in this area is the lack of transparency in relation to the use of AMIF emergency assistance, particularly in relation to contradictions in data published by the European Commission and a lack of publicly available information on the activities, financing and outcomes of AMIF emergency assistance actions.

Recommendations in this area include prompt and full publication of decisions to award AMIF emergency assistance, including the full details of activities, partners and co-financing arrangements, and the publication of interim and final progress reports on actions supported via emergency assistance.

Chapter 7 summarises the main contributions of the AMIF in relation to asylum, integration and return during 2014-17, as identified in national interim evaluation reports.

It concludes that, overall, the Fund has made a significant contribution to broadening the scope of national activities in the areas of asylum, integration and return. However, national evaluations of the AMIF strongly indicate that support from the Fund was insufficient in assisting Member States to cope with the impact of increased arrivals of asylum seekers from 2015, despite the increased financial envelope for the Fund since its establishment. This suggests that the Fund has not been sufficiently flexible and/or there are challenges for some national authorities to effectively absorb and spend its resources.

The chapter also raises questions regarding the complementary nature of AMIF support, given that national evaluations identify actions currently supported by the AMIF that would – in the absence of the Fund – be continued with support from national budgets. It also questions the sustainability of the Fund in relation to integration actions, which evaluations state would be unlikely to be implemented without AMIF funds due to the unavailability of other sources of funding to support this area of work.

Recommendations in this area include extending the common monitoring and evaluation framework to include an assessment of to what extent successful integration practices identified through the use of EU asylum and migration funding have been incorporated into mainstream national service provision, including a comprehensive reflection on what constitutes complementarity and added value in the legal base of the proposed Asylum and Migration Fund, and enabling direct access to emergency assistance for local authorities and national civil society organisations.

Chapter 8 presents the key challenges for national AMIF implementation during 2014-17, as identified in national interim evaluation reports.

Although the AMIF explicitly aimed to reduce the administrative burden associated with implementing EU funds in the area of asylum and migration, evaluation reports conclude that this has not been achieved in relation to either national authorities managing AMIF programmes or AMIF beneficiary organisations. Specific measures introduced by the AMIF to achieve simplification, such as simplified cost options, have not been widely used.

The changing migration situation in Europe since 2015 in many instances has made planned AMIF activities no longer useful or achievable, and created uncertainty in terms of programme planning. Aspects of monitoring and evaluation have also created challenges for national AMIF implementation, including the retrospective evaluation necessitated by the late publication of key elements of the AMIF's monitoring and evaluation framework, unclear links between the different types of indicators included in the framework, and a lack of attention paid to realistic target-setting at the project design phase.

Recommendations in this area include actions to reduce the administrative burden, such as amending the financial reporting year and minimising the required progress reporting for AMIF beneficiaries, measures for improving and increasing the flexibility of common monitoring and evaluation arrangements, and actions to ensure that evaluation expertise is fully engaged in the design and implementation of AMIF national programmes.

The study concludes by presenting **recommendations that have arisen from the detailed case studies of national AMIF implementation in Bulgaria, Estonia, Germany and Spain**, which are included throughout the study. Recommendations are included with reference to:

- The Partnership Principle: initiating implementation of the provisions of the European Code of Conduct on Partnership during the remaining AMIF period, given it will become applicable to EU asylum and migration funds during 2021-27.
- Programme management and coordination: ensuring Responsible and Delegated Authorities have sufficient resources and expertise for managing national programmes; using a multiannual approach wherever possible; increasing transparency where national authorities and agencies are beneficiaries of EU asylum and migration funding.
- Financial implementation: ensuring prompt payment of approved grant funding to beneficiary organisations; aligning financial controls for EU asylum and migration funding with those in place for other EU funds; consulting national partners on the potential use of simplified cost options.

1. METHODOLOGY

Supporting research for this study was conducted utilising a mixed method approach, encompassing the following elements:

- **Desktop analysis, alongside Member State and European Commission AMIF interim evaluation reports:**

27 Member States participate in the AMIF.³ At the outset of the research process in mid-June 2017, five Member States had published AMIF interim evaluation reports. 21 further reports were unpublished, but were provided directly to the research team by Member State authorities on request during June-October 2018. The AMIF interim evaluation report for Croatia was not made available to the research team, and the interim evaluation of the AMIF national programme in Croatia was therefore not included within the scope of this study.

The findings of the desktop analysis of national AMIF interim evaluation reports, together with a comparative assessment of national migratory contexts across European Union Member States, guided the selection of four Member States – Bulgaria, Estonia, Germany and Spain – as the subjects of detailed case studies of national AMIF implementation.

Member States used as case studies were selected based on the following specific criteria:

- Initial national AMIF budgetary allocations for 2014-20.
- National AMIF expenditure 2014-17.
- Balance of AMIF spending during 2014-17 (for the asylum, integration and return priorities).
- Proportion of national AMIF funds implemented by civil society organisations.
- Participation in resettlement and/or relocation.
- Rate of increase in asylum claims received at the national level during 2014-17.
- Percentage share of asylum claims received in the EU-28 during 2014-17.

- **Online surveys:**

- **26 online surveys on AMIF national programmes** (one for each Member State within the scope of the study) seeking feedback on the conclusions made by the national AMIF interim evaluations, the impact of the AMIF national programmes, and respondent experiences from implementing AMIF actions.
- **One online survey seeking examples of good practice in AMIF implementation** at the national level.

The surveys were made available in ten European languages, accessible via a central webpage, and circulated via the ECRE and UNHCR networks. The response rate (8 responses to national surveys, 6 responses to the best practice survey) was insufficient for triangulating the findings of national AMIF evaluations or determining common best practice at the European level, although the survey responses were used to guide the areas of inquiry for the national case studies.

- **One-to-one interviews and a focus group: Bulgaria, Estonia, Germany and Spain**

18 one-to-one interviews and one organisational focus group were conducted with national actors in the four Member States used as case studies, with civil society organisations, UNHCR, IOM, and – in Bulgaria, Estonia and Spain – representatives of AMIF Responsible Authorities. The AMIF Responsible Authority for Germany agreed to participate in the study, but was unable to do so during the 2018 research period.

- **Consultation on preliminary findings with ECRE member organisations and UNHCR**

Preliminary findings on the study were presented for feedback at the ECRE Annual General Conference in Belgrade in November 2018, enabling the views and experiences of the wider ECRE membership and UNHCR participants to be incorporated into the study's findings and recommendations.

³ Denmark does not participate in the AMIF.

2. THE ASYLUM, MIGRATION & INTEGRATION FUND (AMIF) 2014-20

a. AMIF objectives

The AMIF has four common specific objectives:

- strengthening and developing the establishment of the **Common European Asylum System (CEAS)** ('asylum priority');
- supporting **legal migration** to MS in accordance with their economic and social needs and promoting the **effective integration** of third-country nationals ('legal migration and integration' priority);
- enhancing **fair and effective return strategies** with a view to countering **illegal immigration** ('return priority'); and
- increasing **solidarity and responsibility sharing** between MS, with a particular focus on those most affected by migration and asylum flows.⁴

b. Key features of the AMIF

The general principles for AMIF assistance, including that provided for national programmes, describe how support from the Fund is intended to be **complementary** to that provided by other '*national, regional and local interventions*' and results in '*added value for the Union*'.⁵ AMIF actions must also '*take account of a human rights-based approach to the protection of migrants, refugees and asylum seekers*', in particular by ensuring that the specific needs of **vulnerable persons** are addressed through dedicated actions.⁶

The AMIF introduced a new national level **Partnership Principle**, requiring Member States to organise a partnership of national, regional and local public authorities and – where relevant – international organisations, non-governmental organisations and social partners'.⁷ Member States are required to involve this partnership in the '*preparation, implementation, monitoring and evaluation of national programmes*'.⁸ Member States can vary the composition of this partnership throughout the programming period.⁹

To support the implementation of national programmes, Member States are required to establish a **national AMIF Monitoring Committee**, at which the European Commission may participate in an advisory capacity.¹⁰ Although AMIF Monitoring Committees are not explicitly required to involve the national partnerships organised by Member States, their function as the key vehicle for national AMIF implementation, monitoring and evaluation, alongside their inclusion under the '*Partnership*' heading in the legal base, strongly implies a requirement that national partners be included in their work.

The general maximum Union financial contribution to actions supported under AMIF national programmes is 75% of their total cost. The remaining 25% is required to be financed '*by public or private sources*', which can include national budgets.¹¹

c. Allocation of AMIF funds to Member States

The 88% (€2.39bn) of the AMIF financial envelope allocated to supporting national programmes was distributed to Member States for the entire budgetary period of 2014-2020. The distribution was calculated

⁴ Article 3(2), Regulation 516/2014

⁵ Article 3(1), Regulation 514/2014

⁶ Recital 33 Regulation 516/2014

⁷ Article 12(1), Regulation (EU) No 514/2014 of the European Parliament and of the Council

of 16 April 2014 laying down general provisions on the Asylum, Migration and Integration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management (hereafter 'Regulation 514/2014')

⁸ Article 12(3), Regulation 514/2014

⁹ Article 12(3), Regulation 514/2014

¹⁰ Article 12(4-5), Regulation 514/2014

¹¹ Article 16(2-3) Regulation 514/2014

using a pre-determined formula, based on average allocations to each Member State under the three SOLID funds¹² during 2011, 2012 and 2013,¹³ producing the allocations displayed in figure 2.1, below:

The same formula was applied to determine the 2016 allocation of 'top-up' funding to Member States for the return (total **€120 million**) and legal migration and integration (total **€140 million**) priorities of AMIF national programmes.

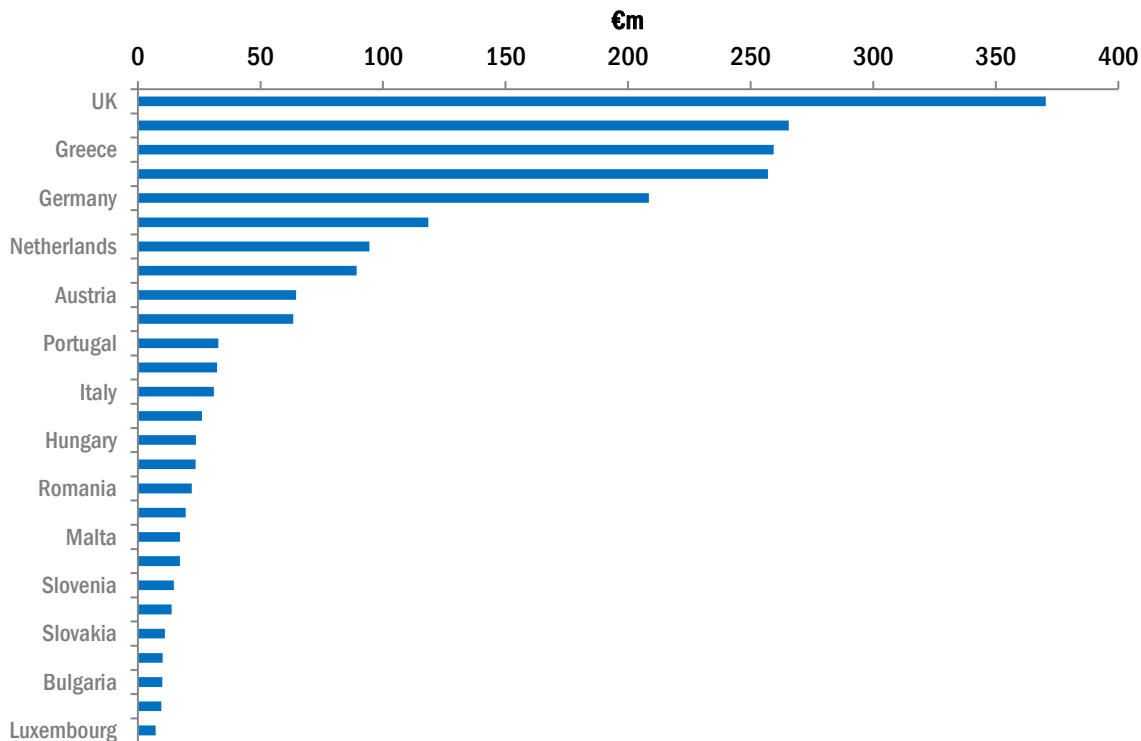


Figure 2.1: AMIF basic budget allocations to Member States (source: Annex I, Regulation 516/2014)

The distribution formula is effectively based on statistical snapshots of migration situations in Member States during 2011-12, and did not produce allocations that reflected the actual needs and situations of Member States.¹⁴

d. AMIF emergency assistance

The AMIF also provides for financial assistance to address emergency migratory situations in Member States or third countries, and originally allocated 8.6% (€269.5m) of the AMIF financial envelope to emergency assistance actions and technical assistance from the Commission. Emergency assistance actions may be implemented directly by the European Commission, via grants to a wide range of actors including Member State authorities and international organisations, or via indirect management through delegation agreements with non-state actors (see Chapter 6 below, for more information on AMIF emergency assistance).

¹² Solidarity and Management of Migration Flows (SOLID) funds: European Refugee Fund; European Fund for the Integration of third-country nationals; European Return Fund.

¹³ Annex I, Regulation 516/2014.

¹⁴ ECRE & UNHCR (January 2018) *Follow the Money: Assessing the use of EU Asylum, Migration and Integration Fund (AMIF) funding at the national level*, p17

e. Timetable for AMIF implementation

As in figure 2.2, opposite, implementation of the AMIF was significantly delayed. The late agreement to the Multiannual Financial Framework for 2014-20 meant that the basic AMIF Regulations were not in place until four months following the Fund's programming period began (16 April 2014), and that the template for Member States to prepare their national programmes was published 3.5 months later (30 July 2014).

The first national programme was agreed upon just over 14 months into the AMIF programming period (11 March 2015), and the final national programmes just over two years into the AMIF period (5 January 2016).

Although common indicators for measuring the outputs of AMIF actions were included in the basic AMIF Regulations issued in April 2014, common result and impact indicators and evaluation questions for AMIF national programmes were published only in October 2016. The delay in publishing these elements of the AMIF common monitoring and evaluation framework effectively required Member States to retrospectively gather data and reflect on evaluation questions in relation to AMIF actions implemented during the preceding period.

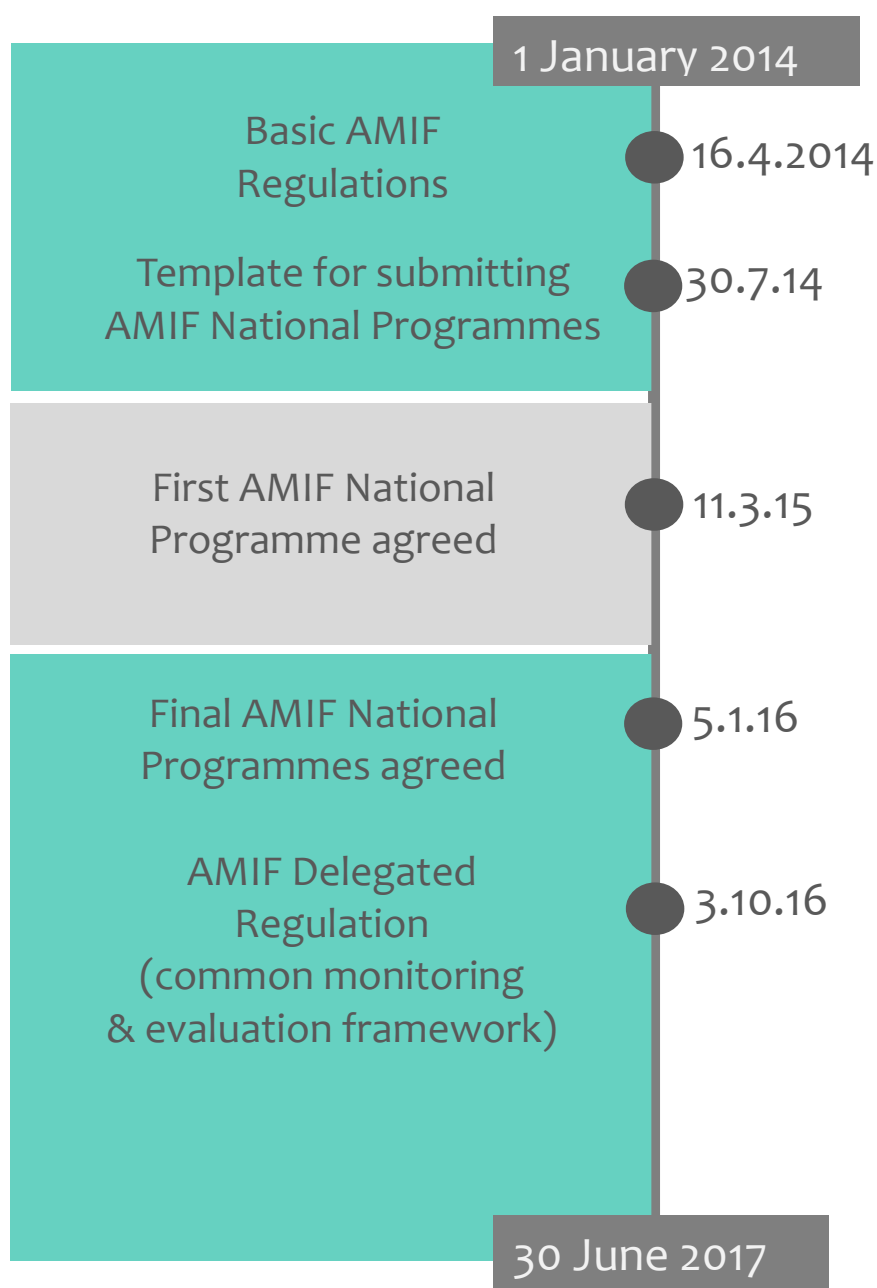


Figure 2.2: Timetable for AMIF implementation: legal base and national programmes (source: European Commission online registry of Commission documents)

3. NATIONAL AMIF EXPENDITURE

a. What is the overall progress in spending the funds?

There is a wide variation in the rate of expenditure of AMIF national funds¹⁵ for the asylum, integration and return priorities reported by 24 participating Member States¹⁶ for the period 1 January 2014 to 30 June 2017:

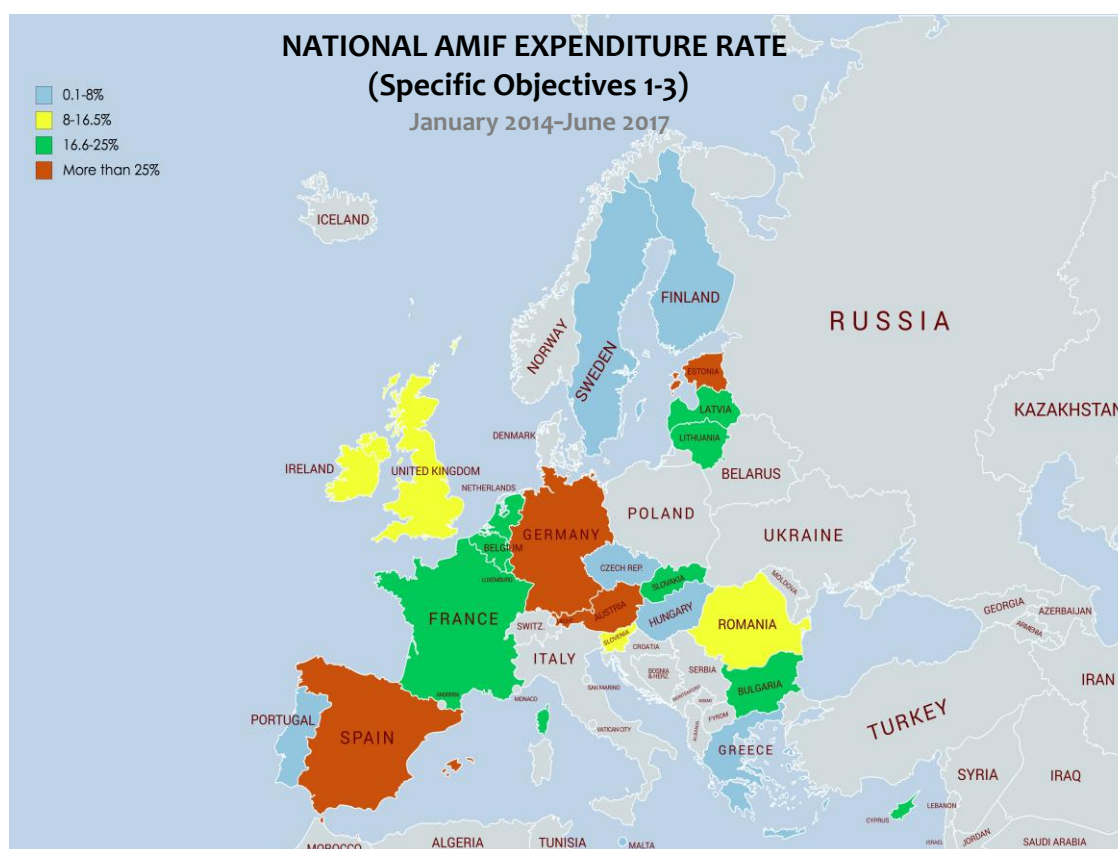


Figure 3.1: National AMIF expenditure rates: AMIF Specific Objectives 1-3, 1 January 2014-30 June 2017 (source: national AMIF interim evaluation reports). Created with mapchart.net, reproduction licensed under a Creative Commons Attribution-ShareAlike 4.0 International License.

11 Member States reported expenditure rates below the European Union average of 16.6%. Seven of these are below 8% (2.7% in Greece; 4.2% in Sweden; 4.9% in the Czech Republic; 5.8% in Hungary; 7% in Portugal; 7.4% in Finland), and the remaining 4 are above 11% (11.3% in Slovenia; 12.6% in Ireland; 13.1% in the UK; 16.4% in Romania).

An expenditure rate of 18-25% was reported by Bulgaria (17.5%), France (18.6%), Slovakia (19.1%), The Netherlands (19.7%), Luxembourg (21.4%), Lithuania and Belgium (both 21.7%), Cyprus (21.8%) and Latvia (24.7%). Of the Member States reporting AMIF expenditure above 25%, Germany (27.1%), Austria (27.5%) and Estonia (28.7%) were below 30%. By far the highest expenditure was reported by Spain (43.6%). Higher rates of expenditure can be seen in both Western Europe and the Baltic states, with lower rates in the Nordic

¹⁵ 'Expenditure' here constitutes national AMIF spending that has been approved and paid to Member States by the European Commission. It does not include funds spent on AMIF actions by Member States which had not been reimbursed at the time of the preparation of national AMIF interim evaluation reports, nor national AMIF funds committed for future expenditure.

¹⁶ 27 Member States participate in the AMIF: Croatia has not yet published a national AMIF interim evaluation report, and reports for Italy and Poland do not include details of national expenditure rates.

countries. Otherwise, regional trends in the rates of AMIF expenditure are not present.

b. What are the funds being spent on?

AMIF budgetary allocations to Member States vary considerably (see Chapter 2, above), as does the rate at which funds have been spent. However, by examining how national AMIF expenditure was distributed across the asylum, integration and return priorities, it is possible to determine Member State spending priorities for the AMIF during January 2014-June 2017.

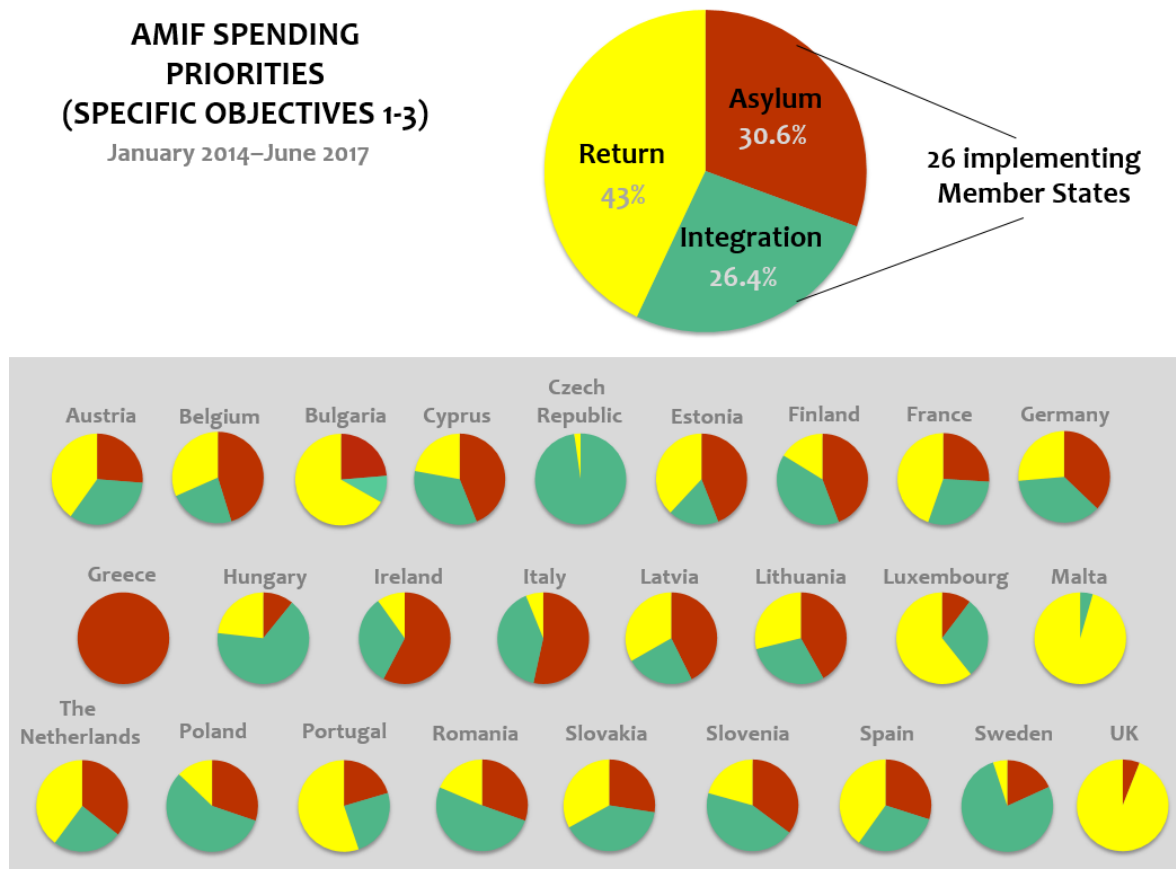


Figure 3.2: National AMIF expenditure rates: AMIF Specific Objectives 1-3, 1 January 2014-30 June 2017 (source: national AMIF interim evaluation reports). Created with *mapchart.net*, reproduction licensed under a Creative Commons Attribution-ShareAlike 4.0 International License.

At the European level, the largest share of national AMIF expenditure financed actions fell under the return priority (43%), and the smallest on integration (26.4%).

As in figure 4.2 displayed above, six AMIF National Programmes have focused heavily on a single priority:

- Greece (asylum priority), reflecting the particular national situation there during the Fund's implementation period.
- Czech Republic and Sweden (integration priority), although the Czech Republic's interim evaluation report references several asylum actions for which funds have presumably been committed but not yet reported to the European Commission.
- Bulgaria, UK and Malta (return priority), with no specific justification for this emphasis provided in national evaluation reports or found in broader national migration contexts.

Of these six programmes, four (Czech Republic, Greece, Malta and Sweden) have low expenditure rates of 0.5-4.9%.

Five Member State national programmes (Austria, Germany, Lithuania, Slovakia and Spain) display balanced spending¹⁷ across the three priorities, with the Spanish programme the most evenly balanced in terms of expenditure across the three priority areas.

Certain clear divergences in AMIF spending priorities have also emerged at the regional level.¹⁸ The Baltic and Southern European states focus strongly on the asylum priority (43% and 40% of all expenditure to date, respectively), with far less focus on this priority in terms of expenditure in Central/Eastern and Western Europe and the Nordic countries (24-25%). The Nordic countries (68%) and Central/Eastern Europe (51%) display the strongest focus on integration, and Member States in Western Europe (21%) the least. Programmes in Western Europe (54.2%) focused heavily on the return priority, with the least emphasis in terms of spending on this priority area seen in the Nordic countries (8%).

c. What progress has been made in relation to AMIF national programme spending commitments?

As detailed in Chapter 2 previously, AMIF budgetary allocations to Member States vary considerably. Figure 4.3, below, displays the financial resources allocated by Member States to the asylum, integration and return priorities in their AMIF national programmes:

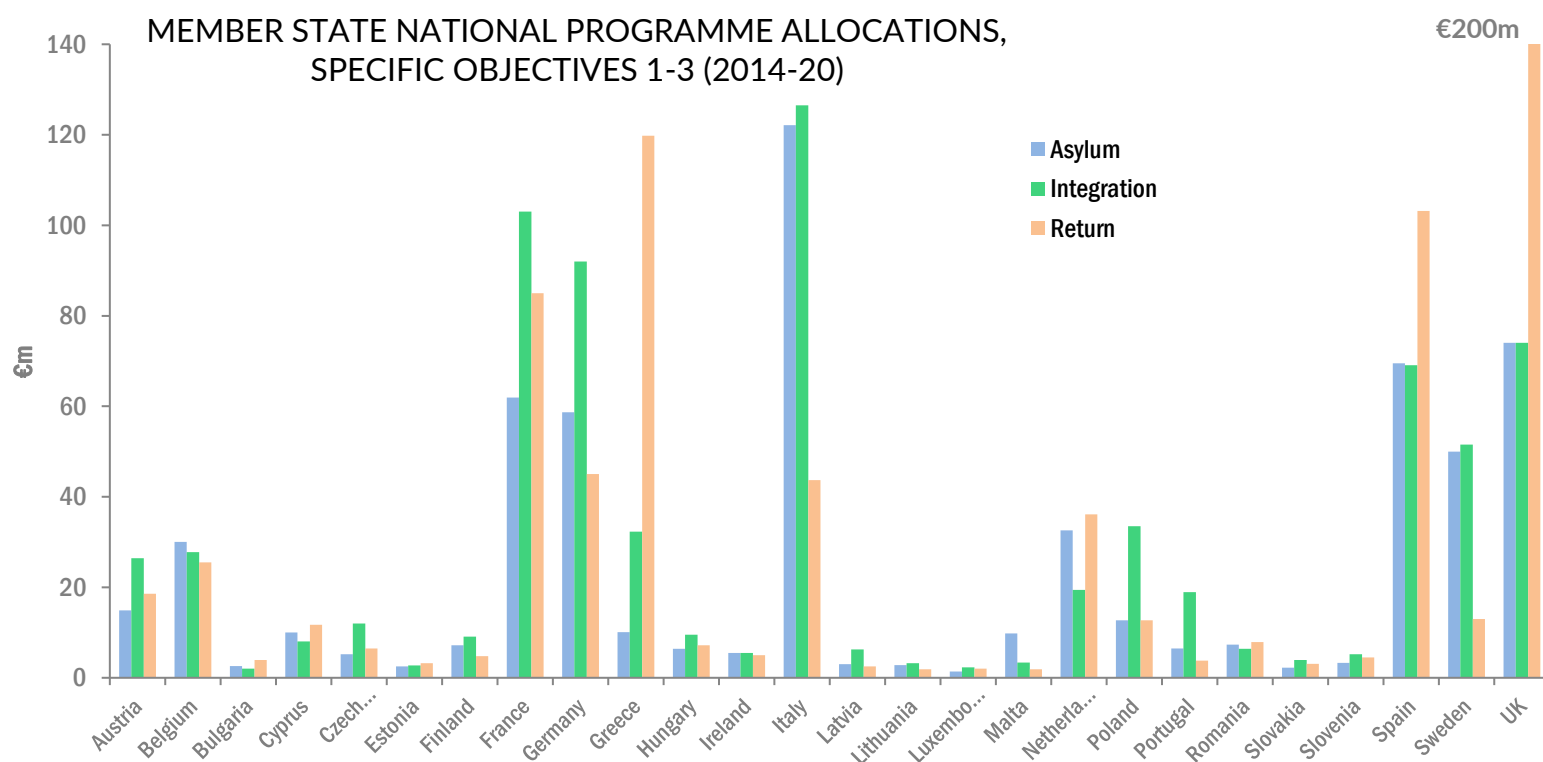


Figure 3.3: Member State AMIF national programme budgetary allocations: AMIF Specific Objectives 1-3, 1 (source: Member State AMIF national programmes)

¹⁷ 'Balanced spending' here is defined as less than a 15% variation in proportional spending across the asylum, integration and return priorities.

¹⁸ Regional groupings are Western Europe (Austria, Belgium, France, Germany, Ireland, Luxembourg, The Netherlands and the UK); Nordics (Finland, Sweden); the Baltics (Estonia, Latvia, Lithuania); Central/Eastern Europe (Bulgaria, Czech Republic, Hungary, Poland, Romania, Slovenia, Slovakia); and Southern Europe (Cyprus, Greece, Italy, Malta, Portugal, Spain).

Figure 3.4, below, displays Member State expenditure¹⁹ in the asylum, integration and return priority areas as a proportion of these programmed spending commitments:

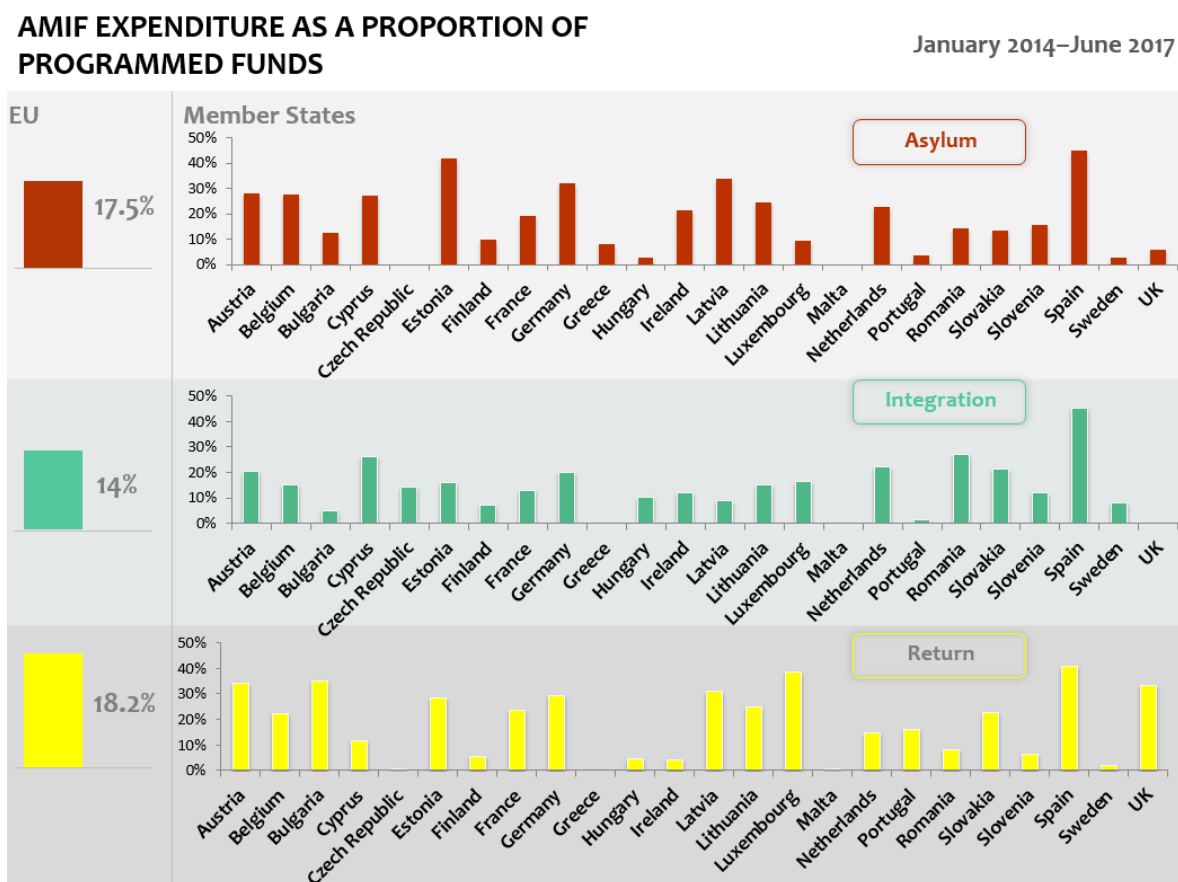


Figure 3.4: National AMIF expenditure as a proportion of programmed funds: Specific Objectives 1-3, 1 January 2014-30 June 2016 (source: national AMIF interim evaluation reports)

When preparing AMIF National Programmes, Member States were required to make budgetary allocations to each of the Fund's priority areas. A minimum of 40% of national AMIF funds were required to be allocated to the asylum (20%) and integration (20%) priorities,²⁰ albeit without a requirement to spend at corresponding levels. At the midway point of the AMIF, 14 of the 25 Member States for which their data is displayed have spent less than 20% on the asylum priority (nine of which have spent less than 10%), and 17 of the 25 have achieved less than 20% expenditure on the integration priority (nine of which have spent less than 10%).

3.5 years into the AMIF implementation period, the majority of Member States have spent less than 30% of their programmed funds for all three priority areas. At the European level, AMIF spending as a proportion of programmed national funds is highest for the return priority (22%) and lowest for the integration priority (14.9%).

Although expenditure in relation to programmed AMIF spending commitments is slow, overall, data on both approved expenditure and programmed AMIF funds suggest financial implementation in all three priority areas has hastened as the AMIF period progresses.

Figure 3.5, displays the two distinct periods for which AMIF national interim evaluations report data on implementation (1 January 2014-15 October 2016 and 16 October 2016-30 June 2017).

¹⁹ Italy did not provide data on expenditure in relation to the programmed funds in its national AMIF Interim Evaluation report, and as such is not included here.

²⁰ A derogation from the minimum allocation percentages was approved by the European Commission for Greece, which allocated 39.3% of the basic AMIF national programme allocation to the asylum priority and 12.5% to integration.

The first evaluation reporting period displays a total of €253.5m national AMIF expenditure, reported to and approved and reimbursed by the European Commission. During the second evaluation period, AMIF funds programmed for projects that have begun to be implemented total €405.4m.

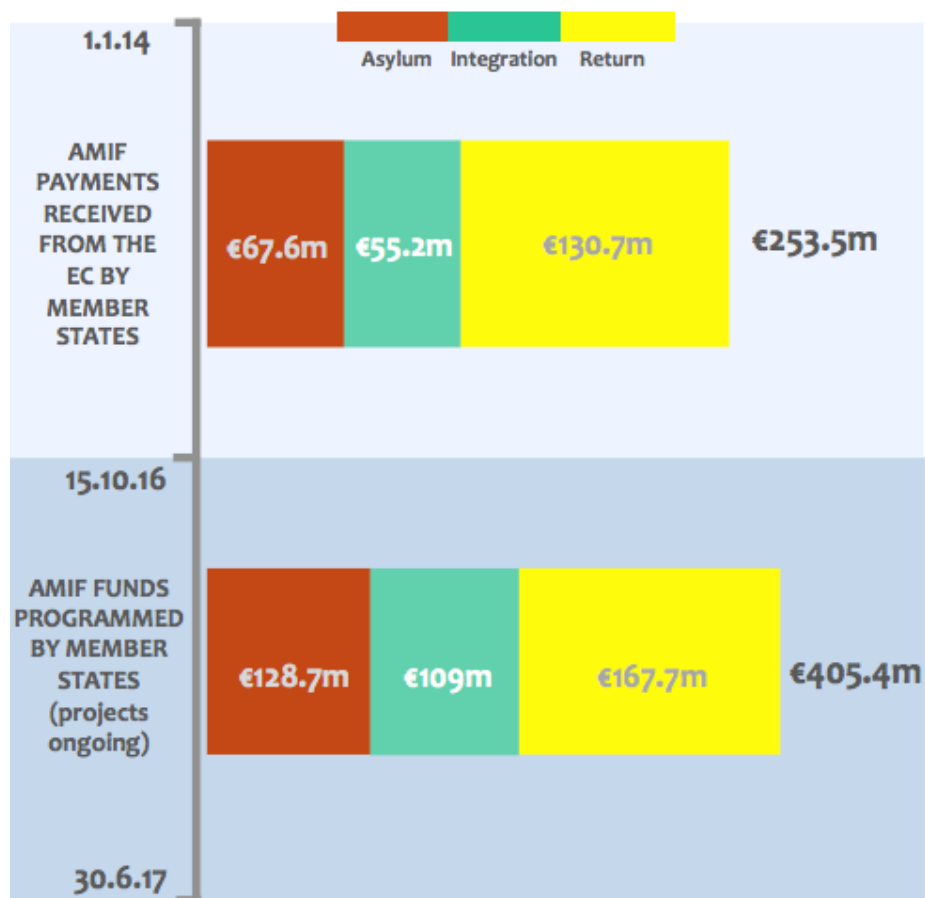


Figure 3.5: AMIF payments to Member States (1 January 2014-15 October 2016) and AMIF funds committed to ongoing projects (16 October 2016 to 30 June 2017) (source: national AMIF interim evaluation reports)

KEY FINDINGS

1. The period for which expenditure is recorded represents 3.5 years, or half of the seven-year AMIF implementation period. With the majority of Member States recording expenditure rates of less than 25%, the rate at which the AMIF undergoing implementation can be classified as slow, with substantial work required to ensure that all available national AMIF funds are spent by end-2022, as required.
2. At the European level, approved expenditure of national AMIF funds to date has placed the greatest emphasis on actions under the return priority (43% of all approved expenditure) and the least on actions under the integration priority (26.4%). This pattern persists in spending priorities for committed AMIF national funds.
3. At the national level, AMIF spending priorities across the asylum, integration and return priorities vary considerably: six national programmes focus heavily on a single priority, and just five show balanced spending across the three priorities.
4. There is a disconnect between the required programme allocations for asylum (20%) and integration (20%), and actual spending under national programmes to date. Even if national expenditure in the latter half of the AMIF implementation period brings programmes in line with the 20% required allocations, the first half of the Fund's implementation period will still have witnessed comparatively less attention paid to actions under the asylum and integration priorities in certain national contexts.
5. Although programmed funds may be spent by beneficiaries at any time until end-2022, there is a clear upward shift in the rate of commitment of AMIF funds as the AMIF implementation period progresses.

RECOMMENDATIONS

a. Recommendations addressed to the European Commission and – where relevant – the European Parliament

Remaining AMIF cycle and future Asylum and Migration Fund:

- i. In the course of monitoring national use of future EU asylum and migration funds, ensure that national expenditure addresses the funding priority areas in a balanced fashion throughout the programming period.
- ii. Require Member States wishing to exceed programmed spending on a single priority area seek formal approval from the European Commission in order to do so.

b. Recommendations addressed to Member States

Remaining AMIF cycle and future Asylum and Migration Fund:

- iii. Ensure balanced spending across all priority areas of the AMIF and future EU asylum and migration funds in which national actions have been programmed throughout the funding period, so as to avoid unmet needs in one or more priority areas within a programming period.

4. IMPLEMENTING ORGANISATIONS

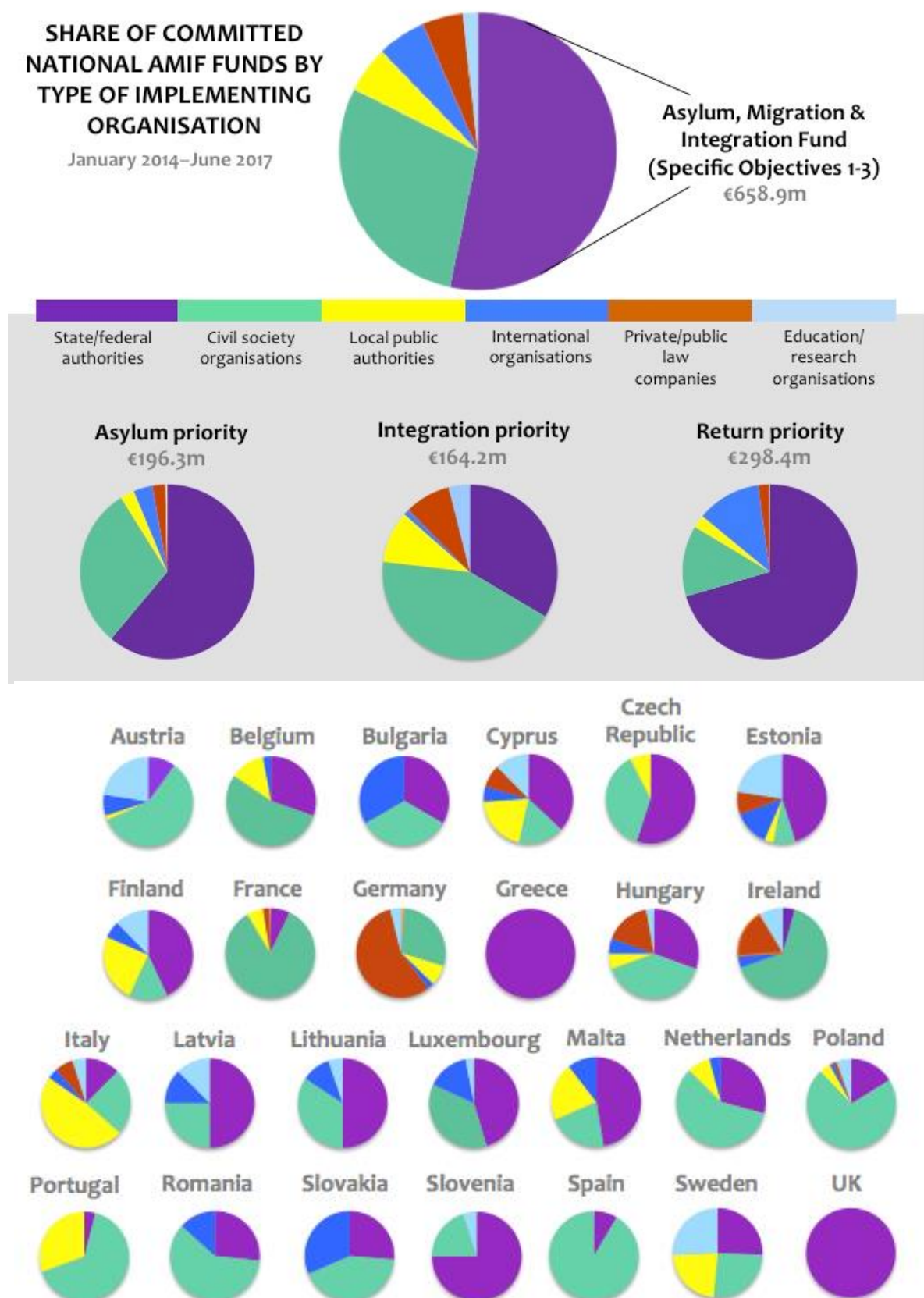


Figure 4.1: Types of organisations implementing national AMIF funds: Specific Objectives 1-3, 1 January 2014 to 30 June 2017 (source: national AMIF interim evaluation reports)

Figure 5.1, above, displays the share of committed AMIF national funds (expenditure approved and reimbursed by the European Commission and AMIF funds programmed for projects that have begun to be implemented) by type of implementing organisation.

At the European level, just over half (54.7%) of all AMIF national funds are allocated to actions implemented by Member State national and federal authorities. These actors implement the largest shares of AMIF funds allocated to the asylum and return priorities (61% and 70%, respectively), but are less active as beneficiaries of AMIF funding for integration. Six AMIF National Programmes (Czech Republic, Greece, Latvia, Lithuania, Slovenia and the UK) allocate 50% or more of national AMIF funds for the three priorities to national authorities, of which two (Greece and the UK) are entirely state-implemented. A further five programmes (Cyprus, Estonia, Finland, Luxembourg and Malta) allocate more funds to national authorities than any other type of beneficiary. Six national programmes (Austria, France, Germany, Ireland, Portugal and Spain) allocate 10% or less of their national AMIF asylum, integration and return resources to national authorities.

Civil society organisations are the next largest beneficiary of national AMIF funds at the European level, albeit at just over half the rate (30%) of Member State national authorities. They are the largest beneficiary of AMIF funds allocated to the integration priority (43%) and the second largest for asylum (30%). They are far less active under the return priority, receiving the same proportion (12%) of allocated AMIF funds as 'international organisations', which, in the context of AMIF, refers to the International Organization for Migration (IOM).

Nine AMIF national programmes (Austria, Belgium, France, Ireland, The Netherlands, Poland, Portugal, Romania and Spain) allocate 50% or more of AMIF funds for the three priorities to civil society organisations, of which programmes in France (84%) and Spain (91%) are almost entirely civil society-led. Nine programmes (Cyprus, Estonia, Finland, Greece, Italy, Latvia, Malta, Slovenia and the UK) demonstrate allocations to civil society of less than 25%. Aside from Greece and the UK – for which evaluations record AMIF programmes as being entirely implemented by national authorities – the lowest allocation to civil society organisations was in Estonia (8%).

'Local public authorities' – in the main municipalities but also local branches of national agencies such as public employment services – are beneficiaries of AMIF funds in all three priority areas at European level, although predominantly in integration (10%). At the national level, these actors are AMIF beneficiaries in 15 national programmes (Austria, Belgium, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Hungary, Italy, Malta, The Netherlands, Poland, Portugal and Sweden), and implement more than 20% of national AMIF funds in five of these (Cyprus, Finland, Italy, Malta, Portugal and Sweden). Their participation is most notable in Italy (48%), in which the majority of integration activities are implemented via regional plans involving local public authorities.

The German national programme is unique in its allocation of the majority of AMIF funds across the three priorities to 'private/public law companies,' although the interim evaluation report template does not define which organisations are included under this heading.

KEY FINDINGS

1. Member State authorities are the single largest beneficiary of national AMIF funds. Six AMIF national programmes allocated more than 50% of national AMIF funds to these actors.
2. Civil society organisations are the second largest beneficiary of national AMIF funds, and the largest beneficiary type for actions under the integration priority of AMIF national programmes.
3. At the national level, the participation of civil society organisations in implementing AMIF national programmes varies considerably: from no participation (two national programmes) to implementing 91% of national AMIF resources (Spain).
4. At the European level, 'local public authorities' implement actions under all three AMIF priority areas (asylum, integration and return), but predominantly under the integration priority (10% of all national AMIF funds).
5. 'Local public authorities' participate in AMIF national programmes in 15 Member States, most notably in Italy (48% of all national AMIF resources) and Portugal (31%).
6. International organisations (International Organization for Migration/IOM) implement actions under all three AMIF priority areas (asylum, integration and return), although predominantly under the return priority (12% of all national AMIF funds).

RECOMMENDATIONS

a. Recommendations addressed to the European Commission and – where relevant – the European Parliament

Future Asylum and Migration Fund:

- i. Require minimum allocations of national EU asylum and migration funds for asylum and integration to civil society organisations (28%) and regional/local authorities (5%), mirroring current allocations at the EU level.
- ii. Limit the allocation of national EU asylum and migration funds to state authorities and agencies to 40% of overall resources.

b. Recommendations addressed to Member States

Future Asylum and Migration Fund:

- iii. Allocate minimum percentages of national EU asylum and migration funds for asylum and integration to civil society organisations (28%) and regional/local authorities (5%).
- iv. Limit the allocation of national EU asylum and migration funds to state authorities and agencies to 40% of overall resources.

5. INTERIM EVALUATION OF THE AMIF

a. The AMIF evaluation framework

Evaluation is a core general principle of the AMIF, and is described in its legal base as essential to ensuring the effectiveness of actions supported by the Fund.²¹ Member States and the European Commission are jointly responsible for ensuring the effectiveness of AMIF support through monitoring, reporting and evaluation.²²

i. Common monitoring and evaluation framework

To guide monitoring and evaluation activities, the AMIF provides for a common monitoring and evaluation framework. The purpose of the framework is to enable an evaluation of the Fund's performance as an instrument in itself, in relation its specific objectives, and as an instrument contributing to the European policy area of freedom, security and justice. The framework mandates evaluation of the Fund in six key areas:

- Relevance
- Effectiveness
- Efficiency
- Added value
- Sustainability of the actions
- Simplification and reduction of the administrative burden²³

The common monitoring and evaluation framework has been set out in two legislative documents:

The April 2014 AMIF Regulation includes a list of '*common indicators for the measurement of the specific objectives*',²⁴ or indicators to monitor the total output from programme activities (see Annex A to this document). Member State AMIF National Programmes set targets for output indicators at the programme level, and can add their own programme-specific indicators should they wish.

The October 2016 Delegated Regulation on the common monitoring and evaluation framework includes:

- A set of common result and impact indicators for each of the AMIF's Specific Objectives (national level statistical information on asylum, legal migration and integration, and return) and for efficiency, added value and sustainability (see Annex B to this document).²⁵
- A list of evaluation questions addressing the six key evaluation areas for the AMIF listed above (see Annex C to this document).²⁶

Member States are responsible for putting into place procedures to collect the '*data necessary for the evaluations*', including that referred to in the common monitoring and evaluation framework.²⁷ Member States must appoint a monitoring and evaluation coordinator within the AMIF Responsible Authority, responsible for the implementation of the framework at the national level, leading evaluations of the national programme, and exchanging best practice in this area with other implementing Member States and with the European Commission.²⁸

ii. Evaluation reports

Member States are responsible for evaluating their National Programmes, and must report evaluation outcomes to the European Commission on two occasions, via:

²¹ Recital 41, Regulation 514/2014

²² Article 3(7) and Article 55(2) Regulation 514/2014

²³ Article 55(3), Regulation 514/2014

²⁴ Annex IV, Regulation 514/2014

²⁵ Annex III, Commission Delegated Regulation of 3 October 2016 on the common monitoring and evaluation framework provided for in Regulation (EU) No 514/2014 of the European Parliament and of the Council laying down general provisions on the Asylum, Migration and Integration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management (hereafter 'Delegated Regulation on monitoring and evaluation')

²⁶ Annex I, Delegated Regulation on monitoring and evaluation

²⁷ Article 56(2), Regulation 514/2014

²⁸ Article 1 Delegated Regulation on monitoring and evaluation

- an interim evaluation report '*on the implementation of actions and progress towards achieving the objectives of their national programmes*', submitted by 31 December 2017; and
- a final evaluation report '*on the effects of actions under their national programmes*', submitted by 31 December 2023.²⁹

On the basis of these reports, the European Commission must submit to the European Parliament, Council, Economic and Social Committee, and Committee of the Regions:

- an interim evaluation report on the performance of the AMIF at the Union level, by 30 June 2018; and
- a final evaluation report on the effects of the AMIF, including its impact on '*the development of the area of freedom, security and justice*', by 30 June 2024.³⁰

Both reports from Member States and the European Commission are required to be published in their entirety, save for any restricted information.³¹

iii. Carrying out the national AMIF evaluation

National AMIF evaluations must be carried out by experts who are '*functionally independent*' of the national authorities responsible for managing and auditing the AMIF national programmes. Experts can be externally appointed, or come from '*an autonomous public institution responsible for the monitoring, evaluation and audit of the administration*'.³² The costs of the evaluation are provided for via AMIF national programme technical assistance funds.³³

Member States are required to involve national AMIF partners in the evaluation of AMIF national programmes, in addition to other areas of the programme as provided for by the Partnership Principle,³⁴ and to consult with the national AMIF Monitoring Committee on '*the follow up to the conclusions and recommendations made in the evaluation reports*'.³⁵

Member States must use a standard evaluation report template prepared by the European Commission, which includes the indicators and questions set out in the common monitoring and evaluation framework.³⁶ In addition, in January 2017 the European Commission published guidance for Member States to assist in carrying out evaluations.³⁷

iv. AMIF mid-term review

National interim evaluations are the basis for a mid-term review of national AMIF programmes undertaken jointly by the European Commission and each Member State during 2018, the outcomes of which may lead to a revision of programmes where considered necessary. The European Commission must include the outcomes of mid-term reviews in its report to the various institutions on the AMIF interim evaluation.³⁸

b. The interim evaluation

i. Reporting the evaluation

At December 2018, 15 Member States (Bulgaria, Estonia, Finland, Germany, Greece, Ireland, Lithuania, Luxembourg, Malta, The Netherlands, Slovenia, Slovakia, Spain, Sweden and the UK) had published national AMIF interim evaluation reports, and reports for 11 Member States (Austria, Belgium, Cyprus, Czech Republic, France, Hungary, Italy, Latvia, Poland, Portugal and Romania) are as yet unpublished.

²⁹ Article 57(1) Regulation 514/2014

³⁰ Article 57(2-3) Regulation 514/2014

³¹ Article 56(4) and Article 57(4) Regulation 514/2014

³² Article 56 Regulation 514/2014

³³ Article 20 1(c) Regulation 514/2014

³⁴ Article 12(3) Regulation 514/2014

³⁵ Article 2(4), Delegated Regulation on monitoring and evaluation

³⁶ Article 2(1-2), Delegated Regulation on monitoring and evaluation

³⁷ DG Home Affairs and Joint Research Council (January 2017) *Guidance on the common monitoring and evaluation framework of the Asylum, Migration and Integration Fund (AMIF) and the Internal Security Fund (ISF)*

³⁸ Article 15, Regulation 514/2014

On 12 June 2018, the European Commission reported to the European institutions on the interim evaluation of the AMIF, including national evaluations.³⁹ Although not formally required to do so, the European Commission additionally published an external evaluation of the Fund.⁴⁰

ii. National evaluation methodologies

Member States were required to detail the approach employed in completing the interim evaluation in their national reports, and the following key features can be observed:

- 22 evaluations were completed by external organisations, and three (Czech Republic, Malta and the UK) by other government departments. One evaluation report (Slovakia) does not provide this information.
- All evaluations made use of management information provided by AMIF Responsible Authorities, and progress/monitoring and financial reports submitted to national authorities by AMIF beneficiary organisations.
- All evaluations sought input from AMIF beneficiary organisations, via methods including online surveys, questionnaires, focus groups and one-to-one interviews.
- Responsible Authorities guided the selection of beneficiaries intended for inclusion in evaluation research.
- One evaluation (Portugal) mentions feedback from wider AMIF stakeholders (non-state actors not in receipt of AMIF funds).
- One evaluation (Sweden) mentions feedback from AMIF target beneficiaries.
- One Responsible Authority (Luxembourg) commissioned two separate evaluations: one for asylum and integration, and another for return and solidarity, quoting the different expertise required to adequately evaluate AMIF actions in these areas.

³⁹ European Commission (12 June 2018) *Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on interim evaluation of the Asylum, Migration and Integration Fund and the Internal Security Fund* (hereafter 'EC AMIF evaluation report')

⁴⁰ Ramboll (November 2018) *Interim evaluation of the Asylum, Migration and Integration Fund: Final report* (hereafter 'external AMIF evaluation report')

KEY FINDINGS

Data presented in national AMIF evaluation reports has a number of limitations:

1. Nine evaluators stated it was too early in the implementation of the AMIF national programme to conduct a full evaluation, and thus limited their conclusions to an evaluation of national AMIF programming and the expected results.
2. Evaluation questions on the Fund's effectiveness ask for general updates on national actions in AMIF priority areas, in addition to information on how the Fund has contributed. The majority of reports therefore include detailed accounts of actions not financed by AMIF national programmes.
3. Information on expenditure as a proportion of programmed funds per AMIF priority area is restricted to expenditure approved by the European Commission and reimbursed to Member States.
4. Information on the number of projects being supported by national programmes across the two evaluation reporting periods (1 January 2014-15 October 2016 and 16 October 2016-10 June 2017) cannot be regarded as reliable, as it is unclear if the project totals for the second period are cumulative.
5. 14 reports were incomplete, being published/provided without:
 - i. data annexes; *and/or*
 - ii. aspects of financial information; *and/or*
 - iii. answers to one or more key questions.
6. The majority of reports did not reference beneficiary feedback in the 'effectiveness' section of the report, although guidance by the European Commission mandates this approach (see Directorate General for Home Affairs & Joint Research Council's *Guidance on the common monitoring and evaluation framework of the Asylum, Migration and Integration Fund and the Internal Security Fund*, published in January 2017).
7. National evaluation reports were not required to provide any information on the complementarity of AMIF emergency assistance actions and those of AMIF National Programmes, a missed opportunity to learn more about the interaction between AMIF instruments and their overall impact at the national level.

RECOMMENDATIONS

a. Recommendations for the European Commission and – where relevant – the European Parliament *Remaining AMIF cycle:*

- i. Adjust evaluation questions on the effectiveness of AMIF national programmes to focus solely on actions supported by the Fund, rather than on national actions in asylum and migration in general.
- ii. Include in evaluation reports an assessment of committed AMIF funds (rather than expenditure approved by the European Commission) in relation to programmed spending.
- iii. Include in evaluation reports an assessment of the interaction between support from AMIF national programmes and AMIF emergency assistance provided for the implementation of actions in that Member State.
- iv. Improve the recording of the number of actions supported by national AMIF programmes during the evaluation period.
- v. Require Member States to publish national AMIF interim evaluation reports in full and within a defined time period following their approval (ideally one month).
- vi. Ensure input from the following actors and entities during the approval process for Member State national AMIF evaluation reports:
 - European Commission staff responsible for monitoring AMIF implementation in the Member State concerned.
 - National Monitoring Committee members.
 - Relevant UNHCR regional/country representations.
 - Organisations representing AMIF partners at the EU level.
- vii. Approve Member State evaluation reports only where evidenced that the specified evaluation methodologies have been incorporated, particularly in relation to evidencing feedback from AMIF beneficiaries in the presentation of findings.

Remaining AMIF cycle and future Asylum and Migration Fund:

- viii. For each evaluation of the use of EU asylum and migration funding at the national level produced by Member States, publish a response from the European Commission detailing planned future actions by both the European Commission and the Member state in question in order to address key evaluation findings.
- ix. Require evaluations on the use of EU asylum and migration funding at the national level to be completed by external experts only.
- x. Mandate the inclusion of beneficiary views on the overall implementation and impact of EU asylum and migration funding at national level, to avoid beneficiary input being restricted to providing and/or clarifying project data in future evaluations.

b. Recommendations addressed to Member States

Remaining AMIF cycle:

- i. Publish national AMIF evaluation reports in full and in a timely fashion (ideally one month following their approval by the European Commission), including details of decisions to withhold specific information on grounds of confidentiality.
- ii. Reference feedback from AMIF beneficiary organisations when presenting evaluation findings, as required by the AMIF's common monitoring and evaluation framework.
- iii. Include in evaluation reports detailed accounts of the methodology used to complete evaluations, including, for example, numbers and the type of contacts with beneficiaries, the content and focus of interviews, surveys and focus groups, and the identity of the evaluator.

Remaining AMIF cycle and future Asylum and Migration Fund:

- iv. Consider undertaking separate evaluations for different priority areas of national EU asylum and migration fund programmes, given the varied expertise required to evaluate actions in these different areas.
- v. Publish national responses to evaluations of AMIF and future EU asylum and migration funds, detailing planned actions to address key findings.

6. AMIF EMERGENCY ASSISTANCE

a. What is AMIF emergency assistance?

The AMIF provides for financial assistance to address 'emergency situations of heavy migratory pressure in Member States or third countries'.⁴¹ Emergency situations are defined as those resulting from:

- 'heavy migratory pressure in one or more Member States characterised by a large and disproportionate inflow of third-country nationals, which places significant and urgent demands on their reception and detention facilities, asylum systems and procedures'; or
- the implementation of temporary protection mechanisms⁴²; or
- 'heavy migratory pressure in third countries where refugees are stranded due to events such as political developments or conflicts'.⁴³

The European Commission determines the overall amount available for AMIF emergency assistance within the annual Union budget-setting process, and sets out these available resources and their planned overall use in work programmes.⁴⁴

AMIF emergency assistance actions may be implemented directly by the European Commission and its executive and decentralised agencies,⁴⁵ or via indirect management by a wide range of actors including Member State authorities or 'entities and persons other than Member States'.⁴⁶ Emergency assistance grants may cover up to 100% of the costs of the actions they support.⁴⁷

b. What resources are available for AMIF emergency assistance?

12% (€385m) of the original AMIF financial envelope of €3.1bn was allocated to Union actions, emergency assistance, the European Migration Network and technical assistance of the Commission. 30% of this allocation was reserved for Union actions and the European Migration Network, leaving an available budget of €269.5m from which resources for emergency assistance and Union actions could be drawn.⁴⁸

Actual budget allocations for AMIF emergency assistance were, as for other areas of the Fund, substantially higher than originally provided for. During 2014-17, work programmes issued by the European Commission allocated a total of €977.5m to emergency assistance actions.⁴⁹

The increasingly prominent role of AMIF emergency assistance in responding to migratory pressures in the EU during 2015-16 can be seen in the number of annual emergency assistance work programmes issued by the European Commission: a single work programme was issued in 2014, three programmes in 2015, four programmes in 2016, and two in 2017.⁵⁰ Figure 6.1,

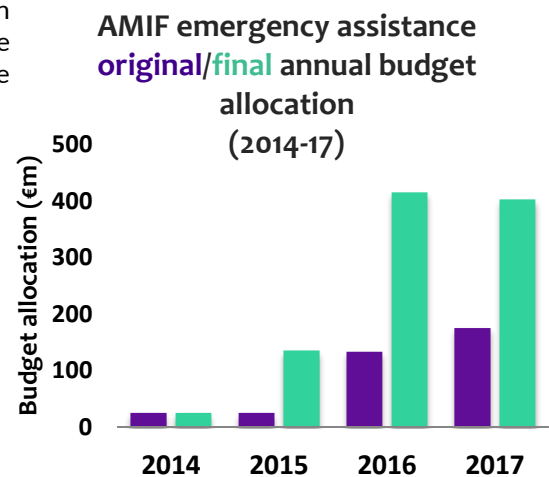


Figure 6.1: Original and final annual AMIF emergency assistance budgetary allocations (source: European Commission AMIF emergency assistance Work Programmes published during 2014-17)

⁴¹ Recital 46 Regulation 516/2014

⁴² Within the meaning of Council Directive 2001/55/EC of 20 July 2001 on minimum standards for giving temporary protection in the event of a mass influx of displaced persons and on measures promoting a balance of efforts between Member States in receiving such persons and bearing the consequences thereof

⁴³ Article 2(k), Regulation 516/2014

⁴⁴ Article 6(1-3), Regulation 516/2014

⁴⁵ Article 7(5), Regulation 516/2014

⁴⁶ Article 6(4), Regulation 516/2014

⁴⁷ Article 7(2), Regulation 516/2014

⁴⁸ Article 14(6b), Regulation 516/2014

⁴⁹ European Commission AMIF emergency assistance Work Programmes published during 2014-17

⁵⁰ European Commission AMIF emergency assistance Work Programmes published during 2014-17

opposite, displays the increases in annual budgetary allocations for emergency assistance from the first to the last work programmes issued for each year during 2014-17. 2016 witnessed both the largest final budget allocation (€414.9m) and the largest increase (€281.9m) from the original budget allocation for a single year.

c. Reporting on the use of AMIF emergency assistance

When the European Commission decides to provide AMIF emergency assistance, it must 'inform the European Parliament and the Council in a timely manner'.⁵¹

The European Commission does not, however, routinely publish details of individual decisions to provide AMIF emergency assistance grants, instead:

- reporting cumulative totals of funding granted per Member State and type of implementing actor (covering Member State authorities, UNHCR, EASO and IOM), in the context of reporting on progress on implementation of the European Agenda on Migration. The last of these statistical overviews was published on 20 September 2017⁵², although no longer available online, and further updates are not available online;
- publishing lists of emergency assistance grants agreed during specific periods: two lists (grants until 31 December 2015 and grants until 31 December 2016) have been published to date, and include EU financial contribution, project title, implementing organisations and partners; and
- publishing periodic factsheets on EU financial support for managing migration in Greece, Italy and Spain, including details (grant award date, EU contribution amount, project title and implementing entity) of AMIF emergency assistance grants for actions in those Member States.

The publications listed above do not include detailed descriptions of the activities supported by AMIF emergency assistance, information on co-financing arrangements, or retrospective information on project outcomes (for example, the extent to which the grant amounts were spent and the impact of the funded activities).

Information for AMIF emergency assistance grants in 2017 has been published only in the context of the external interim evaluation of the AMIF, based on datasets provided by the European Commission.

⁵¹ Article 7(1), *Regulation 514/2014*

⁵² Updated ANNEX 8 (20/9/2017) of *Communication from the Commission to the European Parliament and the European Council and the Council - Managing the refugee crisis: State of Play of the Implementation of the Priority Actions under the European Agenda on Migration*

d. Emergency assistance for actions in Member States

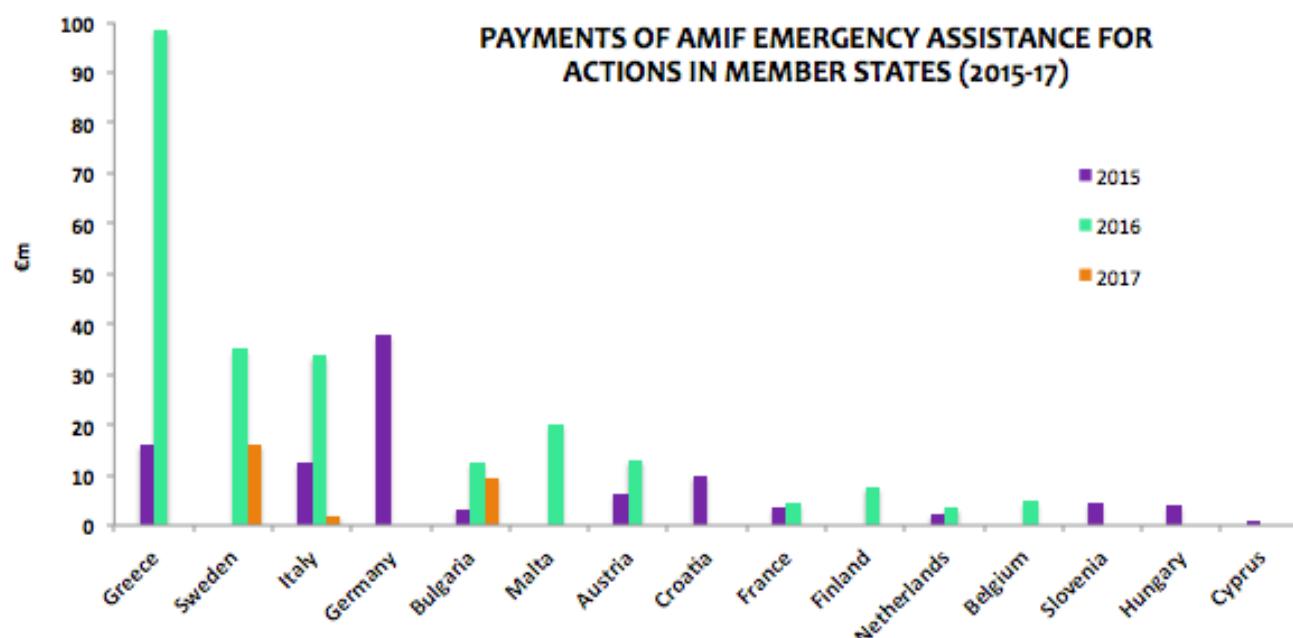


Figure 6.2: Payments of AMIF emergency assistance for actions in Member States, 2015-17 (source: Ramboll (November 2018) *Interim evaluation of the Asylum, Migration and Integration Fund: Final report*)

During 2015-17, just over €361m in AMIF emergency assistance was provided for actions in 15 Member States (no emergency assistance payments were made during 2014).⁵³

Actions in Greece received the largest total payment (€114.5m), followed by Sweden (€51m) and Italy (€48.2m). Emergency assistance funding provided for actions in eight of these Member States accounted to less than €10m each. Of the 12 Member States in which emergency assistance actions were not implemented during 2015-17, national authorities in Spain have in 2018 been allocated €25.6m to implement actions in this area.⁵⁴

The final emergency assistance payments displayed in figure 6.2, above, represent just over 80% of the €440m originally agreed upon as grant amounts for these actions during 2015-17. Emergency assistance actions in all Member States except Greece achieved an implementation rate of 80% or higher: in Greece in 2015, just 56% of the originally allocated grant amount was finally implemented.⁵⁵

Member State national authorities or agencies implemented all AMIF emergency assistance actions in 12 of the 15 Member States to which these funds were directed. In Greece, however, the majority of emergency assistance actions (58.6%) were implemented by UNHCR (39.4%), IOM (11.1%) and EASO (8.1%). In Bulgaria (13% implemented by IOM and UNHCR) and Italy (1% by IOM), non-state actors possessed a far less significant role in implementing AMIF emergency assistance.⁵⁶

⁵³ External AMIF evaluation report, p90

⁵⁴ European Commission Press Release (2 July 2018) *Migration: Commission steps up emergency assistance to Spain and Greece*

⁵⁵ External AMIF evaluation report, p90

⁵⁶ Updated Annex 8 (20 September 2017), *Communication from the Commission to the European Parliament and the European Council and the Council - Managing the refugee crisis: State of Play of the Implementation of the Priority Actions under the European Agenda on Migration*

e. AMIF emergency assistance actions implemented by Member State national authorities (2015-16)

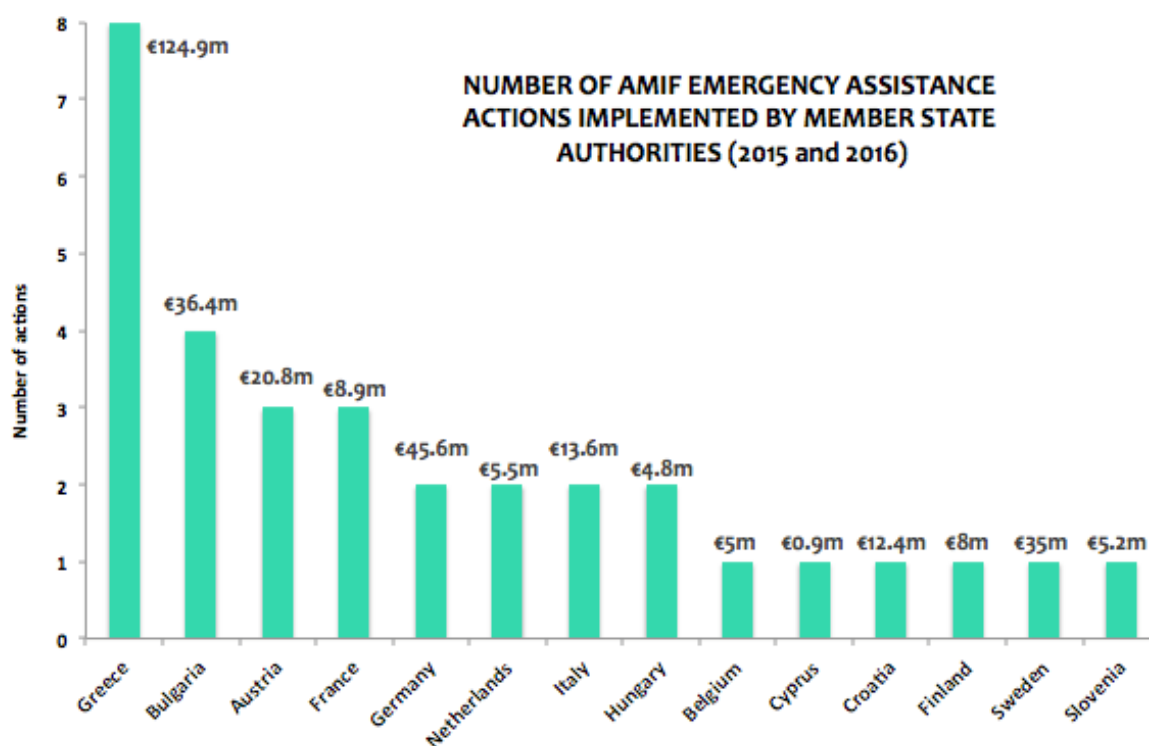


Figure 6.3: Number of AMIF emergency assistance actions implemented by Member State authorities and total grant amounts per Member State, 2015 and 2016 (source: European Commission (2016) *Direct award of action grants to provide emergency assistance under the Asylum, Migration and Integration Fund: list of awarded projects until 31 December 2015 and (2017) Direct award of action grants to provide emergency assistance under the Asylum, Migration and Integration Fund: list of awarded projects from 1 January to 31 December 2016*)

During 2015-16, national authorities in 14 Member States implemented 32 emergency assistance actions, with an agreed upon total AMIF grant contribution of €327m.⁵⁷ As information on co-financing arrangements for these actions is not included in published information, it is unclear if the AMIF contribution financed the entire costs of implementing these actions or if other actors/funding streams were also engaged.

⁵⁷ European Commission (2016) *Direct award of action grants to provide emergency assistance under the Asylum, Migration and Integration Fund: list of awarded projects until 31 December 2015 and (2017) Direct award of action grants to provide emergency assistance under the Asylum, Migration and Integration Fund: list of awarded projects from 1 January to 31 December 2016*

Where information on the key activities of AMIF emergency assistance actions was provided, those implemented by national authorities addressed one or more of six key areas, shown in figure 6.4, below:

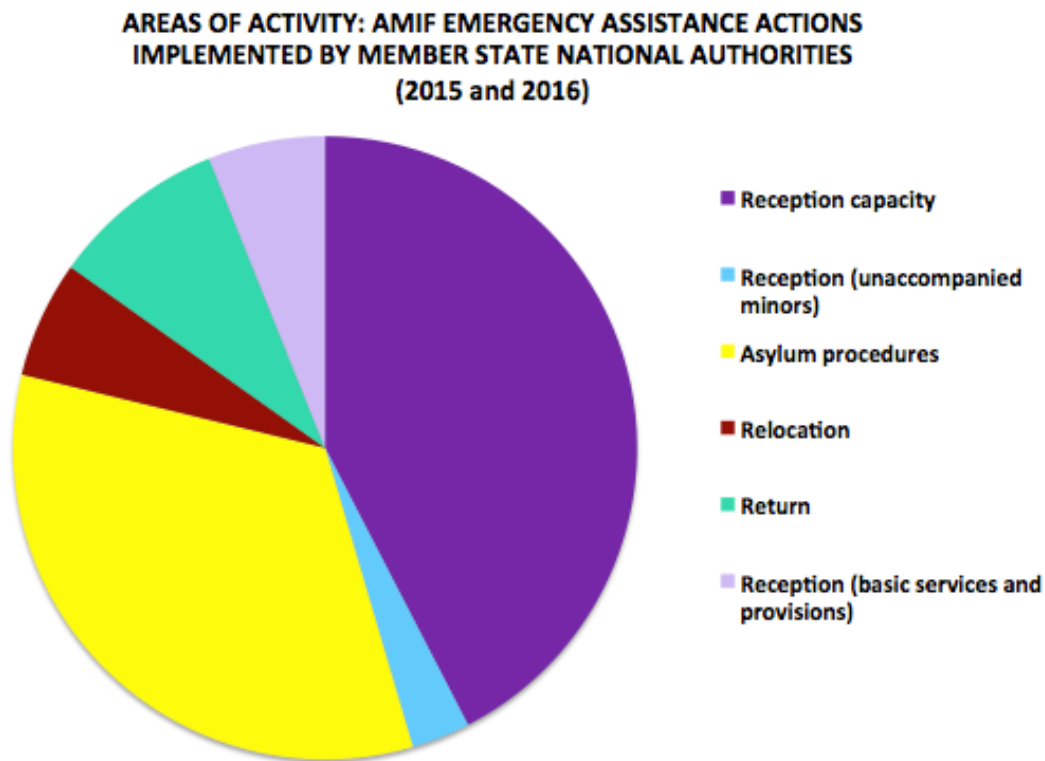


Figure 6.4: Areas of activity, AMIF emergency assistance actions implemented by Member State national authorities, 2015 and 2016 (source: European Commission (2016) *Direct award of action grants to provide emergency assistance under the Asylum, Migration and Integration Fund: list of awarded projects until 31 December 2015* and (2017) *Direct award of action grants to provide emergency assistance under the Asylum, Migration and Integration Fund: list of awarded projects from 1 January to 31 December 2016*)

17 emergency assistance actions aimed to expand asylum reception capacity, including by refurbishing and extending existing reception accommodation, increasing staffing at reception facilities, and creating temporary accommodation. Only a single action, implemented in Italy, addressed specific reception arrangements for unaccompanied minors. 14 actions aimed to increase Member State capacity to process increased numbers of asylum claims, mainly by increasing staffing levels.

From the emergency assistance actions for which information on co-beneficiaries was provided, civil society organisations participated in seven actions implemented by national authorities: in Italy (two actions), Bulgaria (two actions), Greece (one action) and France (two actions). These included actions to expand reception capacity (Italy and Bulgaria), provide basic services for irregular migrants (France), and improve access to asylum procedures (Greece).

KEY FINDINGS

1. The low implementation rate (58%) of AMIF emergency assistance grants in Greece during 2015 suggests challenges in absorbing the funds and/or spending them on eligible costs during this period.
2. For emergency assistance grants agreed upon during 2014-16, data included in the external evaluation of the AMIF published by the European Commission in certain instances conflicts with that published by the European Commission, for example:
 - **Italy:** the external evaluation of the AMIF notes grants for 2014-16 totalling approximately €56.8m, whereas published project information notes grants of just over €14.5m.
 - **Malta:** a 2016 AMIF emergency assistance grant of just under €25m noted in the external evaluation of the AMIF does not appear on the list of funded projects for 2016 published by the European Commission.
3. It is not clear if these inconsistencies are accounted for by:
 - allocations of funding from annual AMIF emergency assistance Work Programme budgets in the calendar year after that Work Programme was applicable (grants would in these cases not be recorded in grant information published by the European Commission, which reports grants during the Work Programme calendar year only); or
 - the omission of some emergency assistance grant information from lists published by the European Commission.
4. There is an overall lack of transparency and accountability in relation to individual AMIF emergency assistance grants and the actions they finance in Member States, particularly in terms of their relationship to other funding streams (co-financing), detailed information on their activities, and evaluations of key aspects of their implementation such as efficiency and impact.

RECOMMENDATIONS

a. Recommendations addressed to the European Commission and – where relevant – the European Parliament

Remaining AMIF cycle and future Asylum and Migration Fund:

- i. Ensure authorities/organisations implementing emergency assistance actions have sufficient capacity and expertise to fully implement awarded funds.
- ii. Publish the full information on AMIF emergency assistance grants within a defined time period following grant decisions being made (ideally two weeks), to include:
 - identified needs to be addressed by the action
 - activities to be supported by the grant
 - details of grant recipients and implementation partners
 - co-financing arrangements and sources
 - monitoring, reporting and evaluation arrangements
 - expected results
- iii. Publish interim and final progress reports and any evaluations of actions supported by AMIF emergency assistance, including final expenditure in relation to initial grant awards.

7. CONTRIBUTION OF THE AMIF TO NATIONAL ASYLUM, INTEGRATION AND RETURN ACTIVITIES (2014-17)

This chapter summarises the main contributions of the AMIF in relation to asylum, integration and return during 2014-17, as identified in national interim evaluations. As evaluation reports describe activities at different stages of implementation, a 'contribution' by the Fund is identified in three ways:

- The AMIF has funded a specific activity which has begun to be implemented.
- An AMIF-funded activity is on course to meet, has met or has exceeded its individual targets (common output indicators).
- The AMIF national programme is on course to achieve or has achieved targets for a specific priority area (common output indicators) and/or has made a significant contribution to relevant improved national common result and impact indicators.

a. Overall contribution of the AMIF

All evaluation reports note the general contribution of the AMIF to widening the scope of national activities in the three priority areas, and the significantly reduced levels of investment in these activities that would result from the Fund's absence. Just three reports (Belgium, France and Italy) explicitly describe the AMIF as having enabled national authorities to cope with the increased arrivals of asylum seekers to Europe from 2015.

Eight reports (Austria, France, Germany, Hungary, Lithuania, Slovakia, Spain and Sweden) note the main contribution of the fund as supporting expanded activities in the area of integration, for which other sources of funding are not always readily available at the national level. Although the Fund aims to 'support legal migration to the Member States in line with their economic and social needs such as labour market needs',⁵⁸ 12 reports (Austria, Belgium, Finland, Ireland, Lithuania, Luxembourg, The Netherlands, Portugal, Romania, Slovakia, Spain and Sweden) note no actions in the area of legal migration within AMIF National Programmes. In these cases, legal migration actions were either not included in national programmes, or programmes have been adjusted to focus solely on integration for third country nationals due to the increasing need for activities of this type since 2015.

⁵⁸ Article 3(2b), *Regulation 516/2014*

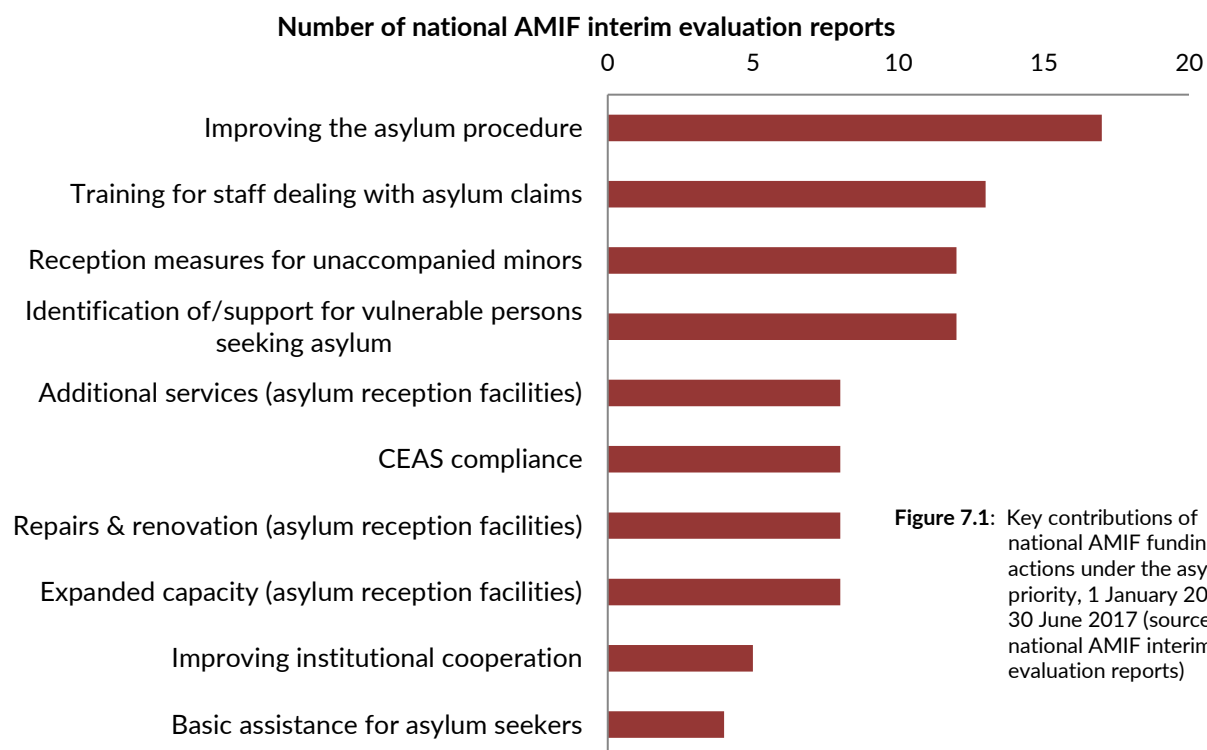


Figure 7.1: Key contributions of national AMIF funding for actions under the asylum priority, 1 January 2014-30 June 2017 (source: national AMIF interim evaluation reports)

b. Asylum

AMIF contributions to the area of asylum were most commonly noted in the area of **improving national asylum procedures** (17 reports: Austria, Belgium, Cyprus, Czech Republic, Estonia, Germany, Greece, Finland, France, Latvia, Lithuania, Poland, Romania, Slovakia, Slovenia and the UK). Actions here focused on two key areas:

- better asylum decision-making (increased staffing; updated country of origin information; technical process (re)design; new/enhanced IT tools); *and*
- a more accessible asylum procedure (legal advice and representation; translated informational materials on the asylum process; translation and interpretation; physical improvements to facilities for asylum decision-making).

Training for staff dealing with asylum claims (13 reports: Austria, Belgium, Finland, Germany, Latvia, Luxembourg, The Netherlands, Poland, Portugal, Romania, Spain, Sweden and the UK) encompassed training for staff making asylum decisions (CEAS requirements; national legal frameworks; new IT systems) and for interpreters.

12 reports (Belgium, Cyprus, Czech Republic, Finland, Germany, Italy, Latvia, Lithuania, The Netherlands, Poland, Sweden and the UK) describe AMIF contributions to **improved reception measures for unaccompanied minors** (expanding/constructing specialist reception accommodation facilities; training for staff dealing with asylum claims, and other professionals working with this group; fostering schemes; psycho-social support; educational and cultural activities). 12 reports (Austria, Belgium, Finland, France, Germany, Luxembourg, The Netherlands, Poland, Spain, Slovakia, Slovenia and the UK) also note the Fund's contribution to **identifying vulnerable persons in the asylum procedure** (screening tools for use in the asylum procedure; training and information for staff in reception facilities, those dealing with asylum claims and border police) and **supporting vulnerable asylum seekers** (psycho-social support; adapting reception facilities). Specific groups addressed by these measures include people with physical disabilities, victims of trafficking/modern slavery, torture and FGM, and those with mental difficulties.

The AMIF contributed to **improving and expanding asylum reception accommodation** via physical construction/expansion (Belgium, Bulgaria, Cyprus, Latvia, Lithuania, The Netherlands, Portugal and Spain) and repair and renovation (Bulgaria, Czech Republic, France, Greece, Lithuania, Poland, Romania and Slovenia). It also supported the provision of additional services for reception accommodation for residents, including language learning, sports and cultural activities, and education for children (eight Member States) and, to a lesser degree, **basic assistance for asylum seekers** in the form of food, clothes and basic healthcare (Estonia, Poland, Romania and Slovakia).

AMIF contributions to **improving institutional cooperation in the context of asylum** (Belgium, Czech Republic, Estonia, France and Spain) included investing in new IT tools and knowledge management platforms, developing new partnerships (for example between border police and civil society organisations) and developing multi-stakeholder policy and operational frameworks. Although improved CEAS compliance may be implied by many of the activities outlined above, it is only included here where evaluation reports explicitly note an AMIF contribution (as in Belgium, Cyprus, France, Germany, The Netherlands, Romania and Spain).

c. Integration

16 national reports (Belgium, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Italy, Latvia, Lithuania, The Netherlands, Poland, Portugal, Romania, Slovenia and Spain) describe the AMIF's contribution in the area of **language learning**, many of which note the importance of this area within national integration policy frameworks and/or AMIF programming decisions. Actions supported by the AMIF in this area include expanded language learning programmes (including tuition at specific levels required by third country nationals, and expansion of language programmes to areas of national territories where provision was previously lacking), developing new methodologies for language teaching, training for language teachers, and programmes to collate existing language learning resources and make them available to wider audiences.

AMIF made a significant contribution to **institutional cooperation in the context of integration** in 15 Member States (Austria, Belgium, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Latvia, Luxembourg, Poland, Portugal, Romania, Slovenia and Spain), by:

- Supporting knowledge-sharing and cooperation platforms involving public authorities, civil society organisations and academic institutions.
- Strengthening networks of regional and local integration centres and service providers.
- Supporting the development of new integration policy frameworks at the regional and local levels.

Two reports (Czech Republic and Portugal), specifically note the AMIF's contribution to promoting local and regional ownership of integration activities.

Many of the AMIF supported activities in the areas of **labour market integration** (Austria, Finland, France, Germany, Hungary, Ireland, Lithuania, Luxembourg, The Netherlands, Poland, Portugal, Romania, Slovenia and Sweden), **civic and social orientation** (Belgium, Estonia, Finland, France, Ireland, Latvia, Luxembourg, The Netherlands, Poland, Romania, Slovakia, Spain and Sweden) and **initial support to access basic services** (Austria, Belgium, Cyprus, Czech Republic, Estonia, Finland, France, Poland, Romania, Slovakia and Slovenia) are implemented together, in the context of projects involving actors from multiple sectors. Although labour market integration activities report good outcomes at the project level, evaluations note the lack of impact of these actions on national employment rates for third country nationals.

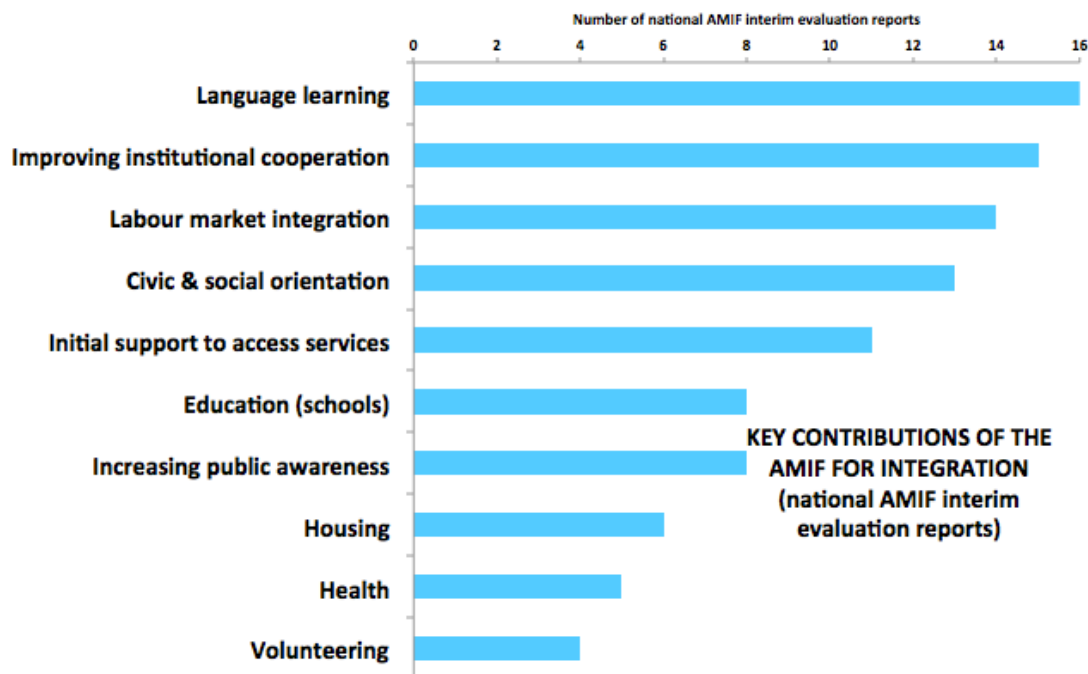


Figure 7.2: Key contributions of national AMIF funding for actions under the integration priority, 1 January 2014-30 June 2017
(source: national AMIF interim evaluation reports)

Evaluations note less of a contribution from the AMIF to integration actions oriented toward **health** and **housing** and, while AMIF actions to **increase public awareness** about migration issues had been implemented in many Member States, their impact was difficult to quantify.

d. Return

In the area of return, AMIF made a significant contribution to implementing actions designed to provide **better advice and information on voluntary return** (Austria, Belgium, Bulgaria, Cyprus, Estonia, Finland, France, Germany, Lithuania, Romania, Slovenia, Spain and the UK). Actions here included:

- Providing information on voluntary return possibilities to third country nationals via direct advice services (provided by national authorities and agencies, IOM and civil society organisations).
- Providing translated print and web-based information.
- Conducting research to provide potential voluntary returnees with up-to-date country of origin information.
- Training and information actions to increase awareness of voluntary return programmes amongst state and non-state actors.

AMIF contributions to actions to **improve detention conditions for persons subject to removal orders** were also significant (Belgium, Cyprus, Estonia, France, Latvia, Luxembourg, Poland, Romania, Slovakia, Slovenia, Spain and the UK). Actions in this area addressed a variety of different improvement measures (increased staff at detention facilities; renovation of detention facilities; operational costs of running detention facilities; interpretation and healthcare services; legal assistance for detainees; leisure, cultural and educational activities at detention facilities). Just two reports (France and the UK) highlighted AMIF actions as providing alternatives to detention in the area of return, one of which (in the UK) has been discontinued.

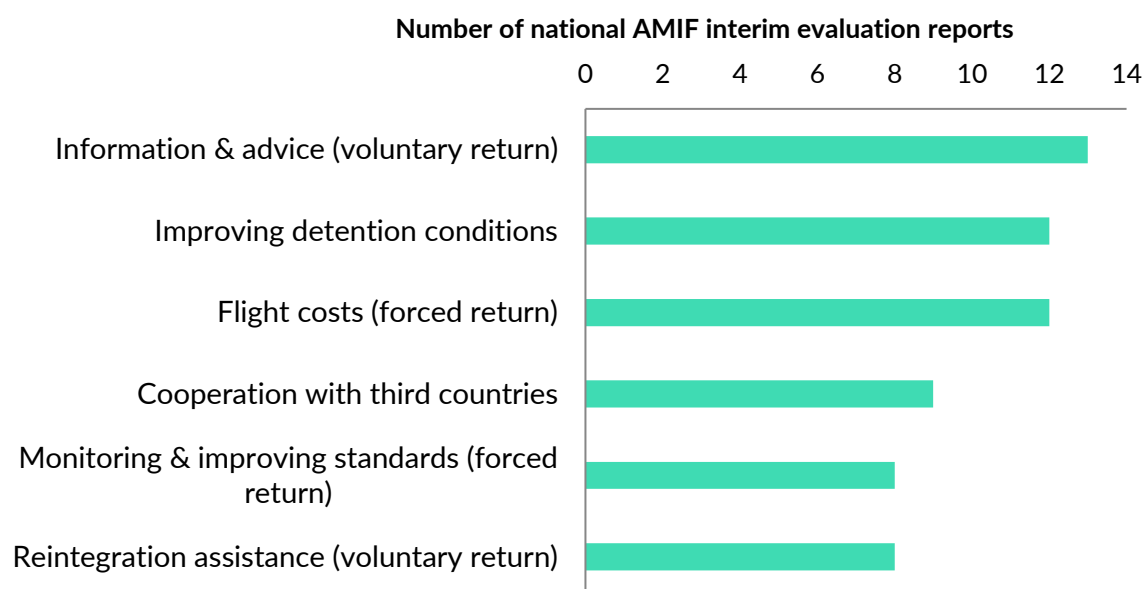


Figure 7.3: Key contributions of national AMIF funding for actions under the return priority, 1 January 2014-30 June 2017 (source: national AMIF interim evaluation reports)

Evaluation reports confirmed the use of AMIF funds to **finance flight costs for forced return operations** in 12 Member States (France, Hungary, Ireland, Latvia, Luxembourg, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden and the UK), one of which (Luxembourg) intends to make a future retroactive claim for the costs of forced return charter flights incurred since 2014. The AMIF also contributed to **cooperation with third countries** in 9 Member States (Austria, Belgium, Germany, Latvia, Luxembourg, The Netherlands, Poland, Spain and Sweden), almost exclusively in the context of forced return, through:

- Missions and delegations to improve consular cooperation.
- Agreeing upon joint operational protocols.
- Stationing national liaison officers in third countries.
- Developing new IT systems for the sharing of information.

8 national reports (Austria, Czech Republic, Finland, Latvia, Romania, Slovakia, Slovenia and Spain) noted support from the AMIF for actions to **monitor and improve the standards of forced return operations**. Activities here included forced return monitoring by independent actors (often including the production of recommendations for future monitoring frameworks), training and quality assurance tools for border police and national authorities managing return operations, and financing the presence of medical staff during such return operations. Support from the AMIF for **reintegration assistance for those undertaking voluntary return** was also mentioned in 8 reports (Austria, Belgium, Germany, Latvia, The Netherlands, Slovakia, Spain and the UK), with assistance here concentrated on measures to facilitate employment in the country of return (grants for business start-ups; pre-departure vocational training) and cash assistance provided to returnees.

KEY FINDINGS

1. Although national AMIF funding made a significant contribution to actions to support and expand asylum reception and procedures, national interim evaluations of the AMIF strongly indicate that support from the Fund was insufficient in assisting Member States to cope with the impact of increased arrivals of asylum seekers from 2015. Given that the overall financial envelope for the Fund has increased from €3.1bn to €6.9bn, including a significant increase in funding for emergency assistance (see Chapter 6, above), national evaluation conclusions suggest the Fund has not been flexible or accessible enough at the national level and/or there are challenges for some national authorities to effectively absorb and spend its resources.
2. The AMIF is intended to provide support *'which complements national, regional and local interventions'* and results in *'added value for the Union'*. An assessment of the added value of AMIF actions is resultantly included in the AMIF's common monitoring and evaluation framework. Several Member State reports however note actions in the areas of asylum and return which, if not financed by the AMIF, would be continued using national resources. It is not clear how the AMIF achieves added value for the Union, a core objective of the Fund, by distributing funds to Member States which are used to substitute the existing capabilities of national budgets.
3. Eight Member State reports note that integration activities would be unlikely to be implemented without AMIF funds due to the unavailability of other funding sources to support this area of work. Although the AMIF has made some significant contributions to *'building sustainable organisational structures for integration and diversity management'*, sustainability for other integration measures included in this AMIF Specific Objective seems limited.
4. National AMIF support for forced return activities included expenditure on flight costs for persons being returned, including higher-cost charter flights. Although the AMIF has made a significant contribution to the expansion of voluntary return activities, it is not clear if expenditure of national AMIF resources in this area matches that devoted to supporting basic operational costs for forced return.

RECOMMENDATIONS

a. Recommendations addressed to the European Commission and – where relevant – the European Parliament

Remaining AMIF cycle and future Asylum and Migration Funds:

- i. Include in the common monitoring and evaluation framework an assessment of to what extent successful integration practice has been identified through the use of EU asylum and migration funding has been incorporated into mainstream national service provisions.
- ii. Include both short- and long-term indicators in the common monitoring and evaluation framework to capture the impact of actions to increase/improve public awareness of asylum and migration.

Future Asylum and Migration Fund:

- iii. Enable direct access to EU emergency assistance funds for asylum and migration for regional/local authorities and civil society organisations in a position to directly and rapidly respond to emergency situations in Member States.
- iv. Include a fuller reflection on what constitutes 'added value' for EU asylum and migration funds implemented at the national level, both in the legal base of future funds and associated guidance on implementation for Member States.
- v. In the course of evaluating national implementation, require Member States to provide justifications for the transfer of services and projects from national budgets to national EU asylum and migration funds.
- vi. Ensure Member State programming and spending of national EU asylum and migration funds for return prioritises actions to promote sustainable voluntary return and reintegration.

8. CHALLENGES FOR NATIONAL AMIF IMPLEMENTATION (2014-17)

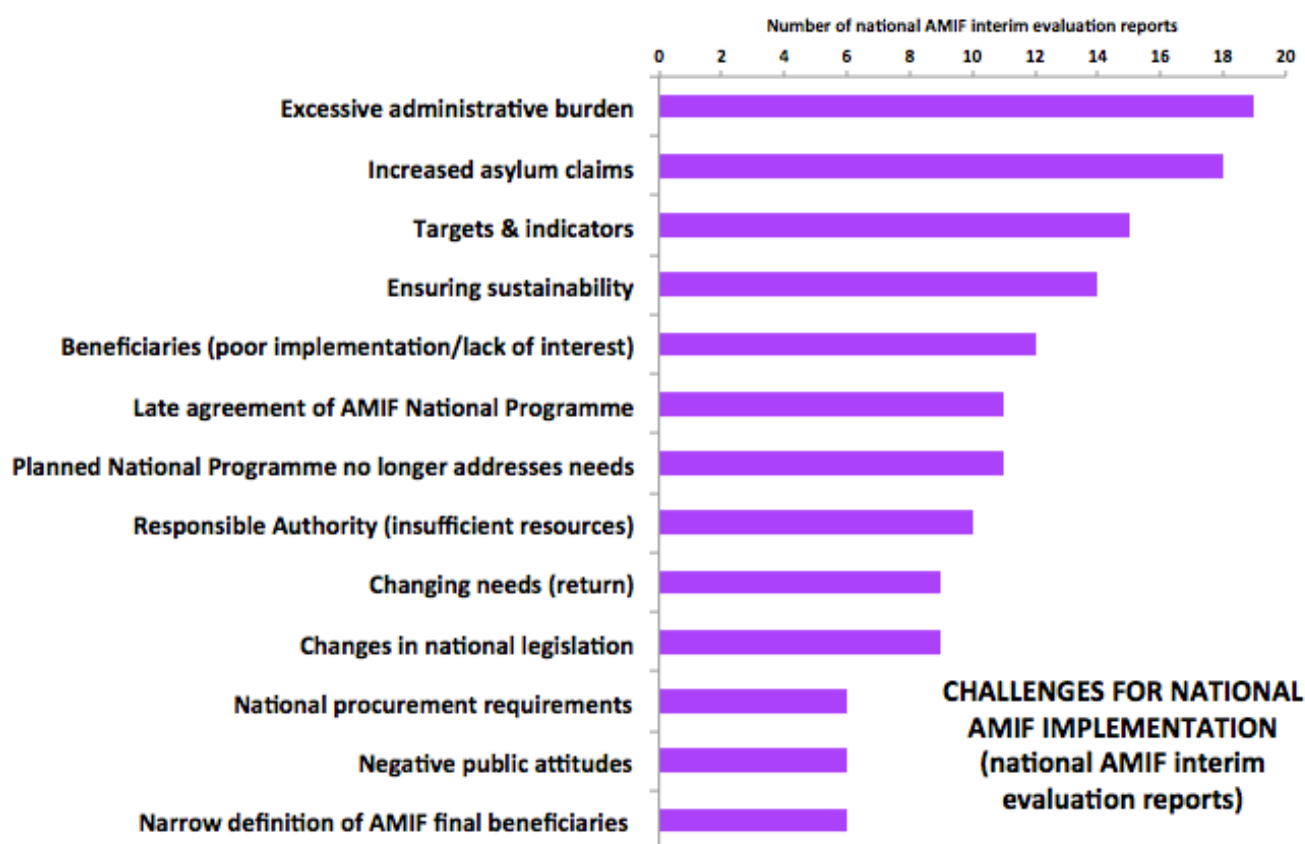


Figure 8.1: Challenges for national AMIF implementation, 1 January 2014-30 June 2017 (source: national AMIF interim evaluation reports)

a. Excessive administrative burden

The key challenge for AMIF national programmes was the **excessive administrative burden** associated with implementing the Fund, specific examples of which were noted in 19 interim evaluation reports (Belgium, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Hungary, Italy, Latvia, Lithuania, Luxembourg, Malta, The Netherlands, Portugal, Romania, Slovakia, Sweden and the UK). For Responsible Authorities, the AMIF financial year (16 October to 15 October) did not align with the calendar year (1 January to 31 December) commonly used for regular accounting procedures, leading to unnecessarily complicated calculations and subsequently additional staff time. Timescales for closing AMIF accounts were considered to be too short, and EU management and control procedures were also felt to be disproportionately complex for AMIF national programmes with comparatively smaller national budget allocations.

For AMIF beneficiaries, the requirement to submit progress reports for individual projects (in some cases every two months) was considered to be excessive, as was the non-alignment of AMIF reporting schedules with general reporting requirements for other EU funding programmes. Beneficiaries also felt that the guidance provided for interpreting and applying expenditure rules to be absent or incomplete/inadequate, and reported conflicting interpretations of expenditure rules by the European Commission and national authorities.

Both Responsible Authorities and AMIF beneficiaries pointed to staff resources required to complete financial and activity reporting, highlighting that the costs of this time were not fully reimbursed by national

programme or individual project budgets. Beneficiaries were particularly concerned that using significant staff time to comply with administrative requirements reduced the staff resources available for project activities, thus detracting from the overall quality of AMIF actions, and that smaller organisations with less available staff capacity would find implementing AMIF actions more challenging.

In terms of specific measures introduced by the AMIF to achieve simplification, the use of simplified cost options was found to be extremely limited, due to the need to conduct detailed feasibility studies on their use prior to their introduction, and/or to resolve conflicts between simplified cost options and national rules for budget design and financial management of grants provided via national authorities.

b. Changing circumstances

18 reports (Belgium, Bulgaria, Cyprus, Estonia, Germany, Greece, Finland, France, Hungary, Italy, Latvia, Lithuania, Luxembourg, The Netherlands, Portugal, Slovakia, Slovenia and Spain) noted how **increased numbers of asylum claims** from 2015 onwards impacted national AMIF implementation, primarily by requiring national programme resources to be diverted away from planned priorities to expanding capacity in asylum reception systems, and providing legal advice, healthcare and specific interventions for vulnerable persons.

This factor also influenced **changing return needs** in nine Member States (Estonia, Hungary, Italy, Latvia, Malta, The Netherlands, Portugal, Spain and the UK), causing fluctuations in demand for voluntary return and in the number of persons subject to return orders throughout the period, and providing the basis for reports from 11 Member States (Czech Republic, Estonia, Finland, Germany, Hungary, Lithuania, Malta, The Netherlands, Slovakia, Slovenia and Spain) concluding that the **planned AMIF National Programme no longer addresses actual needs**. It also influenced increasingly **negative public attitudes** toward asylum and migration in six Member States (Bulgaria, Czech Republic, Estonia, France, Hungary and Slovakia) which adversely affect the operating environment for AMIF actions.

At the project level, the needs presented by increased arrivals of asylum seekers caused AMIF beneficiaries to focus on certain planned project activities at the expense of others, thus leading to uneven implementation. Rapid and unpredictable fluctuations in arrivals also led to project planning challenges for AMIF applicant organisations.

c. Monitoring, evaluation and target-setting

Challenges relating to AMIF **targets and indicators** were noted in 15 reports (Belgium, Czech Republic, Finland, Hungary, Italy, Latvia, Lithuania, Luxembourg, The Netherlands, Poland, Portugal, Romania, Slovenia, Sweden and the UK).

As in Chapter 2, above, common result and impact indicators were published by the European Commission only in October 2016, and AMIF projects that had been underway for some time were subsequently required to collect new data retrospectively.

Responsible Authorities, AMIF beneficiary organisations and evaluators offered several criticisms of indicators included in the common monitoring and evaluation framework:

- An unclear relationship between output indicators and common result and impact indicators, creating challenges for target-setting, data collection and reporting.
- A lack of contextual indicators on which to base assessments of the actual impact of AMIF actions.
- The number of persons returned being a poor measure of success for return actions, as 'demand' in this context depends heavily on external factors.
- Changes in national legislation and eligibility criteria during the programming period make certain indicators irrelevant in particular national contexts, and their corresponding targets unachievable.

Evaluators noted a lack of attention paid to realistic target-setting by Responsible Authorities when evaluating applications for AMIF support, leading to both over- and under-fulfilment of targets during implementation, and the need for Responsible Authorities to clarify the EU indicators to make them more relevant to actual project activities. They also recommended that Calls for Proposals mandate the inclusion

of evaluation expertise or advice in individual AMIF actions, to ensure the design of efficient data monitoring systems and assist in project reporting.

d. Other challenges

Eight reports (Belgium, Cyprus, Hungary, Italy, Malta, Romania, Slovakia and Sweden) highlighted a **lack of interest in applying for AMIF funds amongst potential beneficiaries**, motivated by the amount of work required to make applications and – for public authorities – a lack of human resources sufficient for implementing AMIF actions. This resulted in Calls for Proposals for which either a single application or none at all had been received and – for national AMIF actions implemented by regional actors – created a risk of uneven availability of services for AMIF target beneficiaries across a national territory.

Instances of **poor or limited project implementation by AMIF beneficiary organisations** were included in reports for eight Member States (Belgium, Cyprus, Malta, The Netherlands, Poland, Portugal, Romania and the UK) including:

- Insufficient or incorrect information in applications for AMIF support.
- Delays in implementing individual project components.
- Poor quality of reporting, resulting in longer processes for report approval.
- Failure to complete required project evaluations.
- Smaller implementing organisations being unable to upscale activities in response to increased demand.

Links between these observations on the performance of AMIF beneficiary organisations and factors such as the administrative burden of implementing AMIF actions and/or the quality of support provided to beneficiaries by national Responsible Authorities were not explicitly examined in evaluation reports.

Evaluation conclusions on **insufficient resources within national Responsible Authorities** for 11 Member States (Cyprus, Finland, Germany, Hungary, Italy, Lithuania, Portugal, Romania, Slovenia, Spain and Sweden) related to understaffing, high staff turnover and a lack of expertise within these authorities relative to the tasks required to manage AMIF national programmes, may also be of relevance to poor or limited project implementation.

The AMIF programming period is 2014-20, and the timetable for the interim evaluation was designed to assess the Fund's performance at the mid-point of its implementation. As detailed in Chapter 2 previously, the first AMIF National Programme was agreed upon with the European Commission in March 2015 and the final programmes in January 2016, resulting in delays in the implementation of AMIF national programmes of up to two years. 11 national interim evaluation reports (Belgium, Cyprus, Czech Republic, Finland, Hungary, Lithuania, Malta, Portugal, Romania, Sweden and the UK) accordingly attribute underperformance of national programmes to their delayed agreement.

In nine Member States (France, Hungary, Italy, Lithuania, Luxembourg, Poland, Slovakia, Sweden and the UK), **changes in national legislation** and subsequent reorganisations of institutional competences resulted in changing conditions for the implementation of AMIF projects, in some instances requiring revisions of activities and/or causing initial project targets to be unachievable.

The most significant impact in this area was noted in the evaluation of Poland, where the October 2016 cancellation of their national migration policy resulted in the single AMIF Call for Proposal issued in 2015 being withdrawn, and the suspension of decisions on the outcomes of the three Calls for Proposals issued in 2016. The evaluation acknowledges how the AMIF has been the sole source of meaningful support for activities in the areas of migration, asylum and integration in Poland, and the unavailability of national AMIF funding during 2014-16 therefore has incurred significant consequences, both for the ongoing financial viability of potential beneficiary organisations and the support available for AMIF target beneficiaries in Poland during this period.

In six Member states (Belgium, Czech Republic, Finland, France, Germany and Malta) evaluations identified that the **narrow definition of AMIF final beneficiaries** created practical problems for the implementation of integration actions. Several noted the relevance of these actions for nationals of other EU Member States, who are not eligible AMIF beneficiaries, and the difficulty of implementing actions designed to build

relationships at the community level when individuals from the 'host society' were not eligible for inclusion in these activities. Beneficiary organisations also experienced difficulties in determining individual eligibility to participate in AMIF actions, in certain cases receiving conflicting advice from Responsible Authorities in this context.

KEY FINDINGS

1. The AMIF has not substantially reduced the administrative burden associated with implementing the Fund, when compared to the previous funding period, either for Member State national authorities or beneficiary organisations. National actors in many Member States have expressed concern that the resources required to administer the AMIF detract from the quality of individual AMIF actions and the overall impact of AMIF national programmes. In some national contexts, the perceived administrative burden of implementing AMIF actions has led to a lack of interest in applying for AMIF funds amongst potential beneficiary organisations.
2. Specific measures included in the AMIF to achieve simplification were not widely used in national programmes, in particular simplified cost options.
3. The changing migration situation in Europe since 2015 has created significant challenges for the implementation of the AMIF at the national level, including by diverting resources away from the management of national programmes, creating fluctuating need/demand for AMIF actions, and provoking negative public attitudes.
4. The publication of key elements of the AMIF's common monitoring and evaluation framework just under three years into the Fund's implementation period has required both national Responsible Authorities and AMIF beneficiary organisations to retrospectively collect data on AMIF actions already being implemented.
5. National authorities and AMIF beneficiary organisations attribute difficulties in target-setting, data collection and accurate project evaluation to deficiencies in the design of the AMIF monitoring and evaluation framework.
6. Evaluations note a lack of attention to realistic target-setting and the appropriate selection of indicators for individual AMIF actions at the national level.
7. Poor or limited implementation by AMIF beneficiary organisations was in some instances noted as negatively affecting the overall impact of AMIF national programmes, although links between these observations, the administrative burden of implementing AMIF actions and the quality of support provided to beneficiaries by national Responsible Authorities were not explicitly examined.
8. The AMIF's target beneficiary group of third country nationals was felt to be too narrow in some national contexts, particularly in those Member States with significant populations of EU citizens who might benefit from AMIF integration actions.

RECOMMENDATIONS

a. Recommendations addressed to the European Commission and – where relevant – the European Parliament

Future Asylum and Migration Fund:

- i. Change the financial/accounting year used for reporting on the national implementation of EU asylum and migration funds from October 16 to October 15 to 1 January to 31 December.
- ii. To increase flexibility, introduce a process for amending programme indicators in response to changed circumstances, including national legislative or operational changes that make indicators unachievable.
- iii. Ensure common monitoring and evaluation arrangements:
 - provide clear guidance on the link between output indicators and common result/ impact indicators; and
 - provide adequate contextual indicators to assess the actual impact of actions supported by EU asylum and migration funds, including, for example, external factors influencing demand for return.
- iv. Enable nationals in implementing Member States to be included in integration actions designed to facilitate contact and build relationships between the 'host society' and third country nationals.

b. Recommendations addressed to Member States

Remaining AMIF cycle and future Asylum and Migration Fund:

- i. Require formal progress reports for individual actions to be submitted at a maximum of every 6 months during implementation, and consider longer reporting intervals for multiannual actions.
- ii. Include input from evaluation experts in the assessment of applications for support from EU asylum and migration funds made by potential beneficiary organisations.
- iii. Mandate the inclusion of evaluation assistance in the budgets and activities of individual actions supported by EU migration and asylum funds *and/or* consider innovative approaches in this area (such as providing support for actions dedicated to evaluation, the services of which would be made available to smaller organisations implementing actions with support from EU asylum and migration funds).
- iv. Streamline the project application process to the greatest extent possible, and ensure dedicated support for potential beneficiary organisations to build their capacity for submitting applications.
- v. Ensure dedicated support for beneficiary organisations to build their capacity to complete required project reporting tasks.
- vi. Provide clear and consistent guidance for beneficiary organisations on identifying target beneficiaries eligible for support from EU asylum and migration funds.

Future Asylum and Migration Fund:

- vii. To increase flexibility, introduce a process to amend project indicators in response to changed circumstances, including national legislative or operational changes that make indicators unachievable.

CASE STUDIES

Bulgaria
Estonia
Germany
Spain

CASE STUDY: AMIF IMPLEMENTATION IN BULGARIA

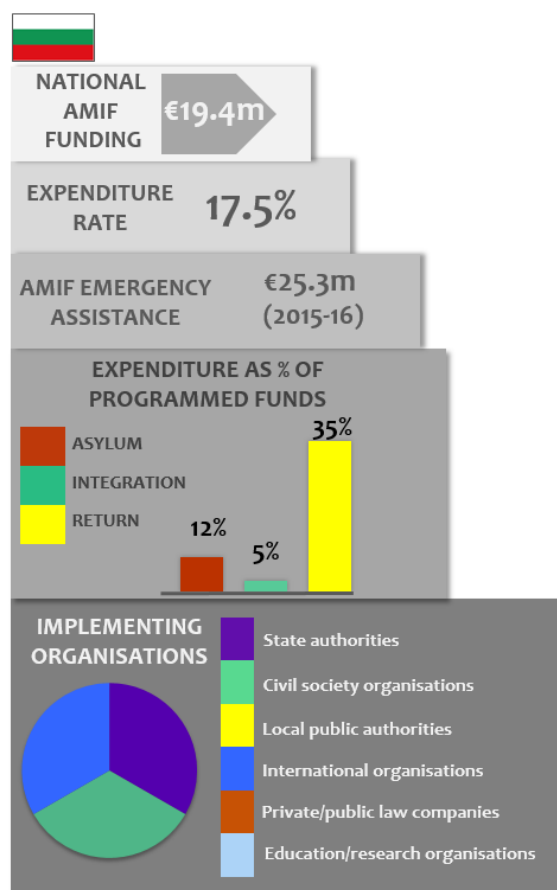


Figure BG.2: Collected AMIF information for Bulgaria (source: Updated ANNEX 8 (20/9/2017) of Communication from the Commission to the European Parliament and the European Council and the Council - Managing the refugee crisis: State of Play of the Implementation of the Priority Actions under the European Agenda on Migration and national AMIF interim evaluation report for Bulgaria)

The **context for AMIF implementation** in Bulgaria was characterised by an increase in asylum claims from the end of 2013 onwards, peaking during 2015-16 and declining sharply in 2017.

This prompted an increasingly negative public and political discourse on asylum and migration, and a parallel increase in the number of grassroots, volunteer-led civil society initiatives to assist new arrivals.

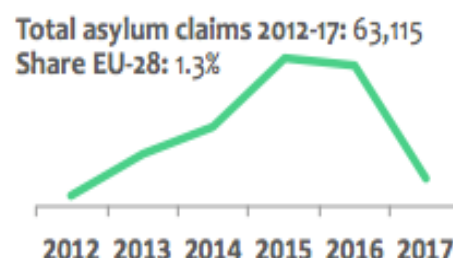


Figure BG.1: Asylum claims in Bulgaria 2012-17 (source: Eurostat (accessed November 2018) first time asylum applicants: annual aggregated data 2012-17)

AMIF integration actions in Bulgaria have been implemented in the absence of a national integration policy or integration support for third country nationals. Although a December 2016 Integration Ordinance transferred competence for integration to municipalities, no specific resources were attached to this policy and the 'zero integration'⁵⁹ situation remains.

Civil society actors consider the **spending priorities of the Bulgarian AMIF programme** to be guided by national political priorities, centred around low asylum recognition rates and high rates of return.

Key elements of the AMIF's Partnership Principle have been realised in Bulgaria:

- **Preparing the national programme** with the input of an Inter-ministerial Working Group involving state authorities, civil society actors and international organisations, including the consideration of comments received from wider stakeholders on a published draft national programme.
- Establishing a **national AMIF Monitoring Committee** that includes civil society partners, and meets at defined points in the programming cycle to agree on the annual implementation report (March each year for the previous financial year) and approve the annual AMIF work programme (October each year for the year ahead). Civil society actors consider Monitoring Committee meetings to be well-prepared and informative.

⁵⁹ ECRE Asylum Information Database (December 2016) *Country Report: Bulgaria*

- **Calls for Proposals** are developed by the Responsible Authority (Ministry of the Interior) with the input of AMIF partners via a transparent process: draft calls are published online for comment, and all partner feedback is collated and circulated with an explanation of how it has – or why it has not been – incorporated into a final call.
- **Information Days for potential AMIF applicant organisations** introducing the activities included in each AMIF Call for Proposal as well as the rules and requirements for making applications were considered to be extremely useful, as was a newly introduced **electronic platform for submitting AMIF applications**.

Nonetheless, **administrative and reporting requirements for AMIF beneficiary organisations** are considered to pose a major barrier to successful implementation of AMIF actions.

The requirement to provide technical progress reports every two months was considered excessive, as was the extent of the documentation that beneficiaries are required to submit for progress and final reports. Long waiting periods for approval of reports, due to the volume of the documentation requiring verification and the reliance of the approval process on formal correspondence, caused delays in payments of AMIF funds to beneficiaries and required some beneficiary organisations to assume the costs of implementing ongoing projects whilst awaiting payment. The limiting of eligible indirect costs to 10% of a project's overall budget is considered to be inadequate for covering the staff resources necessary to administer and report on AMIF projects.

The **AMIF application process** is felt to be sufficiently complex so as to disadvantage and discourage smaller organisations with less experience with applying for EU funds. The perceived administrative burden of implementing AMIF actions, and the financial implications of delayed payments and costs deemed ineligible at the reporting stage, have together acted to discourage both larger and smaller civil society organisations from applying for AMIF funds.

While AMIF beneficiary organisations valued the possibility of implementing actions on a multiannual basis, there was a lack of flexibility in amending **project indicators** during implementation where activities had been amended to meet changing needs.

Civil society organisations expressed concern that **state authorities and agencies** received too large a share of what are limited national AMIF programme resources, often via direct award, and intended to support the acquisition of equipment and other assets rather than to provide services. Transparency of direct award of AMIF funds was not a concern, as the Bulgarian AMIF Responsible Authority regularly publishes details of these awards, including their reasoning for selecting the activities to be supported and awarding the funds to a particular recipient.

Positive impacts of the AMIF national programme were identified, mainly in the area of asylum:

- Expanded reception capacity.
- The territorial expansion of the reception accommodation network.
- Increased resources for the State Agency for Refugees.
- The training of state officials working on asylum and related areas.

'The single largest barrier to successful implementation of the AMIF in Bulgaria'

Bulgarian procurement law and the AMIF

The May 2014 Bulgarian national procurement law and subsequent decree on *'the terms and conditions for the designation of a contractor'* by recipients of EU funds, designate any activities that can be performed by a for-profit enterprise as 'economic activity' subject to procurement requirements.

AMIF beneficiary organisations are therefore required to conduct public procurement exercises to subcontract the vast majority of project activities, including for example catering services, interpretation, the design and production of informational materials, research, training delivery, and the provision of conference/meeting facilities.

Even where procurement exercises for similar activities are combined in order to streamline the process, AMIF beneficiary organisations report that these requirements cause delays to project implementation of a minimum of one year, often longer.

Many of the activities subject to procurement requirements are those falling within the realm of expertise of AMIF beneficiaries, attributes that presumably were the basis for their selection for receiving AMIF funds. In these instances, expert AMIF beneficiaries effectively become contracting bodies responsible for overseeing project tasks implemented by others.

Although the impact of procurement requirements on AMIF implementation has been raised at the AMIF Monitoring Committee, the Responsible Authority has not been able to effect a change in national policy in this regard.

In terms of **priorities for the remainder of the AMIF programming period**, civil society actors felt that the greatest impact could be achieved by allocating AMIF resources to building the awareness of municipalities about the 2016 Integration Ordinance, including through training for local agencies and services, and making resources available to municipalities for realising the central role allocated to them in this integration framework.

CASE STUDY: AMIF IMPLEMENTATION IN ESTONIA

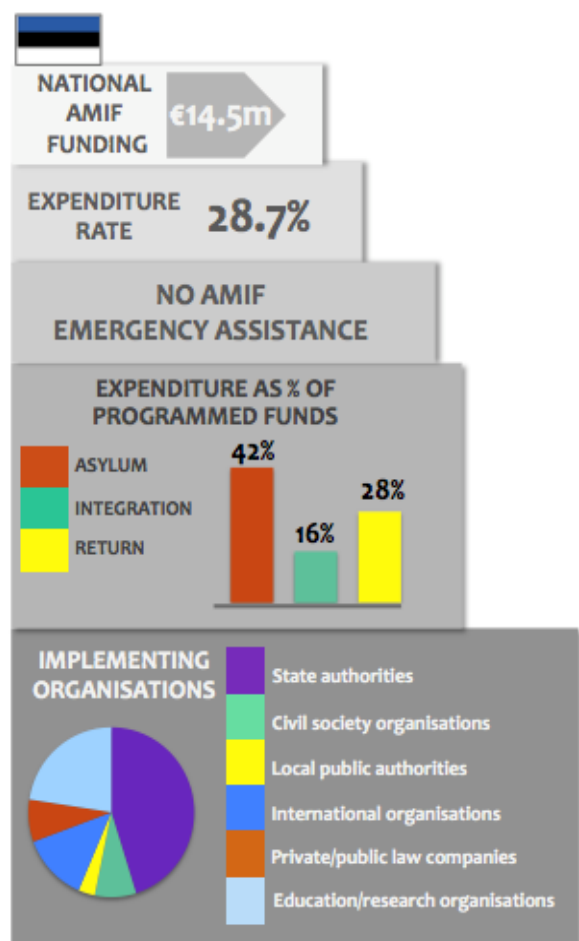


Figure EE.2: Collected AMIF information for Estonia (source: Updated ANNEX 8 (20/9/2017) of Communication from the Commission to the European Parliament and the European Council and the Council - Managing the refugee crisis: State of Play of the Implementation of the Priority Actions under the European Agenda on Migration and national AMIF interim

The **context for AMIF implementation** in Estonia witnessed a steady increase in the limited number of asylum claims received in the country throughout 2014-15, peaking at 230 claims during 2015. The country's new participation in resettlement during the AMIF period, as a response to the wider 'migration crisis', generated far more public and political discussion about asylum and refugees in a society largely unaccustomed to immigration.

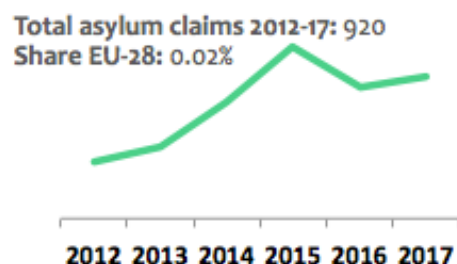


Figure EE.1: Asylum claims in Estonia 2012-17 (source: Eurostat (accessed November 2018) first time asylum applicants: annual aggregated data 2012-17)

'Integration' in Estonia is understood to refer to activities towards the large, Russian-speaking minority resident in the country since Estonian independence in the early 1990s, which also includes newer migrants from Russia and Ukraine, while 'adaptation' refers to activities to integrate refugees.

From the perspective of AMIF beneficiary organisations, the implementation of the **Partnership Principle** in the Estonian national AMIF programme has been extremely limited.

When **preparing the AMIF National Programme**, the AMIF Responsible Authority (Ministry of the Interior) invited civil society organisations to submit comments on priorities that the programme could address. Although all comments were circulated, civil society actors felt that their suggestions were not reflected in the final programme. The Responsible Authority here points to the limited budget for the national programme, and the subsequent difficulties in balancing the interests and priorities of different stakeholders in the process.

Membership of the **national AMIF Monitoring Committee** is restricted to representatives of national authorities. An operational 'social partners' forum involving several AMIF beneficiary organisations was convened to coordinate a response to the 'migration crisis' of 2015. This group does not have a formal role in relation to the implementation of the AMIF national programme, and its meetings are not programmed at regular points in the AMIF programming cycle.

AMIF beneficiary organisations consider that structured cooperation with the Responsible Authority via a national AMIF Monitoring Committee involving non-state actors would greatly benefit the national programme, by enabling partners input into how AMIF resources are used and to share common challenges in implementing AMIF actions that could be addressed at a programme level. Although the interim evaluation of the AMIF programme in Estonia recommended the establishment of a cooperation structure for AMIF beneficiary organisations, the Responsible Authority believes this would not be an efficient measure in a small country such as Estonia.

In addition to the absence of a formal structure through which have input into programme implementation, AMIF beneficiary organisations also point to **limited opportunities to record and use the results of AMIF actions to inform the wider development of the national programme**. They point to the lack of feedback on

narrative reports on project activities, refusal of requests to include evaluation costs in project budgets, and Calls for Proposals that included unrealistic baseline data and/or specified activities that were not achievable.

The **absence of a published schedule for Calls for Proposals** means potential AMIF beneficiaries are unsure if/how to plan for possible applications, and the **requirement to submit applications within one month of calls being issued** was felt to mitigate possible innovation, the development of partnership projects, and the assemblage of a solid evidence base for proposed activities.

The **method for evaluating applications for AMIF support**, which relies upon deducting evaluation 'points' based on errors rather than positively assessing strengths, is viewed as problematic both in itself and in relation to the requirements set out in Calls for Proposals that were sometimes perceived as contradictory and confusing. Equally problematic was the perceived lack of transparency in the **direct award of AMIF funds to state agencies**, most commonly those involved in border management and policing. Little or no information has been made available to other AMIF beneficiaries on the needs that the AMIF actions by these agencies are designed to address, or on the monitoring arrangements, financial/operational oversight or impact of their activities.

By contrast, **support for organisations implementing AMIF projects** is considered to be both accessible and effective, with a high degree of flexibility in amending project activities and grant agreements in response to changing needs.

The commitment of national authorities to provide the required **co-financing** of 25% of the cost of AMIF actions from the national budget is valued, and the Responsible Authority reports a strong ongoing commitment to this allocation of state resources by national authorities. The general policy of the Responsible Authority to provide **pre-financing payments** of up to 50% of project costs is also viewed positively, although both the Responsible Authority and AMIF beneficiary organisations point to the long periods required for the approval of project reports and the particular impact of subsequent payment delays for civil society organisations.

Although some recent actions that have been allocated AMIF funding are considered to provide **added value**, beneficiary organisations also provided several examples of activities formerly supported by state funds that had since been transferred to the AMIF national programme. Similarly, while AMIF actions in the area of training and voluntary return are felt to have created some degree of **sustainability**, core services such as integration support and language tuition that are currently funded by the AMIF have no alternative sources of support with which to sustain themselves in the absence of this funding.

Given the small number of refugees in Estonia, and the presence of Russian-speaking and Roma minorities that would be natural **target beneficiaries** for AMIF integration actions, beneficiary organisations identify integration activities designed solely for third-country nationals as being inefficient in the Estonian context.

In terms of **priorities for the remainder of the AMIF programming period**, current AMIF beneficiaries identified support for labour market integration and developing innovative approaches to Estonian language learning as key areas of need.

CASE STUDY: AMIF IMPLEMENTATION IN GERMANY

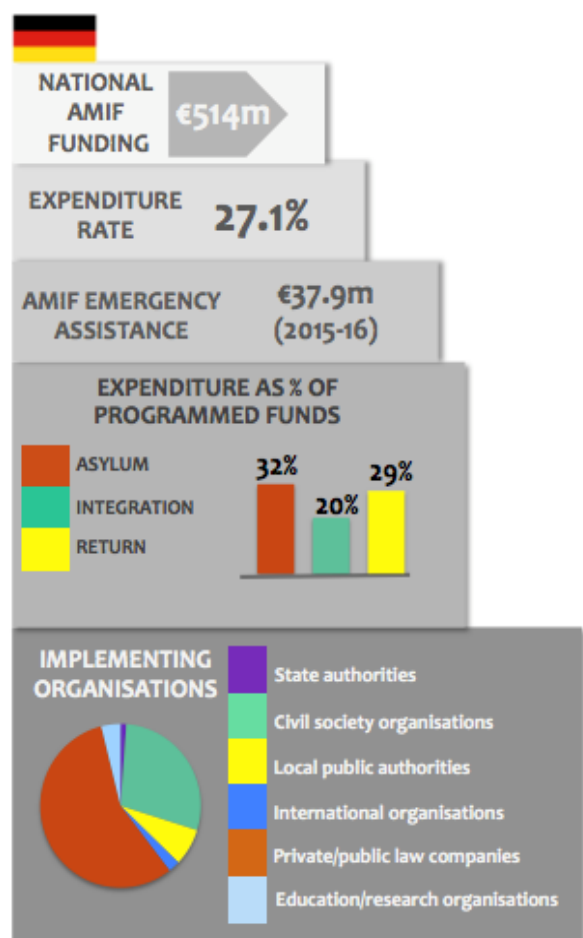


Figure DE.2: Collected AMIF information for Germany (source: Updated ANNEX 8 (20/9/2017) of Communication from the Commission to the European Parliament and the European Council and the Council - Managing the refugee crisis: State of Play of the Implementation of the Priority Actions under the European Agenda on Migration and national AMIF interim evaluation report for Germany)

UNHCR, it is described as a forum solely for the AMIF Responsible Authority (Federal Office for Migration and Refugees/BAMF) to share basic information on AMIF spending, remaining resources and procedural amendments. Annual Monitoring Committee meetings do not include any strategic discussions in relation to the national programme or opportunities for discussing common issues affecting implementation, and the committee membership has no role in developing the Calls for Proposals via which AMIF funds are disbursed. There is additionally no process by which Monitoring Committee members can add items to agendas for upcoming meetings, and the provision of BAMF Monitoring Committee informational materials only after meetings have taken place means members have no time to prepare questions or other relevant contributions.

Both understaffing and a high rate of staff turnover at the AMIF Responsible Authority, the latter necessitated in part by the redeployment of expert staff to manage the emergency situation of 2015-16,

The **context for AMIF implementation** in Germany was dominated by substantial increases in the number of asylum claims received during 2014-16, from 77,485 in 2014 to a peak of 745,155 in 2016. Although these began to decline after 2016, the number of claims made during 2017 remains three times as high as those recorded for 2012.

Total asylum claims 2012-17: 1,851,060
Share EU-28: 39.5%

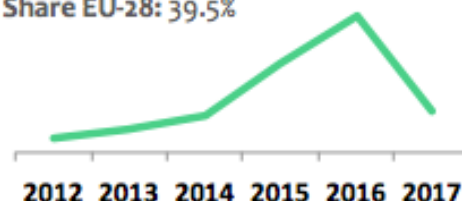


Figure DE.1: Asylum claims in Germany 2012-17 (source: Eurostat (accessed November 2018) first time asylum applicants: annual aggregated data 2012-17)

Civil society organisations point to a shift in political priorities for asylum and migration in Germany through the AMIF programming period, from an

initial focus on asylum and integration to the current emphasis on facilitating return. In their view, **the spending priorities of the AMIF programme are guided by political priorities** rather than by need, with more resources now being made available for activities under the return priority. This increase in AMIF resources has in turn provided a platform for the issue of return in Germany, strengthening its prominence in political and public debates on asylum and migration.

Civil society organisations consider the implementation of the AMIF's **Partnership Principle** in Germany to be extremely limited.

Civil society input into **preparing the national AMIF programme** was restricted to an invitation to provide comments on specific elements, late in the preparation process and within very short timescales. Although some details of the programme were amended as a result, civil society actors were not able to obtain input into the development of overall AMIF priorities.

Although the **national AMIF Monitoring Committee** has a wide membership drawn from larger national civil society organisations, national and federal authorities, the IOM and

are identified as the causes of several major difficulties encountered by organisations applying for AMIF support and/or implementing AMIF actions, including:

- **Inconsistent schedules for issuing Calls for Proposals**, with calls often issued several months following the pre-announced point and – on one occasion – at the start of the summer period, requiring applications to be completed when the majority of staff were on leave.
- **Long periods spent waiting for the outcomes of applications for AMIF support**, averaging 9-12 months.
- **Delays of up to 18 months in providing formal AMIF grant agreements for newly approved projects**, without which payments of AMIF funds cannot be made to implementing organisations. Some organisations in this situation have chosen to withdraw their proposals, while others are implementing provisionally approved AMIF actions and absorbing the associated costs. Although the Responsible Authority has established a 'hardship procedure' to provide one-off grants to beneficiaries no longer able to absorb these costs in the absence of AMIF payments, beneficiaries do not consider this to be an adequate enough response.
- **A lack of ownership and expertise in the AMIF area** amongst a rapidly changing staff, of particular importance in relation to BAMF officers at the federal state level who play a central role in evaluating applications for AMIF support.
- **Long periods for the approval of interim and final reports** produced by AMIF beneficiaries, and subsequent delays in the payment of AMIF funds. The extensive documentation required to evidence expenditure is identified here as also creating an unreasonable burden for the staff resources of both beneficiary organisations and the Responsible Authority.

Civil society organisations point to an **excessive level of financial control** for AMIF actions in comparison to those implemented with the support of other EU funding programmes, attributing this to the Responsible Authority's fear that expenditure will later be deemed ineligible by the European Commission.

AMIF actions were felt to have a clear **added value** in certain contexts, particularly in relation to additional sports, educational and cultural activities provided at asylum reception facilities. In other areas, civil society organisations considered that national and federal state authorities often seek to transfer services from their budgets to the AMIF programme, including legal advice, integration counselling, and reintegration support for voluntary return. They also note operational difficulties caused by the **ineligibility for AMIF support of some third country nationals** with protection/residence statuses specific to Germany, requiring project staff to attempt to explain AMIF funding requirements to excluded persons.

The positive impacts of the AMIF national programme were mainly identified in its support for building new partnerships and cooperation networks in the areas of asylum and integration, and some opportunities to

A simplified cost option?

Using lump sums to reimburse AMIF staff costs in Germany

The AMIF national programme in Germany originally reimbursed staff costs on the basis of actual expenditure, an approach that proved bureaucratically complicated for both beneficiary organisations and the Responsible Authority.

In an attempt to alleviate this problem, in 2015 the Responsible Authority introduced a 'lump sum' approach in which costs for each staff member working on an AMIF project were reimbursed on the following basis:

- Maximum 1720 hours per year, claimable only where the staff member can be evidenced to have worked directly on the AMIF project.
- Maximum five days sickness/other certified absence per year.
- Salary costs calculated on the basis of costs for the same/similar staff position during the past 12 months.

Beneficiary organisations state that this new approach was launched without any consultation or request for prior input, and note the following difficulties with its provisions:

- 1720 hours does not fully account for all project work, staff training and administrative work on AMIF projects by individual staff members.
- Evidencing time spent on an AMIF project by a staff member funded from several different sources is challenging and time-consuming.
- The allowance for sickness and absence effectively discriminates against staff members with disabilities or complex illnesses, and women taking maternity leave. Beneficiary organisations must absorb the costs of sickness or absence of these staff members, and risk incurring significant losses.

The staff cost procedure is currently the subject of a discussion between AMIF beneficiary organisations, the Responsible Authority and the European Commission.

implement innovative, multiannual projects for which funding support would not otherwise be available. Although limited in its current form, the AMIF Monitoring Committee is the first structure for cooperation on asylum and migration which involves state authorities, with civil society organisations and beneficiary organisations hoping it can produce broader and more meaningful partnerships in this area in the future.

In terms of **priorities for the remainder of the AMIF period**, civil society organisations recommend a renewed focus on asylum, in particular using AMIF support to develop strategic national approaches in the identification of vulnerable persons, improving reception arrangements for unaccompanied minors, and ensuring the consistent availability of independent legal advice for asylum seekers – including return counselling – across national territory.

CASE STUDY: AMIF IMPLEMENTATION IN SPAIN

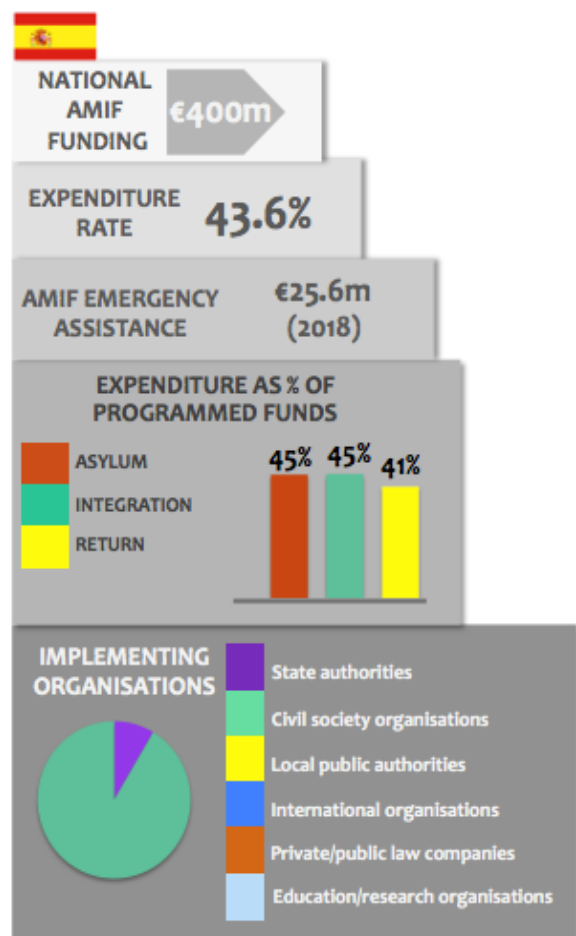


Figure ES.2: Collected AMIF information for Spain (source: Updated ANNEX 8 (20/9/2017) of Communication from the Commission to the European Parliament and the European Council - Managing the refugee crisis: State of Play of the Implementation of the Priority Actions under the European Agenda on Migration and national AMIF interim evaluation report for Spain)

2014-20 witnessed **several key changes affecting the context for AMIF implementation** in Spain. Steadily increasing asylum claims during 2012-15 prompted a national initiative to expand capacity of the almost exclusively NGO-operated national asylum reception system,⁶⁰ and during 2015-16 many additional NGOs were added as operators for national asylum reception system.⁶¹

Although the number of asylum claims in many Member States decreased during 2016-17, those in Spain more than doubled from 2016 (15,775) to 2017 (36,605), with 60,000

arrivals to Spain's southern coast expected by the end of 2018. AMIF priorities have resultantly shifted from a planned expansion of reception capacity and supporting integration, to the current emergency response focused on ensuring adequate reception capacity and access to asylum procedures.

Implementation of the **Partnership Principle** in the Spanish AMIF national programme is achieved in specific areas of the programme only. While the AMIF Responsible Authority in Spain is the Ministry of Labour, which coordinates national AMIF activities for asylum reception, integration and voluntary return, the Ministry of the Interior as an AMIF Delegated Authority coordinates activities for the areas of the programme within its competence (asylum procedure and forced return).

There are consequently two **national AMIF Monitoring Committees**:

- One facilitated by the Ministry of Labour, with participation from national authorities and representatives of the Forum for the Social Integration of Immigrants (a national, legally constituted and consultative body with a wide membership

drawn from civil society organisations, regional governments, social partners and local authorities).

- One facilitated by the Ministry of the Interior, with representation from relevant national agencies such as the police and border security force.

Input into the preparation and implementation of the AMIF national programme follows a similar dual process, in that the Forum for the Social Integration of Immigrants was consulted on the draft national programme, and the integration priorities for the AMIF national programme have been taken from general national priorities, developed by national authorities with the consultative input of the Forum as part of an established national process. Similar consultative mechanisms do not exist for the areas of the national programme coordinated by the Ministry of the Interior.

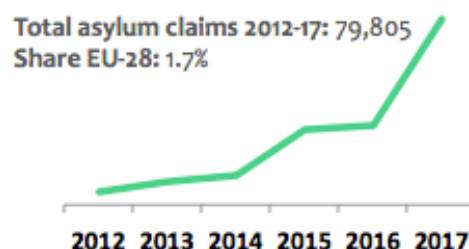


Figure ES.1: Asylum claims in Spain 2012-17 (source: Eurostat (accessed November 2018) first time asylum applicants: annual aggregated data 2012-17)

⁶⁰ ECRE Asylum Information Database (April 2016) *Country Report: Spain*, p36

⁶¹ ECRE Asylum Information Database (March 2018) *Country Report: Spain (2017 update)*, p50

In relation to the Ministry of Labour, the changing asylum context in Spain has led to a number of important impacts for **national capacity to effectively coordinate the AMIF national programme**. Beneficiary organisations note that an increase in staff capacity at the Ministry in 2015 was achieved by hiring temporary staff, who legally cannot be employed for longer than three years. As a result, more than 100 staff at the Responsible Authority are now being replaced, with the subsequent loss of working contacts and relationships for civil society organisations, and of their considerable expertise for the programme overall.

The shift to single, annual **Calls for Proposals** for each AMIF priority (from calls per activity under the previous SOLID funds) is considered to have significantly streamlined the application process, although beneficiary organisations did not consider the calls as evidence that outcomes and lessons learned from AMIF actions during the preceding year had been incorporated into their development. AMIF integration actions are implemented for a period of 12 months only, while beneficiaries consider that **multiannual programming** would increase the impact of individual actions, enable greater innovation, and reduce administrative workloads.

Beneficiary organisations consider **excessive administrative and reporting requirements** to be the largest barrier to effective AMIF implementation in Spain.

Progress reports for AMIF actions are required to be submitted every 6 months, with final financial and activity reports due one month following the end of a project. Beneficiary organisations describe the challenge of compiling the extensive documentation required to evidence expenditure within the one-month deadline, with final reports generally requiring up to four large boxes of documents. The requirement for beneficiaries to keep all documentation for six years following project-end has led to their having to rent additional storage space, the costs of which are not reimbursed via the AMIF. Beneficiaries also note their inability to fund from within AMIF project budgets the staff costs necessary to complete reporting tasks.

While the provision to claim 15% of the total costs of an AMIF action as **indirect costs** is considered sufficient to resource organisation overheads during project implementation periods, it does not provide for the costs beyond this period when work on final reports, and answering queries on those reports and on audits is ongoing. Additionally, indirect costs cannot be claimed as a lump sum but must instead be evidenced, creating additional administrative work for disaggregating individual organisational costs and assign them to individual projects. Beneficiaries recommend the introduction of **simplified cost options** to reduce the considerable administrative burden currently associated with implementing AMIF actions.

Positive impacts of the AMIF national programme are identified by beneficiary organisations in the area of integration, in which the AMIF has provided support for neighbourhood coexistence, intercultural programmes in schools, advice for third country nationals and language tuition actions for which alternative funding would not have been available. For asylum, the AMIF is considered to have contributed to increased expertise amongst public officials through training and information, a subsequently higher quality asylum procedure, and expanded capacity of the asylum reception system.

An uncertain future for AMIF implementation?

In January 2018, the government of Catalonia won a legal challenge to asserting the competence of Spain's 17 regional governments to manage services and programmes for asylum seekers in the fields of health, educational and social activities. A September 2018 appeal by the NGO ACCEM and the national government was rejected.

The judgement means regional governments are now responsible for implementing a substantial proportion of the activities falling within the scope of the AMIF national programme. As AMIF funding arrangements for 2019 have already been agreed, it is expected that this new framework for AMIF implementation will be implemented from 2020.

It is currently unclear how AMIF funds will be distributed across the regional governments, and what the implications of an additional layer of institutional management of the AMIF will be, in particular for NGOs operating the national asylum reception system.

RECOMMENDATIONS ARISING FROM THE CASE STUDIES

a. Recommendations addressed to the European Commission and – where relevant – the European Parliament

Partnership Principle

Remaining AMIF cycle:

- i. As the European Code of Conduct on Partnership will become applicable to EU asylum and migration funds during 2021-27, begin to implement its provisions in the current AMIF, primarily by consulting organisations representing AMIF partners at the EU level in the course of the AMIF's final evaluation.

Future Asylum and Migration Fund:

- ii. Revise the European Code of Conduct on Partnership to fully align it with the proposed Asylum and Migration Fund, and provide additional guidance and examples of best practices from the current implementation period to assist Member States to fully implement its provisions in the new multiannual funding period 2021-27.

b. Recommendations addressed to Member States

Partnership Principle

Remaining AMIF cycle:

- i. As the European Code of Conduct on Partnership will become applicable to EU asylum and migration funds during 2021-27, begin to implement its provisions in the current AMIF, with a particular focus on:
 - Composition of partnerships.
 - Ensuring full participation of national partnerships in all priority areas addressed by AMIF national programmes.
 - Complying with requirements for approving programme reports and evaluations.
 - Complying with requirements for consultation and the operation of national Monitoring Committees (with respect to the type of information to be provided to Monitoring Committee members and deadlines for feedback).
 - Ensuring measures for building the institutional and technical capacity of AMIF partners.

Programme management and coordination:

Remaining AMIF cycle and future Asylum and Migration Fund:

- i. Ensure Responsible and Delegated Authorities are adequately staffed and have sufficient expertise for the completion of all required programme management tasks.
- ii. Implement specific measures to limit staff turnover at Responsible and Delegated Authorities.
- iii. Use a multiannual approach wherever possible.
- iv. Increase transparency in relation to support from EU asylum and migration funds for actions implemented by state authorities and agencies.

Financial implementation

Remaining AMIF cycle and future Asylum and Migration Fund:

- i. Conduct meaningful consultation with national partners on the potential use of simplified cost options prior to their introduction.
- ii. Ensure payments of funds for actions approved for support from national EU asylum and migration programmes are provided to beneficiary organisations within a maximum of 90 days of those actions being approved.
- iii. Align financial controls for national EU asylum and migration funds with those used for other EU funding programmes implemented at the national level.
- iv. Consider pre-financing 30-50% of total project costs for actions supported by national EU asylum and migration funds.

ANNEX A

List of common indicators for the measurement of AMIF specific objectives

Reproduced from Annex IV of Regulation (EU) 516/2014 of the European Parliament and of the Council of 16 April 2014 establishing the Asylum, Migration and Integration Fund.

(a) To strengthen and develop all aspects of the Common European Asylum System, including its external dimension.

- i. Number of target group persons provided with assistance through projects in the field of reception and asylum systems supported under the Fund. For the purposes of annual implementation reports, as referred to in Article 54 of Regulation (EU) No 514/2014, this indicator shall be further broken down in sub-categories such as:
 - number of target group persons benefiting from information and assistance throughout the asylum procedures,
 - number of target group persons benefiting from legal assistance and representation,
 - number of vulnerable persons and unaccompanied minors benefiting from specific assistance;
- ii. Capacity (i.e. number of places) of new reception accommodation infrastructure set up in line with the common requirements for reception conditions set out in the Union *acquis* and of existing reception accommodation infrastructure improved in accordance with the same requirements as a result of the projects supported under the Fund and percentage in the total reception accommodation capacity;
- iii. Number of persons trained in asylum-related topics with the assistance of the Fund, and that number as a percentage of the total number of staff trained in those topics;
- iv. Number of country-of-origin information products and fact-finding missions conducted with the assistance of the Fund;
- v. Number of projects supported under the Fund to develop, monitor and evaluate asylum policies in Member States;
- vi. Number of persons resettled with support of the Fund.

(b) To support legal migration to the Member States in accordance with their economic and social needs, such as labour market needs, while reducing the abuse of legal migration, and to promote the effective integration of third-country nationals.

- i. Number of target group persons who participated in pre-departure measures supported under the Fund;
- ii. Number of target group persons assisted by the Fund through integration measures in the framework of national, local and regional strategies. For the purposes of annual implementation reports, as referred to in Article 54 of Regulation (EU) No 514/2014, this indicator shall be further broken down in sub-categories such as:
 - number of target group persons assisted through measures focusing on education and training, including language training and preparatory actions to facilitate access to the labour market,
 - number of target group persons supported through the provision of advice and assistance in the area of housing,
 - number of target group persons assisted through the provision of health and psychological care,
 - number of target group persons assisted through measures related to democratic participation;
- iii. Number of local, regional and national policy frameworks/measures/tools in place for the integration of third-country nationals and involving civil society and migrant communities, as well as all other relevant stakeholders, as a result of the measures supported under the Fund;
- iv. Number of cooperation projects with other Member States on the integration of third-country nationals supported under the Fund;
- v. Number of projects supported under the Fund to develop, monitor and evaluate integration policies in Member States.

(c) To enhance fair and effective return strategies in the Member States supporting the fight against illegal immigration with an emphasis on sustainability of return and effective readmission in the countries of origin and transit.

- i. Number of persons trained on return-related topics with the assistance of the Fund;
- ii. Number of returnees who received pre or post return reintegration assistance co-financed by the Fund;
- iii. Number of returnees whose return was co-financed by the Fund, persons who returned voluntarily and persons who were removed;
- iv. Number of monitored removal operations co-financed by the Fund;
- v. Number of projects supported under the Fund to develop, monitor and evaluate return policies in Member States.

(d) To enhance the solidarity and responsibility sharing between the Member States, in particular towards those most affected by migration and asylum flows.

- i. Number of applicants and beneficiaries of international protection transferred from one Member State to another with support of the Fund;
- ii. Number of cooperation projects with other Member States on enhancing solidarity and responsibility sharing between the Member States supported under the Fund.

ANNEX B

Common result and impact indicators for AMIF evaluation reports by Member States and the European Commission

Reproduced from Annex III of *Commission Delegated Regulation (EU) 2017/207 of 3 October 2016 on the common monitoring and evaluation framework provided for in Regulation (EU) No 514/2014 of the European Parliament and of the Council laying down general provisions on the Asylum, Migration and Integration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management.*

1. INDICATORS BY SPECIFIC OBJECTIVES

(a) To strengthen and develop all aspects of the Common European Asylum System, including its external dimension:

- i. number of places adapted for unaccompanied minors supported by the Asylum, Migration and Integration Fund ('Fund') as compared to the total number of places adapted for unaccompanied minors;
- ii. stock of pending cases at first instance, by duration;
- iii. share of final positive decisions at the appeal stage;
- iv. number of persons in the reception system (stock at end of the reporting period);
- v. number of persons in the reception system as compared to the number of asylum applicants;
- vi. number of accommodation places adapted for unaccompanied minors as compared to the number of unaccompanied minors;
- vii. convergence of first instance/final instance recognition rates by Member States for asylum applicants from a same third country.

(b) To support legal migration to the Member States in accordance with their economic and social needs, such as labour market needs, while safeguarding the integrity of the immigration systems of Member States, and to promote the effective integration of third-country nationals:

- i. share of third-country nationals having received long-term residence status out of all third-country nationals;
- ii. employment rate: gap between third-country nationals and host-country nationals;
- iii. unemployment rate: gap between third-country nationals and host-country nationals;
- iv. activity rate: gap between third-country nationals and host-country nationals;
- v. share of early leavers from education and training: gap between third country nationals and host-country nationals;
- vi. share of 30 to 34-years-olds with tertiary educational attainment: gap between third country nationals and host-country nationals;
- vii. share of population at risk of social poverty or social exclusion: gap between third-country nationals and host-country nationals.

(c) To enhance fair and effective return strategies in the Member States supporting the fight against illegal immigration with an emphasis on sustainability of return and effective readmission in the countries of origin and transit:

- i. numbers of removals supported by the Fund, as compared to the total number of returns following an order to leave;
- ii. number of persons returned in the framework of the joint return operations supported by the Fund as compared to the total number of returns supported by the Fund;
- iii. (number of returnees who have received pre or post return reintegration assistance co-financed by the Fund, as compared to the total number of voluntary returns supported by the Fund;

- iv. number of places in detention centres created/renovated with support from the Fund, as compared to the total number of places in detention centres;
- v. number of returns following an order to leave compared to the number of third-country nationals ordered to leave;
- vi. return decisions issued to rejected asylum applicants;
- vii. effective returns of rejected asylum applicants.

2. INDICATORS ON EFFICIENCY, ADDED VALUE AND SUSTAINABILITY, AS FORESEEN IN REGULATION (EU) NO 514/2014

(d) To measure and evaluate efficiency, added value and sustainability:

- i. number of Full Time Equivalent in the Responsible Authority, the Delegated Authority and the Audit Authority working on the implementation of AMIF and paid by the technical assistance or national budgets as compared to the number of projects implemented and to the amount of the funds claimed for the financial year;
- ii. technical assistance plus the administrative (indirect) cost of projects as compared to the amount of funds claimed for the financial year;
- iii. absorption rate of the Fund.

ANNEX C

List of evaluation questions for AMIF evaluation reports by Member States and the European Commission

Reproduced from Annex I of *Commission Delegated Regulation (EU) 2017/207 of 3 October 2016 on the common monitoring and evaluation framework provided for in Regulation (EU) No 514/2014 of the European Parliament and of the Council laying down general provisions on the Asylum, Migration and Integration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management.*

1. EFFECTIVENESS (To what extent has the Asylum, Migration and Integration Fund ('Fund') reached the objectives defined in Regulation (EU) No 516/2014?)

- (a) *How did the Fund contribute to strengthening and developing all aspects of the Common European Asylum System, including its external dimension?*
 - i. What progress was made towards strengthening and developing the asylum procedures, and how did the Fund contribute to achieving this progress?
 - ii. What progress was made towards strengthening and developing the reception conditions, and how did the Fund contribute to achieving this progress?
 - iii. What progress was made towards the achievement of a successful implementation of the legal framework of the qualification directive (and its subsequent modifications), and how did the Fund contribute to achieving this progress?
 - iv. What progress was made towards enhancing Member State capacity to develop, monitor and evaluate their asylum policies and procedures, and how did the Fund contribute to achieving this progress?
 - v. What progress was made towards the establishment, development and implementation of national resettlement programmes and strategies, and other humanitarian admission programmes, and how did the Fund contribute to achieving this progress?
- (b) *How did the Fund contribute to supporting legal migration to the Member States in accordance with their economic and social needs, such as labour market needs, while safeguarding the integrity of the immigration systems of Member States, and to promoting the effective integration of third-country nationals?*
 - i. What progress was made towards supporting legal migration to the Member States in accordance with their economic and social needs, such as labour market needs, and how did the Fund contribute to achieving this progress?
 - ii. What progress was made towards promoting the effective integration of third-country nationals, and how did the Fund contribute to achieving this progress?
 - iii. What progress was made towards supporting cooperation among the Member States, with a view to safeguarding the integrity of the immigration systems of Member States, and how did the Fund contribute to achieving this progress?
 - iv. What progress was made towards building capacity on integration and legal migration within the Member States, and how did the Fund contribute to achieving this progress?
- (c) *How did the Fund contribute to enhancing fair and effective return strategies in the Member States which contribute to combating illegal immigration, with an emphasis on sustainability of return and effective readmission in the countries of origin and transit?*
 - i. What progress was made towards supporting the measures accompanying return procedures, and how did the Fund contribute to achieving this progress?
 - ii. What progress was made towards effective implementation of return measures (voluntary and forced), and how did the Fund contribute to achieving this progress?
 - iii. What progress was made towards enhancing practical cooperation between Member States and/or with authorities of third countries on return measures, and how did the Fund contribute to achieving this progress?

iv. What progress was made towards building capacity on return, and how did the Fund contribute to achieving this progress?

(d) *How did the Fund contribute to enhancing solidarity and responsibility-sharing between the Member States, in particular towards those most affected by migration and asylum flows, including through practical cooperation?*

i. How did the Fund contribute to the transfer of asylum applicants (relocation as per Council Decisions (EU) 2015/1523 (1) and (EU) 2015/1601 (2))?

ii. How did the Fund contribute to the transfer between Member States of beneficiaries of international protection?

(e) *How did the Fund contribute to supporting the Member States in duly substantiated emergency situations requiring urgent action?*

i. What type of emergency actions was implemented?

ii. How did the emergency actions implemented under the Fund contribute to addressing the urgent needs of the Member State?

iii. What were the main results of the emergency actions?

2. EFFICIENCY (Were the general objectives of the Fund achieved at reasonable cost?)

(a) *To what extent were the results of the Fund achieved at reasonable cost in terms of deployed financial and human resources?*

(b) *What measures were put in place to prevent, detect, report and follow up on cases of fraud and other irregularities, and how did they perform?*

3. RELEVANCE (Did the objectives of the interventions funded by the Fund correspond to the actual needs?)

(a) *Did the objectives set by the Member State in the National Programme respond to the identified needs?*

(b) *Did the objectives set in the Annual Work Programme (Union actions) address the actual needs?*

(c) *Did the objectives set in the Annual Work Programme (Emergency Assistance) address the actual needs?*

(d) *Which measures did the Member State put in place to address changing needs?*

4. COHERENCE (Were the objectives set in the national programme Fund coherent with the ones set in other programmes funded by EU resources and applying to similar areas of work? Was the coherence ensured also during the implementation of the Fund?)

(a) *Was an assessment of other interventions with similar objectives carried out and taken into account during the programming stage?*

(b) *Were coordination mechanisms between the Fund and other interventions with similar objectives established for the implementing period?*

(c) *Were the actions implemented through the Fund coherent with and non-contradictory to other interventions with similar objectives?*

5. COMPLEMENTARITY (Were the objectives set in the national programme and the corresponding implemented actions complementary to those set in the framework of other policies, in particular those pursued by the Member State?)

(a) *Was an assessment of other interventions with complementary objectives carried out and taken into account during the programming stage?*

(b) *Were coordination mechanisms between the Fund and other interventions with similar objectives established to ensure their complementarity for the implementing period?*

(c) *Were mechanisms aimed to prevent overlapping of financial instruments put in place?*

6. EU ADDED VALUE (Was any value added brought about by the EU support?)

- (a) What are the main types of added value resulting from the Fund support (volume, scope, role, process)?*
- (b) Would the Member State have carried out the actions required to implement the EU policies in the Fund areas without the financial support of the Fund?*
- (c) What would be the most likely consequences of an interruption of the support provided by the Fund?*
- (d) To which extent have actions supported by the Fund resulted in a benefit at the Union level?*

7. SUSTAINABILITY (Are the positive effects of the projects supported by the Fund likely to last when the support from FUND will be over?)

- (a) What were the main measures adopted by the Member State to ensure the sustainability of the results of the projects implemented with the Fund support (both at programming and implementation stage)?*
- (b) Were mechanisms put in place to ensure a sustainability check at programming and implementation stage?*
- (c) To what extent are the outcomes/benefits of the actions sustained by the Fund expected to continue thereafter?*

8. SIMPLIFICATION AND REDUCTION OF ADMINISTRATIVE BURDEN (Were the Fund management procedures simplified and the administrative burden reduced for its beneficiaries?)

- (a) Did the innovative procedures introduced by the Fund (simplified cost option, multiannual programming, national eligibility rules, more comprehensive national programmes allowing for flexibility) bring about simplification for the beneficiaries of the Fund?*



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