

AMIF INTERIM EVALUATION REPORT

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Time period covered	01/01/2014 - 30/06/2017

INDEPENDENT EXPERTS (AS REQUIRED IN ART. 56(3) OF THE REGULATION (EU) NO 514/2014)

Within the framework of the art. 56.3 of the EU Regulation 514/2014 FAMI, the RA has opted for the external contracting of independent experts, different from the authorities (RA, AA, DA). The procurement procedure responds to the modality "negotiated without advertising" provided for in Spanish legislation on public procurement. Within all companies, Red2Red Consultores S.L was selected through the application of the criteria established in the technical specifications document. This company accumulates a long experience and solvency in the development of studies and evaluations of public policies, including projects such as: Evaluating the outcomes and impacts of actions with co-funding from the European Fund for the Integration of Third Country Nationals (EFI 2011-2013), Monitoring implementation in Spain of the 2013 AP of the European Refugee Fund and the European Return Fund (2014) for the European Commission; Technical assistance for monitoring actions carried out in the frame of the Strategic Plan for Citizenship and Integration and other projects to monitor and evaluate European Funds, in particular, ESF, ERDF and EAFRD.

It is therefore a private company with no relation of functional or hierarchical dependence of any of the authorities of the FAMI.

The evaluation methodology combines quantitative and qualitative techniques such as:

- **Document review:** focused on statistics, indicators, reports and annual accounts presented by the Fund, etc.
- <>: one online survey directed at implementing entities that were Fund beneficiaries (53 NPEs) and another telephone and online survey directed at TCN end beneficiaries of the actions (400 people)

Semi-structured interviews with key agents (10) with RA, DA and bodies implementing the funded actions.

The most significant results in NP execution throughout the period are:

- In the area of **asylum** CEAS has been reinforced and promoted.
 - Capacity to investigate IP cases has been strengthened by hiring temporary support staff at OAR. This action has significantly increased the number of cases investigated in response to the substantial increase in applicant numbers since 2015, but response times have not been shortened.
 - Integral reception and integration projects have been developed for IP applicants, creating and maintaining specific integral assistance resources for vulnerable groups.
 - In terms of indicators, the number of AMIF beneficiaries of the reception and asylum system rose to 41,750 (SO1R1), 139.2% of the target for 2020. 82% of these people received information and assistance and 32% received legal assistance and representation (SO1R1, sections i) and ii) respectively).
 - The number of reception places has been increased and living conditions for beneficiaries have improved, especially after the grant calls directed at NPEs. The number of new and/or improved reception places (SO1R2) totals 4,934; 229% of the target for the entire period.
 - 523 NPE professionals working on asylum matters (SO1R3) have been trained, 13.4% of the target for 2020.

- On **TCN Integration**:

- AMIF has made a very significant contribution to the integration of end beneficiaries of the funded projects. In the study period, the number of beneficiaries of AMIF-supported projects (SO2R2) totalled 184,449. These people value participation in AMIF-funded projects very positively for improving their personal situation.

- However, AMIF impact indicators show that at macro level, improvements in the Spanish economy hardly reached the target population.
 - Although it has reduced over the period, the difference between unemployment rates for TCN and nationals (SO2I3) is 9.9 points in 2017.

 - In 2017, the difference in employment rates between third country nationals and host country nationals (SO2I2) is similar to the baseline (-9.96 p.p. in 2017; -9.5 p.p. in 2013).

 - In 2016 (latest available data) the difference in early school leaver rates between TCN and nationals (SO2I5) is similar to the 2013 rate (21.9 and 21.7 percentage points, respectively), therefore it remains highest for NTP.

 - Similarly, the SO2I6 and SO2I7 indicators that measure differences (%) between young TCNs and nationals aged between 30 and 34 years with higher education certificates and the percentage of the TCN and national populations at risk of poverty or social exclusion respectively have not varied significantly throughout the period. The situation continues unfavorable for the NTP.

- In relation to return actions.

- The VR programmes have responded to decreasing demand as a consequence of certain improvements in the economic situation. The number of TCNs who **voluntarily returned (SO3R3 a)** with AMIF funding was 2,698 up to 30 June 2017, which represents **9% of what was anticipated**.

- In FR, accompanying measures have been developed directed at improving the living conditions in the CETI and CIE accommodating TCNs who are to be forcibly returned. The number of TCNs **forcibly returned** with AMIF funding (**repatriated persons (SO3R3 b)**) is 9,673 individuals, representing 18% of the anticipated target.

Furthermore, the mid-term review pointed to the need to review the budget allocation for SO1, to improve and maintain a rapid, effective response to the growing demand for IP and reception; continue with the programmes and review the indicators contemplated in the NP for SO2 and reduce the VR budget in SO3.

In line with the above, and the analysis results, the following conclusions and recommendations can be offered:

1. Through the NP, AMIF has contributed to the development of asylum, integration and return policies in Spain and the EU. Actions have been funded that respond to identified needs and Spain's capacity to respond to the refugee crisis emergency and the growing number of IP applications. Nevertheless, the response to needs has been limited with uneven results depending on the objective.

Actions taken in relation to reception, integration and voluntary return have helped to improve the situation of TCNs and relevant quality services have been provided.

On the matter of asylum and reception, however, needs arising over the period have exceeded proposed solutions, showing shortfalls in the ability to respond to the regulation and comply with Spain's resettlement and relocation commitments. In relation to the capacity and quality of the system's infrastructures and forced return of TCNs, the need and urgency for some of the actions contemplated in the NP has been verified.

The following measures are considered necessary to increase the response capacity of Spain's asylum system: increase the number of staff in OAR; speed up development of the management tool for IP application procedures; prioritise construction of the planned CIE and increase places in CETI and speed up production of the Assistance Plan for Asylum Applicants and the action protocols for cases of mass arrivals.

1. The most noteworthy items pending execution in the NP are: production of the planned evaluation reports and development of a management tool for the asylum procedure (SO Asylum, NO evaluation); cooperation with other countries, the exchange and dissemination of experiences and implementation of instruments for evaluation and monitoring (SO integration - NO Capacity); generate knowledge through reports, exchange of experiences and participation in networks (SO Return - NO cooperation) and implement actions linked to protection, assistance and integration of Unaccompanied Foreign Minors (UFM).

The shortage of HR in the management teams is one of the reasons why these issues were not tackled in the first part of the period. Therefore the number of human resources specialised in asylum, integration and return policies must be increased.

2. Actions implemented within the NP have been coherent and complementary with national and EU policies on asylum, reception, integration and return. Integration and reception actions have been implemented in coordination with other programmes with General State Budget and ESF co-funding. Legal immigration and forced return actions have been complemented by others funded by ISF and General State Budgets. Implementing education, training and cooperation actions could improve coherence and complementarity in the second stage of AMIF execution.
3. There has been no significant reduction in the administrative burdens linked to AMIF management. Some of the procedural innovations introduced in this period have brought improvements in terms of management (multi-year programming) but others have not had any significant impact (simplified costs). At the same time, control and audit procedures persist that are understood to be redundant and represent a very large administrative burden.

Another novelty that has negatively affected Fund management processes was the establishment of the financial year from 15th October to 15th October, which has introduced distortions in physical and financial management (financial and physical indicators).

In this area, the recommendation is to study the feasibility of applying other simplified cost methods and for the EC to produce a guide; organise mechanisms for sharing lessons and experiences generated by Fund management; explore the possibility of changing the annual cycle so it coincides with the calendar year.

1. AMIF has provided added value by extending the quantitative and qualitative scope of asylum, reception, integration and return policies.

It has also contributed towards improving the systems, structures and processes on which the policies are based, promoting improvements in the management and implementation of the actions carried out by the bodies and entities involved in executing the NP.

In terms of sustainability, it is highly likely that these actions and their effects will continue in the years to come, given that most of them depend largely on General State Budgets rather than AMIF (except for hiring staff at OAR and VR actions, among others). The Fund contributes to the complementarity and specificity in the development of the actions. Efforts need to be redirected towards developing and strengthening monitoring and evaluation procedures and improving the services provided to TCNs targeted by the Fund.

SECTION I: CONTEXT OF IMPLEMENTATION OF AMIF DURING 01/01/2014 - 30/06/2017

During the period under evaluation significant events have generated changes in the initially anticipated needs, either because some of them have intensified or because other needs have emerged.

Instability in the Near East (Syria in particular) and some areas in the North and centre of Africa has led to the forced displacement of a large number of people from those regions, and although they have largely been taken in by neighbouring countries, EU countries are the intended destination for some of them, either as migrants or asylum applicants.

In the refugee crisis the migratory flow increased in the Eastern and Central Mediterranean to EU countries like Greece, Hungary (especially from the Turkish border) and Italy (from the coasts of Libya) in addition to flows that directly affect Spain from Northern Africa (especially in Ceuta and Melilla). In this context, in late 2015 EU Member States undertook to relocate 160,000 asylum applicants from Italy and Greece and to re-settle another 22,504 from those same countries (Spain committed to taking in 17,337 people).

In addition to this commitment, the intensification of migratory flows has meant a significant increase in the number of asylum applications throughout the EU which, although noticeably lower in Spain than in other countries like Germany, Italy and the United Kingdom, has seen the number of applications triple in three years (5,615 in 2014 to 15,755 in 2016).

The financial crisis also affected migratory flows in Spain. The number of third country nationals (TCN) dropped significantly in 2013 and 2014. In 2015 the numbers fell again, but only slightly and then showed a small increase throughout 2016 (Continuous Register data, INE (Spain's Institute of Statistics)).

The economic recession and high unemployment rates had a dual effect on integration policies: an increased need for assistance among vulnerable groups and people of immigrant origin and adjustments in the response offered to these people by Spanish public authorities due to budget limitations.

From the management perspective, the situation overlapped with the closure of SOLID Funds for the period 2007-2013, as the programme ended on 30 June 2015.

SECTION II: CHALLENGES ENCOUNTERED AND THEIR IMPACT ON THE IMPLEMENTATION OF THE NATIONAL PROGRAMME

Changes in the context in which the National Plan (NP) was designed have forced efforts to be redirected to deal with new needs which have impacted at the level of executing the actions and the capacity to manage them.

The most important challenges concern asylum.

- The significant increase in applications for International Protection (IP), from 5,950 in 2014 to 18,063 up to October 2017 have forced a response to the pressure on a congested reception system, increasing capacity and improving reception conditions in public centres and those arranged with non-profit entities (NPE), as well as reinforcing integration projects for people with some type of IP. At the same time, the investigative capacity of the Office of Asylum and Refuge (Oficina de Asilo y Refugio (OAR)) has had to be resized to deal with the increase in IP application cases and, as far as possible, reduce the average time taken to decide such cases.
- Similarly, Spain's commitments to the EU in response to the refugee crisis (resettle and relocate 17,228 people) in addition to adding to the above, have required joint action mechanisms to be established with Greece and Italy in an attempt to meet re-location objectives and reinforce the missions to select and examine candidates for resettlement in collaboration with UNHCR and the International Organization for Migration (IOM).

As regards immigration and return, the financial crisis had a major impact on TCN, which increased pressure on social protection systems in all areas, some of which provide for basic needs (housing, food, health, etc.). Nevertheless, these aspects were largely anticipated and on integration issues there is a line of continuity in relation to the years prior to 2014.

Regarding return, the financial crisis meant that for a few years there was increased demand from TCN for voluntary return (VR) to their countries of origin. However, from the start of the period under review here, signs of improvements in the economy and the drop in people meeting the requirements, reduced the demand for VR.

Finally, as regards forced return (FR), the challenges lie in ensuring living and housing conditions for TCN housed in (CIE) and (CETI), due to the overload on available places and the conditions of the facilities and equipment, as well as ensuring appropriate management of transfers of illegal TCNs to reduce the overload on those centres.

SECTION III: DEVIATIONS IN IMPLEMENTATION OF THE NATIONAL PROGRAMMES IN COMPARISON WITH WHAT WAS INITIALLY PLANNED (IF ANY)

SO1. ASYLUM

The NP anticipated the incorporation of 40 investigators and support staff in OAR in order to bring the average time for deciding IP applications into line with the plans. However, the significant increase in IP applications required a twofold increase in staff numbers (the team of temporary staff reached a maximum of 109 individuals).

The hiring of staff has enabled more cases to be examined (more than 1,000 cases examined monthly by the Inter-ministerial Commission of Asylum and Refuge (*Comisión Interministerial de Asilo y Refugio*, CIAR), and a significantly higher number of decisions (from 3,315 in 2015 to 7,655 in 2016) with case settlement times remaining stable at between 9 to 11 months on average, without achieving the 6 months established by law and set as a target when the NP was produced.

In relation to the facilities, it was planned to start refurbishing the access points for IP applicants at the Madrid-Barajas and Barcelona-El Prat airports to adapt them to the needs stemming from the increased volume of applicants and the requirements of the applicable regulations (access to natural light for at least one hour a day, guaranteeing the right to privacy, etc.). The NP anticipated the closure of these actions in 2017, but execution has been affected by the difficulties linked to availability and assignment of spaces by AENA (public company that manages the airports). Currently, efforts are centred on the Madrid-Barajas facilities, with works planned for late 2018 and early 2019.

The NP also included as an anticipated result, training on asylum matters for staff involved in the IP process (20 courses and 300 trained OAR workers, members of law enforcement bodies and staff involved in the reception stage). The training courses have been carried out under the national budget.

Although the NP included the development of an application program for the IP application procedure, difficulties in designing the tool and financial issues, mainly, have prevented it from being included in AMIF to date.

In the rest of measures and actions regarding NO1 on Reception and Asylum, progress has been made that comes more or less within the planned levels and execution periods. By way of summary:

- In the improvement of reception conditions and reinforcement of the mixed public-private system of reception at migration centres, the number of reception places has been increased from 909 in 2013 to **4,934 at June 2017 (SOR2)** and maintenance and improvement works have been carried out at the Immigration Department's (DGM) Migration Centres (CETI and

CAR). In parallel, projects for the reception and integration of IP applicants have been undertaken.

- Progress has been made in relation to the NP for the Reception System and for managing mass arrivals, although still in a very preliminary phase.

As regards **resettlement**, at 30 June 2017, 418 people had successfully been brought to Spain, although by the end of November, when this report was written, the figure totalled 1,135, 78.3% of the 1,449 planned for the 2016-2017 two year period.

At 30 June 2017 1,069 resettlements had been executed, although by the end of November 2017, the figure was 1,301 (14% of the commitment to 9,323). In relocation, the deviations are due to various factors regarding the capacity for responding to the complexity of managing said cases and the difficulty in finding in Greece and Italy the planned profiles that meet requirements for relocation (nationalities with an IP recognition rate of more than 75% or which arrived before 26 September 2015 and were registered in said programme)

SO2. INTEGRATION/LEGAL MIGRATION

No deviations in execution have been detected beyond those stemming from delay in approving the regulations and the PN itself and the availability of funds for starting the projects.

SO.3. RETURN

Measure 1 of ON1 - Accompanying measures - which contemplated the construction of 3 new CIE to replace current ones to ensure quality standards for the available places was to be planned in 2015, execution to begin in 2016 and closure up to 2020. In the case of Malaga, possible deviations have been identified because in October 2017 the acquisition of land for subsequent construction had yet to be decided. The centres in Madrid and Algeciras, with that stage already completed, will be built during the 2017-2020 period.

As regards VR, the number of participants has fallen annually (3,850 in 2013 to 1,052 in 2016), as a consequence of less demand from TCNs resident in Spain.



SECTION IV: EVALUATION QUESTIONS

1	Effectiveness
1.1	Specific objective 1: Asylum - Strengthen and develop all aspects of the Common European Asylum System.
	The overall question: How did the Fund contribute to strengthening and developing all aspects of the Common European Asylum System, including its external dimension?
	<p>AMIF has significantly contributed to reinforce and promote CEAS mainly in the following elements:</p> <ul style="list-style-type: none"> • Strengthening capacity to investigate IP cases, mainly by hiring temporary support staff and financing other key aspects for it, such as the interpreter service. This action has helped to significantly increase the number of cases investigated in response to the substantial increase in applicant numbers since 2015. • Increasing reception places and improving conditions for users: undertaking actions to improve reception centres and facilities, including the adaptation of buildings, the provision of social and health services and the generation of new places, especially through grant calls directed at NPEs. • Developing integral reception and integration projects for IP applicants that cover both basic and initial aid, as well as aspects focused on social integration in the host country, also through calls for proposals. AMIF has focused on creating and maintaining specific resources for integral assistance for vulnerable groups (victims of trafficking, gender violence, etc.). • Training for NPE professionals working in asylum and sensitisation of the host society to promote the integration of IP applicants. • In compliance with Spain’s resettlement and relocation commitments. <p>Nevertheless as will be described later, it must be highlighted that in financial terms and since 2016 the significance of AMIF has been reduced due to the increase in national funding directed at responding to needs stemming from the change of context regarding asylum in Europe.</p>

	<p>Likewise AMIF has also contributed, although less significantly, to the development of a Plan to assist asylum applicants and an action protocol to deal with possible mass influxes of IP applicants that are also at a preliminary phase. On these issues, progress has been slower because of the difficulties in coordinating all the ministerial departments involved, although there are already initial drafts and there have been high level meetings between Ministries.</p>
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1.1.1	<p>What progress was made towards strengthening and developing the asylum procedures, and how did the Fund contribute to achieving this progress?</p>
	<p>AMIF's main contribution to the reinforcement and promotion of asylum procedures has been from the human resources perspective, hiring temporary support staff for OAR to investigate IP applications. The hired staff has varied throughout the study period but has always exceeded and even duplicated the 40 people initially planned in the NP (up to a maximum of 109 people).</p> <p>This increase in staff has had a direct effect on OAR's investigative capacity. After hiring and training temporary personnel (until April 2016) the capacity of IP cases taken to CIAR has increased significantly. Thus while between January and April 2016 an average of 309 cases were brought before CIAR, since May investigated reports per month have never fallen below 1,000. Allocation of this staff has been crucial as well for managing cases linked to Spain's resettlement and relocation commitments adopted in 2015.</p> <p>Furthermore, AMIF has also contributed towards funding another fundamental aspect in asylum proceedings, translation and interpreter services. The need for this service grew in parallel with that of the number of IP applications presented and the contracts supporting said service have been included in AMIF's annual accounts.</p> <p>To sum up, a growing trend has been observed year after year in the number of cases pending before first instance courts. In 2014, the number of cases at first instance pending of decision under 6 months was 2,148 whereas in 2016, it was 6,702 (SO1I1). The number of cases pending of decision at first instance which exceeded 6 months was 2,875 in 2014 and 10,828 in 2016 (SO1I1). The percentage of final positive decisions at appeal stage started at 1.6% rising to 3.9% in 2016 (SO1I2).</p> <p>In relation to the indicators linked to this question, in the methodology guide on evaluation developed by the EC, for the entire study period, the following is worth noting:</p>

	<ul style="list-style-type: none"> • Accumulated data on the number of persons in beneficiary groups assisted through reception and asylum system projects (SO1R1) throughout the study period is 41,750 individuals (139% of the initially proposed objective), almost 55% counted in 2017. • The number of people in beneficiary groups that received information and assistance through asylum procedures throughout the period totals 34,266 individuals (SO1R1 i). • The number of people in beneficiary groups that received legal assistance and representation was 13,310 (SO1R1 ii). • In addition, the number of vulnerable people and unaccompanied minors (the latter are not counted because are attended by Autonomous Communities) who received specific assistance was 5,011 individuals (SO1R1 iii). • On the matter of education, 523 people received training on asylum-related matters with help from the Fund (SO1R3). All of them were NPE staff.
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1.1.2	What progress was made towards strengthening and developing the reception conditions, and how did the Fund contribute to achieving this progress?
	<p>Progress in this regard has been very significant and has attempted to respond to the growing needs stemming from the increase in IP applications in recent years (264% in the 2013-2016 period) as well as Spain's commitments acquired since the refugee crisis in 2015. The following data show the growth experienced by the national reception system: The number of international protection (IP) beneficiaries in the Migration centres run by Spain's immigration and emigration department (SGIE) has increased by 203.6% (from 1,387 in 2013 to 4,211 in 2016) and in NGO centres by 383.9% (from 7,653 in 2014 to 37,034 in 2016).</p> <p>As is to be expected, reinforcement of the reception system in Spain was not only based on AMIF. To respond to the growing needs regarding the reception of IP applicants in 2016 the Spanish government significantly increased the national budget allocated to the reception system (via General State Budgets), so that AMIF co-funding went from 18.5% of the global budget allocated to the system in 2015 (General State Budget, AMIF and ESF) to around 13.17% in 2016 and 5.54% in 2017. Therefore, in relative terms, AMIF's contribution,</p>

although significant, has gradually fallen as the Spanish government has increased spending on the national reception system in response to the growing needs.

The following result and impact indicators can be used to highlight AMIF'S contribution and degree of development in relation to the goals contemplated in the NP (data up to 30 June 2017).

- The number of AMIF beneficiaries in the reception and asylum system has risen to 41.750 (SO1R1), 139.2% of the target contemplated for 2020. The 82.1% of these people received information and assistance and 31.9% received legal assistance and representation (SO1R1, sections i) and ii) respectively). The number of vulnerable people who receive specific assistance rose to 5,011, 12% of the total (SO1R1 -iii, not including Unaccompanied Foreign Minors (UFM)), as they are the competence of the regional authorities ("Autonomous Communities").
- In terms of capacity, the number of reception places was increased to comply with the planned rules (SO1R2) rising to 4,934, 229% of the 1,500 places established as a target for the entire period.
- The percentage of people included in the reception system for asylum applicants (SO1I4) rose to 27.9% for the entire study period, a statistic which has increased annually (in 2017 it is 44%).
- As regards training (SO1R3) 523 people have been trained with AMIF funding belonging to NPE beneficiaries of the 2016 call (72% of all people trained).

The survey of people in the reception system (NPE places) can be used to contrast aspects linked to the suitability and quality of assistance in the projects around which the integral reception programme is organised (ordinarily lasting 18 months). In most cases, these assessments usually coincide with those of the NPEs consulted.

- 77% of interviewees consider that the attention received was good or very good and 78% assess reception conditions in the same way. 68% of people were satisfied or very satisfied in global terms.
- 56% of interviewees consider that the assistance received was completely tailored to their needs and 30% consider that it was partially tailored (noting the lack of other services). The NPEs consulted pointed to the need to extend the range of services included in the calls and even the time lines for users, especially taking into account the high vulnerability profile of beneficiaries assisted by AMIF-funded projects.

	<ul style="list-style-type: none"> • 73% consider that the services received were very or quite useful for improving their personal situation. The NPEs generally share that vision as well. • The most critical element concerns access, 54% consider that the formalities and procedures for accessing the reception system were easy or very easy (although 19% consider them difficult or very difficult) <p>In qualitative terms, according to the agents consulted, it is also possible to detect AMIF's contribution to:</p> <ul style="list-style-type: none"> • Improving reception conditions insofar as it has been possible to transfer part of the requirements for actions funded by the fund to the Ministry of Employment and Social Security and NPE operations. • Maintaining operational the network of reception centres that covers the entire national territory, largely supported by NPEs <p>Finally, despite the efforts and resources allocated to processing and examining asylum applications, decision periods remain above the 6 months established by the regulation, which means added pressure on the reception system.</p>
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1.1.3	<p>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?</p>
	<p>Progress in this aspect is linked to progress on the issue of asylum procedures and reception conditions, responded to in the above questions.</p> <p>Fruitful application of the legal framework for recognition has been reinforced mainly by increasing OAR's investigative capacity with temporary support staff hired with co-funding from AMIF. With this action, the monthly average of around 300 IP cases taken to CIAR for a decision in the first quarter of 2016 has risen to more than 1,000 a month since May 2016.</p> <p>Despite that, average decision time for IP cases is still more than 6 months, at around 9 to 11 months on average. Therefore the hiring of temporary support staff with AMIF funds has not helped to reduce waiting times, although according to OAR managers, it did mean waiting</p>

	<p>time remained stable and did not increase, especially in view of the increase in IP applications since 2015.</p> <p>With AMIF support it is planned to work on the design and development of a management tool which will help to make the processing of cases efficient (simplifying steps and reducing bureaucratic burdens) which should have an impact on reducing decision times. As noted in section III, however, there has been no progress on this aspect to date.</p> <p>In relation to the indicators linked to this question in the methodology guide on evaluation developed by the EC, convergence of Member State recognition rates at first and last instance for asylum applicants from the same third country (SO116) was 52 p.p. for Spain in 2016 (latest available data calculated for all Member States with regard to a single nationality: Afghan) while in 2014 it was 12 p.p. and 33 p.p. in 2015.</p>
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1.1.4	<p>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?</p>
	<p>On this matter progress has been limited in general and therefore AMFI's contribution has been very scanty or indirect.</p> <p>From the point of view of policy formulation and design, preliminary progress has been made on defining a Plan for assisting asylum applicants and an action protocol in the event of any mass influxes of IP applicants. Meetings are being held between the various ministerial agents involved and UNHCR.</p> <p>On the matter of monitoring and evaluation, no progress has been made on the provisions in the NP. Initially, for the entire period an evaluation report on asylum policy and management of the asylum system was contemplated as well as evaluation reports on the reception programme and protocols for cases of mass arrivals (1 report for each National Resettlement Plan) but they have not been produced yet. Similarly, development of the new tool for managing the asylum process is expected to facilitate information from indicators for monitoring and evaluation.</p>

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	<p>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?</p>
	<p>The National Resettlement Plans (NRPs) approved by the Council of Ministers have gradually formalised the commitments and objectives established before and after the EU commitments agreed in 2015. Thus, the following was established in the National Plan and the successive NRPs:</p> <ul style="list-style-type: none"> • Resettlement of 260 people from Syria in the 2014-2015 two year period and 1,449 in the 2016-2017 two year period. • Relocation from Italy and Greece of 9,323 IP applicants (initial commitment) and the admission of 6,456 people from Turkey in the period 2016-2017 (second commitment added to the previous one, in total 15,779 people). <p>To comply with resettlement commitments 7 missions were conducted to select and identify candidates on the ground (6 missions since 2014) to supplement the information gathered by UNHCR and analyse the socio-cultural profile of people who can be resettled from the perspective of their reception and integration in Spanish society. In this regard, IOM awarded a grant for collaboration with the Spanish government in developing the NRP</p> <p>Although the agents involved consider that AMIF's role was particularly significant in being able to fulfill the NP and NRP on resettlement (conducting missions, capacity for investigating IP cases, etc.) there is consensus over the insufficient amount of 10,000 Euros per resettled person which is very far from the real costs required to deal with each case, especially taking into account the especially vulnerable profile of AMIF beneficiaries.</p> <p>In terms of results, the number of people arriving in Spain during the period was far from what was anticipated:</p> <ul style="list-style-type: none"> • With regard to a relocation, on June 30, 2017 the number of people relocated was 1,069. At the time of writing this report, at the end of November, the number of people relocated was 1,301 (more than 90% from Greece). That is, only 14% of the people anticipated in the initial commitment (9,323 people) arrived or 8.2% taking into account the second commitment (15,779 people). • In relation to the commitments acquired under Council decision of 15/07/2015 stemming from the 2015 refugee crisis, 418 people were resettled by 30/6/17, - 28.84% of the commitment. Previously 260 had been approved (RNP 2014) of whom 122 were resettled. Between 2015 and November 2017 the number totalled 1,333 (91.99% of the objective).

	<p>Despite the fact that Spain is the 9th country in relocations in the EU (as of 11/24/2017), it is true that the results have been far from the commitments acquired by Spain. These deviations can be explained partly by the following factors:</p> <ul style="list-style-type: none"> • The already-mentioned work overload at OAR. Although the hiring of temporary support staff with AMIF funds increased the investigative capacity, average decision times for IP cases is still above the 6 months established by the regulation. • Although it does not explain the scanty results achieved for relocation from Italy and Greece, the results have also been limited by the design of the relocation programme itself at community level. The criteria established for the eligibility of candidates – nationalities with a PI recognition rate of 75% on average from all Member States-, is leaving a large number of people belonging to other nationalities outside the eligible profiles (such as Afghan, Iraqi, etc.). In addition, other deadline and bureaucratic factors linked to the date of arrival in these countries and candidates’ registration in the programme has hindered the identification of profiles, especially in the last few months before the deadline expired (an event illustrating this aspect is that in 2017 Greece notified Spain that it had no cases that complied with the relocation programme criteria). • On the issue of resettlement, the agents consulted identify other barriers. In addition to the complexity of the procedure and the formalities, there is a percentage of “abandonment” by potential previously identified candidates proposed by UNHCR who do not continue with the process and finally do not reach Spain despite being able to meet all the conditions to do so, for various reasons (change in personal circumstances, preference for other countries, they are not convinced by the conditions, etc.).
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1.2	Specific objective 2: Integration/legal migration - Support legal migration to the Member States in line with their economic and social needs such as labour market needs, while safeguarding the integrity of the immigration systems of Member States, and promote the effective integration of third-country nationals.
	The overall question: 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?
	AMIF focus on promoting TCN integration and improving capacity on that:

Its contribution has been very significant since 2014 continuing the role of SOLID Funds making it possible to attend to the needs of a large number of TCNs who, as a result of the financial crisis and increased unemployment, saw their situation in Spain deteriorate. In budgetary terms AMIF funding was, depending on the year, between 40 and 50% of the total amount allocated to integration projects via grant calls managed by the MEYSS (combining funding from the General State Budget, ESF and AMIF).

According to the agents consulted, including beneficiaries themselves, AMIF projects have significantly contributed to improving the situation of TCN participants. Nevertheless, given that integration policies transcend AMIF and even the National Government (i.e.: Regional Governments), the positive results identified at micro level are not reflected in the macro data. AMIF impact indicators show that progress in the Spanish economy barely reach the target population in only a few aspects, bringing few, or very scanty improvements:

- The difference between unemployment rates for TCNs and nationals (SO2I3) has gone down by 5.7 percentage points from the baseline until 2017 which is at 9.9 percentage points (III trimester EPA).
- The difference in the employment rate between third country nationals and host country nationals (SO2I2) has barely varied from the baseline until 2017 although in the intermediate years it reduced (-8.8 p.p. in 2014; -7.5 p-p in 2015; -7 p.p. in 2016; and -9.96 p.p. in 2017; baseline -9.5 p.p.).
- The activity rate among TCNs (SO2I4) dropped from the baseline until 2017 by 1.9 percentage points, which shows greater convergence but not an improvement in the situation of TCNs.
- As a positive statistic, the percentage of TCNs with long-term residence status (SO2I1) increased 2.3 points from the baseline until 2016 (from 48.02% to 50.36%).

Finally, the set of agents highlights that the projects carried out through AMIF have contributed to preventing the xenophobic discourse and the existence of significant incidents which become more frequent in times of crisis. In this regard, sensitisation actions directed at the host society and carried out in different spheres (neighbourhood level, public services like health, education, social assistance, etc.) are highly appreciated by the agents and TCNs themselves.

1.2.1	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?
	This question does not apply to the Spanish cases as AMIF does not include legal migration objectives.

1.2.2	What progress was made towards promoting the effective integration of third-country nationals, and how did the Fund contribute to achieving this progress?
	<p>As regards TCN integration, public policies in Spain have been directed at responding to the situation generated by the financial crisis in a context which saw an increase in assistance needs in vulnerable groups, like immigrants in combination with budget adjustments by all Spain's public authorities. In this context, the AMIF NP maintains a line of continuity with the previous period retaining the priorities dealt with by SOLID Funds because, despite certain signs of economic recovery in recent years, these improvements do not reach the most disadvantaged layers of society.</p> <p>Thus Responsible Authority (RA) priorities have been: equal access for TCNs to public services, specific assistance for the integration of more vulnerable groups and persons, promotion of co-existence, social cohesion and co-responsibility between TCNs and the host society, training for professionals and promoting the active role of civil society in the integration process.</p> <p>The RA has organised these priorities through grant calls under the regime of competitive calls directed at NPEs which have combined funding and coordinated objectives from different funds, the General State Budget, ESF and AMIF. AMIF has funded different types of programmes a) acquiring knowledge of the language, history, institutions, order, culture, co-existence, etc.; b) integration of minors and young people in the education system and ensuring conditions of equality;c) focused on health issues; d) directed at women; e) promoting equal treatment and non discrimination; f) identifying experiences and good practice and; g) dialogue and citizen co-existence. Likewise in 2014, funding was provided for integral intervention projects in neighbourhoods.</p> <p>In the period under analysis, the number of beneficiaries of AMIF-supported projects (SO2R2) totalled 184,449. That represents a 37% increase on what was anticipated for the entire period, although it must be remembered that the beneficiaries of 145 completed and justified projects were counted. Participation from these beneficiaries focused mainly on measures concerning education and training, including language training and preparatory action to facilitate access to the labour market in 42% of cases (SOR2 i).</p>

Surveys of TCN beneficiaries of the projects and the NPE executing them enable more in-depth exploration of relevant elements and show very positive assessments in terms of efficiency and results, which include:

- 76.5% consider that the steps and procedures for accessing these activities and programmes were easy or very easy.
- 94% of interviewees consider that the assistance received was good or very good, the same percentage as those who were satisfied or very satisfied overall with the activities in which they participated.
- 89% of interviewees considered that participation in the activities contributed positively or very positively to their integration in Spain. Focusing on specific aspects, the activities have made a significant contribution: TCN interviewees consider participation very positive or positive for accessing health services (80%), facilitating legal and administrative formalities (91%), improving their level of Spanish (75%), improving training and other cultural knowledge (85%), improving the options of obtaining or retaining employment (76%), establishing more contact with other people in their neighbourhood, district, locality, etc. (86%), participation in associations (74%) and improving the situation of women (62%).
- 70% consider that the activities they took part in were tailored to their needs and another 15% agreed but also felt that other activities were lacking.
- And as a global indicator, 79% of TCN participants consider that the support received in these activities was very or quite useful for improving their situation and/or that of their children and/or relatives in Spain. Similarly, 90% of interviewees consider that they are very or quite integrated in Spain.

In general, NPE assessments are on similar lines (almost 100% of interviewees consider that AMIF-funded projects have helped to facilitate TCN integration in Spain). NPEs and managers of grant calls attach great importance to the work of sensitisation carried out through AMIF funding with the host society, to the extent that integration is seen as a two-way process that still needs to be worked on and strengthened (82% of NPEs consider that projects funded by AMIF have helped to sensitise Spanish society to immigration and promote co-existence).

In qualitative terms, the agents consulted particularly value the role of AMIF and the calls for proposals to the extent that they contribute to TCN integration projects that cover the entire national territory and feed into integration policies through entities that are very closely linked to the territory, reaching even rural areas which would otherwise be very

	difficult.(Note: SO2I2, SO2I3, SO2I5, SO2I6 and SO2I7 are analyzed in the question of Relevance 3.1)
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1.2.3	What progress was made towards supporting co-operation 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?
	The NP did not contemplate cooperation actions on immigration. The closest thing to this point was the participation of RA representatives at international meetings to exchange experiences, in the European Migrations Network and in international Committees and meetings on migratory issues as well as participation in a workshop and exchange of experiences with other Member States on good practices in integration and IP applicant and beneficiary reception in Spain and synergies with other European funds.

1.2.4	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?
	<p>AMIF's contribution to training in integration and legal migration in Spain has been very limited for various reasons:</p> <ul style="list-style-type: none"> • Capacity-building and training for NPE professionals and volunteers working in this field has been organised around projects with ESF co-funding in the context of grant calls which combined different sources of funding (General State Budget, ESF and AMIF) and objectives and lines of action were coordinated. • Although RA staff have been trained in integration the costs were not allocated to AMIF annual accounts. In the case of the RA, because the training was provided by RA staff during work hours.

1.3	Specific objective 3: Return - Enhance 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.
	The overall question: 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?
	<p>AMFI has enabled improvements to the conditions under which TCNs return, whether via voluntary return (VR) or forced return (FR).</p> <p>The programmes developed around voluntary return have placed particular emphasis on making the return of TCN beneficiaries of these measures viable and sustainable. They attempt to focus efforts on the most vulnerable people in order to facilitate access to this option. In this regard, work has been done throughout the period with annual calls directed at NPEs for three types of projects which, according to potential beneficiary profiles, facilitate the procedure from the preparatory stage to when they return to their countries of origin and take up their life projects again by reintegrating in their communities.</p> <p>As regards forced return, guidance measures have been developed directed at improving living conditions in centres (CETI and CIE) housing TCNs subject to forced return, as well as developing integral assistance programmes in CETI and health care actions in CIE. In CETI potential TCN beneficiaries of asylum and those finally subject to forced return operations were addressed.</p> <p>In this regard:</p> <ul style="list-style-type: none"> • The number of voluntarily returned TCNs with AMIF funding (SO3R3 a) or O3 C3) was 2,698 up to 30 June 2017, which represents 9% of what was anticipated. • The number of forced returns of TCNs funded by AMIF (SO3R3 b) or OE3 C4) is 9,673 individuals representing 18.3% of the anticipated target. <p>Other actions planned and closely linked to the development of return strategies, like the development of a protocol for returning minors and financial help for sustainable return projects for unaccompanied minors through family regroupment has not been part of AMIF actions to date, although there has been progress in collaboration with other Member States in the context of Specific Measure 7 - Joint family unit and reintegration of unaccompanied</p>

	minors and Spain’s participation in the action “Organisation of joint reintegration projects for UFM” led by France.
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1.3.1	<p>What progress was made towards supporting the measures accompanying return procedures, and how did the Fund contribute to achieving this progress?</p> <p>The objectives proposed in the NP for the entire period were:</p> <ul style="list-style-type: none"> • Providing suitable quality of accommodation in CIE and improving infrastructures and living conditions in the other centres, establishing as a priority investment in the construction of 3 new CIE (Malaga, Algeciras and Madrid). • Maintaining and improving CETI in Ceuta and Melilla: improving and adapting the centres to the family profiles of the residents (mainly mothers with minors in their care). It is planned to increase capacity in CETI by 500 places. • Reinforce integral assistance programmes (including reception, social services, security and administrative management tailored to the needs of vulnerable people) and various types of accompanying measures: <ul style="list-style-type: none"> ○ In CETI, in particular to identify potential cases of human trafficking. ○ Directed at immigrants arriving at the Spanish coast, Ceuta, Melilla, or who form settlements with socio-sanitary risks. ○ Support, food, personal hygiene and health and assistance services for those received at CETI or elsewhere. • Specific training for staff involved in return actions. • Coordination to produce a protocol for the return of minors and financial help for sustainable return projects for unaccompanied minors through family regroupment. <p>Progress has been uneven around the different objectives:</p>
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- As noted in section III in this report, during the 2017-2020 period, CIE will be built in Madrid and Algeciras, and progress has been made on the process of acquiring the land and developing the project. For the CIE in Malaga work is still in the land procurement phase.
- In parallel and on existing CIE various works have been done to improve and adapt the accommodation facilities to improve living conditions for TCNs forced to leave the country, funded by AMIF.
- Since 2014 projects have been carried out to maintain and improve living conditions of TCNs housed in CIE which have included basic health care and personal hygiene kits. Other actions like social assistance in internment centres, although carried out, are currently funded through General State Budgets.
- As regards training, 30 members of the Police Department have been trained (SO3R1), which achieves the goal for the entire period.

Other planned actions, like developing a protocol for the return of minors and financial help for sustainable return projects for unaccompanied minors through family regroupment have not been part of AMIF actions to date. Progress, however, has been made on the approach to these measures in collaboration with France, Belgium, and Greece to implement in five countries, Morocco, Albania, Pakistan, Mali and Egypt, which may vary depending on changes in needs or migratory flows. The project objective is to establish an integral, global approach to unaccompanied minors in both host and origin countries. Actions will include information and sensitisation campaigns and actions to support the reintegration of unaccompanied minors, working to rebuild the family unit, education and vocational training and a feasibility study on an entity or association with a structure in the selected country of origin that will receive the minor if family reunification is not possible. Participation of the RA in this project and lessons learned will be transmitted to the Centres for Minors in Ceuta and Melilla which may have AMIF co-funding in future annual accounts.

Despite the actions to date, there is still an evident problem of TPN overload in CIE and CETI and consequently on the living and accommodation conditions for the residents in those centres as the ombudsman has highlighted in various actions and reports (study *“El asilo en España. La protección internacional y los recursos del sistema de acogida y visitas a CIE en los años 2016 y 2017”*) (Asylum in Spain. International protection, reception system resources and visits to CIE in 2016 and 2017)

Finally, the other indicators linked to this question in the evaluation guide are as follows:

	<ul style="list-style-type: none"> • The number of returnees who received assistance with reintegration co-funded by the Fund, before or after returning, was 2,698 (SO3R7 a) during the evaluation period. • Throughout the period, the total number of places in internment centres (SO3R8 b) has gradually been reduced as the consequence of court decisions on adapting or improving the spaces. Numbers went from 2,888 in 2013 (baseline) to 1,179 in 2017.
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1.3.2	<p>What progress was made towards effective implementation of return measures (voluntary and forced), and how did the Fund contribute to achieving this progress?</p>
	<p>Although the NP includes an objective for the number of returns anticipated for the 2014-2020 period calculated from historical data, agents say it is difficult to estimate and forecast returns because they are linked to migratory flows that change substantially in response to a variety of factors.</p> <p>In voluntary return (VR) a fundamental factor has been the financial crisis and increased unemployment which significantly affected TCNs, driving many of them to return to their countries of origin (the number of TCNs resident in Spain fell during the period 2013-2015) In this regard, the number of TCNs who returned voluntarily with AMIF funding (SO3R3 a) or OE3 C3) was 2,698 up to 30 June 2017 which represents 9% of what was planned.</p> <p>VR has been channelled through annual grant calls (2015, 2016 and 2017) for projects, framed in three types of programmes whose objective is to facilitate the voluntary return and sustainable reintegration of immigrants to their countries of origin:</p> <ul style="list-style-type: none"> • Assisted VR and reintegration programme with particular attention to vulnerable persons through personalised return and reintegration itineraries. • Productive VR programme through personalised return and reintegration itineraries that include support for entrepreneurial skills. • Programme of grants to supplement the accumulated advance payment of contributory unemployment benefit (APRE) through grants to supplement the accumulated advance payment of contributory unemployment benefit. <p>In all cases, vulnerability is a priority criterion for selecting beneficiaries and three types of measures can be funded that cover the entire return process: measures required to prepare</p>

return operations, accompanying actions for return procedures and practical cooperation and measures to reinforce capacity.

Although few cases of VR project beneficiaries are available for the survey and it is not possible to draw firm conclusions from the results, there seem to be high levels of satisfaction with the assistance from NPEs (88% consider it good or very good and 82% consider they are satisfied or very satisfied). Meanwhile, in terms of results, the information suggests that those who return to their countries of origin did so generally under good and very good conditions (75%) but with some weaknesses, some of which indicate that their needs were not always met or incompletely met (40%).

From the qualitative perspective, the agents consulted point to two significant elements:

- The wide variability in the cases dealt with, always tailored to the individual needs of the people participating in the projects.
- The drop in demand for **APRE** projects largely explained by the high rates of unemployment over time so that increasingly fewer TCNs are entitled to this type of contributory benefit. In addition, some NPE representatives point to the lack of information provided by SEPE (State Public Employment Service) to benefit from this option.

In addition to the financial crisis, as regards **forced return (FR)** a fundamental factor has been border control. Although people continue to arrive illegally, the volume of arrivals has reduced in relation to previous years.

- The number of forced returns of TCNs funded by AMIF (SO3R3 b) or OE3 C4) is 9,673 individuals representing 18.3% of the anticipated target (same value for indicator SO3R5 a) persons who were repatriated (and whose return has been co-financed by the Fund).
- The percentage of forced returns following an order to abandon the territory financed by the fund (SO3R5) for the entire period is 35.5%.

Actions funded by AMIF for FR include:

- Actions required for expulsion operations: both transfer for the preparatory work prior to return between centres within national territory of persons with an FR file or highly likely to be given one and the final trip of these persons to the return countries,

	<p>by different routes, with the most significant in financial terms being flights exclusively chartered for forced return operations.</p> <ul style="list-style-type: none"> • The escort service on FR flights to improve security of return arrangements thus complying with EU regulations on assistance in cases of transit, repatriation or removal by air, with the European Convention for the Protection of Human Rights and Fundamental Freedoms and other international regulations on the matter. They are organised by seconding police agents for escort missions and expenses are funded. <p>Finally, TCN identification committees were executed with the national budget although there are plans to include them in AMIF accounts in the future.</p>
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1.3.3	<p>What progress was made towards enhancing practical co-operation between Member States and/or with authorities of third countries on return measures, and how did the Fund contribute to achieving this progress?</p>
	<p>Since 2016 the RA has formed part of the ERIN network (European Reintegration Network) and is carrying out some of the actions in the NP related to cooperation with third countries receiving returned persons.</p> <p>In January 2017, the 18 countries members of ERIN published the European Reintegration Network (ERIN) Specific Action Programme which offers assistance for socio-economic reintegration through advice and assistance related to the return and/or reintegration of immigrants who return voluntarily or involuntarily to their country of origin.</p> <p>For the moment, participation of the RA in the network has not been very intense, but is expected to increase in the coming years.</p> <p>Cooperation with third countries contemplated by the DA (delegated authority) in the NP in SO3.NO3 has not been executed with the AMIF budget, but has been entirely funded from the national budget. In the future there are plans to include it among the actions to be funded by AMIF.</p>

1.3.4	What progress was made towards building capacity on return, and how did the Fund contribute to achieving this progress?
	At the level of training, 30 members of the Police Department have been trained.

1.4	Specific objective 4: Solidarity - Enhance the solidarity and responsibility sharing between the Member States, in particular towards those most affected by migration and asylum flows, including through practical cooperation.
	The overall question: 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?

1.4.1	How did the Fund contribute to the transfer of asylum applicants (relocation as per Council Decisions (EU) 2015/1253 and 2015/1601)?

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

2	Efficiency
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2	The overall question: Were the general objectives of the Fund achieved at reasonable cost?
	Estimating efficiency in AMIF management and execution is complex, whether it be in global terms or by objectives, due to the huge differences between the projects funded within each SO (building and updating infrastructures, improving management systems and hiring management

teams, end projects directed at specific beneficiaries with very different profiles, etc.) and the diversity of profiles of the people assisted and the needs being addressed in each case, including highly vulnerable TCNs

We will, however, attempt to answer this question by examining different elements linked to the execution and management of actions carried out in the frame of the NP:

The first approach consists in relating the global costs in each planned objective in the NP for the entire study period (sum of the first two columns in Table 1 in the annexes) to the number of end beneficiaries (SO1R1, SO2R2 and SO3R3), in order to obtain gross AMIF investment per individual beneficiary of the fund,. Although asylum, reception, integration and return systems are not supported by the AMIF budget alone, the calculations yield the following results:

- On asylum and reception (not including special cases) AMIF cost per beneficiary was €680.61
- On integration AMIF cost per beneficiary was €169.71
- On return AMIF cost per beneficiary was €1,925.2 in VR and €1,597.1 in FR.

These data alone do not offer much information and must be approached with caution because they only refer to the contribution of AMIF to total expenditure which is fed by other sources of funding such as General State Budgets and ESF, in addition to the contribution from NPEs. The data do, however, at least show that average costs per beneficiary are within what can be considered a reasonable range. The differences between objectives is to be expected taking into account the type of costs allocated to each objective:

- Asylum and reception include, in addition to reception and integration projects directly aimed at IP applicants, significant investment in infrastructures and in maintaining places in the state-run reception network (CETI and CAR) and in the NPE network as well as hiring temporary support staff in OAR and the interpreter and translation service. All of the above, as will be seen in the section on relevance, align with the identified needs.
- Amounts for integration projects are lower per beneficiary, which is to be expected given that the projects are less personalised and organised around activities directed at a wider public. The expenditure included in each section corresponds to the projects implemented by NPEs through grant calls for projects designed to help TCNs acquire skills and tools for integration and do not include other types of investments like building or improving centres and equipment.

- Return (VR and FR) has the highest cost per beneficiary. In this objective, expenditure per beneficiary includes, health care and maintenance expenditure and the cost of trips for returnees and escort services (including expenses); and for VR projects implemented by NPEs, return trip costs in addition to other types of aid and assistance according to the type of project.

The second approach to efficiency focuses on the, very limited, analysis of the types of costs in AMIF-funded projects:

- Firstly, by analysing the proportion of indirect costs for AT on all amounts declared as charged to the Fund (indicator H2) both annually and for the entire period. For the entire study period (2014 - 30 June 2017) the percentage of these costs over the total is around 5.04%. Indicator H2 a) only includes AT costs because RA indirect costs cannot be included.

Looking at the annual values for this indicator, two stages can be distinguished. 2015 was the year when the NP began and the proportion of indirect and AT costs was particularly low (2.1%). In the 2016-2017 period the NP was already in progress and this percentage is around 6% (5.7% in 2016 and 5.9% in 2017).

- Secondly, brief analysis of the costs structures for the candidate projects for inclusion in the stories of success and failure, which were all NPE projects reveals the following:
 - The diversity of concepts within the direct costs structure for the projects which vary according to type of project and objective. Whereas asylum and reception projects include eight direct cost concepts (personnel, travel costs and expenses, building rental, specific costs for the target groups, etc.) distributed in relation to type of activity (information and guidance, social intervention, temporary reception, etc.), integration has 11 expenditure concepts (personnel, teams, building rental, travel, etc.) and voluntary return projects have six (personnel, travel and accommodation, etc.).
 - Indirect costs for these projects vary between 4% and 8% (general limit established in the grant calls) although AMIF permits the application of a fixed rate of 15% on personnel costs.

Another approach to efficiency, although largely partial, is to consult the bodies executing the projects.

- The implementing bodies in the organic structures of the RA and DA (MEYSS and MIR) consider that, in global terms, the results to date have been achieved at reasonable cost, always taking into account AMIF objectives and following these authorities' usual management criteria. Nevertheless, from the perspective of management of the Fund itself, they point to an excessive workload for inspection and some administrative aspects (AMIF financial year) which have a negative impact on efficiency (these aspects are explored in the second sub-question in this section and in the question on administrative simplification).
- NPEs were consulted indirectly on these aspects (asking whether they considered the economic resources received sufficient to implement their projects) and their responses point in the same direction. 51.9% of them considered the resources received to be insufficient, whereas the rest (48.1%) said that funding was sufficient or reasonable. Relating this information to the results analysed in the section on efficiency shows that any imbalance between the results and the costs incurred to achieve them can be discarded. NPEs who implement asylum and return projects are more critical about the sufficiency of resources than those involved in integration.

Furthermore, and focusing on the availability of funding for NPEs, in the grant calls the RA planned advance payment of funds upon project approval in response to EU pre-financing restrictions (5% in this period as against 50% in the previous period). This solution, which sought to endow the bodies with financial capacity (an aspect considered key for efficiency-implementation capacity-and effectiveness- effective use of the funds) was highly appreciated by NPEs: 90.4% said funds were provided in time for them to implement their projects.

Finally, and once again considering underuse of available funds at any stage of management could be seen as loss of efficiency, the Fund absorption index (indicator H3) is analysed.

Amounts allocated to NP have increased in the different EU annual reviews and so we calculate by years:

- In 2014-2015 the rate was 10% of what was allocated by the NP in 2015 which was €259,701,872

	<ul style="list-style-type: none"> • In 2016, according to the first review (21/03/2016), the rate was around 13% of the assigned €330,129,877 and according to the subsequent review (13/12/2016), it was 11% of €372,093,877 • In 2017 (up to 30 June) fund absorption was around 14% (provisional data pending approval in the annual account) of an allocation to NP of €400,039,733 <p>Nevertheless, the prevision is that as the period progresses projects started in previous years and which can be included in future AMIF accounts will gradually close so that the absorption rate in the last few years of the period will be higher than the rate achieved so far and the global absorption rate will increase (for example, including 2014 expenditure in the 2017 account and 2017 absorbing more funding than that initially contemplated in the NP, thus compensating for the lower expenditure in previous years)</p>
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2.1	<p>To what extent were the results of the Fund achieved at reasonable cost in terms of deployed financial and human resources?</p>
	<p>Efficiency in terms of human and financial resources can be analysed through three elements.</p> <p>Firstly, by analysing the efficiency indicators (indicator H1) throughout the period. Taking aggregate data from 1 January 2014 to 30 June 2017, the number of full time equivalents in RA, DA and AA involved with implementing the Fund and paid from technical assistance or national budgets amount to 186 staff. Similarly, the number of projects executed over the period rose to 824 which in aggregate represent €122,580,193.97. These data yield the following ratios for the entire period.</p> <ul style="list-style-type: none"> • Each equivalent staff member was involved in the implementation/management of 4.4 projects a year. • Average project size was €148,762.37 • Therefore each equivalent staff member participated in the implementation/management of €659,033.39 a year, a fairly high figure especially taking into account the diversity of AMIF-funded projects.

As occurs with the other efficiency indicators, a distinction can be made between 2014 and 2015 when the NP and the fund was being set up (4 and 9 staff members respectively and 85 projects executed) and the 2016-2017 period with more advanced management and execution supported by 85 full time staff members on average who implemented an average of 370 projects.

The second element, the information gathered from interviews, permits some nuances to these data. A large part of RA and DA resources are concentrated on implementing inspection and audit duties, and there is little margin for action to deal with other aspects of fund and project management that can impact on greater quality in execution, monitoring and evaluation. The agents consider the overload of inspection tasks and duties is not very efficient and affects all management, an aspect dealt with in greater depth in the next sub-question and in the section on simplifying administrative burdens.

The final element, linked to financial resources and already dealt with in the previous question (question 2) is based on a series of approaches to efficiency that mean the results up to 30 June 2017 were achieved incurring reasonable costs from the financial point of view. By way of summary below are some data to support this argument:

- Cost per beneficiary, that is, the overall costs for the number of beneficiaries per SO(SO1R1, SO2R2 and SO3R3) yield the following results:
 - On asylum and reception (not including special cases) the cost per beneficiary was €680.61
 - On integration, the cost per beneficiary was €169.71
 - On return AMIF cost per beneficiary was €1,925.2 in VR and €1,597.1 in FR.

The differences between SO are explained by the type of projects and therefore expenditure and investment in each case: SO1 on asylum includes significant investment in infrastructures and maintaining places in the state-run reception network (CETI and CAR) and in those run by NGOs as well as hiring temporary support staff in OAR: SO3 on return includes travel costs for returnees (and escorts in the case of forced returns), which substantially increases costs. Finally, in SO2 expenditure is

	<p>basically limited to implementing projects intended for a wider public and does not include investments in infrastructures, trips, etc.</p> <ul style="list-style-type: none"> • The burden of indirect costs allocated to AT on the set of amounts declared and charged to the Fund (indicator H2) for the entire study period was 5.04%. That is to say, more than 94% of funding were direct costs focused on implementing projects with a direct impact on TCN beneficiaries of the fund. • The management bodies and entities consider that within the objectives contemplated by the NP, costs were reasonable. More than half the NPEs implementing projects funded by AMIF (51.9%) consider that the resources received were insufficient and the rest consider them appropriate and reasonable, which suggests resources were used appropriately or at least not misused.
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2.2	<p>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?</p>
	<p>Within the Fund management and control system various mechanisms were planned to prevent, detect, notify and control fraud and other irregularities.</p> <p>On the issue of detection and prevention, different types of control are contemplated in the Fund's governing regulations and in the RA and DA's own management and control system. These very exhaustive and in many cases, redundant controls, are as follows:</p> <ul style="list-style-type: none"> • FA: advance payment is controlled when the project is awarded and its objective is to check payment dates and eligibility of expenditure. • Operational controls on the ground. They are in situ visits to monitor the projects and are carried out on at least 20% of projects. They focus on technical monitoring and the detection of deviations concerning the justification of costs. • Administrative control when the projects end, which inspect 100% of the expenditure on 100% of the projects.

- Financial control on the ground, this control in the previous period was the responsibility of the Certification Authority and in this period it passed to the RA and DA. Its objective is to check that the administrative inspection has been carried out correctly through financial inspections on a sample of 10% of projects which, throughout the period, the RA has always exceeded, inspecting as many as 30% - 40%.

The result of these inspections can be seen as very effective for preventing fraud, but not very efficient from the management perspective. Inspection of the 2015 and 2016 accounts shows minimum deviations in comparison to the cost of the inspections. In 2015, 0.09% and in 2016, 0.03% deviations in the inspected amounts in each year. These are the results of processes with projects that have been audited three or 4 times.

Following instructions from Spain's Antifraud Coordination Service (AFCOS) a series of elements have been included in contracts, calls and assignments managed by the RA including:

- Mid-term and final monitoring reports on physical and financial implementation, to identify and prevent deviations and problems with the justification of expenditure.
- The bodies and entities responsible for processing and management have been instructed to include, in grant calls and in public contracting procedures, an express reference to the possibility of notifying AFCOS of any incidents which might constitute fraud or irregularity.
- Linked to the above, a specific section on EU Funds has been included on the website of the Ministry of Employment and Social Security with this information and a direct link to the specific channel enabled by AFCOS (complaints e-mail box for reporting fraud).

The DA has also instructed Fund beneficiaries to include information in the tender and other information documents to facilitate notifying the competent body of any incident or process that may constitute fraud or irregularity.

Therefore, any person who is aware of events that may constitute fraud or irregularity in relation to AMIF-funded projects may inform the Spanish Governments' Internal Audit Office (IGAE) AFCOS of said incidents by email or ordinary post. A procedure is in place on how to process this information and what actions may stem from its analysis.

Throughout the period no reports of fraud or irregularities were presented.

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3	Relevance
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3	<p>The overall question: Did the objectives of the interventions funded by the Fund correspond to the actual needs?</p> <p>Interventions co-funded by AMIF have aligned with real needs in all areas: asylum, integration and return.</p> <p>Both from the perspective of the design and the results it can be said that the funded finalist actions (calls for integration, return and asylum projects) have contributed to improving the situation of beneficiaries. It is considered some aspects could be improved (detailed below) in all of the actions but they are generally well appreciated by managers, NPE and the end beneficiaries themselves.</p> <p>All actions and support measures of a non-finalist nature are considered relevant in that they clearly respond to needs identified beforehand. The most relevant part in those linked to forced return and asylum is linked to the urgent need to fit out the facilities and equipment in the centres for persons applying for IP and those subject to forced return (CIE, CETI and rooms at airports, mainly).</p> <p>However, elements not anticipated, like the increase in IP applications and the response to the refugee crisis with resettlement and relocation commitments have required increased intensity in some of the responses which has consequently displaced some of the planned objectives like, for example, reducing the periods for deciding IP applications.</p> <p>This aspect, considered crucial for the efficiency and effectiveness of the reception service insofar as delay in decision times generates greater pressure on the reception system and available places, has not been resolved despite hiring temporary support staff at OAR to investigate cases. This reinforcement has, however, enabled the increase in applications to be dealt with while maintaining decision times at 2014 rates.</p> <p>Furthermore, there seems to be a general consensus that needs in all areas are much greater than the resources dedicated to resolving them, regardless of the source of funding.</p>
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3.1	Did the objectives set by the Member State in the National Programme respond to the identified needs?
	<p>Although the NP did not deal with all the possible objectives contemplated by AMIF, such as for example the objective of solidarity and cooperation among Member States, those that were included in the planned measures did align with the needs detected at the time of programming. In addition, in cases where needs have varied in intensity, such as on the matter of asylum, the RA and DA have arranged some room for manoeuvre in the NP framework to reinforce the measures and actions taken to meet those needs like, for example, on the issue of asylum to deal with the increase in IP applications and commitments to relocate and resettle.</p> <p>Thus, the doubts are not at the level of whether what has been done was necessary, as seen below the agents consider it was, but whether what has been done was sufficient.</p> <p><u>As regards asylum</u>, although there has been a response to a certain extent to the increase in needs the results are far from what was anticipated as indicated in the section on efficiency, especially as regards reducing times for deciding IP applications and relocation commitments.</p> <p>From the perspective of the reception process, the agents' assessments are positive to the extent that the number of places within the system has been increased to respond to the greater number of potential beneficiaries (4,934 up to June 2017, more than triple those anticipated for the entire period - SO1R2), and increased need, although the imbalance is highlighted between the effective period for deciding IP applications at present (from 9 to 11 months) and the times in the stages of the integration process in the reception system (first stage up to 6 months and second up to 18 months (in ordinary processes)).</p> <p>As regards the calls for reception projects, the NPE consider some elements have helped to meet needs better (for example, call objectives, target population and groups) and others have limited them (execution periods and types of fundable projects). In general, they consider these calls fairly suited to needs, although they also identify needs that are not addressed and are usually specific.</p> <p>In the <u>area of integration</u>, although results have been achieved at micro level among the participants in those actions, macro level indicators show that what has been done in the</p>

context of AMIF (as well as other policies funded through other channels) is insufficient to respond to TCN integration needs:

- Although it has reduced over the period, the difference between unemployment rates for TCN and nationals (SO2I3) is 9.9 points in 2017.
- In 2017 the difference in employment rates between third country nationals and host country nationals (SO2I2) is similar to the baseline (-9.96 p.p. in 2017; -9.5 p.p. in 2013).
- In 2016 (latest available data) the difference in early school leaver rates between TCN and nationals (SO2I5) is similar to the 2013 rate (21.9 and 21.7 percentage points, respectively).
- Similarly, the SO2I6 and SO2I7 indicators that measure differences between the percentage of young TCNs and nationals aged between 30 and 34 years with higher education certificates and the percentage of the TCN and national populations at risk of poverty or social exclusion respectively have not varied significantly throughout the period (see table on result and impact indicators)

As regards funded actions, the NPEs consider that the calls have largely enabled the response to existing needs.

As regards VR, the response has been to decreasing demand as a consequence of certain improvements in the economic situation (in 2017 the number of participants in VR projects was 2,698 (SO3R3) 70% compared to 2013 (baseline)). The NPEs consulted positively value the calls, but are more critical as regards periods and budget for the projects. Perhaps the most significant aspect from the perspective of needs not met is that there has been no progress as regards return procedures for UFM.

Although account must be taken of the difficulties in planning the response capacity for FR and progress made on improving centres, facilities and equipment, in the period so far it is evident that needs exceed efforts and it has been impossible to provide an effective response to the living conditions in CIE and CETI as the section on efficiency has shown.

3.2	Which measures did the Member State put in place to address changing needs?
	<p>As noted above, the main measure adopted to deal with the growing needs has been to hire (and train) temporary support staff to investigate IP application cases. The hiring, co-funded by AMIF has raised the average of around 300 IP cases a month taken to CIAR to be decided in the first quarter of 2016 to more than 1,000 a month since May 2016. Despite that, the average decision time for IP cases is still more than 6 months, averaging around 9 to 11 months. Therefore the hiring of temporary support staff with AMIF funds has not helped to reduce waiting times, although according to OAR managers, it did mean waiting times remained stable and did not increase, especially in view of the increase in IP applications since 2015.</p> <p>The hired staff has varied throughout the study period but has always exceeded and even duplicated the 40 people initially planned in the NP (up to a maximum of 109 people).</p> <p>Furthermore, the Interior Ministry has had to extend the contract for translation and interpreter services, funded by AMIF because the need for this service grew in parallel to the number of IP applications in recent years.</p> <p>There have been no major measures or decisions on integration and return due to the change in context during the study period, except for operational adaptations and planning decisions which do not affect the strategic objectives, like for example, changing from a call for neighbourhood-based integration projects to calls focused on areas of action, due to the distribution of competences between public authorities.</p>

4	Coherence
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4	The overall question: Were the objectives set in the national programme 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?
	Preliminary note: The coherence and complementarity analyses have been conducted jointly as the questions focus on the same aspects. For that reason, the response to the questions is the same in both sections.

At the programming stage coherence and complementarity of the objectives is due to a series of inputs and coordination mechanisms that have enabled clear identification of areas of action and responsibilities.

In this regard the ex post evaluations of SOLID Funds and the ex-ante evaluations of the ESF operational programmes has been a fundamental input for:

- Firstly, to provide continuity in the 2014-2020 period for actions carried out to date by the European Refugee Fund (EFR), The European Return Fund (RF) and the European Fund for the Integration of Third Country Nationals (EIF) in a grouped, organised manner.
- Secondly, having information available on the actions included in OP ESF 2014-2020 oriented at the socio-occupational integration of TCN, especially in the Social Inclusion and Social Economy Operational Programme with national government participation (specifically the AMIF RA), the autonomous regions and social organisations.

The distribution of responsibilities and duties in AMIF has also been key to guaranteeing coherence and complementarity in programming and especially in the execution stage.

Locating the RA in the Ministry of Employment and Social Security (MEYSS) and specifically within the Immigration Department has facilitated coordination with the main actors involved in actions directed at TCNs and consequently coherence and complementarity with other interventions. This has transferred to execution of the actions, with evidence of coherence and complementarity between actions carried out in the context of AMIF and those funded by the ESF and General State Budget which could even be considered good management practices.

Furthermore, locating the DA in the Ministry of the Interior has promoted coherence and complementarity in the actions undertaken in the frame of AMIF and those organised through ISF.

4.1	Was an assessment of other interventions with similar objectives carried out and taken into account during the programming stage?
	In the programming period the evaluations of funds prior to AMIF, SOLID Funds (ERF, RF and EIF) were taken into account. These evaluations were the input required for the Ministry of

	<p>Employment and Social Security, and specifically for the RA to produce the AMIF NP 2014-2020 insofar as the AMIF groups the previous funds and organises their continuity.</p> <p>Similarly, the evaluation of the European External Borders Fund was taken into account, in this case in particular by the Ministry of the Interior as the DA and for the purpose of coordinating AMIF NP actions with those contemplated in the context of the Internal Security Fund. For example, to combat TCN contraband, AMIF acts on prevention and the ISF acts with third countries, on borders and on strengthening the capacity for response, investigation and monitoring.</p> <p>Furthermore, in the context of programming for the 2014-2020 period for the European Structural and Investment Funds (ESIF) ex ante evaluations were conducted on the Operational Programmes of the European Social Fund, including OP ESF 2014-2020 Social Economy and Social Inclusion whose objectives include developing measures and actions to improve the social inclusion of vulnerable groups, including the immigrant population from a jobs-related perspective.</p> <p>These evaluations were used to contrast the coherence and complementarity of the measures contemplated in each fund, thereby avoiding overlapping or imbalances as regards the objective of the different actions and coverage of the target groups (TCN population and IP applicants and beneficiaries). Thus there was an attempt to generate synergies to optimise the efficiency and effectiveness of the Funds as detailed below in the section on complementarity.</p>
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4.2	Were co-ordination mechanisms between the Fund and other interventions with similar objectives established for the implementation period?
	<p>The main coordination mechanism between AMIF and other interventions with similar objectives during the execution period were the management system itself and control of the NP and the organic structure of the ministries with the RA and DA.</p> <p>The organisational chart and operation of the Ministry of Employment and Social Security (MEYSS) can be considered the initial element for coordinating AMIF with other interventions, mainly the ESF for the following reasons:</p> <ul style="list-style-type: none"> • The Immigration Department, attached to the General Secretariat for Immigration and Emigration (SGIE) is part of the MEYSS structure which in turn provides the framework for the ESF management authority in Spain, the ESF administrative unit (UAFSE).

	<ul style="list-style-type: none"> • Furthermore, the Immigration Department is in turn an Intermediate Body of OP ESF 2014-2020 Social Economy and Social Inclusion and as such sits on the monitoring committees for this programme. This arrangement facilitates the exchange of information required to know what measures are being implemented in the context of OP ESF 2014-2020 Social Economy and Social Inclusion but outside the sphere of MEYSS, that is, by other agents like the autonomous communities and NGOs acting as intermediate bodies or end beneficiaries in this OP. • The RA is also in contact with the ESF Management Authority to find out what has been done as regards integrating TCNs in regional ESF OPs managed by the Autonomous Communities. <p>A clear example of coordination mechanisms at the Immigration Department is the existence of annual calls with integration and asylum objectives which combine different sources of funding (AMIF, ESF and General State Budgets) and which organise different objectives and types of activities directed at different potential beneficiary profiles, an aspect that clearly redounds to efficient management (see the following question for further details).</p> <p>Similarly, the General Department for Planning, Infrastructure Management and Security Measures, an AMIF Delegated Authority, acts as the RA for the Internal Security Fund, which can be considered a first level coordination mechanism between AMIF and ISF, especially in actions directed at managing and responding to the incoming flow of illegal TCNs.</p>
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4.3	Were the actions implemented through the Fund coherent with and non-contradictory to other interventions with similar objectives?
	<p>As noted above, throughout the study period the Immigration Department has launched multifund calls (AMIF, ESF and General State Budgets) in which different types of projects have been funded depending on the funding source.</p> <p>On TCN Integration:</p> <ul style="list-style-type: none"> • Through AMIF, the following projects have been funded: <ul style="list-style-type: none"> ○ Acquiring knowledge of the language, history, institutions, legal system, culture, co-existence, etc., information, guidance and advice, translation services, information and legal assistance, etc.

- Promotion of the **integration of minors** and young people in the educational system and ensuring conditions of equality: preventing school absenteeism, language learning and Spanish culture, participation of TCN families in the educational process, etc.
- Health care directed at TCNs: sexual and reproductive health care, investigation and prevalence of diseases, socio-health care mediation, training health professionals in interculturality, etc.
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Promoting equal treatment and non-discrimination in Spanish society: promoting interculturality and diversity, especially in educational and health centres, fighting racism and xenophobia and promoting equal treatment, etc.

- Identification of experiences and good practices.
- Promoting dialogue, citizen co-existence, sense of belonging and responsibility.
- Through ESF the following projects have been funded:
 - Employment: integrated personalised labour market integration itineraries for IP applicants and beneficiaries.
 - Basic and further training for professionals to assist TCNs.
 - Sensitisation and promotion of equal treatment and non-discrimination in the workplace directed at employees and businesses.
- Through the General State Budgets:
 - Integral reception projects addressing basic needs.
 - Projects to equip and adapt buildings

As regards asylum various priorities were established that have been addressed through different sources of funding:

- General State Budgets have exclusively funded:
 - Establishment of NGO reception places.
 - Public health projects in CETI in Ceuta and Melilla.
- AMIF has funded projects directed at promoting integration of IP applicants
 - Directed at promoting understanding of asylum applicants and IP beneficiaries, improving reception conditions and integration (including vulnerable groups), and sensitising the host society.
 - Basic and further training for professionals and volunteers working in the area of asylum and reception.
 - Directed at creating or maintaining specific resources for the integral care of vulnerable groups (victims of trafficking, gender violence, etc.).
 - Equipping and adapting buildings: support for the acquisition of appropriate material resources to operate or adapt entities' reception mechanisms
- Through ESF:
 - The type of projects to be funded are the same as those detailed above as regards integration.

Organising this type of multi-fund calls has been a key to the coherence and complementarity of the different actions. This point has been highlighted by fund managers and the assessments of the NPEs interviewed can be similarly interpreted. 89.6% of NPEs consider that their AMIF-funded actions complemented other interventions funded through other channels and 91.7% of NPE beneficiaries of integration and/or asylum projects consider they were consistent (not contradictory) with other interventions. Nevertheless, NPEs that worked on asylum are more critical than those working on integration and point to the difficulty of working with

	<p>particularly vulnerable profiles and covering some first point of call needs and care in the case of IP applicants.</p> <p>Similarly, the DA has emphasised that the coherence and complementarity of the actions undertaken in the frame of AMIF and ISF is guaranteed to the extent that actions to monitor borders and illegal immigration are coordinated by the RA itself and largely feed back. In addition, through General State Budgets the MA has funded all training on asylum and the cleaning service for CIE, international recognition committees and social and humanitarian care in CIE as regards return.</p>
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5	Complementarity
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5	<p>The overall question: 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?</p>
	<p>Note: The analysis of coherence and complementarity sub-sections have been carried out jointly because the concerned questions are focused on the same aspects. That is why, the answer to the questions are the same in both sub-sections.</p> <p>At the programming stage coherence and complementarity of the objectives is due to a series of inputs and coordination mechanisms that have enabled clear identification of areas of action and responsibilities.</p> <p>In this regard the ex post evaluations of SOLID Funds and the ex ante evaluations of the ESF operational programmes has been a fundamental input for:</p> <ul style="list-style-type: none"> • Firstly, to provide continuity in the 2014-2020 period for actions carried out to date by the European Refugee Fund (EFR), The European Return Fund (RF) and the European Fund for the Integration of Third Country Nationals (EIF) in a grouped, organised manner. • Secondly, having information available on the actions included in OP ESF 2014-2020 oriented at the socio-occupational integration of TCN, especially in the Social Inclusion

	<p>and Social Economy Operational Programme with national government participation (specifically the AMIF RA), the autonomous regions and social organisations.</p> <p>The distribution of responsibilities and duties in AMIF has also been key to guaranteeing coherence and complementarity in programming and especially in the execution stage.</p> <p>Locating the RA in the Ministry of Employment and Social Security (MEYSS) and specifically within the Immigration Department has facilitated coordination with the main actors involved in actions directed at TCNs and consequently coherence and complementarity with other interventions. This has transferred to execution of the actions, with evidence of coherence and complementarity between actions carried out in the context of AMIF and those funded by the ESF and General State Budget which could even be considered good management practices.</p> <p>Furthermore, locating the DA in the Ministry of the Interior has promoted coherence and complementarity in the actions undertaken in the frame of AMIF and those organised through ISF.</p>
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5.1	<p>Was an assessment of other interventions with complementary objectives carried out and taken into account during the programming stage?</p>
	<p>In the programming period the evaluations of funds prior to AMIF, SOLID Funds (ERF, RF and EIF) were taken into account. These evaluations were the input required for the Ministry of Employment and Social Security, and specifically for the RA to produce the AMIF NP 2014-2020 insofar as the AMIF groups the previous funds and organises their continuity.</p> <p>Similarly, the evaluation of the European External Borders Fund was taken into account, in this case in particular by the Ministry of the Interior as the DA and for the purpose of coordinating AMIF NP actions with those contemplated in the context of the Internal Security Fund. For example, to combat TCN contraband, AMIF acts on prevention and the ISF acts with third countries, on borders and on strengthening the capacity for response, investigation and monitoring.</p> <p>Furthermore, in the context of programming for the 2014-2020 period for the European Structural and Investment Funds (ESIF) ex ante evaluations were conducted on the Operational Programmes of the European Social Fund, including OP ESF 2014-2020 Social Economy and Social Inclusion whose objectives include developing measures and actions to improve the</p>

	<p>social inclusion of vulnerable groups, including the immigrant population from a jobs-related perspective.</p> <p>These evaluations were used to contrast the coherence and complementarity of the measures contemplated in each fund, thereby avoiding overlapping or imbalances as regards the objective of the different actions and coverage of the target groups (TCN population and IP applicants and beneficiaries). Thus there was an attempt to generate synergies to optimise the efficiency and effectiveness of the Funds as detailed below in the section on complementarity.</p>
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5.2	<p>Were co-ordination mechanisms between the Fund and other interventions with similar objectives established to ensure their complementarity for the implementing period?</p>
	<p>The main coordination mechanism between AMIF and other interventions with similar objectives during the execution period were the management system itself and control of the NP and the organic structure of the ministries with the RA and DA.</p> <p>The organisational chart and operation of the Ministry of Employment and Social Security (MEYSS) can be considered the initial element for coordinating AMIF with other interventions, mainly the ESF for the following reasons:</p> <ul style="list-style-type: none"> • The Immigration Department, attached to the General Secretariat for Immigration and Emigration (SGIE) is part of the MEYSS structure which in turn provides the framework for the ESF management authority in Spain, the ESF administrative unit (UAFSE). • Furthermore, the Immigration Department is in turn an Intermediate Body of OP ESF 2014-2020 Social Economy and Social Inclusion and as such sits on the monitoring committees for this programme. This arrangement facilitates the exchange of information required to know what measures are being implemented in the context of OP ESF 2014-2020 Social Economy and Social Inclusion but outside the sphere of MEYSS, that is, by other agents like the autonomous communities and NGOs acting as intermediate bodies or end beneficiaries in this OP. • The RA is also in contact with the ESF Management Authority to find out what has been done as regards integrating TCNs in regional ESF OPs managed by the Autonomous Communities. <p>A clear example of coordination mechanisms at the Immigration Department is the existence of annual calls with integration and asylum objectives which combine different sources of</p>

	<p>funding (AMIF, ESF and General State Budgets) and which organise different objectives and types of activities directed at different potential beneficiary profiles, an aspect that clearly redounds to efficient management (see the following question for further details).</p> <p>Similarly, the General Department for Planning, Infrastructure Management and Security Measures, an AMIF Delegated Authority, acts as the RA for the Internal Security Fund, which can be considered a first level coordination mechanism between AMIF and ISF, especially in actions directed at managing and responding to the incoming flow of illegal TCNs.</p>
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5.3	Were mechanisms aimed to prevent overlapping of financial instruments put in place?
	<p>As noted above, throughout the study period the Immigration Department has launched multifund calls (AMIF, ESF and General State Budgets) in which different types of projects have been funded depending on the funding source.</p> <p>On TCN Integration:</p> <ul style="list-style-type: none"> • Through AMIF, the following projects have been funded: <ul style="list-style-type: none"> ○ Acquiring knowledge of the language, history, institutions, legal system, culture, co-existence, etc., information, guidance and advice, translation services, information and legal assistance, etc. ○ Promotion of the integration of minors and young people in the educational system and ensuring conditions of equality: preventing school absenteeism, language learning and Spanish culture, participation of TCN families in the educational process, etc. ○ Health care directed at TCNs: sexual and reproductive health care, investigation and prevalence of diseases, socio-health care mediation, training health professionals in interculturality, etc. ○ < > <p>Promoting equal treatment and non-discrimination in Spanish society: promoting interculturality and diversity, especially in educational and health centres, fighting racism and xenophobia and promoting equal treatment, etc.</p>

- Identification of experiences and good practices.
- Promoting dialogue, citizen co-existence, sense of belonging and responsibility.
- Through ESF the following projects have been funded:
 - Employment: integrated personalised labour market integration itineraries for IP applicants and beneficiaries.
 - Basic and further training for professionals to assist TCNs.
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- Through the General State Budgets:
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- Directed at promoting understanding of asylum applicants and IP beneficiaries, improving reception conditions and integration (including vulnerable groups), and sensitising the host society.
- Basic and further training for professionals and volunteers working in the area of asylum and reception.
- Directed at creating or maintaining specific resources for the integral care of vulnerable groups (victims of trafficking, gender violence, etc.).
- Equipping and adapting buildings: support for the acquisition of appropriate material resources to operate or adapt entities' reception mechanisms
- Through ESF:
 - The type of projects to be funded are the same as those detailed above as regards integration.

Organising this type of multi-fund calls has been a key to the coherence and complementarity of the different actions. This point has been highlighted by fund managers and the assessments of the NPEs interviewed can be similarly interpreted. 89.6% of NPEs consider that their AMIF-funded actions complemented other interventions funded through other channels and 91.7% of NPE beneficiaries of integration and/or asylum projects consider they were consistent (not contradictory) with other interventions. Nevertheless, NPEs that worked on asylum are more critical than those working on integration and point to the difficulty of working with particularly vulnerable profiles and covering some first point of call needs and care in the case of IP applicants.

Similarly, the DA has emphasised that the coherence and complementarity of the actions undertaken in the frame of AMIF and ISF is guaranteed to the extent that actions to monitor borders and illegal immigration are coordinated by the RA itself and largely feed back. In addition, through General State Budgets the MA has funded all training on asylum and the cleaning service for CIE, international recognition committees and social and humanitarian care in CIE as regards return.

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6	EU added value
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6	<p>The overall question: Was any added value brought about by the EU support?</p> <p>Above and beyond the increase in the number of projects, activities and final beneficiaries (quantitative scope) which can be met with the additional funding that has been provided, the AMIF has added value in various dimensions throughout the study period.</p> <p>The regulatory framework linked to the funding of projects via AMIF establishes a series of requirements and funding priorities that have prompted the development of some elements that can be considered added value.</p> <p>AMIF funding has permitted and/ or facilitated the ability to address new issues or areas of action and focus efforts on particularly vulnerable TCN groups who, before the period being assessed, were less frequently included in asylum, integration and return policies. That is, from a qualitative perspective, the scope has been increased by incorporating or intensifying efforts to develop programmes and projects that work with particularly vulnerable groups like victims of human trafficking, gender violence (or which tackle such issues) and actions directed at making the host society participate and be co-responsible in the process of integrating TCNs and refugees.</p> <p>In addition, AMIF has also had an impact at the level of systems, structures and processes on which public asylum, integration and return policies are based. The demand for certain requirements to fund actions and projects has generated a series of dynamics for improving management and execution involving the responsible public authorities (RA and DA and beneficiary management bodies) as well as NPEs who directly recognise that their participation in AMIF has improved their management and execution processes within their organisations, simultaneously improving the quality of the services provided.</p> <p>It should also be noted that these improvement processes are being organised by theme-based work groups promoted by the RA focusing on aspects directly linked to fund management (eligibility, and justification of costs, electronic administration, report templates, management and financial inspections and monitoring and evaluation indicators) with NPEs as the main beneficiaries.</p>
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6.1	What are the main types of added value resulting from the support by the Fund (volume, scope, role, process)?
	<p>Qualitative information is used to identify various types of added value stemming from AMIF-funded actions.</p> <ul style="list-style-type: none"> • In the volume and quantitative scope of the actions. As is to be expected the availability of funding linked to specific objectives has helped, especially in a period of budget adjustments, to maintain certain levels of activity in National Government asylum, integration and return policies. <p>Although as noted above, in the asylum objective AMIF support gradually lost relative importance as needs increased and were met with a significant increase in the budget item for assisting refugees (an increase of 200 Million Euros approved in 2015 for the 2016 General State Budgets), AMIF's role has been key to maintaining programmes linked to asylum and reception from the start of the period. AMIF's role has been even more important in programmes designed to the integration TCNs and voluntary return (this one co-financed in all its proceedings exclusively by FAMI). Thus one aspect managers emphasise in particular is that AMIF has helped to maintain the network of entities and projects through which a large part of the National Government's TCN integration policies are channelled and it has a striking ability to feed through to the entire territory and work both in city neighbourhoods and rural environments where the target population is more difficult to reach.</p> <p>The NPEs interviewed point in the same direction, 86.8% of all of them (grouping those which have carried out asylum, integration and return projects) consider that participation in AMIF has delivered added value (a lot or quite a lot) in extending the scope of their actions in terms of the assisted/participant population, an aspect which is clearly linked to obtaining funding.</p> <p>Similarly, managers and NPEs also highlight as an added value of AMIF the chance to work on less usual issues regarding integration of TCNs and people under some type of IP, an aspect which is dealt with in greater depth in the following sub-question. Both the DA and RA note that with AMIF it is possible to undertake actions that the previous SOLID Funds did not permit, like investments in Centres.</p> <ul style="list-style-type: none"> • At the level of systems, structures and processes: The agents all point out that certain requirements contemplated in AMIF (selection of operations, rules on eligibility of expenditure and controls on management and expenditure) have generated incentives to

improve management and implementation of policies, programmes and projects at different levels.

The requirements as regards planning, management and justification of costs of projects funded by AMIF and monitoring compliance have prompted specific improvements in management of the departments in the ministries involved. For example:

- In the case of the RA, the experience and accumulated track record in managing ESF and other European Funds have permitted greater progress in aspects linked to management of grant calls that comply with the applicable EU regulations, and to plan what operations are included or not in AMIF depending on criteria linked to management (operations of a given financial weight and simple to manage and justification to optimise fund absorption, for example).
- Similarly, and almost as a consequence of the above, NPEs also recognise that participation in AMIF (and in ESF) has prompted them to introduce improvements in the management and execution of their projects, especially at the level of justifying costs (essential to obtain all the requested funding). Thus 86.8% of the organisations interviewed consider that AMIF has contributed added value in terms of improving execution and management of the projects carried out by their entity. Qualitative information can be used to illustrate this aspect because the consulted entities have indicated that some of the procedures set up to manage and execute AMIF projects have subsequently been introduced throughout the organisation. That represents a qualitative leap in the quality of the services provided (in fact, 92.5% of NPE interviewed identify AMIF added value (a lot or quite a lot) in improvements in the quality of projects and services, although this aspect is obviously also linked to the availability of funding).
- The DA emphasises that the accumulated experience and know-how acquired through managing the RF is an added value for their management methods, facilitating in turn management of AMIF.

6.2	Would the Member State have carried out the actions required to implement the EU policies in areas supported by the Fund without its financial support?
	While not ignoring the fact that the existence of funding linked to specific objectives and a programming, execution, monitoring and evaluation cycle has boosted development of EU

	<p>priorities, had there been no AMIF grants Spain would have developed actions to apply EU policies on asylum, integration and return as they are competences of the Ministries involved.</p> <p>An example of this is that during the study period, only calls for voluntary return proposals were exclusively funded by AMIF whereas calls for integration and asylum projects have combined funding from General State Budgets, ESF and AMIF. Similarly, the Spanish Government uses the national budget to support a large part of the actions to support asylum, integration and return policies in which other authorities participate like the Autonomous Communities and Local Corporations in the area of their competences and financial autonomy.</p> <p>Nevertheless AMIF has had a positive impact in terms of the scope of the policies promoted by the EU. From the qualitative point of view, as dealt with in the above sub-question, AMIF funding has made it possible to increase the number of end beneficiaries of these policies and improve the quality of the services received, either by participation in projects and activities or by improving conditions in the facilities and equipment at immigration centres and CIE and by training professional teams.</p> <p>More significant in this case is the added value of AMIF funding in terms of qualitative scope, that is, in the issues and areas that it has enabled or facilitated agents' ability to tackle. Managers point to this and 84.9% of the NPEs interviewed consider that AMIF contributed added value (a lot or quite a lot) by facilitating the ability to deal with a wider diversity of projects.</p> <p>Qualitative information helps to illustrate this once again: both managers and NPEs note that as AMIF included them among its priorities, new issues have been tackled in the projects and less usual groups have been assisted; like for example victims of human trafficking or gender violence in the asylum objective, sensitisation projects in the integration and asylum objectives and sustainability and reintegration processes in return itineraries (for example the ERIN Network).</p> <p>Finally, in terms of added value, AMIF has also been a significant instrument for responding to emerging needs as regards asylum stemming both from the increase in ordinary IP applications and in Spain's EU resettlement and relocation commitments as a consequence of the 2015 refugee crisis.</p>
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6.3	
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	<p>What would be the most likely consequences of an interruption of the support provided by the Fund?</p>
	<p>In line with the information in the above sub questions the most likely consequences of an interruption in the aid provided by AMIF would be:</p> <p>Loss of scope in asylum, integration and return policies both quantitatively and qualitatively: less funding would reach fewer beneficiaries in any of the policies and/or do so with a drop in the quality of service provision. In addition, from the qualitative point of view, there would be less capacity to meet the needs of TCNs throughout the territory (loss of capacity and feed through in the network of specialised social entities) and less assistance for particularly vulnerable collectives and priority issues for AMIF, for which financial incentives have been crucial. For example, the most immediate impact on asylum would probably be a reduction in OAR's capacity to investigate IP applications, taking into account that a large part of the team is hired with AMIF funding.</p> <p>Similarly, interruption of AMIF grants would also probably slowdown (or in the worst case, interrupt) the process of improving management processes in the authorities and administrative units involved in managing and executing AMIF and the professionalisation process being promoted in NPEs which have been motivated and boosted by participating in co-funded projects.</p>

6.4	<p>To which extent have actions supported by the Fund resulted in a benefit at the Union level?</p>
	<p>To the extent that the actions have contributed to the objectives pursued by the EU, they have become advantages at EU scale.</p> <p>As regards asylum, actions have been carried out that have helped to reinforce the common European system of asylum and progress has been made or other actions have been planned in the same line during the second phase of the execution period. Actions carried out to date include:</p> <ul style="list-style-type: none"> • Reinforcements in OAR to increase its investigative capacity and respond to the increase in IP applications (despite being unable to reduce average case decision times).

	<ul style="list-style-type: none"> • More places in the reception system for IP applicants, in general and in the places allocated to vulnerable groups funded by AMIF and integration programmes. • And even the resettlement and relocation results which although globally are very far from the commitments acquired, have helped to organise the EU response to the refugee crisis (insufficient and far from what was anticipated globally as well) and in turn evidenced shortfalls in the system. <p>As regards integration, to the extent that TCN integration is promoted in Spain, their integration in the EU is also promoted, especially in view of the fact that the fields in which work is being done are in line with the agenda on reducing poverty and social exclusion in the EU, focusing on TCN access to public services (health, education, etc.) and participation in the host society, making the host society participate as well, through sensitisation measures, in the process of integrating TCNs.</p> <p>As regards return, the actions carried out by the DA help to reduce migratory pressure at European level and guarantee rights for illegal TCNs during their stay in national territory in line with the provisions of the return directive.</p>
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7	Sustainability
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7	<p>The overall question: Are the positive effects of the projects supported by the Fund likely to last when its support will be over?</p> <p>In most cases it is likely that the positive effects of the projects carried out to date and funded by AMIF will continue.</p> <p>In cases where AMIF has contributed to improving infrastructures and equipment (mainly in Immigration Centres) their continuity and operation are not solely linked to AMIF funding, as these policies are also developed with state funding from General State Budgets as noted in the above evaluation questions (complementarity, coherence, added value and effectiveness).</p>
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In projects developed by NPEs the positive effects are sustainable over time insofar as the services provided to TCN participants provide them with lessons, knowledge and tools which, once acquired or received, do not depend on the continuity of the programmes, although logically, these effects are limited to the sphere of the direct beneficiaries (an aspect examined in greater detail in question 7.3).

In contrast, a project to be reinforced and consolidated with a view to its sustainability is that of contracting temporary support staff at OAR (funded by AMIF).

As dealt with in the other evaluation questions (effectiveness-asylum, EU relevance and added value), although the hiring of this staff has enabled a greater number of IP applications to be processed per month, the average IP case decision time has not been reduced and remains around 9-11 months on average and above the 6 months contemplated in the regulations. This fact, in addition to the rise in the number of IP applicants and therefore in cases to be processed by AOR throughout 2017 reveals two aspects.

- Firstly, despite the positive effects, this project has been insufficient to deal with the growing needs over the period and therefore the AOR team must be resized by hiring sufficient staff to meet the demand.
- Secondly, a scenario without AMIF that leads to a possible interruption of support from this temporary support staff for OAR (temporary or permanent as a consequence of the limitations or requirements for National Government hiring) would have very negative effects on the Spanish and European system of asylum and reception.

7.1	What were the main measures adopted by the Member State to ensure the sustainability of the results of the projects implemented with support of the Fund (both at programming and implementation stage)?
	A very significant part of the actions contemplated at the programming stage and included in the NP aimed to improve the structures and systems for asylum, reception, integration and

	<p>return by allocating and updating various types of resources: from improving current migration centres and building new ones, to elaborating specific plans and protocols (reception and mass influx of immigrants, UFM return), and reinforcing management tools, and in this case in particular, development of an application to improve the IP process.</p> <p>In this regard, these investments in strengthening the structures and systems used to carry out policies linked to AMIF objectives will directly contribute to the sustainability of the whole. The sustainability of each programmed actions, when carried out, would be guaranteed to the extent that their maintenance and normal operation would become part of the actions conducted by the state which can be funded from General State Budgets or through AMIF. Nevertheless, it must be pointed out that the most relevant part of these investments has not been made to date (management tool for the IP procedure) or in the best of cases, is at a very initial phase (migration centres).</p> <p>From the perspective of what has already been executed and as indicated in the added value section, there are positive elements at the level of management and execution of activities and projects (improving procedures, training teams, etc.) which in all likelihood will remain in place in the bodies and entities involved in executing the policies that form part of AMIF objectives.</p>
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7.2	Were mechanisms put in place to ensure a sustainability check at programming and implementation stage?
	<p>As indicated in the previous sub-question the sustainability of investments in strengthening the structures and systems for asylum, reception, integration and return policies (especially as regards migration centres) would be guaranteed to the extent that their maintenance and normal operation would become part of the actions carried out by the state which can be funded from the General State Budgets or through AMIF.</p> <p>Another of the aspects that suggest the sustainability of AMIF-funded investments and projects is guaranteed is the degree of complementarity and coherence with other actions funded from General State Budgets, ESF and ISF as detailed in the corresponding sections.</p> <p>The two elements indicated above are in turn related to the distribution of competences in the National Government on matters addressed by AMIF which fall to the Ministry of Employment and Social Security (MEYSS) and the Ministry of the Interior (MIR), assigning duties and responsibilities in management of the fund and the NP (MEYSS is RA) and MIR (DA). Both RA and DA are, at the same time, responsible for carrying out the actions and their</p>

	<p>subsequent sustainability (allocating resources to operate and maintain them) which helps to include this criterion at the planning and execution stages of the actions included in the NP.</p> <p>Furthermore, from the perspective of execution and focusing in particular on the programmes and projects developed under the regime of calls for proposals (RA grants directed at immigrant integration, voluntary return and reception programmes for IP applicants); the regulations governing the award of projects include specific requirements concerning the technical solvency of potential beneficiary entities (based on criteria like prior experience in similar projects, degree of introduction in the territory, management structure and capacity, suitable human resources or length of time assisting the target population) and the quality and feasibility of the projects presented (detection of needs, integrated approach, planning of activities, means and resources, etc.), aspects which undoubtedly positively affect the sustainability of the projects approved and finally realised.</p> <p>In the case of voluntary return projects, particular emphasis has been placed on including sustainability mechanisms in funded projects, including counterparty organisations in the return country which contribute to and monitor the reintegration process of participants in their countries. Similarly the ERIN Network (funded by AMIF) is another instrument in which the RA participates directed at improving monitoring of return processes and therefore, their sustainability.</p> <p>Finally, the very nature of the results achieved by the projects on immigrant integration and reception of IP applicants include elements of sustainability, to the extent that they carry out activities that improve the situation of participants. Many of these activities, like for example those that focus on participation and the acquisition of knowledge and training for participants and those of sensitising the host society without necessarily requiring new costs, facilitate the social insertion process at all levels, cultural, educational, occupational, etc.</p>
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7.3	To what extent are the outcomes/benefits of the actions sustained by the Fund expected to continue thereafter?
	<p>As noted in the above sub-questions, in most cases it is expected that the results and advantages of actions funded by the FUND will continue.</p> <p>As regards investments and actions in structures and systems pending execution (Migration Centres, IP process management application, Reception plan, Protocol for mass influxes of immigrants, UFM return plan, etc.) the permanence of the results is guaranteed because their application, normal operation and maintenance would become part of state actions which can be funded from the General State Budgets or by AMIF as occurs with similar types of minor actions that have already been executed (fitting out and improving facilities and centres, for</p>

example). This aspect is also reinforced by the coherence and complementarity of these actions with other actions carried out through other channels and by the distribution of competences and responsibilities between the RA and the DA.

As regards executed project results, as indicated in sub-question 7.2 the very nature of the results achieved by the projects on immigrant integration and reception of IP applicants include elements of sustainability, something on which all the agents consulted agree.

90.6% of the total NPE interviewed (beneficiaries of asylum, voluntary return and integration projects) consider that the project results are sustainable over time and only 9.4% consider that they will only remain while the project and therefore funding last.

Qualitative information confirms this aspect and allows some nuances to be introduced. The projects are directed at and succeed in improving the situation of the beneficiaries, strengthening their capacity to function in the host society while attempting to ensure society promotes this process through sensitisation. These capacities once acquired by the end beneficiaries are accumulative, that is, the lessons and tools acquired do not expire at the end of the project, although another new project could strengthen the integration process for these people (the same logic operates with sensitisation of the host population).

In this regard, the fact that the results are sustainable does not mean that TCN integration needs will disappear for various reasons:

- The influx of TCNs may vary in intensity but does not disappear, with the continuous incorporation of a new potential beneficiary population.
- Some TCNs have not benefited from this type of project even though they have been living in Spain for years.
- In most cases, TCNs who have benefited, require specific support to progress further with integration.

As a consequence of the above, the target population may vary in characteristics and size but it always exists and for that reason NPEs are calling for longer term projects (multi-year calls) and continuity of funding for immigrant integration policies.

Finally, and as another key element for the sustainability of results, the need to permanently manage processes with the host societies is constant and permanent and as reflected in the second example of the success stories in this report, projects have been carried out with positive effects funded by AMIF which municipal and regional authorities have then taken on.

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8	Simplification and reduction of administrative burden
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8	<p>The overall question: Were the Fund management procedures simplified and the administrative burden reduced for its beneficiaries?</p> <p>Overall, administrative burdens have not been reduced for three reasons:</p> <ul style="list-style-type: none"> • The innovations which have provided progress and improvement in terms of management are considered very positive but insufficient as they do not compensate in global terms for those which remain or have been generated. That is the case of the introduction of multi-year programming which has had positive effects on reducing administrative burdens by avoiding recurring annual programming and has increased the government's capacity to tailor funding to its needs throughout the period. • Procedures persist that concentrate a very significant part of management team resources and efforts for which the administrative burden has not been reduced, despite having applied some of the planned innovations. This is the case of control and audits of the projects and funded activities which is considered unbalanced, redundant and inefficient in that they absorb a large amount of resources from all the agents involved in implementing AMIF (RA and DA and beneficiary bodies and entities) which greatly exceeds the added value they provide. • Some of the innovations in Fund management processes have generated extra burdens by introducing distortions in the Member State's management systems. This is the case of the AMIF financial year (from 15 October to 15 October) as it does not coincide with the calendar year and the national budgetary cycle generates difficulties for the accurate reporting of financial indicators and results. Furthermore, the period for closing the annual accounts (4 months before year end) is considered insufficient to respond to all the requirements for monitoring projects and expenditure in the year.
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8.1	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?
	<p>In general, Fund beneficiary bodies continue to perceive Fund management from the administrative perspective as complex and very costly regardless of whether the actions are by way of award through a grant call or direct execution.</p> <p>On the positive side, the introduction of the multi-year programme is an improvement because it permits more flexibility than the annual programming of SOLID Funds, while also reducing the administrative burdens on RA and DA and has increased the government's capacity to manage funding, adapting it to needs throughout the period.</p> <p>Certain changes in eligibility rules have had positive elements such as for example covering all aspects linked to the improvement and operation of centres, although other changes have introduced negative elements such as for example:</p> <ul style="list-style-type: none"> • The non-inclusion of stateless persons as an eligible population which may lead to these people to seek asylum in order to access services. • Calling into question sensitisation projects directed at the host society (because they are not directly aimed at the identifiable AMIF target population) when such projects were admitted during the SOLID Fund period, and all the agents consider them to be relevant and value their effectiveness (as indicated in one of the success stories). <p>Furthermore, although simplified costs are applied for indirect costs that has not significantly reduced the administrative burden. Although the intention is to progress toward applying simplified cost methods (direct costs), the agents responsible identify certain resistance on the part of general government intervention and difficulties adapting to national rules thus making the application of simplified cost methods very complex:</p> <ul style="list-style-type: none"> • In the context of RA calls, due to the difficulty in standardising services provided by NPEs, as they are closely tailored to the highly vulnerable profiles of a large part of AMIF beneficiaries. • As regards DA projects, the operations representing the most burden are FR and the escort service, because of the preliminary requirements established for justification (showing that displacement requires leaving national territory, specifying the name of the returned person for the escort service) <p>In contrast, one of the innovations introduced is particularly noteworthy for the difficulties it represents at all management levels. Establishing the AMIF financial year from 16 October to</p>

15 October of the following year and its imbalance with the annual national budget cycle introduces distortions in the economic and financial management of co-funded actions and in keeping track of indicators when producing annual reports presented to co-funding which has the effect of increasing managers' administrative burden. In addition, the deadline for presenting the annual accounts (4 months from year end) is considered insufficient for covering all the requirements to inspect and audit the expenditure presented in the accounts (especially in view of the overlap with the close of the annual budget cycle and the Christmas holiday period), which sometimes requires transferring expenditure to the next annual accounts.

Furthermore, another of the innovations with a negative impact has been the reduction in pre-funding amounts of AMIF, currently 5% (50% in SOLID Funds) which has had the immediate effect of considerably reducing the funding capacity of project beneficiary bodies and entities.

Finally, although in the added value section it was found that the requirements demanded and the existence of inspections have incentivised improvements in management and execution, there continues to be an over-sizing of control functions which the set of agents consider unbalanced. Redundancy in the inspection procedures facing RA and DA (who have also had to assume responsibility for financial control on the ground, which in the previous period fell to the certification authority) and beneficiary bodies and entities, requires a disproportionate amount of human, financial and time resources which could be redirected at improving other processes (execution quality, improving information systems for monitoring, evaluation, etc.) especially taking into account that subsequently the audit authority carries out its own inspections.

SECTION V: PROJECT EXAMPLES

Description of three 'success stories', among all the projects funded

Example 1

The project “*Asistencia social, legal y jurídica a mujeres víctimas de trata de seres humanos solicitantes de asilo*” (Social, and legal assistance for women asylum applicants victims of human trafficking) by the NGO Adoratrices Esclavas del Santísimo Sacramento y de la Caridad (SICAR) falls within the grant call for projects to assist IP applicants and beneficiaries, the statute on the status of stateless persons and temporary protection (resolution of 20 May 2015) and is included in Specific Objective 1 Asylum in the National Programme of the Asylum, Migration and Integration Fund (AMIF).

The project execution period went from 1 January 2016 to 30 June 2016. The area of action comprised the Madrid region and Catalonia and was directed at TCN women applying for asylum who were victims of human trafficking for the purpose of sexual exploitation.

The programme aimed to develop a specialised competent intervention strategy in Spain’s legal framework that would give access to the IP contemplated in the Asylum Law to women victims of trafficking as a particularly vulnerable collective.

Programme objectives were:

- To detect women who might be trafficking victims who could apply for asylum or present the need for IP in order to provide them with information and guidance on the asylum procedure and activate the protocol for protecting trafficking victims, as appropriate (referral to assistance resources and measures).
- Provide legal advice and conduct individualised legal monitoring of assisted women adapted to each woman’s profile and needs respecting her personal status, cultural background and skills.
- Encourage institutional coordination to promote the asylum procedure for assisted women, providing advice on the asylum application to the relevant organisations as regards the evidence from trafficking victims and producing reports to support a favourable outcome for the asylum procedure.

Example 1

This project is considered a success story because it contains the combination of the following suitability criteria:

- Relevance of the action and adjustment to needs

In Spain, people who have been trafficked for exploitation purposes are mainly foreign women. They are in a situation of maximum vulnerability and identifying and assessing them correctly has depended on whether they can access the network of services and an integral recovery process which they are entitled to by law. As intervention protocol, the women are offered an integral project: accommodation at the entity's residential resources, assistance from one or more specialised services (legal assistance, social intervention, health mediation, psychological assistance, guidance with social and labour insertion and/or management of voluntary return to the country of origin. The voluntary return service is not requested or used by those who are potential asylum applicants).

- Innovation and efficient execution

Continuous, fluid coordination between the legal department and the social intervention department is fundamental for obtaining and maintaining asylum applicant status, which allows IP beneficiaries to be integrated in the basic circuits and provisions (health, formal and non-formal education, financial benefits to help with active job seeking, etc.) and for them to have the same rights as any person with a lawful administrative status.

- There has been a positive deviation in the results due to the increase in asylum applications, especially in the first quarter of 2016 in the respective airports of reference (Barajas and el Prat), both for the legal assistance service and the social intervention service.

Furthermore, finally, since March, SICAR Catalonia has been able to accompany the Unit against immigration and document fraud (UCRIF) in interviews to identify possible trafficking victims who request asylum at el Prat airport when requested to do so by OAR or other actors (Border police (CNP Frontera) and/or duty lawyers). This represents significant progress in relating trafficking and asylum.

Various coordination meetings have also been held with Cruz Roja Cataluña to better coordinate possible entry into the territory of people whose asylum application has been accepted for processing, but who present signs of trafficking.

Another unexpected result has been that we have had detected 5 minors (2 in Madrid and 3 in Catalonia) in the context of asylum who showed signs of trafficking.

Example 1

Example 2

The project “Intercultural community intervention in the los Rosales neighbourhood” of the entity Columbares has been chosen as a successful case because of the impact and synergies created in the neighbourhood when the project ended.

Framed within SO2 Integration, the objective was to design and implement a series of interventions at all levels in a suburban neighbourhood in the El Palmar municipal area of Murcia, characterised historically by social exclusion caused by unemployment, precarious employment, the submerged economy, high rates of school failure and/or abandonment, scanty training and ignorance of employment resources, low levels of education and qualifications, a high rate of illiteracy and all sorts of health problems, in addition to the sale of drugs and violence.

These indicators underwent a significant quantitative increase with the arrival of migrants from different backgrounds (Sub-Saharan and Maghrebis among others) whose new training, social, economic, health and cultural needs required a more specialised, integral intervention.

The specific objectives were: promote integration of immigrant pupils, involving their parents, providing a mediation service, promote social skills among TCN women and their insertion into society and the labour market; promote collaboration between the different communities, associations and institutions in the neighbourhood and their participation in the Forum for Co-existence, promote inclusion in society of young migrants through cultural, artistic and sports activities; promote care for the environment through theoretical and practical workshops; diffuse a positive image of the neighbourhood’s linguistic, ethnic and cultural diversity; provide specialised mediation support for health professionals and municipal Social Services workers and for TCN users themselves.

There is a variety of reasons on different levels for regarding this project as a success story:

- Relevance of action: the actions in this project were relevant and tailored to the objectives proposed in the NP. Migrant women and young people are the main target collectives in compliance with the priority to include the most vulnerable groups and persons to help them overcome the social disadvantages associated with their situation.
- Added value and improvements in management: the specific nature of management of AMIF-funded projects has led to the association awarded this project to make internal

Example 2

changes in its structure, particularly in administrative tasks, which have transferred to the entity's other projects improving monitoring and therefore quality.

- Complementarity, synergies with other actors and integral approach: from the implementation perspective networking, motivated by the fund itself and the call, has facilitated greater coordination with the City Council and the other municipal social services and neighbourhood associations for the purpose of optimising the various resources available in the context of social intercultural intervention.

This methodology has also enabled them to intervene globally, carrying out actions in different areas in a joint, complementary, integrated manner with a cohesive work team.

- Results and sustainability: The results are much better than expected, going beyond what was contemplated without AMIF. From the qualitative perspective the results are noteworthy for their sustainability: the creation of the Forum for co-existence represents dialogue and pooling from all significant social agents, cultural centres, social services, etc, on co-existence in the neighbourhood. The forum emerged in the frame of AMIF and has been assumed by the governing bodies in the territory itself, acquiring its own dynamics. The funded programme has had and still has a lot of visibility, to the extent they have been asked to participate in a regional forum.

Also at the level of visibility, AMIF funding has enabled this project to have a fairly high level of diffusion and great communicative impact, way ahead of that of the entity's other projects.

The information gathered points to progress in participation and collaboration from TCNs and their associations in the activities, showing great progress in co-existence and integration. The call for integral neighbourhood intervention projects, funded by AMIF, facilitated this multidimensional approach.

Example 3

The International Organization for Migration's (IOM) *Proyecto de Retorno Voluntario Productivo a África y Latinoamérica* (Project for Voluntary Productive Return to Africa and Latin America), framed within Specific Objective 3 - Voluntary Return. Its main objective was to facilitate the voluntary return and sustainable reintegration of TCNs to their countries of origin through personalised return and reintegration itineraries. These itineraries included support for entrepreneurial skills through training in self-employment and business management and technical

Example 3

assistance and monitoring of the setting-up of micro-business projects associated to the return. The person's vulnerability was a priority criterion for selection.

In addition to the vulnerability criterion, entrepreneurial aptitudes are taken into account (active participation in training is an important criterion, the degree of initiative, whether they are decisive or not, their personal skills and experience) and applicants must have a minimum ability for business management in order to guarantee as far as possible the sustainability and feasibility of the projects in the medium and long term.

The project also incorporates the gender perspective with particular attention to especially vulnerable women (heads of single parent families and victims of trafficking). They seek equity in the number of beneficiaries and offer types of courses and timetables to facilitate access for people who live far away or have family responsibilities and allow minors at activities like talks and courses so that people caring for minors (mainly women) can attend.

The general assessment of the project is positive, the anticipated results were slightly exceeded as regards the number of people assisted.

The criteria justifying its inclusion as a success story are the results, the assistance methodology, the dissemination and information work and coordination with other agents. The following elements or strong points of the project can be highlighted:

- The proportion of food packages and transport and housing grants to facilitate access to training courses for people with major financial difficulties.
- Accompaniment and collection at exit and transit points (airports, bus and train stations) for people with major difficulties for operating in these spaces or with language barriers.
- The dissemination campaign to 83 prisons throughout Spain and three informative talks with technical staff from three Social Insertion Centres (CIS) in accordance with the Collaboration Agreement signed with the Prison Department to include the illegal foreign population on day release from prison in Spain in voluntary return projects
- The work coordinated with consulates, general and specialised NGOs, Social Services Centres and immigrant associations, has been crucial in reaching the neediest individuals and was strengthened by the use of new information technologies and radio.
- Collaboration with the Association of Senegalese Immigrants in Spain (information point and referral of people from this country) for advice and the production of Business plans has

Example 3

functioned effectively permitting IOM to assist a population which it would have been unable to access through other channels.

- Personalised monitoring of business plans to assist project beneficiaries with drafting and start up.

Coordinated work between IOM in Spain and local offices in the countries of origin has been fundamental for understanding the local area of the project and to ensure the quality of reintegration assistance and start up of business initiatives.

Description of one ‘failure’, among all the projects funded

Example

The project “Atención y Prevención Integral para Mujeres e Hijas/os de Inmigrantes Víctimas de Violencia de Género” (Attention and integral prevention for Women and children of immigrants victims of gender violence) from Spain’s National Federation of Separated and Divorced Women (Federación Nacional de Asociaciones de Mujeres Separadas y Divorciadas (FNAMSD)) aimed to prevent, assist, strengthen and recover TCN women and their children, victims of gender violence or otherwise, by coordinating services developed by areas (legal, psychological, social or admission to the Centre for the Assistance, Recovery and Reinsertion of Abused Women (CARRMM) which provides prevention, protection and integral recovery interventions and visibilises reality by contributing to the adoption of attitudes, strategies and policies required to provide respectful, quality assistance for TCN women and their children.

The project proposed the following activities: dissemination of the action programme to publicise the services offered by the entity; legal advice on Family, Civil and Criminal law matters; individual psychological consultations to facilitate unblocking, fears, feelings of guilt, recognition of abuse, recovery of self-esteem and reinforcement of personal criteria; group psychology to empower users and share their experiences.

This story is considered a failure because it did not comply with grant call requirements for this programme. The entity awarded the grant notes as much in its final report, and refunded the entire amount of the grant.

As presented below, this story of failure identifies the elements related to:

- Errors in the Entity’s planning and design of the intervention and its capacity to intervene on the target population.
- The identification of risks when selecting projects for the call. On this point it must be clarified that this is not common, but does provide an opportunity to reinforce the criteria for selecting and assessing projects.

Below are the difficulties and problems the entity alleged in the report that emerged during execution of the programme, followed by the notes or lessons with a view to improving what remains of the programme.

- Scant capacity to reach and capture the target population.

Example

- Difficulty for the entity itself to provide appropriate, specialised assistance for the target population given its particular vulnerability: *“Vulnerability of the women and children who bear the circumstances the programme tackles together with ignorance of the legal system can frighten users to the extent that it stops them from going to places where they could receive information about the programme, embassies, consulates, social services, hospitals, etc... All of which had information on the grant holder.”*
- A large number of users have returned to their countries of origin or have acquired Spanish nationality, which prevents them from benefitting from this type of programme: *“All the TCN women from South American countries who have attended and attend our consultancies in very significant numbers because it is easier for them and they trust the country in which they have moved since they arrived. Most have Spanish nationality, which is why they cannot join the programme we are discussing”*
- A large number of users do not see themselves as victims of gender violence which prevents them from receiving the programme: *“Another not insignificant number of women (...) did not dare to use this resource because of their insuperable fear of their husband or family environment when there are situations of violence, and so they did not start the programme because of their inability to overcome the fear of presenting a report or requesting a divorce”.*
- Migration of women to other areas outside Spain to seek employment: *“Other reasons which cannot be concealed and much less discarded are the impossibility of finding work, which has driven these TCN women to seek a solution in other countries or return to their own country, because Spain no longer has work for working women TCNs or otherwise”*
- The impossibility of justifying according to requirements the number of persons assisted, women beneficiaries of the subsidised programme: *“The number of nationalised women, mainly from South American countries, who have been assisted but cannot be counted given the requirements of the grant call for this programme”.*

However, measures were not proposed to correct the deviations from the planned objectives. The entity proceeded to refund the grant to the Administration.

SECTION VI: METHODOLOGY

The methodology is based on the following techniques for gathering and analysing information.

Document review

This has been key both for feeding the indicators contemplated in the monitoring and evaluation context and the rest of the quantitative and qualitative indicators specifically formulated by the evaluation team (shown in the annexes) to respond to the evaluation questions. The reports and annual accounts presented for monitoring the Fund were reviewed, grant calls funded by AMIF, as well as other documentation linked to the programme and evaluation objectives.

Surveys

Two types of surveys were conducted:

1. Online survey directed at entities executing the actions

Recipients were beneficiary entities (non-profit entities - NPEs) in adjudication mode (grant calls for asylum, integration and VR projects).

This survey was aimed at gathering perceptions of organisations that have executed actions co-funded by the Fund to obtain information on the design, implementation and results of those actions.

The survey was sent to a total of 109 NPEs, obtaining a response from 53 of them (48.6% response rate).

1. Telephone and online survey directed at end beneficiaries of co-funded actions (third country nationals)

The objective was to find out opinions and perceptions in terms of usefulness and satisfaction of third country national end beneficiaries of said actions to which the Fund is largely directed.

A total of 401 surveys was obtained, of which 97 were asylum project beneficiaries, 289 integration project beneficiaries and 15 return beneficiaries. Although overall, a sample with a sampling error of less than 5% and a 95.5 confidence level has been achieved, representation is much lower depending on the SO, especially in return and asylum.

Due to the very nature of the Fund and some of its objectives (especially return), it is difficult to contact the entire beneficiary population:

- There is no unique register of beneficiaries of the actions;
- The population is volatile in itself: some beneficiaries participated in actions more than two years ago and many potential beneficiaries no longer reside in Spain and;
- There are also language barriers which have further hampered contact with these people (despite having combined telephone and online surveys and having sent questionnaires in Spanish, English and French).

Contact details were facilitated by the NPEs.

Semi-structured interviews with key agents

This technique was used to collect information on:

- The relevance, complementarity and coherence of the National Programme and the planned actions with our country's needs in this matter and with the other interventions and strategies developed at national and EU level.
- Fund management and governance processes (efficiency, difficulties, areas for improvement, simplification of processes, etc.);
- Execution of the actions contemplated for each of the objectives pursued by AMIF and the National Programme and the results.
- Future recommendations and areas for improvement.

A total of 10 interviews were conducted (most of them group interviews) with persons from:

- The Responsible Authority and directly linked to the definition of the National Programme and its execution and monitoring of the actions.
 - AMIF managers at the Migration Department.

- Manager and team managing calls for reception and asylum proposals.
- Manager and team managing calls for integration and return proposals.
- Manager and team dealing with resettlement and relocation.
- Delegated Authority:
 - AMIF Managers at the Police Department and General Office for Infrastructure Planning and Management and Security Resource and head of Asset Management (contracting).
 - Police Department heads
 - OAR team (with a subsequent semi-structured questionnaire for the manager via email).
- Representatives from NPE project beneficiaries: three interviews, one for each objective in the NP.

Criteria for selecting the success and failure stories

Success stories: one story per objective contemplated in the NP was chosen based on the following criteria: relevance of the action and its adaptation to needs, innovation and effectiveness in execution and results and sustainability.

Failure story: the selection attempted to be as representative as possible of the most significant difficulties found in execution and oriented at obtaining positive lessons which can be of use to all actors.

SECTION VII: MAIN CONCLUSIONS AND RECOMMENDATIONS

Main conclusions

Conclusion 1

In general terms, through the NP, AMIF has contributed to the development of policies on asylum, integration and return in Spain, and therefore the EU. Actions have been financed aligned with the needs identified in each area and Spain's response capacity (flexibility and scope) to needs arising from the refugee crisis and growing number of IP applications has increased. Nevertheless, the response to needs has been limited with uneven results depending on the objective.

From the perspective of outcomes, actions taken in relation to reception, integration and voluntary return have helped to improve the situation of TCNs and NPE projects have provided relevant quality services.

However, on the matter of asylum and reception, needs arising over the period have exceeded the proposed solutions, showing shortfalls in the ability to respond to regulatory provisions (IP applications have not been decided within the maximum period of 6 months despite additional staff in OAR) and to comply with Spain's resettlement and relocation commitments. In relation to the capacity and quality of system infrastructures and also linked to the forced return of TCNs, the need for and urgency of some of the actions contemplated in the NP has been demonstrated (for example, building and improving CIE, increasing places in CETI and asylum facilities at Barajas and el Prat airports).

Conclusion 2

At the level of executing actions contemplated in the NPs, efforts have focused on resolving the needs that have arisen over the period, displacing other relevant matters within the planned NO it is envisaged will be dealt with during the second stage of the AMIF programming period. The most noteworthy pending issues are:

- In the NO on evaluation of the SO1 on asylum: production of the planned evaluation reports and linked to that, developing a management tool for the asylum procedure (OAR software tool)

Conclusion 2

- In the NO on capacity of the SO2 on integration: the actions contemplated in the section on cooperation with other countries, generation of spaces for meetings, exchange and dissemination of experiences and collaboration with the agents involved and developing instruments to evaluate and monitor outcomes and impacts.
- In the NO on cooperation within the SO3 on Return: actions linked to the generation of knowledge like the production of reports, exchange of experiences and participation in networks (with the exception of the ERIN network where participation already takes place).
- In addition to the above, actions are still pending on the protection, assistance and integration of UFM linked to the three SOs in the NP.

One of the most significant reasons for the fact that these issues have not been dealt with in the first part of the period has been the lack of HR in the management teams. In addition, the concentration of HR on tasks linked to the control and justification of expenditure has made it difficult to tackle issues like this which require dedication from specialised staff.

Conclusion 3

The actions carried out in the frame of the NP have been coherent and complement national and EU policies on asylum, reception, integration and return. This aspect has been largely guaranteed by the location of the RA and DA in MEYSS and MIR respectively.

On the matter of TCN integration and reception and IP applicants, the actions developed with AMIF support have been coherent with other programmes and projects funded by General State Budgets and ESF. They have focused on target populations and aspects that complement each other covering the entire spectrum of identified needs. A good example of this is the launch of grant calls that combined the three sources of funding and coordinated objectives and beneficiary profiles.

On the matter of legal immigration and forced return, complementarity and coherence has occurred with ISF and the General State Budgets themselves, insofar as once the identified needs were addressed, they were covered by one of the funding sources exclusively or through a combination of several according to the eligibility of expenditure. This aspect has been facilitated by the fact that

Conclusion 3

the General Department of Planning and Infrastructure Management and Security Measures is acting as DA in AMIF and RA in ISF.

However, as mentioned in the second conclusion, some actions where no progress has been made or it has been scanty could improve the complementarity and coherence of the actions, for example, issues linked to education, training and cooperation.

Conclusion 4

Throughout the study period, there has been no significant reduction in the administrative burdens linked to AMIF management.

Although some of the procedural innovations introduced in this period have meant progress and improvement in terms of management (e.g. multi-year programming), others like the application of the simplified costs method for 15% of direct staff costs have not had a significant impact. At the same time, other inspection and audit procedures persist that are understood to be redundant (they do not provide added value after a point) and represent a very significant administrative burden, consuming significant part of management team resources and efforts.

Furthermore, a new feature that affects Fund management processes such as establishing the financial year from 16th October to 15th October has had the consequence of increasing administrative burdens by introducing distortions when balancing physical and financial management (financial and physical indicators) with management systems in the Member State based on the calendar year. Furthermore, the period for closing the annual accounts (4 months from year end) is considered insufficient for responding to inspection requirements for the projects and expenditure during the year, especially in view of all of the above.

Conclusion 5

AMIF has provided added value beyond the availability of funds for actions in the frame of policies on asylum, reception, integration and return, especially voluntary return. AMIF has enabled an extension of both the quantitative scope of these policies (number of projects and beneficiaries) and the qualitative scope insofar as it has facilitated:

Conclusion 5

- Maintaining in a period of budget adjustments, certain levels of activity in policies on asylum, reception, integration and return developed by the General State Administration (AGE), especially in relation to reception and integration projects supported by the NPE network which covers the entire national territory.
- Tackle new issues or areas of action and focus efforts on specific particularly vulnerable TCN groups which, before the study period, were less frequently included in policies on asylum, integration and return (victims of human trafficking, gender violence, actions to sensitise the host society, etc.).

From the perspective of the systems, structures and processes supporting these policies, AMIF has provided added value by encouraging improvements in management and implementation in the agents involved in executing the NP and co-funded actions.

In terms of sustainability, it is highly likely that the positive effects of co-funded actions will continue, given that in most of the actions continuity depends more on the General State Budgets than on the fund (hiring staff in OAR and the VR programmes being the most dependent actions). In this sense, the Fund contributes to the complementarity and specificity in the development of the actions.

Recommendations

Recommendations 1

The response capacity of the asylum system in Spain needs to be increased to comply, as soon as possible, with the regulations.

The number of IP applications has increased spectacularly since 2014 and continues to increase, and that will undoubtedly have a negative impact on the asylum and reception system if action is not taken. In this regard it is considered crucial:

- To increase the number of staff in OAR to adapt to the growing needs and regulatory requirements (decision times). By contracting temporary support staff with AMIF funding, it has been possible to increase the number of IP applications brought before CIAR for decision per month, but not reduce decision times which remain at around 9 to 11 months. The objective must be to get them below the 6 months contemplated in the regulations.
- Speeding up development of the management application for IP application procedures. In line with the above, this aspect must be prioritised as it will help to make the procedures more effective and efficient, increasing OAR's investigative capacity to comply with the regulation.
- Prioritising and speeding up construction of the planned CIE and increasing the number of places in CETI in order to adapt the system's capacity to actual demand and improve assistance and living conditions for the TCNs housed there.
- Prioritise and speed up the Assistance Plan for asylum applicants and the action protocol for mass influxes contemplated in the NP, in order to improve assistance for IP applicants and TCN who arrive to Spanish and European territory.

Recommendations 2

Insofar as the aspects indicated in Conclusion 2 are considered relevant for strengthening the system of asylum, reception, integration and return, the recommendation is to deal with pending aspects in the second part of the period.

Recommendations 2

As indicated in Conclusion 2, most of these matters require the dedication of specialised human resources who are familiar with the policies on asylum, integration and return and the processes on which they are based to develop the planned activities and products.

In this regard, the recommendation is to study the suitability of increasing expenditure on AT in order to increase the capacity of management teams and release specialised resources within MEYSS and MIR that can dedicate themselves to these activities, whether directly or by managing external support that could also be funded from the technical assistance item.

Recommendations 3

In order to improve the coherence and complementarity of actions funded by AMIF, with those developed by other agents and funded with other objectives, the recommendation is:

- To promote cooperation, education and training, following the indications in the second recommendation. In particular with the Autonomous Communities, concerning reception, integration and assistance for UAM and with other Member States in the area of legal migration and internal security.
- Study the possibility of launching more multi-year calls which enable longer-term projects with a more integral approach and greater capacity for synergy and results.
- Organise new mechanisms of collaboration between the RA and the DA for the continuous improvement of the management, monitoring and evaluation of the actions financed, through the exchange of experiences and learning accumulated in the management of European Funds.

Recommendations 4

Recommendations 4

In order to effectively reduce the administrative burdens, we recommend Member State Authorities (RA and DA) to:

- Study the feasibility and relevance of applying other simplified cost methods taking into account the limitations and difficulties for their application in Spain.
- Articulate new collaboration mechanisms between the RA and the DA for the continuous improvement of the management, monitoring and evaluation of the actions financed, as described in the third recommendation.

Recommendations for the European Commission:

- Explore the possibility of changing the annual cycle (16 October to 15 October) to make it coincide with the calendar year and extend the period for closing the annual accounts.
- Move forward with the proposal for a guide on criteria for applying simplified costs for specific application to eligible actions in AMIF

Recommendations 5

The recommendations for promoting and consolidating EU added value and sustainability of the positive effects are:

- For the pertinent authorities (AA), linked to Conclusion 4 and Recommendation 4, redirect efforts focused until now on controlling expenditure towards developing and strengthening monitoring and evaluation processes to improve quality of execution and consequently the services provided to TCN beneficiaries of the Fund.

For RA and DA, promoting the action lines pending on cooperation, capacity and assessment.

SECTION VIII: MID-TERM REVIEW

Provide an assessment of the mid-term review carried out in accordance with Article 15 of Regulation (EU) No 514/2014. If relevant, summarize the main changes having an impact on your activities in the policy areas covered by the Fund, and how your National Programme was/will be adjusted.

The results of the mid-term review largely coincide with the results, conclusions and recommendations of this evaluation.

The most significant challenges and changes identified in this review are

- **SO 1 Asylum:** The challenges are to improve and maintain a rapid, effective response to the growing demand for IP and reception. The budgetary allocation for NO1 Reception and Asylum must be reviewed to deal with pending actions like the acquisition of technical resources to streamline application management, extend facilities and improve assistance at asylum rooms at airports.

NO 3 – While resettlement commitments are being met at an adequate pace, there are difficulties in complying with relocation commitments due to the procedure in place and the conditions imposed on the programme (reception of cases sent by UNHCR and selected people withdrawing).

- **SO2 Integration:** No significant changes are envisaged with an impact on integration policies within this Specific Objective. It is a question of continuing with the various integration projects aimed primarily at vulnerable immigrants (especially minors, young people, UFM and women) and facilitate their integration in the essential areas of society. A review is required of the planned indicators.
- **SO 3 Return:** The plan is to continue with the different types of voluntary return projects (reintegration and productive), nevertheless, the reduction in returns must be looked at and a re-allocation of funds within the objective is proposed. No change is required in forced returns.

SECTION IX: COMMON RESULT AND IMPACT INDICATORS

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1 - Indicators by specific objectives

SO	Type	Ind ID	Indicator description	Meas unit	Baseline value	Source of data	2014	2015	2016	2017
SO1	R	SO1R1	Number of target group persons provided with assistance through projects in the field of reception and asylum systems supported under the Fund:	Number	16,311.00	AIR (indicator SO1 C1)	2,718.00	11,311.00	4,925.00	22,796.00
SO1	R	SO1R1	i) number of target group persons benefiting from information and assistance throughout the asylum procedures	Number	12,148.00	AIR (indicator SO1 C1.a)	1,919.00	4,626.00	4,925.00	22,976.00
SO1	R	SO1R1	ii) number of target group persons benefiting from legal assistance and representation	Number		AIR (indicator SO1 C1.b)	0.00	0.00	4,925.00	8,385.00
SO1	R	SO1R1	iii) number of vulnerable persons and unaccompanied minors benefiting from specific assistance	Number		AIR (indicator SO1 C1.c)	312.00	2,232.00	1,021.00	1,446.00
SO1	R	SO1R2	Capacity (i.e. number of places) of new reception accommodation infrastructure set up in line with the common requirements for reception conditions as 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.	Number	909.00	AIR (indicator SO1 C2.1)	0.00	0.00	202.00	4,934.00
SO1	R	SO1R2	The percentage in the total reception accommodation capacity	Percentage	0.00	AIR (indicator SO1 C2.2)	0.00	0.00	0.00	94.12
SO1	R	SO1R3	Number of persons trained in asylum-related topics with the assistance of the Fund	Number	0.00	AIR (indicator SO1 C3.1)	0.00	0.00	0.00	523.00
SO1	R	SO1R3	That number as a percentage of the total number of staff trained in those topics	Percentage	0.00	AIR (indicator SO1 C3.2)	0.00	0.00	0.00	75.00
SO1	R	SO1R4	(a) Number of places adapted for unaccompanied minors (UAM) supported by the Fund	Number		Project Reporting				0.00
SO1	R	SO1R4	(b) Total number of places adapted for unaccompanied minors	Number		Member States				0.00

SO	Type	Ind ID	Indicator description	Meas unit	Baseline value	Source of data	2014	2015	2016	2017
SO1	R	SO1R4	Number of places adapted for unaccompanied minors (UAM) supported by the Fund as compared to the total number of places adapted for unaccompanied minors.	Percentage		/				0.00
SO1	I	SO1I1	Stock of pending cases at first instance, less than 6 months	Number		EASO (EPS Indicator 2)	2,148.00	4,708.00	6,702.00	
SO1	I	SO1I1	Stock of pending cases at first instance, more than 6 months	Number		EASO (EPS Indicator 2)	2,875.00	8,837.00	10,828.00	
SO1	I	SO1I2	Share of final positive decisions at the appeal stage	Percentage	1.80	Eurostat (migr_asydcfina)	1.63	1.72	3.88	
SO1	I	SO1I3	Number of persons in the reception system (stock at end of the reporting period)	Number	8,985.00	EASO (EPS Indicator 7)	727.00	1,388.00	4,248.00	7,872.00
SO1	I	SO1I4	(a) Number of persons in the reception system	Number		EASO (EPS Indicator 7)	727.00	1,388.00	4,248.00	7,872.00
SO1	I	SO1I4	(b) Number of asylum and first time asylum applicants	Number	4,485.00	Eurostat (migr_asyappctza)	4,445.00	12,871.00	15,552.00	18,063.00
SO1	I	SO1I4	Number of persons in the reception system as compared to the number of asylum applicants	Ratio		/	0.16	0.11	0.27	0.44
SO1	I	SO1I5	(a) Number of accommodation places adapted for unaccompanied minors	Number	0.00	Member States	0.00	0.00	0.00	0.00
SO1	I	SO1I5	(b) Number of asylum applicants considered to be unaccompanied minors (Eurostat migr_asyunaa)	Number	10.00	Eurostat (migr_asyunaa)	12.00	23.00	29.00	
SO1	I	SO1I5	Number of accommodation places adapted for unaccompanied minors (UAM) as compared to the number of unaccompanied minors	Ratio		/	0.00	0.00	0.00	0.00
SO1	I	SO1I6	Convergence of first instance/final instance recognition rates by Member States for asylum applicants from a same third country	Percentage points	41.00	Eurostat (migr_asydcfina)	12.00	33.00	52.00	
SO2	R	SO2R1	Number of target group persons who participated in pre-departure measures supported by the Fund	Number	0.00	AIR (Indicator SO2 C1)	0.00	0.00	0.00	0.00
SO2	R	SO2R2	Number of target group persons assisted by the Fund through integration measures in the framework of national, local and regional strategies	Number	227,061.00	AIR (Indicator SO2 C2)	0.00	0.00	65,927.00	118,572.00

SO	Type	Ind ID	Indicator description	Meas unit	Baseline value	Source of data	2014	2015	2016	2017
SO2	R	SO2R2	i) 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		AIR (indicator SO2 C2.a)	0.00	0.00	32,179.00	19,859.00
SO2	R	SO2R2	ii) number of target group persons supported through the provision of advice and assistance in the area of housing	Number		AIR (indicator SO2 C2.b)	0.00	0.00	10,840.00	6,179.00
SO2	R	SO2R2	iii) number of target group persons assisted through the provision of health and psychological care	Number		AIR (indicator SO2 C2.c)	0.00	0.00	5,526.00	2,251.00
SO2	R	SO2R2	iv) number of target group persons assisted through measures related to democratic participation	Number		AIR (indicator SO2 C2.d)	0.00	0.00	18,099.00	4,781.00
SO2	I	SO2I1	Share of third-country nationals (TCNs) having received long-term residence status out of all TCNs	Percentage	48.02	Eurostat (migr_reslas)	48.56	50.36	50.36	
SO2	I	SO2I2	Employment rate: gap between third-country nationals and host-country nationals	Percentage points	-9.50	Eurostat (Labour Force Survey) (lfsa_argan) (lfsa_ergacob)	-8.80	-7.50	-7.00	-9.96
SO2	I	SO2I3	Unemployment rate: gap between third-country nationals and host-country nationals	Percentage points	16.10	Eurostat (Labour Force Survey) (lfsa_argan) (lfsa_urgacob)	14.40	12.60	10.40	9.95
SO2	I	SO2I4	Activity rate: gap between third-country nationals and host-country nationals	Percentage points	18.70	Eurostat (Labour Force Survey) (lfsa_argan) (lfsa_argacob)	17.40	17.90	16.80	16.84
SO2	I	SO2I5	Share of early leavers from education and training: gap between third country nationals and host-country nationals	Percentage points	21.90	Eurostat (Labour Force Survey) (edat_lfse_02)	25.10	19.80	21.70	
SO2	I	SO2I6	Share of 30 to 34-years-olds with tertiary educational attainment: gap between third country nationals and host-country nationals	Percentage points	-27.50	Eurostat (edat_lfs_9911)	-28.20	-24.90	-27.60	-25.48
SO2	I	SO2I7	Share of population at risk of social poverty or social exclusion: gap between third-country nationals and host-country nationals	Percentage points	36.20	Eurostat (Labour Force Survey) (ilc_peps05)	36.70	37.80	35.10	
SO3	R	SO3R1	Number of persons trained on return-related topics with the assistance of the Fund	Number	0.00	AIR (indicator SO3 C1)	0.00	30.00	0.00	

SO	Type	Ind ID	Indicator description	Meas unit	Baseline value	Source of data	2014	2015	2016	2017
SO3	R	SO3R2	Number of returnees who received pre or post return reintegration assistance co-financed by the Fund	Number	3,850.00	AIR (indicator SO3 C2)	6,896.00	6,452.00	0.00	2,698.00
SO3	R	SO3R3	(a) persons who returned voluntarily	Number	0.00	AIR (indicator SO3 C3)	0.00	0.00	0.00	2,698.00
SO3	R	SO3R3	(b) and persons who were removed	Number	13,225.00	AIR (indicator SO3 C4)	1,317.00	1,178.00	0.00	7,178.00
SO3	R	SO3R3	Number of returnees whose return was co-financed by the Fund	Number		AIR	1,317.00	1,178.00	0.00	9,876.00
SO3	R	SO3R4	Number of monitored removal operations co-financed by the Fund	Number	35.00	AIR (indicator SO3 C5)	6.00	8.00	0.00	23.00
SO3	R	SO3R5	(a) Persons who were removed (and whose return was co-financed by the Fund)	Number	13,225.00	AIR (indicator SO3 C4)	1,317.00	1,178.00	0.00	7,178.00
SO3	R	SO3R5	(b) Total number of returns following an order to leave	Number	17,285.00	Eurostat (migr_eirtn)	11,994.00	13,697.00	10,837.00	2,188.00
SO3	R	SO3R5	Numbers of removals supported by the Fund, as compared to the total number of returns following an order to leave	Ratio		/	0.11	0.09	0.00	3.28
SO3	R	SO3R6	(a) Number of persons returned in the framework of joint return operations (assisted-voluntary and forced) supported by the Fund	Number	0.00	Project Reporting	0.00	0.00	0.00	0.00
SO3	R	SO3R6	(b) Number of returnees whose return was co-financed by the Fund	Number		AIR	1,317.00	1,178.00	0.00	9,876.00
SO3	R	SO3R6	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	Ratio		/	0.00	0.00	0.00	0.00
SO3	R	SO3R7	(a) Number of returnees who received pre or post return reintegration assistance co-financed by the Fund	Number	3,850.00	AIR (indicator SO3 C2)	6,896.00	6,452.00	0.00	2,698.00
SO3	R	SO3R7	(b) Persons who returned voluntarily (and whose return was co-financed by the Fund)	Number	3,850.00	AIR (indicator SO3 C3)	0.00	0.00	0.00	2,698.00
SO3	R	SO3R7	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	Ratio		/	0.00	0.00	0.00	1.00
SO3	R	SO3R8	(a) Number of places in detention centres created/renovated with support from the Fund	Number		Project Reporting	0.00	0.00	0.00	0.00

SO	Type	Ind ID	Indicator description	Meas unit	Baseline value	Source of data	2014	2015	2016	2017
SO3	R	SO3R8	(b) Total number of places in detention centres	Number	2,888.00	Member States	1,536.00	1,536.00	1,462.00	1,179.00
SO3	R	SO3R8	Number of places in detention centres created/renovated with support from the Fund, as compared to the total number of places in detention centres	Ratio		/	0.00	0.00	0.00	0.00
SO3	I	SO3I1	(a) Number of third-country nationals returned following an order to leave (migr_eirtn)	Number	17,285.00	Eurostat (migr_eirtn)	11,994.00	13,697.00	10,837.00	1,970.00
SO3	I	SO3I1	(b) Number of third-country nationals ordered to leave (migr_eiord)	Number	32,915.00	Eurostat (migr_eiord)	33,369.00	35,298.00	29,022.00	4,651.00
SO3	I	SO3I1	Number of returns following an order to leave compared to the number of third-country nationals ordered to leave	Ratio		/	0.36	0.39	0.37	0.42
SO3	I	SO3I2	Return decisions issued to rejected asylum applicants	Number	1,366.00	EASO (EPS Indicator 8a)	1,279.00	1,007.00	2,398.00	1,728.00
SO3	I	SO3I3	Effective returns of rejected asylum applicants	Number		EASO (EPS Indicator 8b)				
SO4	R	SO4R1	Number of applicants and beneficiaries of international protection transferred from one Member State to another with support of the Fund.	Number		AIR (indicator SO4 C1)				
SO4	R	SO4R2	Number of cooperation projects with other Member States on enhancing solidarity and responsibility sharing between the Member States supported under the Fund.	Number		AIR (indicator SO4 C2)				

2 - Indicators on efficiency, added value and sustainability, as foreseen in Regulation (EU) No 514/2014

Ind ID	Indicator description	Meas unit	Baseline value	Source of data	2014	2015	2016	2017
H1	Number of Full Time Equivalent in the Responsible Authority, the Delegated Authority and the Audit Authority working on the implementation of the Fund and paid by the technical assistance or national budgets as compared to:	Number		Member States	4.00	9.00	91.00	82.00
H1	(a) the number of projects implemented	Number		AIR	18.00	79.00	259.00	412.00
H1	(b) the amount of the funds claimed for the financial year	Amount in EUR		Accounts		26,361,634.00	41,764,021.00	54,454,529.00
H2	(a) Technical assistance plus the administrative (indirect) cost	Amount in EUR		Member States		562,619.00	2,328,809.00	3,238,511.00
H2	(b) Amount of funds claimed for the financial year	Amount in EUR		Accounts		26,361,634.00	41,764,021.00	54,454,529.00
H2	Technical assistance plus the administrative (indirect) cost of projects as compared to the amount of funds claimed for the financial year	Ratio		/		0.02	0.06	0.06
H3	Amount of the annual expenditure submitted by the Member State	Amount in EUR		Accounts		26,361,634.00	41,764,021.00	54,454,529.00
H3	Total amount of funds allocated to the national programme.	Amount in EUR		Accounts		259,701,877.00	372,093,877.00	400,039,733.00
H3	Absorption rate of the Fund	Ratio		/		0.10	0.11	0.14

ANNEX: DATA

Table 1: Progress in financial implementation, by specific objectives (in Euro)

National objective / Specific Action	A Total paid	B Total paid	Total paid (A+B/SO programmed) (%)
SO1.NO1 Reception/asylum	18,410,070.52	12,883,211.00	46.89%
SO1.NO2 Evaluation	0.00	0.00	0.00%
SO1.NO3 Resettlement	0.00	0.00	0.00%
TOTAL NO SO1	18,410,070.52	12,883,211.00	
TOTAL SO1	18,410,070.52	12,883,211.00	44.99%
SO2.NO1 Legal migration	0.00	0.00	
SO2.NO2 Integration	14,323,256.07	16,987,963.76	45.59%
SO2.NO3 Capacity	0.00	0.00	0.00%
TOTAL NO SO2	14,323,256.07	16,987,963.76	
TOTAL SO2	14,323,256.07	16,987,963.76	45.26%
SO3.NO1 Accompanying measures	13,250,279.69	8,037,444.50	44.84%
SO3.NO2 Return measures	12,829,105.26	7,867,400.00	37.91%
SO3.NO3 Cooperation	0.00	0.00	0.00%
TOTAL NO SO3	26,079,384.95	15,904,844.50	40.67%
SO3.SA6 Joint reintegration	0.00	0.00	
SO3.SA7 Joint family unity and unaccompanied minor reintegration	0.00	0.00	
TOTAL SA SO3	0.00	0.00	
TOTAL SO3	26,079,384.95	15,904,844.50	40.67%
TOTAL NO SO4			

TOTAL SO4			
Pledges (Union priorities)	4,010,000.00	1,390,000.00	31.60%
Pledges (Others)			
Transfers & relocations	2,364,000.00	4,050,000.00	11.47%
Admission from Turkey			0.00%
TOTAL Special Cases	6,374,000.00	5,440,000.00	10.27%
Technical Assistance	2,938,943.43	3,238,510.00	40.80%
TOTAL	68,125,654.97	54,454,529.26	32.94%

Table 2: Number of projects and EU contribution to finished and open projects, by specific objectives (in Euro)

	Number of projects and EU contribution			
	01/01/2014-15/10/2016			
	Total Nr of finished projects	Total EU contribution to finished projects	Total Nr of open projects	Total EU contribution to open projects
SO1 - Asylum	18	11,640,018.89	25	6,770,051.63
SO2 - Integration/legal migration	110	3,915,747.19	141	10,407,508.88
SO3 - Return	18	20,350,847.97	39	5,728,536.98
SO4 - Solidarity	0	0.00	0	0.00
SO5 - Technical assistance	0	0.00	0	0.00
Total 1	146	35,906,614.05	205	22,906,097.49

	Number of projects and EU contribution			
	16/10/2016-30/06/2017			
	Total Nr of finished projects	Total EU contribution to finished projects	Total Nr of open projects	Total EU contribution to open projects
SO1 - Asylum	41	11,182,462.00	30	1,700,748.40
SO2 - Integration/legal migration	35	-91,831.00	258	17,079,794.82
SO3 - Return	23	13,686,844.00	24	2,217,999.60
SO4 - Solidarity	0	0.00	0	0.00
SO5 - Technical assistance	1	3,238,511.00	0	0.00
Total 2	100	28,015,986.00	312	20,998,542.82
Total 1+2	246	63,922,600.05	517	43,904,640.31

Table 3: Number of projects and EU contribution, by types of beneficiaries and by specific objectives (in Euro)

		Project beneficiaries 01/01/2014-15/10/2016			
		SO1: Asylum	SO2: Integration / Legal migration	SO3: Return	SO4: Solidarity
State/federal authorities	Nr of projects	19	0	19	0
State/federal authorities	EU contribution	12,733,749.09	0.00	20,831,812.42	0.00
Local public bodies	Nr of projects	0	0	0	0
Local public bodies	EU contribution	0.00	0.00	0.00	0.00
Non-governmental organisations	Nr of projects	23	247	38	0
Non-governmental organisations	EU contribution	5,306,212.40	14,175,318.42	5,247,572.53	0.00
International public organisations	Nr of projects	0	0	0	0
International public organisations	EU contribution	0.00	0.00	0.00	0.00
National Red Cross	Nr of projects	1	4	0	0
National Red Cross	EU contribution	370,109.03	147,937.65	0.00	0.00
International Committee of the Red Cross	Nr of projects	0	0	0	0
International Committee of the Red Cross	EU contribution	0.00	0.00	0.00	0.00
The International Federation of Red Cross and Red Crescent Societies	Nr of projects	0	0	0	0
The International Federation of Red Cross and Red Crescent Societies	EU contribution	0.00	0.00	0.00	0.00
Private and public law companies	Nr of projects	0	0	0	0
Private and public law companies	EU contribution	0.00	0.00	0.00	0.00
Education/research organisations	Nr of projects	0	0	0	0
Education/research organisations	EU contribution	0.00	0.00	0.00	0.00

		Project beneficiaries 16/10/2016-30/06/2017			
		SO1: Asylum	SO2: Integration / Legal migration	SO3: Return	SO4: Solidarity
State/federal authorities	Nr of projects	18	0	9	0
State/federal authorities	EU contribution	8,916,880.00	0.00	15,958,196.00	0.00
Local public bodies	Nr of projects	0	0	0	0
Local public bodies	EU contribution	0.00	0.00	0.00	0.00
Non-governmental organisations	Nr of projects	47	290	38	0
Non-governmental organisations	EU contribution	3,414,879.20	16,802,513.25	-53,352.56	0.00
International public organisations	Nr of projects	0	0	0	0
International public organisations	EU contribution	0.00	0.00	0.00	0.00
National Red Cross	Nr of projects	6	3	0	0
National Red Cross	EU contribution	551,452.72	185,450.51	0.00	0.00
International Committee of the Red Cross	Nr of projects	0	0	0	0
International Committee of the Red Cross	EU contribution	0.00	0.00	0.00	0.00
The International Federation of Red Cross and Red Crescent Societies	Nr of projects	0	0	0	0
The International Federation of Red Cross and Red Crescent Societies	EU contribution	0.00	0.00	0.00	0.00
Private and public law companies	Nr of projects	0	0	0	0
Private and public law companies	EU contribution	0.00	0.00	0.00	0.00
Education/research organisations	Nr of projects	0	0	0	0
Education/research organisations	EU contribution	0.00	0.00	0.00	0.00

Table 4: Special cases

Special cases		2014-2015	2016-2017	2018-2020	Total
Resettlement Union Priorities	Pledged				
Resettlement Union Priorities	Actual	1,220,000.00	2,790,000.00		4,010,000.00
Resettlement Others	Pledged	2,600,000.00	14,490,000.00		17,090,000.00
Resettlement Others	Actual				
Transfer & relocation	Pledged		55,938,000.00		55,938,000.00
Transfer & relocation	Actual		2,364,000.00		2,364,000.00
Admission from Turkey	Pledged		41,964,000.00		41,964,000.00
Admission from Turkey	Actual				
Total	Pledged	2,600,000.00	112,392,000.00	0.00	114,992,000.00
Total	Actual	1,220,000.00	5,154,000.00	0.00	6,374,000.00

Documents

Document title	Document type	Document date	Local reference	Commission reference	Files	Sent date	Sent By
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