



Brussels, 4 March 2026  
(OR. en)

6973/26

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**Interinstitutional File:  
2011/0368 (COD)**

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**CRIMORG 56  
COSI 40  
ENFOCUSTOM 27  
ENFOPOL 83  
JAI 289  
CIVCOM 42  
HYBRID 34  
CADREFIN 98  
CT 35  
IXIM 65**

**COVER NOTE**

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From: Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director

date of receipt: 3 March 2026

To: Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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No. Cion doc.: SWD(2026) 79 final

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Subject: COMMISSION STAFF WORKING DOCUMENT  
EVALUATION  
- Ex-post Evaluation of the Internal Security Fund - Police (ISF-P) for the 2014-2020 programming period

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Delegations will find attached document SWD(2026) 79 final.

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Encl.: SWD(2026) 79 final



Brussels, 3.3.2026  
SWD(2026) 79 final

**COMMISSION STAFF WORKING DOCUMENT**

**EVALUATION**

**Ex-post Evaluation of the Internal Security Fund - Police (ISF-P) for the 2014-2020  
programming period**

{SWD(2026) 83 final}

## Table of contents

1. INTRODUCTION.....	1
1.1. Policy context and development.....	3
1.2. Methodology.....	5
1.3. Limitations.....	6
2. WHAT WAS THE EXPECTED OUTCOME OF THE INTERVENTION?.....	6
2.1. Description of the ISF-P and its objectives.....	6
2.2. Intervention logic.....	7
2.3. Points of comparison.....	10
3. HOW HAS THE SITUATION EVOLVED OVER THE EVALUATION PERIOD.....	11
3.1. Overall description of the implementation set-up.....	11
3.2. ISF-P Implementation: Financial Progress.....	12
4. EVALUATION FINDINGS.....	19
4.1. To what extent was the intervention successful and why?.....	19
4.1.1. Effectiveness.....	19
4.1.2. Efficiency.....	31
4.1.3. Simplification and Reduction of Administrative Burden.....	39
4.1.4. Coherence and Complementarity.....	42
4.2. How did the EU intervention make a difference and to whom?.....	50
4.2.1. EU Added Value.....	50
4.2.2. Sustainability.....	54
4.3. Is the intervention still relevant?.....	58
5. WHAT ARE THE CONCLUSIONS AND LESSONS LEARNED?.....	66
5.1. Conclusions.....	66
5.1.1. Effectiveness.....	66
5.1.2. Efficiency and Simplification and reduction of administrative burden.....	67
5.1.3. Coherence and complementarity.....	68
5.1.4. EU added value.....	68
5.1.5. Sustainability.....	69
5.1.6. Relevance.....	69
5.2. Lessons Learned.....	70
ANNEX I. PROCEDURAL INFORMATION.....	72
ANNEX II. METHODOLOGY AND ANALYTICAL MODELS USED.....	73

ANNEX III. EVALUATION MATRIX .....	76
ANNEX IV. OVERVIEW OF BENEFITS AND COST .....	100
ANNEX V. STAKEHOLDER CONSULTATION – SYNOPSIS REPORT .....	103

## Abbreviations

<i>Term or acronym</i>	<i>Meaning or definition</i>
AI	Artificial Intelligence
AMIF	Asylum Migration and Integration Fund
BMVI	Border Management and Visa Instrument
CEPOL	European Union Agency for Law Enforcement Training
CIPS	Specific programme ‘Prevention, Preparedness and Consequence Management of Terrorism and Other Security-related Risks’
DG DIGIT	Directorate-General for Digital Services
DG HOME	Directorate-General for Migration and Home Affairs
DG INTPA	Directorate-General for International Partnerships
DG MARE	Directorate-General for Maritime Affairs and Fisheries
DG REGIO	Directorate-General for Regional and Urban Policy
DG RTD	Directorate-General for Research and Innovation
EMAS	Emergency Assistance
EMPACT	European Multidisciplinary Platform Against Criminal Threats
EU	European Union
Europol	European Union Agency for Law Enforcement
Eurostat	Statistical Office of the European Union
IPA	Instrument for Pre-accession Assistance
ISEC	Specific programme ‘Prevention of and Fight against Organised Crime’
ISF	Internal Security Fund
ISF-BV	Internal Security Fund – Borders and Visa
ISF-P	Internal Security Fund – Police
JHA	Justice and Home Affairs

JIT	Joint Investigation Teams
JRC	Joint Research Centre
MAOC-N	Maritime Analysis and Operations Centre – Narcotics
MS	Member States
NO	National Objective
OLAF	European Anti-Fraud Office
PNR	Passenger Name Record
SCOs	Simplified cost options
SFC2014	System for Fund Management in the European Union
SG	Secretariat-General
SJ	Legal Service
SWD	Staff Working Document
TEU	Treaty on the European Union
TFEU	Treaty on the Functioning of the European Union

## List of tables and figures

Table 1 - Specific Objective – fight against crime: Number of actions per national objective	20
Table 2 – Specific Objective – fight against crime: Achievement per main indicator	21
Table 3 - Specific Objective – fight against crime: Comments per indicator	22
Table 4 - Specific Objective – risk management: Number of actions per national objective	28
Table 5 - Specific Objective – risk management: Achievement per main indicator	29
Table 6 - Shared management: Technical assistance absorption rate by Member State	36
Table 7 - Summary of differences affecting administrative burden between the Instruments	40
Table 8 - Complementarity of the funding components	43
Table 9 - Alignment between the Specific Objectives of the ISF-P and the EU Internal Security Policy	45
Table 10 - Overview of needs identified in the National Programmes per policy fields	61
Table 11 – Description of targeted stakeholders	103
Figure 1 - Development of Home Affairs Funds	5
Figure 2 - Intervention Logic of the ISF-P	9
Figure 3 - Total allocation of the ISF-P	13
Figure 4 - Financial Progress of the ISF-P: Distribution of Allocated, Committed and Paid Resources by Management Mode in EUR	14
Figure 5 - Implementation rate per Specific Objective under shared management	15
Figure 6 - Allocation of paid resources by policy field in shared management	15
Figure 7 - Total allocated resources by Member State (EUR in millions)	16
Figure 8 - Distribution of ISF-P allocated resources by Specific Objective across Member States	17
Figure 9 - Absorption rate per Member State	18
Figure 10 - Distribution of Allocations under Direct and Indirect Management (in millions of EUR)	18
Figure 11 – Timelines for Specific Objective – fight against crime	20
Figure 12 - Stakeholder answers to the question: ‘To what extent have the funded actions resulted in the following outcomes, which strengthened your country’s capacities in preventing and combating cross-border, serious and organised crime, including terrorism?’	26
Figure 13 - Stakeholder answers to the question: ‘To what extent do you agree that the ISF-P contributed to...’	27
Figure 14 - Timelines of Specific Objective – risk management	28
Figure 15 - Stakeholder answers to the question: ‘To what extent have funded actions resulted in the following outcomes, ultimately enhancing the capacity of Member States to manage effectively security-related risks and crises and to protect people’	30
Figure 16 - Replies to the question “In your opinion, to what extent were the results achieved by the ISF-P reached in a cost-effective manner?”	33

Figure 17 - Number of replies to the survey question “To what extent have the following points represented a challenge in managing national programmes and related application procedures?”	35
Figure 18 - Number of replies to the survey question “To what extent had the following changes in procedures introduced by the ISF-P resulted in the simplification of administrative burden for the beneficiaries of the Fund?”	42
Figure 19 - Stakeholder responses on the extent the outcomes and benefits of the projects funded under ISF-P (2014-2020) have been sustainable over time.	56
Figure 20 - Allocation of paid resources under shared management by policy field and by Member State	63
Figure 21 - Distribution of responses by stakeholder type	105
Figure 22 - Breakdown of responses by stakeholder group	107
Figure 23 - Breakdown of responses by country of origin	108
Figure 24 - Breakdown of responses by geographic scope of business	109
Figure 25 - Breakdown of responses by organisation type	109
Figure 26 - Degree to which the following points represented a challenge in managing Member States Programmes and related application procedures	111

## 1. INTRODUCTION

The Internal Security Fund – Police (‘ISF-P’ or the ‘Instrument’) was established by Regulation (EU) No 513/2014<sup>1</sup> (ISF-P Regulation) for the 2014-2020 programming period and is applicable as of 1 January 2014 to all Member States except Denmark<sup>2</sup> and the United Kingdom<sup>3</sup>.

This Staff Working Document (SWD) presents the ex-post evaluation of the ISF-P (hereafter “the Evaluation”). The purpose of this evaluation is set out in Article 57(2)(b) of Regulation (EU) No 514/2014 (Horizontal Regulation)<sup>4</sup>, which requires the Commission to carry out an ex-post evaluation by 30 June 2024 to assess the effect of the ISF-P and Horizontal Regulations following the close of the national programmes.

The deadline of 30 June 2024 was extended by one year through the amendment of the Horizontal Regulation<sup>5</sup>, following the Russian war of aggression against Ukraine on 24 February 2022. The amendment extended the implementation of ISF-P, as well as of the Internal Security Fund – Borders and Visa<sup>6</sup> and the Asylum, Migration and Integration Fund<sup>7</sup> (hereinafter, also jointly as the “Home Affairs Funds”), by one year, to allow the Member States to fully use any unspent amounts from their national programmes, and, where necessary, to swiftly revise the implementation of their programmes to address the challenges arising from the invasion of Ukraine by the Russian Federation.

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<sup>1</sup> Regulation (EU) No 513/2014 of the European Parliament and of the Council of 16 April 2014 establishing, as part of the Internal Security Fund, the instrument for financial support for police cooperation, preventing and combating crime, and crisis management and repealing Council Decision 2007/125/JHA. OJ L 150, 20.5.2014, pp. 93–111. ELI: <http://data.europa.eu/eli/reg/2014/513/oj>.

<sup>2</sup> In accordance with Articles 1 and 2 of Protocol No 22 on the position of Denmark, annexed to the TEU and to the TFEU, Denmark is not taking part in the adoption of this Regulation and is not bound by it or subject to its application. In accordance with Article 3 of Protocol No 21, Ireland has notified its wish to take part in the adoption and application of Regulations (EU) No 513/2014 and 514/2014.

<sup>3</sup> In accordance with Articles 1 and 2 of Protocol No 21 on the position of the United Kingdom in respect to the area of freedom, security and justice, annexed to the TEU and to the TFEU, the United Kingdom is not taking part in the adoption of this Regulation and is not bound by it or subject to its application.

<sup>4</sup> Regulation (EU) No 514/2014 of the European Parliament and of the Council of 16 April 2014 laying down general provisions on the Asylum, Migration and Integration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management. OJ L 150, 20.5.2014, pp. 112–142. ELI: <http://data.europa.eu/eli/reg/2014/514/oj>

<sup>5</sup> Regulation (EU) 2022/585 of the European Parliament and of the Council of 6 April 2022 amending Regulations No 514/2014 laying down general provisions on the Asylum, Migration and Integration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management, (No) 516/2014 establishing the Asylum, Migration and Integration Fund and (EU) 2021/1147 establishing the Asylum, Migration and Integration Fund. OJ L 112, 11.4.2022, pp. 1–5. ELI: <http://data.europa.eu/eli/reg/2022/585/oj>

<sup>6</sup> Regulation (EU) No 515/2014 of the European Parliament and of the Council of 16 April 2014 establishing as part of the Internal Security Fund, the instrument for financial support for external borders and visa and repealing Decision No 574/2007/EC. OJ L 150, 20.5.2014, pp. 143–167. ELI: <http://data.europa.eu/eli/reg/2014/515/oj>

<sup>7</sup> Regulation (EU) No 516/2014 of the European Parliament and of the Council of 16 April 2014 establishing the Asylum, Migration and Integration Fund, amending Council Decision 2008/381/EC and repealing Decisions No 573/2007/EC and No 575/2007/EC of the European Parliament and of the Council and Council Decision 2007/435/EC, OJ L 150, 20.5.2014, p. 168-194, ELI: <http://data.europa.eu/eli/reg/2014/516/2022-04-12>.

The Evaluation covers the period from 1 January 2014 to 30 June 2024. The material scope covers activities under the three existing management modes: shared management, direct management and indirect management. The geographical scope includes all ISF-P participating Member States, i.e. all Member States except Denmark and the United Kingdom<sup>8</sup>. The material scope of the evaluation covers activities under the three existing management modes: shared management, direct management and indirect management.

The Evaluation primarily focuses on assessing the main evaluation criteria of effectiveness, efficiency, relevance, coherence, complementarity, EU added value, sustainability, simplification and reduction of administrative burden. The evaluation questions, as well as the result and output indicators to be used in this evaluation<sup>9</sup>, were defined in the Commission Delegated Regulation (EU) 2017/207<sup>10</sup> setting out a common monitoring and evaluation framework for the 2024-2020 programming period applicable to the ‘Home Affairs Funds’.

The Evaluation is based on ten evaluation questions organised around these eight evaluation criteria<sup>11</sup>, as follows:

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<sup>8</sup> The ISF-P Regulation is based on legal bases under Title V of Part Three TFEU, concerning the area of freedom, security and justice. As a consequence, the application of the Regulation to Denmark, the United Kingdom and Ireland is subject to the provisions laid down in Protocol No 21 and Protocol No 22 annexed to the TEU and the TFEU. In accordance with Articles 1 and 2 of Protocol No 22, Denmark does not take part in the adoption of the ISF-P Regulation and is not bound by or subject to its application. In accordance with Articles 1 and 2 of Protocol No 21, the United Kingdom and Ireland do not take part in the adoption of the ISF-P Regulation and are not bound by or subject to its application. Pursuant to Article 3 of Protocol No 21, Ireland notified its wish to take part in the adoption and application of the ISF-P Regulation.

<sup>9</sup> There was no obligation to report on core indicators for direct and indirect management during the 2014-2020 programming period.

<sup>10</sup> Commission Delegated Regulation (EU) 2017/207 of 3 October 2016 on the common monitoring and evaluation framework provided for in Regulation (EU) No 514/2014 of the European Parliament and of the Council laying down general provisions on the Asylum, Migration and Integration Fund and on the instrument for financial support for police cooperation, preventing and combating crime and crisis management. OJ L 33, 8.2.2017, pp. 1–13. ELI: [http://data.europa.eu/eli/reg\\_del/2017/207/oj](http://data.europa.eu/eli/reg_del/2017/207/oj)

<sup>11</sup> The Evaluation questions are developed in Annex III. Evaluation matrix.

<b>Effectiveness</b>	<ul style="list-style-type: none"> <li>• How did the Fund contribute to the achievement of Specific Objective – fight against crime?</li> <li>• How did the Fund contribute to the achievement of Specific Objective – risk management?</li> </ul>
<b>Efficiency</b>	<input type="checkbox"/> Were the general objectives of the Fund achieved at reasonable cost?
<b>Relevance</b>	<input type="checkbox"/> <input type="checkbox"/> Did the objectives of the interventions funded by the Fund correspond to the actual needs?
<b>Coherence</b>	<input type="checkbox"/> Were the objectives set in the national programme Fund coherent with the ones set in other programmes funded by EU resources and applying to similar areas of work? <input type="checkbox"/> Was the coherence ensured also during the implementation of the Fund?
<b>Complementarity</b>	<ul style="list-style-type: none"> <li>• 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?</li> </ul>
<b>EU Added Value</b>	<input type="checkbox"/> Was any value added brought about by the EU support?
<b>Sustainability</b>	<ul style="list-style-type: none"> <li>• Are the positive effects of the projects supported by the Fund likely to last when the support from ISF-P will be over?</li> </ul>
<b>Simplification</b>	<input type="checkbox"/> Were the Fund management procedures simplified and the administrative burden reduced for its beneficiaries?

## 1.1. Policy context and development

Article 67 of the Treaty on the Functioning of the European Union (TFEU) sets out that the European Union (EU) shall constitute an area of freedom, security and justice and shall endeavour to ensure a high level of security. The objective of ensuring a high level of security is to be achieved inter alia through measures to prevent and combat crime, measures for coordination and cooperation between law enforcement authorities and other Member States' national authorities (including coordination and cooperation with relevant Union agencies and other relevant Union bodies, and with relevant third countries and international organisations).

The Internal Security Strategy for the European Union ('2010 Internal Security Strategy'), adopted by the Council in February 2010<sup>12</sup>, constituted a shared agenda for tackling common internal security challenges for the 2010-2015 period. This Strategy's principles and guidelines were later translated into concrete actions by the Commission Communication of 22 November 2010 entitled 'The EU Internal Security Strategy in Action: Five steps toward a more secure Europe'<sup>13</sup>.

For the 2015-2020 period, the Commission, the Council and the European Parliament defined common priorities as set out in the European Agenda on Security of April 2015<sup>14</sup>. The common priorities set out in the European Agenda were reaffirmed by the Council in the renewed Internal Security Strategy of June 2015 and by the European Parliament in its

<sup>12</sup> 7120/10.

<sup>13</sup> COM(2010) 673 final

<sup>14</sup> COM(2015) 185 final.

Resolution of July 2015, namely by preventing and combating terrorism and radicalisation, serious and organised crime and cybercrime.

To achieve an effective high level of internal security throughout the EU, Member States were provided with adequate financial support from the Union. The first EU funding for internal security purposes was the Framework Programme on Police and Judicial Cooperation in Criminal Matters (AGIS)<sup>15</sup> running between 2003-2007, which was later followed by the General Programme on Security and Safeguarding Liberties covering the Specific Programmes ‘Prevention of and Fight against Crime’<sup>16</sup> (ISEC) and ‘Prevention, Preparedness and Consequence Management of Terrorism and other Security related risks’<sup>17</sup> (CIPS) during the 2007-2013 programming period. These programmes were adopted during the pre-Lisbon intergovernmental period of EU police and security cooperation based on Articles 30, 31 and 34(2)(c) of the Treaty on European Union.

In particular, the ISF-P was established for the 2014-2020 programming period with the objective to support measures aimed at preventing and fighting serious and organised crime, terrorism and radicalisation, corruption and cybercrime, and at assisting and protecting victims of crime.

Funding from the EU budget focuses on actions for which Union intervention can bring greater added value compared with action by Member States alone.

The figure below presents the main stages in the development of EU support to the Home Affairs policy areas of migration, border management and internal security from 2002 through 2027.

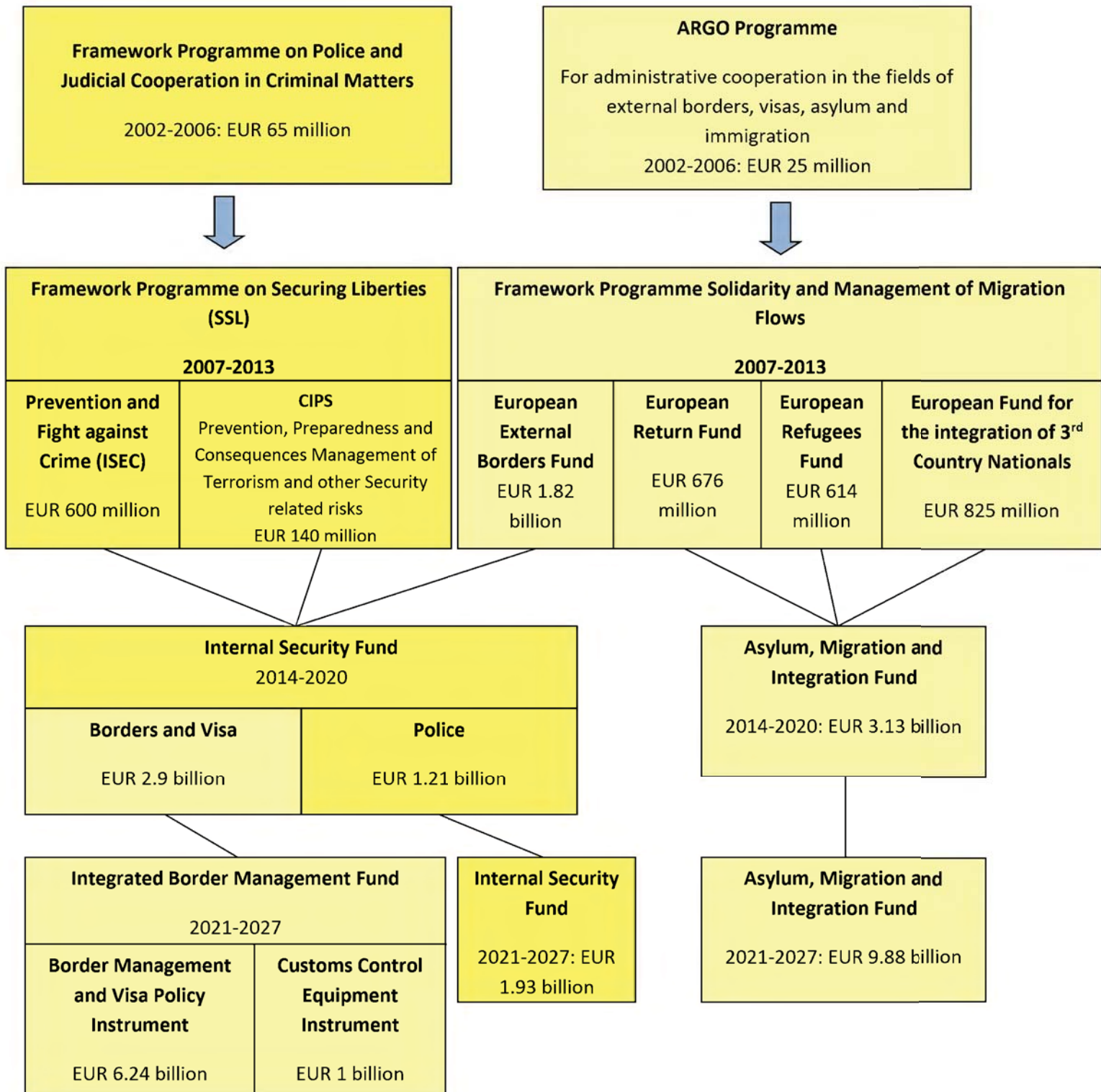
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<sup>15</sup> Council Decision 2002/630/JHA.

<sup>16</sup> Council Decision No 2007/125/JHA.

<sup>17</sup> Council Decision 2007/124/EC.

Figure 1 - Development of Home Affairs Funds



## 1.2. Methodology

The preparatory work for this Evaluation was conducted by a consortium led by ECORYS on behalf of the Commission. The methodology used primary and secondary data collection as well as quantitative and qualitative methods. Data collection included scoping interviews, desk research and targeted consultations (i.e. interviews with stakeholders, targeted surveys and focus groups). It included data analysis concerning country and thematic case studies to provide additional input for the analysis of the different Instrument components. The data collected were triangulated to validate consistency across sources and provide well-founded insights and responses to the evaluation questions. A complete description of the methodology applied is included in Annex I.

As the Commission was also requested to provide a mid-term evaluation report of the successor of the ISF-P, the Internal Security Fund (ISF)<sup>18</sup>, by December 2024, the Commission decided to carry-out both the evaluations of the ISF-P (ex post) and ISF (mid-term) simultaneously, to facilitate the exchange of information and the use of common findings and analysis.

## 1.3. Limitations

The evaluation faced challenges related to data quality, availability, and consistency across Member States. Differences in the level of detail in the Annual Implementation Reports, Final Implementation Reports and national ex-post evaluations made cross-country comparisons difficult. Data on result and impact indicators transmitted by the Member States via System for Fund Management in the European Union (SFC2014) included a number of omissions, clerical errors, and revealed differences in how Member States interpret, measure and report data. Additionally, turnover within key stakeholders impacted institutional memory and the continuity of information. To address these challenges, the study applied triangulation methods and cross-referenced multiple sources.

## 2. WHAT WAS THE EXPECTED OUTCOME OF THE INTERVENTION?

### 2.1. Description of the ISF-P and its objectives

The Internal Security Fund for the 2014-2020 programming period is a comprehensive financing framework composed of two separate acts setting up the different Instruments of the Fund and laying down the objectives, eligible actions and envelopes of each component<sup>19</sup>:

- Regulation (EU) No 513/2014 setting up, as part of the Fund, the component for police co-operation, preventing and combating crime, and crisis management (ISF-P);
- Regulation (EU) No 515/2014 setting up, as part of the Fund, the border management and common visa policy component (ISF-BV).

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<sup>18</sup> Regulation (EU) 2021/1149 of the of the European Parliament and of the Council of 7 July 2021 establishing the Internal Security Fund.

<sup>19</sup> COM(2011) 753 final.

The general objective of the ISF-P is to contribute to ensuring a high level of security within the Union. Within this objective, the Instrument shall contribute to the following two specific objectives<sup>20</sup>:

**‘Specific Objective – fight against crime’:** crime prevention, combating cross-border, serious and organised crime including terrorism, and reinforcing coordination and cooperation between law enforcement authorities and other national authorities of Member States, including with Europol or other relevant Union bodies, and with relevant third countries and international organisations

**‘Specific Objective – risk management’:** enhancing the capacity of Member States and the Union for managing effectively security-related risks and crises and preparing for and protecting people and critical infrastructure against terrorist attacks and other security-related incidents.

## 2.2. Intervention logic

The Intervention Logic forms the basis of the evaluation framework and shows the overall general, specific and operational objectives as well as the expected intermediate results of the instrument.

The intervention logic includes the following components.

**Needs:** were established in response to the need to develop an area of freedom, security and justice while also effectively addressing crime and terrorism and crisis-related issues and increase cooperation and coordination between Member States.

**General objective:** these correspond to the overall objective of the ISF-P as expressed in its legal basis.

**Specific Objectives:** the specific objectives reflect the intended outcomes that are expected through the ISF-P funding. These are essentially the six core policy areas this Instrument addresses (see Section 3.1).

**Operational objectives:** the ISF-P Regulation sets out seven operational objectives<sup>21</sup>, i.e. the various actions implemented by projects funded and implemented under shared, direct and indirect management.

**Inputs:** are translated as the main funding interventions which are divided into shared management and direct/indirect management.

**Activities:** are the direct results/deliverables, which can be reflected in the implemented actions<sup>22</sup> in the form of, e.g. projects, trainings, acquisition of equipment, cooperation and coordination of law enforcement authorities.

**Outputs:** can be identified in the number of operations carried out by enforcement authorities across Member States, the number of trained or upskilled people, or the number of communication activities such as workshops, conferences or the number of EU and

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<sup>20</sup> Articles 3(2)(a) and Article 3(2)(b) of the ISF-P Regulation.

<sup>21</sup> Article 3(3) of the ISF-P Regulation.

<sup>22</sup> Article 4 of the ISF-P Regulation.

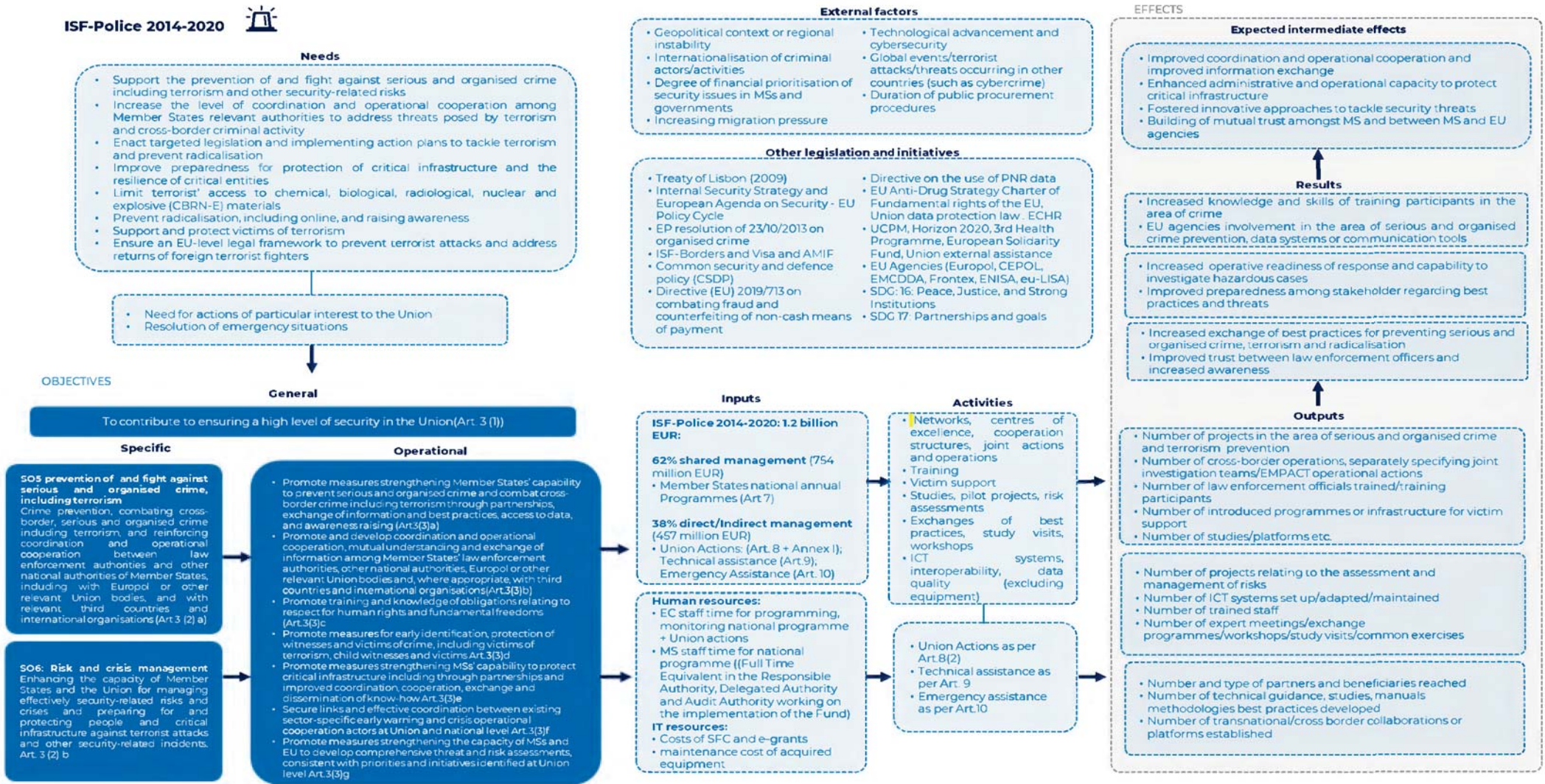
national IT systems acquired. The outputs are based on the list of common indicators outlined in the Annex II to the ISF-P Regulation.

**Results:** measure the intermediate to short-term changes and relate to the specific objectives of the intervention. The results in the intervention logic correspond to the list of common indicators for the measurement of the specific objectives listed in Annex II to the ISF-P Regulation and Annex IV(c) and (d) of the Delegated Regulation (EU) 2017/207.

**Expected intermediate effects:** are identified as short-term impacts derived by the activities introduced by the ISF-P. They are linked to the results and identified needs.

Figure 2 - Intervention Logic of the ISF-P

ISF-Police 2014-2020 



## 2.3. Points of comparison

### Comparison with ISEC and CIPS

The main benchmark of comparison for this ex-post evaluation is the performance between the ISF-P and its predecessors, i.e. the two Specific Programmes under the General Programme on Security and Safeguarding Liberties. The ex-post evaluations of CIPS and ISEC (the Programmes)<sup>23</sup> and the Impact Assessment accompanying the 2014-2020 Home Affairs Funds Regulations proposals (the '2011 Impact Assessment')<sup>24</sup> highlighted several shortcomings of the Specific Programmes design and delivery. The main structural differences between the ISF-P and its predecessors are the following:

- CIPS was established by Council Decision No 2007/124/EC<sup>25</sup>, while ISEC was established by Council Decision No 2007/125/JHA<sup>26</sup>. For the 2014-2020 programming period, the ISF-P was established by the ISF-P Regulation, and the general provisions applicable to that Regulation were laid down in the Horizontal Regulation, with the rationale to ensure a better coordination and management between the Home Affairs Funds. The Commission Delegated Regulation (EU) 2017/207 sets out the common monitoring and evaluation framework provided for in the Horizontal Regulation.
- both ISEC and CIPS were exclusively implemented under direct management via actions under the 2007-2013 Annual Work Programmes via projects supported by Commission grants, contracts for services concluded following calls for tenders published by the Commission or through administrative arrangements with the Joint Research Centre (JRC). The ISF-P interim evaluation<sup>27</sup> confirms that the administrative burden under these Programmes was significant for both the Commission and the beneficiaries. To allow Member States more equal access to funding and improve their participation, a shift towards shared management was introduced for the ISF-P, where all three management modes were applied (see Section 3.1).
- the 2011 Impact Assessment concluded that more flexibility would be needed in the area of internal security, as CIPS and ISEC did not cover emergency measures in crisis situations where flexibility is key in view that certain events require a quick and effective response at EU level (e.g. terrorist attacks, large scale cyber-attacks and mass counterfeiting of the Euro). The ISF-P introduced the Emergency Assistance (EMAS) which is an emergency response mechanism enabling the EU to release funding for the rapid deployment of financial support.
- the ex-post evaluations of CIPS and ISEC reported that an absence of technical assistance budget has negatively affected the effectiveness of the Programmes. To

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<sup>23</sup> SWD(2018) 331 final and SWD(2018) 332 final, respectively.

<sup>24</sup> SEC(2011) 1358 final.

<sup>25</sup> Council Decision of 12 February 2007 establishing for the period 2007 to 2013, as part of General Programme on Security and Safeguarding Liberties, the Specific Programme Prevention, Preparedness and Consequence Management of Terrorism and other Security related risks.

<sup>26</sup> Council Decision of 12 February 2007 establishing for the period 2007 to 2013, as part of General Programme on Security and Safeguarding Liberties, the Specific Programme Prevention of and Fight against Crime.

<sup>27</sup> SWD(2018) 341 final.

counter this shortcoming, the ISF-P introduced a dedicated technical assistance budget.

- the 2011 Impact Assessment identified that both ISEC and CIPS had complex, time-consuming systems which combined a multiannual framework with Annual Work Programmes. The high number of annual programmes resulted in an administrative workload for both the Commission and Member States. To increase flexibility and establish a more results-oriented approach to shared management, the ISF-P moved to multiannual programming and a single seven-year funding cycle thus removing the need to draft annual programmes and enabling projects with longer life-cycles<sup>28</sup> (see Section 4.1.3).
- the 2011 Impact Assessment identified operational limitations in the delivery mechanism of the programmes. In response, the ISF-P sought to improve reporting by introducing common indicators and a Common Monitoring and Evaluation Framework<sup>29</sup> to ensure consistent and uniform reporting across Member States. The ISF-P also introduced simplified cost options (SCOs) as a means of reducing administrative burden and improving the efficiency of the Instrument (see Section 4.1.3).
- the ISF-P benefits from a larger financial allocation compared to its predecessors, with an initial total EU contribution of ca. EUR 1 004 million for the 2014-2020 programming period compared to ca. EUR 142.17 million (CIPS) and EUR 607.36 million (ISEC) for the 2007-2013 programming period.

### **3. HOW HAS THE SITUATION EVOLVED OVER THE EVALUATION PERIOD**

#### **3.1. Overall description of the implementation set-up**

The ISF-P is implemented under shared management, direct management and indirect management. The global resources are implemented through the different components of the Instrument: national programmes of the Member States, Union Actions, EMAS and technical assistance<sup>30</sup>.

Shared management receives the largest share of the global resources, accounting for ca. 66% of the initial budget allocation. At the beginning of the programming period, Member States design their programmes (national programmes) to directly address national and EU objectives. To implement their programmes, Member States have to establish a management and control system<sup>31</sup>. The Commission follows the implementation under shared management by examining the Annual Implementation Reports<sup>32</sup> and accounts submitted once a year by the Member States.

The share of the budget managed by the Commission is subject to Annual Work Programmes which explains how the budget allocated for Union Actions and EMAS will

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<sup>28</sup> COM(2011) 753 final.

<sup>29</sup> Commission Delegated Regulation (EU) 2017/207.

<sup>30</sup> Article 5(3) of the ISF-P Regulation.

<sup>31</sup> Regulation (EU) No 514/2014, Section 2.

<sup>32</sup> Article 54 of the Horizontal Regulation.

be spent. Union Actions, EMAS and technical assistance are implemented under direct and indirect management<sup>33</sup> and account for ca. 34% of the initial budget allocation.

*Union Actions* are transnational projects or actions of particular interest to the Union concerning the general, specific and operational objectives of the ISF-P.<sup>34</sup> Union Actions are implemented under direct and indirect management.

*Emergency Assistance* has the aim of strengthening the Union's capacity to immediately react to security-related incidents or newly emerging threats to the Union<sup>35</sup>. Despite Article 5(4) of the ISF-P Regulation setting out that EMAS can be implemented under direct and indirect management, in practice, all EMAS funded during the 2014-2020 programming period have been implemented under direct management.

*Technical Assistance* should enable the Member States to support the implementation of their national programmes and assist beneficiaries in complying with their obligations and the Union acquis, and, where appropriate, cover the costs incurred by the competent authorities in third countries<sup>36</sup>. Technical assistance may be at the initiative of and/or on behalf of the Commission and at the initiative of a Member State<sup>37</sup>.

### 3.2. ISF-P Implementation: Financial Progress

The global resources of the ISF-P was **initially EUR 1 004 million**, of which:

- EUR 662 million for national programmes
- EUR 342 million for Union Actions, EMAS and Technical Assistance

The amount to the national programmes was increased by EUR 92 million owing to a top-up that took place in 2017<sup>38</sup>.

Financial progress across components and management modes is presented only in terms of EU contribution (national co-financing excluded)<sup>39</sup>.

The total allocated resources amounted to ca. EUR 1 216 million<sup>40</sup>. This includes shared management (62%) and direct/indirect management (38%), which is broken down into Union Actions (action grants and procurement), EMAS, and other actions, which include

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<sup>33</sup> Article 5(4) of the ISF-P Regulation.

<sup>34</sup> Article 8(1) of the ISF-P Regulation.

<sup>35</sup> Recital (28) of the ISF-P Regulation.

<sup>36</sup> Recital (14) of the Horizontal Regulation.

<sup>37</sup> Articles 9(1) and 9(2) of the ISF-P Regulation.

<sup>38</sup> An additional sum of EUR 70 million was added to support the Implementation Plan for Directive (EU) 2016/681<sup>38</sup> on the use of passenger name record (PNR) data, the so-called 'PNR top-up', and EUR 22 million was directed at the development of information exchange and interoperability tools. DB2021.

<sup>39</sup> Through this document, the following terminology is used when it comes to financial progress:

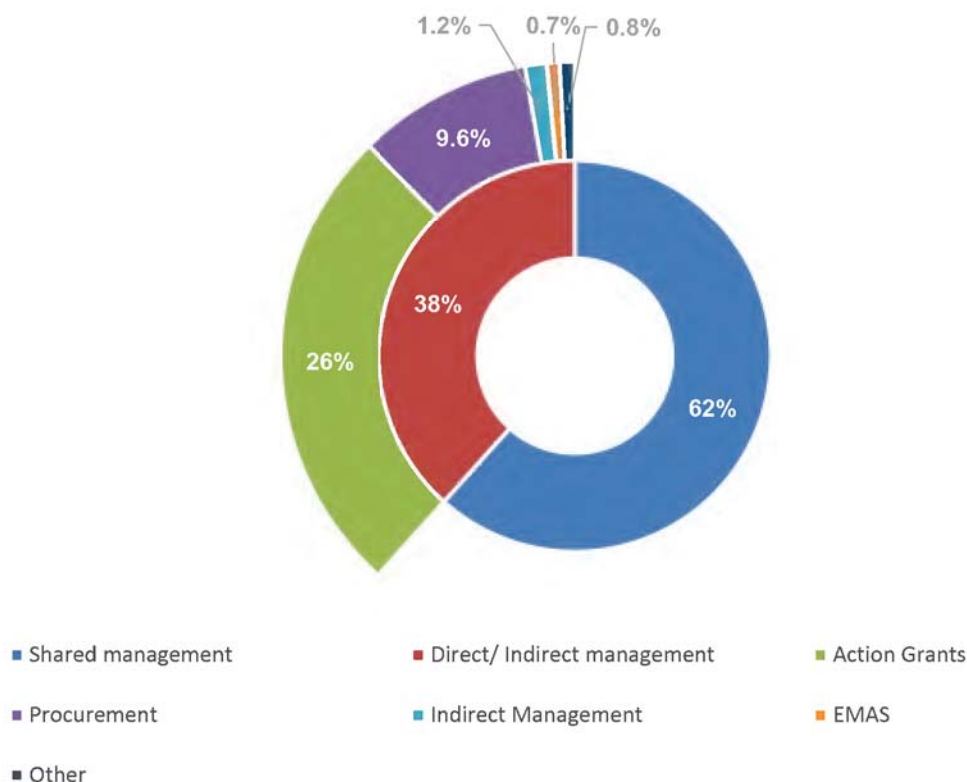
*Allocated resources* correspond to the resources that have been designated to each Specific Objective and each Member State. They represent the programming stage of the ISF-P.

*Committed resources* represent, in broad terms, the commitment of resources to the beneficiaries, i.e. to those responsible for initiating/ implementing the operations. In shared management, this corresponds to the eligible cost of operations that have been selected for support by the Responsible Authorities. For direct and indirect management, it corresponds to the value of grants, contracts or agreements with beneficiaries, contractors and partner entities.

<sup>40</sup> The amount of EUR 1 216 million is calculated as the sum of the shared management allocations, based on the latest national programmes adopted and shared with the consortium by the Commission; and direct and indirect management allocations, derived from the sum of the latest revised Annual Work Programmes.

administrative arrangements with the JRC and or procurements by the Directorate-General for Digital Services (DIGIT) and the Statistical Office of the European Union (Eurostat) under cross-delegated ISF-P funds.

Figure 3 - Total allocation of the ISF-P



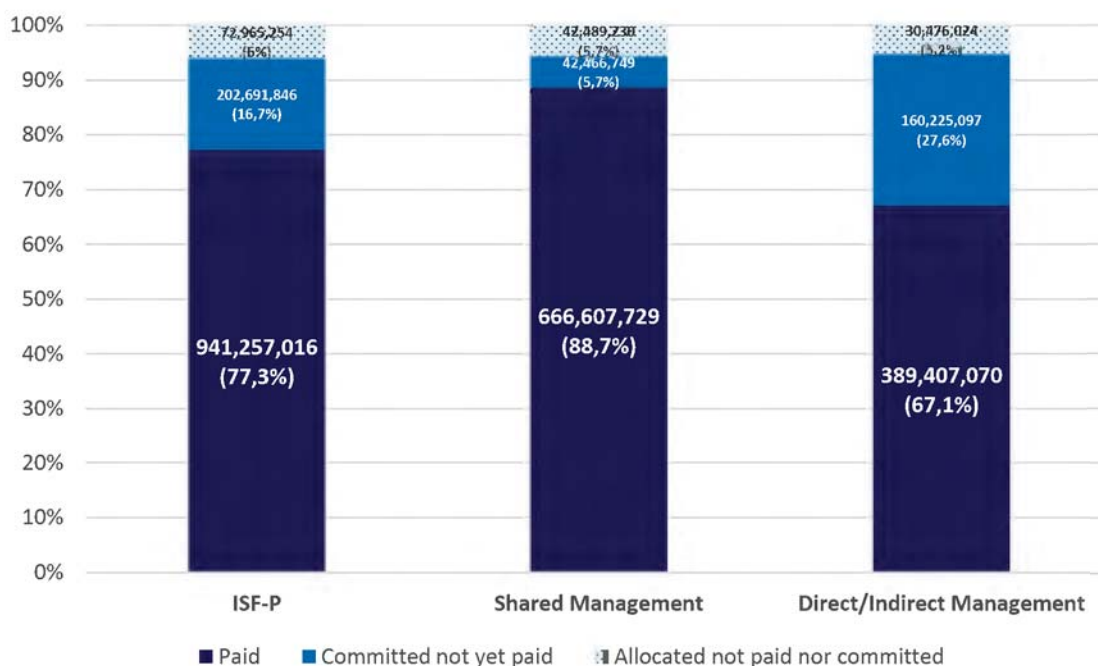
Source: Annual Work Programmes and National Programmes

At the level of the ISF-P, 77.3% have been disbursed by the Commission.

Under *shared management*, 88.7% of resources have already been paid to Member States. However, as closure of the national programmes is ongoing, this percentage is expected to rise and could virtually reach 100% once the process is complete.

In turn, under *direct and indirect management*, only 59% of the total resources have been paid. It should be noted that the relatively lower percentage under direct management may partially result from differences in reporting timelines and the availability of the most recent data – thus, the financial progress may likely be higher than currently reflected.

Figure 4 - Financial Progress of the ISF-P: Distribution of Allocated, Committed and Paid Resources by Management Mode in EUR



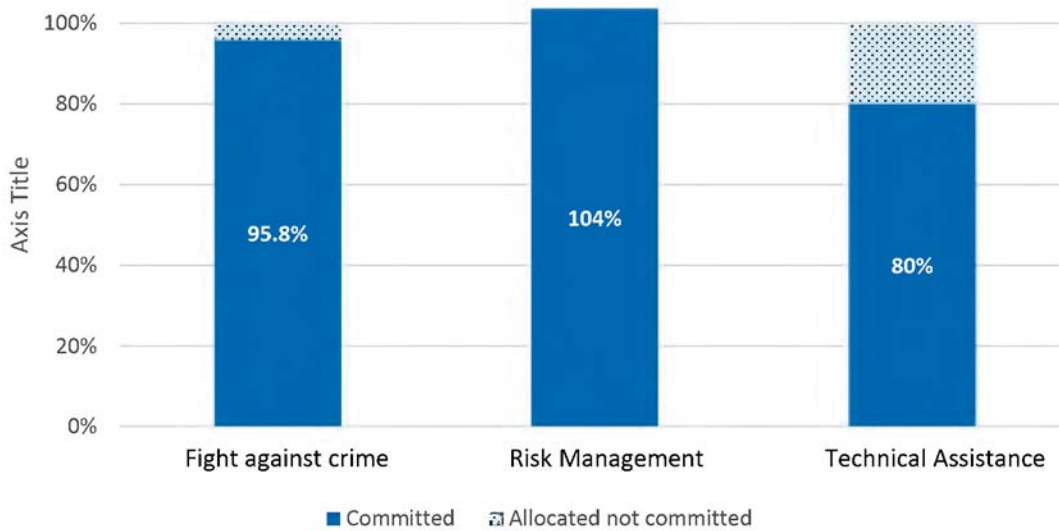
Source: Preparatory study

### Implementation under shared management

Figure 5 indicates strong financial progress under shared management, with ‘Specific Objective – fight against crime’ and ‘Specific Objective – risk management’ demonstrating implementation rates (the proportion of resources committed compared to the resources allocated) of 95.8% and 104%, respectively. An implementation rate over 100% suggests that commitments surpassed initially planned allocations, which may occur where Member States committed to operations above the initial funding ceilings by using additional national resources to cover the expenses.

In turn, the financial implementation rate for technical assistance is slightly lower at 80%, possibly due to limited administrative capacity. The comparatively higher implementation rate for ‘Specific Objective – fight against crime’ and ‘Specific Objective – risk management’ suggests that technical assistance may not have been treated as a priority by Member States.

Figure 5 - Implementation rate per Specific Objective under shared management

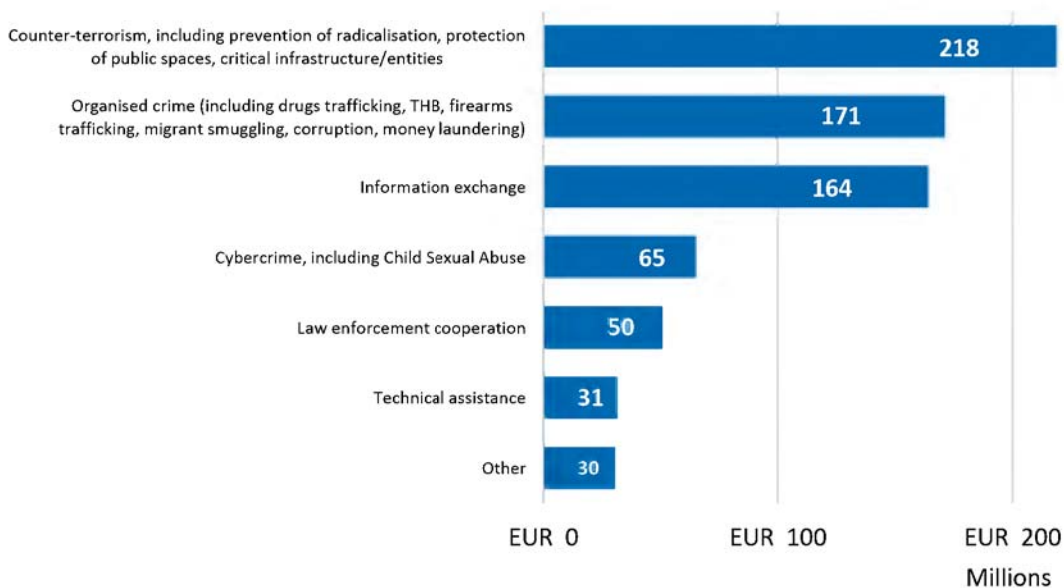


Source: Preparatory study based on SFC2014 data as of 10 February 2025

The policy field with the highest amount of paid resources (ca. EUR 218 million) is counter-terrorism (incl. measures to prevent radicalisation and safeguard public spaces and critical infrastructure), followed by preventing and combating organised crime (ca. EUR 170 million) and information exchange (ca. EUR 164 million).

Certain initiatives did not fully align to a specific policy field and were thus categorised under “other actions”, and include measures such as victim support or the acquisition of specialised equipment (EUR 30 million).

Figure 6 - Allocation of paid resources by policy field in shared management

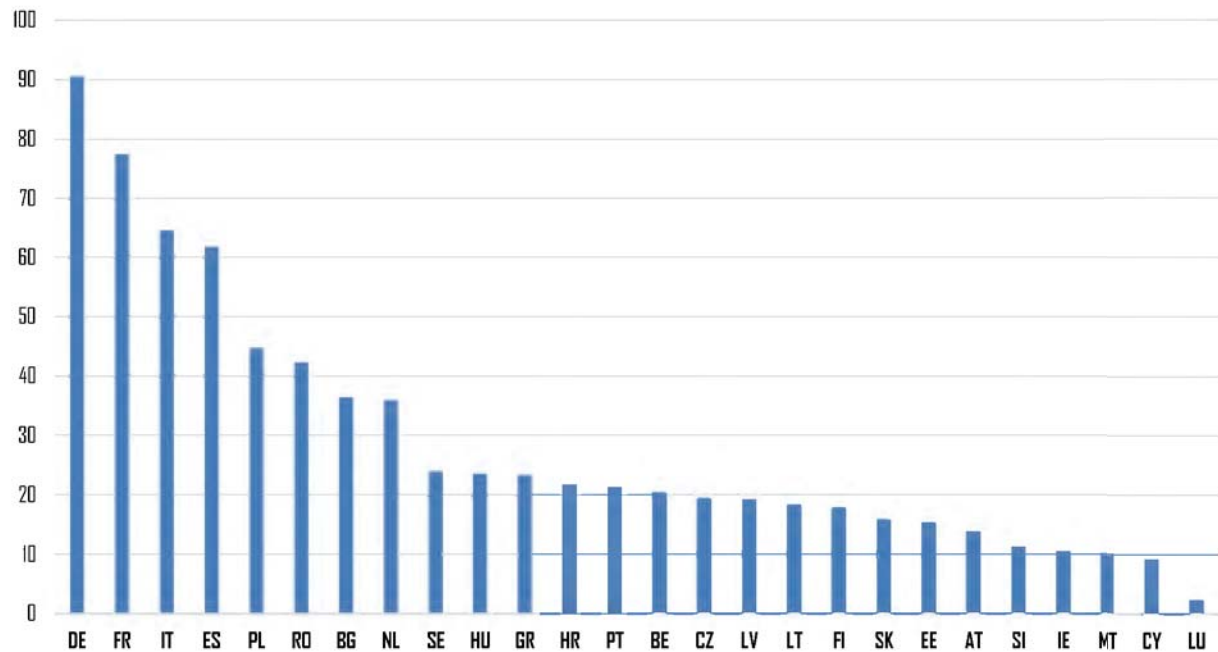


Source: Preparatory study based on SFC2014 data as of 15 March 2025

### ***Implementation at the national programme level***

Within shared management, the largest Member States (Germany, France, Italy and Spain) show the highest amount of allocated resources (39% of the total).

*Figure 7 - Total allocated resources by Member State (EUR in millions)*



*Source: Preparatory study based on the most recent national programmes (10 February 2025).*

**National programmes show significant differences in prioritisation<sup>41</sup>** to ‘Specific Objective – fight against crime’ and ‘Specific Objective – risk management’.

For ‘Specific Objective – fight against crime’, the allocated EU average is 74.6%, and it was prioritised by all Member States (Luxembourg excepted). Ireland (91.1%), Malta (88.7%), and Czechia (87.5%) show the highest level of prioritisation.

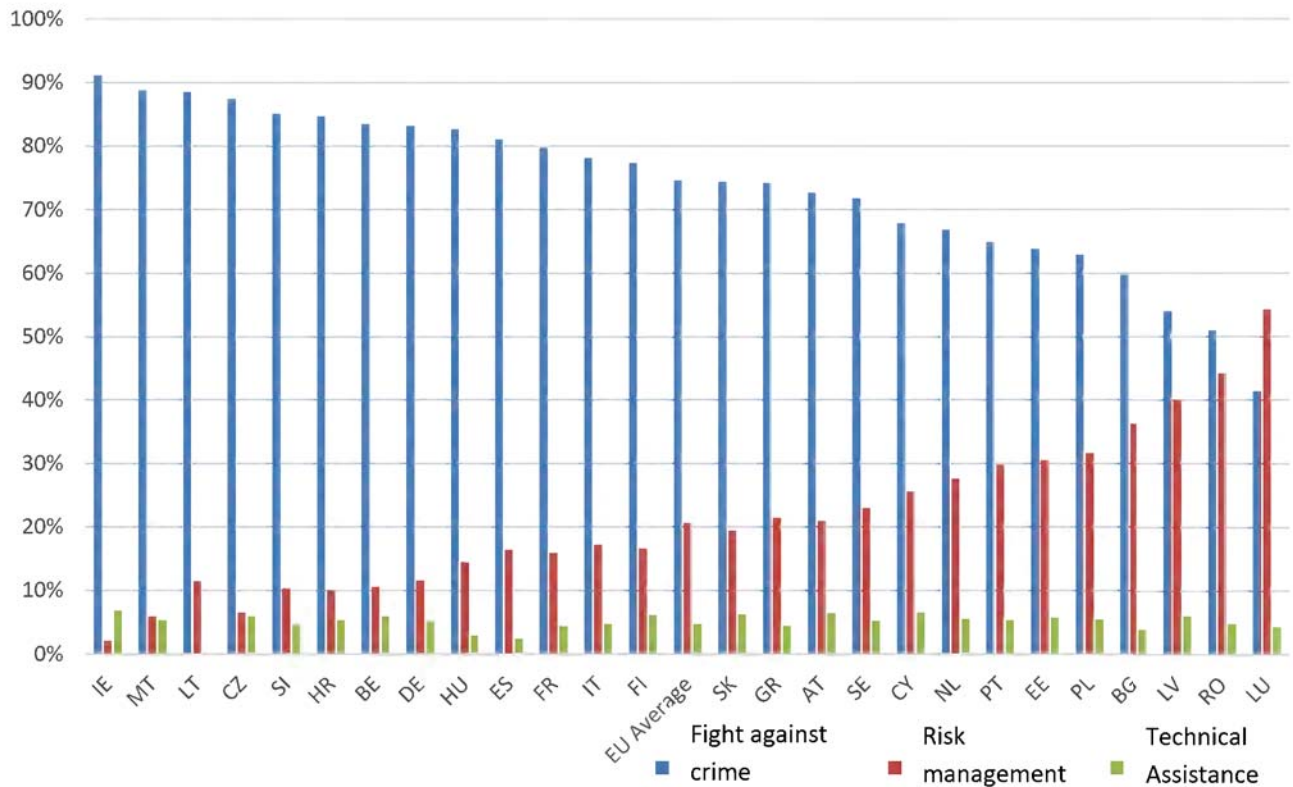
For ‘Specific Objective – risk management’, the allocated average is 20.6%. Ireland (2.1%), Malta (5.9%) and Czechia (6.5%) each allocated under the minimum threshold of 10%<sup>42</sup>, while Croatia (10%), Slovenia (10.3%), Belgium (10.5%), Lithuania (11.4%), and Germany (11.6%) barely met or slightly exceeded this threshold.

By contrast, technical assistance, was distributed quite evenly across the Member States with an average of 4.8%, with only five Member States exceeding 6% (IE, FI, SK, AT and CY). Despite some Member States exceeding the 5% threshold, the committed amounts remain below the legal ceiling of 5% of total allocation plus EUR 200 000.

<sup>41</sup> It should be noted that the level of prioritisation of the ISF-P to a certain Specific Objective is complementary to the policy fields/objectives prioritised by national budgets.

<sup>42</sup> Article 5(6)(b) of the ISF-P Regulation.

Figure 8 - Distribution of ISF-P allocated resources by Specific Objective across Member States



Source: Preparatory study on the national programmes

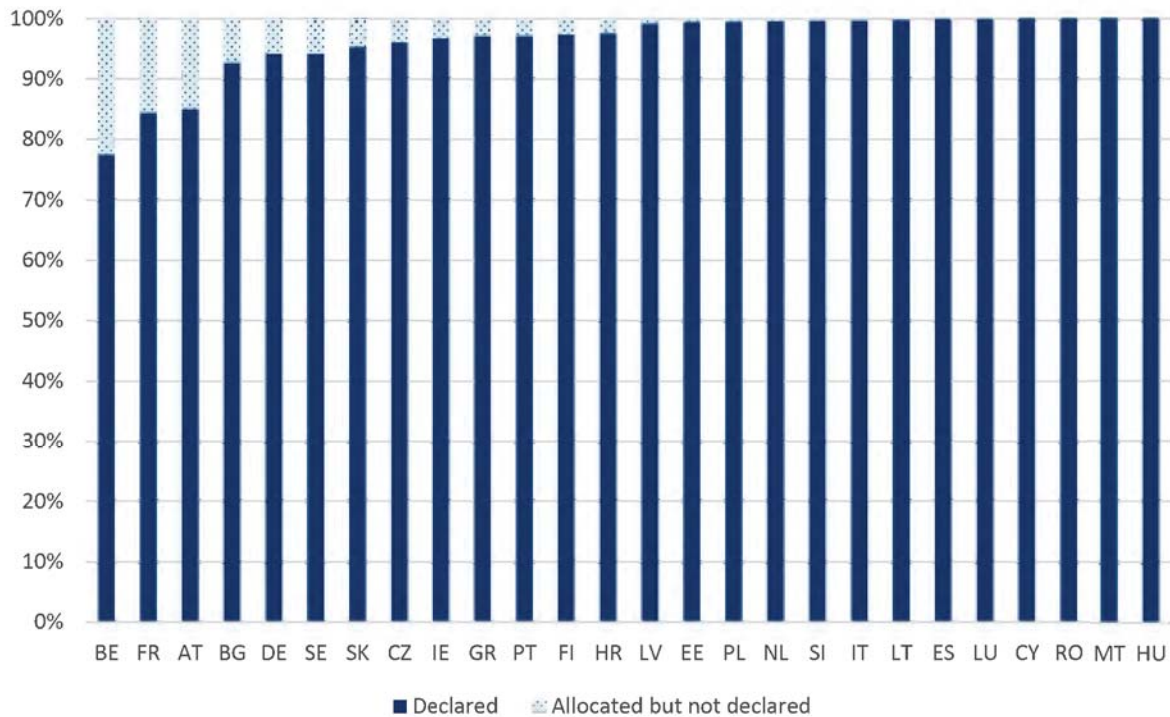
In terms of the instruments' effective implementation, several participating Member States have very high absorption rates<sup>43</sup>.

The majority of the Member States (20) have absorption rates over 95%, and only three Member States remain below 90%, i.e. Belgium (77.5%), France (84.5%) and Austria (85%).

Cyprus, Romania, Malta and Hungary have absorption rates over 100%, i.e. these member States committed to operations above the initial funding ceilings, using additional national resources to cover the expenses.

<sup>43</sup> The proportion of resources paid by the Commission to the Member State compared to the initial allocations per Member State.

Figure 9 - Absorption rate per Member State

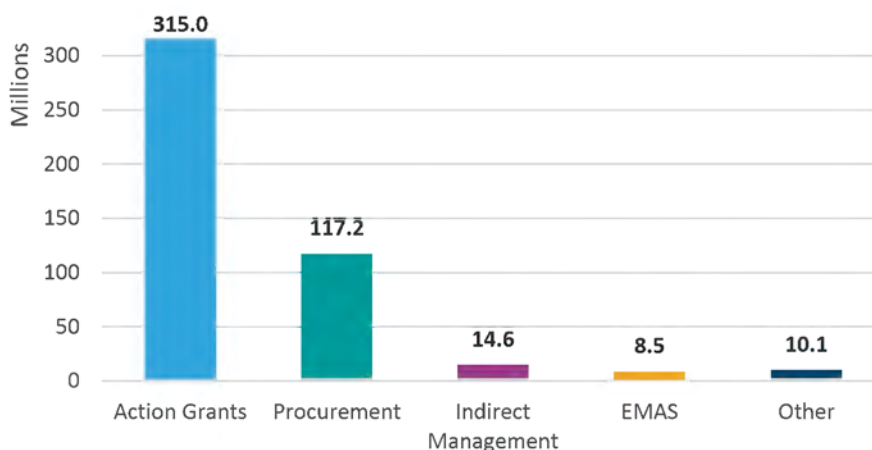


Source: Preparatory study based on SFC2014 data of 10 February 2025

### Implementation under Direct and Indirect Management

Of the ca. EUR 465.3 million allocated under direct and indirect management, 68% was channelled to action grants (EUR 315 million), ca. 25% to procurement (EUR 117.2 million), ca. 3% to indirect management (EUR 14.6 million), ca. 2% to EMAS (EUR 8.5 million) and ca. 2% to Other Actions (ca. EUR 10 million).

Figure 10 - Distribution of Allocations under Direct and Indirect Management (in millions of EUR)



Source: Preparatory study based on the most recent Annual Work Programmes, as per 10 February 2025

## 4. EVALUATION FINDINGS

### 4.1. To what extent was the intervention successful and why?

#### 4.1.1. Effectiveness

The assessment of effectiveness evaluates the extent to which the ISF-P has achieved its objectives and provides a basis for judging the role of EU action in driving the observed changes. The analysis identifies the extent of the success as well as the factors contributing to its lack or delay. Furthermore, it examined the factors driving and hindering progress and examined how they are linked to the ISF-P.

*How did the Instrument contribute to the achievement of the ‘Specific Objective - fight against crime’?*

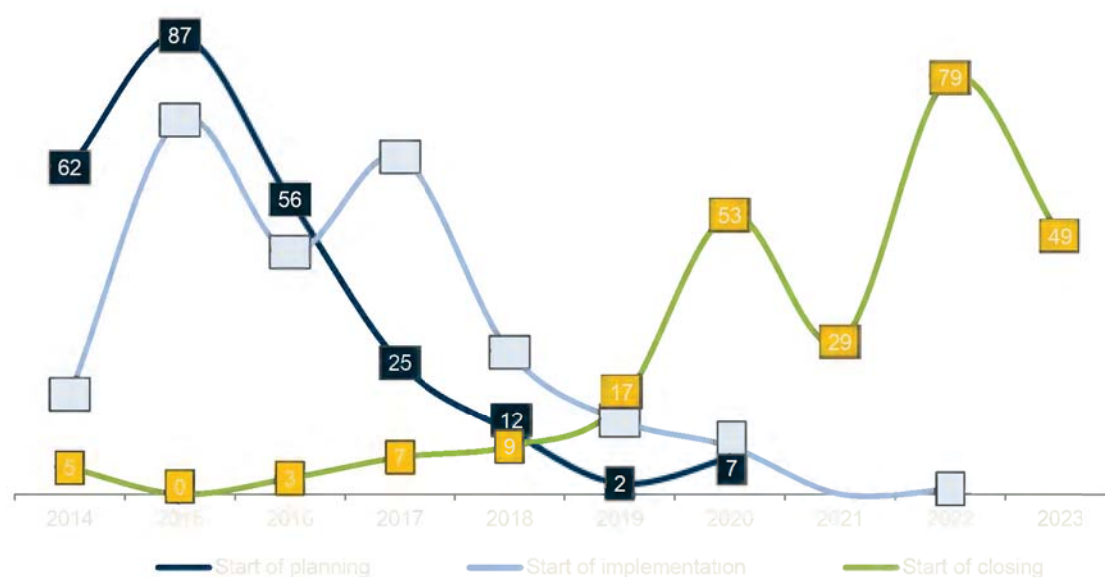
The ISF-P contributed to ‘Specific Objective – fight against crime’ by enhancing Member States’ capabilities to combat cross-border, serious and organised crime, including terrorism, through investments in modernising law enforcement tools, intelligence sharing, and cross-border operational projects such as joint investigations and training. It also reinforced cooperation between national authorities, Europol, and international partners by supporting IT interoperability, data exchange (e.g. Passenger Name Record systems), and liaison structures.

**At EU level, the combined indicator target values for most ‘Specific Objective – fight against crime’ indicators (excepting those on training) were achieved.**

At national level, depending on the indicator in question, between 5 and 13 Member States did not achieve their targets (see Table 3). Nevertheless, the national ex-post evaluation reports, and the qualitative input via surveys, public consultation, and interviews largely support the conclusion that the ISF-P positively advanced ‘Specific Objective – fight against crime’.

There were 251 actions under this Specific Objective in the 2014-2020 programming period. The planning of the actions largely started on time with ca. 60% of them having already been planned in the first two years of the programming period (149 out of 251 actions). Implementation also started promptly, with ca. 80% of actions starting between 2014 and 2017. Closing of actions took more time, as only ca. 16% of the actions were closed in the 2014-2019 period. Closure of the actions increased in 2020, but dropped in 2021, likely due to the COVID-19 pandemic. More than 50% of the actions were closed in 2022-2023.

Figure 11 – Timelines for Specific Objective – fight against crime



Source: Preparatory study based on the submitted Final Implementation Reports

Table 1 presents the distribution of actions per national objective (NO). Member States prioritised actions under the objectives ‘Prevention and combating cross-border, serious and organised crime, including terrorism’ and ‘Exchange of information’ (each NO with 72 actions) and all of them (Luxembourg excepted<sup>44</sup>) had actions under both these NOs. Actions on training were also numerous (55) with only three Member States not reporting NOs (Latvia, Luxembourg, and Malta). ‘Victim support’ (20 MS) and ‘Threat and risk assessment’ (11 MS) had the least number of actions.

Member States with the highest number of actions under ‘Specific Objective – fight against crime’ were Hungary (15), Croatia (14) and Spain/Sweden (13), while Luxembourg (3) and Latvia (5) had the lowest number of actions. On average, Member States had over 9 actions under this Specific Objective.

Table 1 - Specific Objective – fight against crime: Number of actions per national objective

National objective	Number of actions	Percentage <sup>45</sup>
NO1 - C - prevention and combating cross-border, serious and organised crime, including terrorism	72	29%
NO2 - C - exchange of information	72	29%
NO3 - C – training	55	22%
NO4 - C - victim support	32	13%
NO5 - C - threat and risk assessment	20	8%
<b>Total</b>	<b>251</b>	<b>100%</b>

Source: Preparatory study based on the submitted Financial Implementation Reports

<sup>44</sup> Luxembourg only reported actions under ‘exchange of information’ (NO2).

<sup>45</sup> Some of these percentages have been rounded up.

Table 2 – Specific Objective – fight against crime: Achievement per main indicator

Summary Indicators	Target	Achieved	% achievement	C2.1.a - Terrorism	C2.1.b - THB and sexual exploitation of women and children	C2.1.c - Illicit drug trafficking	C2.1.d - Illicit arms trafficking	C2.1.e - Money laundering	C2.1.f - Corruption	C2.1.g - Counterfeiting of means of payment	C2.1.h - Computer crime	C2.1.i - Organised crime
C1 - Number of joint investigation teams and EMPACT operational projects supported by the Fund, including the participating Member States and authorities	216	375	174%									
C2.1 - Number of law enforcement officials trained on cross-border-related topics with the help of the Fund	128 110	91 969	72%	15.6% <sup>46</sup>	5.0%	20.9%	0.3%	1.7%	7.4%	0.3%	7.2%	22.8%
C2.2 - Duration of the training (carried out) on cross-border related topics with the help of the Instrument (person days)	198 075	183 650	93%	6.4% <sup>47</sup>	2.8%	2.2%	0.1%	11.2%	5.0%	0.1%	14.4%	31.3%
C3.1 - Number of projects in the area of crime prevention	375	536	143%	24%	7%	9%	2%	6%	4%	1%	10%	37%
C3.2 - Financial value of projects in the area of crime prevention	260 436 836	415 936 901	160%	31%	2%	4%	2%	5%	2%	0%	13%	41%
C4 - Number of projects supported by the Fund, aiming to improve law enforcement information exchanges which are related to Europol data systems, repositories or communication tools (e.g. data loaders, extending access to SIENA, projects aiming to improving input to analysis work files etc.)	134	160	120%									

Source: Preparatory study based on the submitted Final Implementation Reports

The **combined indicator target values for most ‘Specific Objective – fight against crime’ indicators were achieved**. The number of joint investigation teams (JITs) and EMPACT projects, the number/value of projects in the area of crime prevention, and in aiming to improve law enforcement information exchanges were all overachieved. The indicators related to the number of law enforcement officials trained on cross-border-related topics and the duration of the training were not achieved. Nevertheless, the number of law enforcement officials trained is significant, i.e. more than 90 000.

The areas most prioritised across Member States are organised crime and terrorism (see Table 2). In terms of number of law enforcement officials trained, illicit drug trafficking were also a key area (ca. 21%). As to the number of projects and financial value of projects in crime prevention, the third most prominent area (after terrorism and organised crime) was computer crime. The least prioritised areas were counterfeiting of means of payment and illicit arms trafficking.

<sup>46</sup> The values for this indicator do not sum to 100% because there is also disaggregation according to: C2.1.j - Area of law enforcement: information exchange and C2.1.k - Area of law enforcement: operational cooperation

<sup>47</sup> *Idem*

The analysis **at Member State level** shows a more nuanced picture (see Table 3):

- While the general values show overachievement for most indicators, at Member State level, **many Member States did not manage to meet their targets per indicator**. The lowest percentage of achievement is for the indicator ‘Number of JITs and EMPACT operational projects supported by the Fund’ (35%).
- Only 11 Member States reported achievements on the indicator ‘Number of JITs and EMPACT operational projects supported by the Fund’, while 20 Member States had envisaged target values. This shows that despite the high percentage of overall achievement, the number of JITs and EMPACT projects was much lower than planned.
- The highest percentage of achievement was for indicator ‘Number of projects in the area of crime prevention’ (80%), for which all Member States had planned values and reported achievements of this indicator.
- There are considerable **discrepancies between target and achieved values**, i.e. there are several cases of overachievement of these target values, at times showing achievement of several thousand per cent.
- **Inconsistent reporting of the sub-indicators:** for instance, for indicator C1 some Member States added the sub-indicators when providing the overall value (Austria, Bulgaria, Slovenia and Slovakia) while others did not (Germany and Finland).

Table 3 - Specific Objective – fight against crime: Comments per indicator

Specific Objective – fight against crime: Summary Indicators	Comment
C1 - Number of JITs and EMPACT operational projects supported by the Fund, including the participating Member States and authorities	<p>11 Member States reported values (excluding zeros), while 20 Member States had envisaged target values.</p> <p>7 Member States achieved their targets (AT, BG, DE, FI, LT, LV, RO), while 13 Member States did not (BE, CY, CZ, ES, FR, HR, HU, IE, IT, PT, SE, SL), i.e. ca. 35% of Member States achieved their targets.</p> <p>The percentage of achievement varies significantly (from 0 to almost 2 000%).</p> <p>Austria and Germany reported 138 projects each (much higher than the planned values of 7 and 8, respectively).</p> <p>Romania reported the highest number of projects as a leader (36 out of 36), followed by Germany (14 out of 138).</p>
C2.1 - Number of law enforcement officials trained on cross-border-related topics with the help of the Fund	<p>22 Member States reported values (excluding zeros), while 24 Member States had envisaged target values.</p> <p>14 Member States achieved their targets (BG, CY, DE, EE, FI, HU, IE, LT, PL, PT, RO, SE, SK, SL), while 10 did not (AT, BE, EL, ES, FR, HR, IT, LT, LV, NL)<sup>48</sup>, i.e. ca. 58% of Member States achieved their targets.</p> <p>The percentage of achievement varies significantly (from 0 to above 1 000%).</p>

<sup>48</sup> While its target was 0, Czechia reported 703 trained staff.

	The highest number of staff trained was in Romania, Hungary and Poland.
C2.2 - Duration of the training (carried out) on cross-border related topics with the help of the Instrument (person days)	<p>21 Member States reported values (excluding zeros), while 23 had envisaged target values.</p> <p>13 Member States (BG, DE, EE, EL, ES, FR, HU, IT, LT, PL, RO, SE, SK) achieved their targets, while 10 Member States did not (AT, BE, CY, HR, IE, LU, LV, NL, PT, SL)<sup>49</sup>, i.e. ca. 57% of countries achieved their targets.</p> <p>The percentage of achievement varies significantly (from 0 to above 34,000%<sup>50</sup>).</p> <p>The highest number of person days was reported by Poland, Slovenia, and France.</p>
C3.1 - Number of projects in the area of crime prevention	<p>This indicator shows the best proximity between planning and achievements.</p> <p>25 Member States reported values (no zeros), while 25 Member States had envisaged target values (excluding LU).</p> <p>20 Member States achieved their targets, while 5 Member States did not (CY, EL, IT, PT, SI), i.e. 80% of Member States achieved their targets.</p> <p>The percentage of achievement varies (from 40% to above 800%).</p> <p>The highest number of projects was reported by Germany (61), Lithuania (56), and Spain (50).</p>
C3.2 - Financial value of projects in the area of crime prevention	<p>25 Member States reported values (no zeros), while 25 Member States had envisaged target values (excluding LU).</p> <p>18 Member States achieved their targets, while 7 Member States did not (AT, CY, CZ, IT, NL, PT, SI), i.e. 72% of countries achieved their targets.</p> <p>The percentage of achievement varies (from 2% to above 2,000%).</p> <p>The highest values of projects was reported by ES (ca. EUR 70 million), IT (over EUR 47 million), and DE (ca. EUR 40 million).</p>
C4 - Number of projects supported by the Fund, aiming to improve law enforcement information exchanges which are related to Europol data systems, repositories or communication tools	<p>20 Member States reported values (excluding zeros), while 22 Member States had envisaged target values.</p> <p>12 Member States (AT, BE, DE, EL, FI, FR, HU, LV, PL, RO, SE, SK) achieved their targets, while 10 did not (BG, CY, ES, HR, IE, IT, LT, MT, PT, SI), i.e. ca. 55% of Member States achieved their targets.</p> <p>The percentage of achievement varies significantly (from 0 to 1,000%).</p> <p>The majority of projects had the objective of improving input to analysis work files (73 projects in 15 Member States), followed by data loaders (44 projects in 11 Member States) and extending access to SIENA (20 projects in 9 Member States).</p>

Source: Preparatory study

Member States reported that cases of underachievement of some target values were due to procurement delays and the COVID-19 pandemic (particularly concerning indicators on training). Nonetheless, transitioning traditional in-person meetings to virtual meetings led

<sup>49</sup> While their target was 0, Czechia reported 2,974 and Finland – 7,158 person days.

<sup>50</sup> For this particular case, Greece reported the following in SFC 2014 “it is noted that indicator C2.2 of Specific Objective – fight against crime is reflected in seminar hours and not in man-days”, which can partially explain the very high overachievement.

to the overachievement of the number/duration of training sessions in some Member States (e.g. Hungary and Italy).

**The ISF-P significantly contributed to strengthening Member States' capacities in crime prevention, combating cross-border, serious and organised crime, including terrorism, and reinforcing cooperation between Member States.**

The national ex-post evaluation reports evidence that the ISF-P has contributed to the operational objectives<sup>51</sup> by:

- **modernising law enforcement capabilities, enhancing intelligence sharing, and improving IT infrastructure.** Examples of such projects include: a Rapid Response Mechanism to combat smuggling (Austria); expansion of the Police Information and Analysis Network (PIAV) to tackle organised crime (Germany); and improvements in biometric data sharing and surveillance through projects like Prüm (Fingerprints),<sup>52</sup> the National Surveillance Unit (Ireland); the development of an advanced Passenger Name Record (PNR) system to track airline data for terrorism prevention (Sweden); and the upgrading of forensic databases and IT systems to enhance cross-border investigations (Bulgaria).
- **significant progress in enhancing administrative and operational coordination among Member States' public authorities, Europol, with third countries and international organisations** by supporting projects advancing information exchange, law enforcement capabilities, and cross-border cooperation. Member States focused on IT system development to ensure seamless interoperability with EU information-sharing networks (DE, EE and NL) and strengthened cooperation through PNR systems and data exchange mechanisms with Europol and other partners (FI, IE and SE). The ISF-P also supported operational activities (joint investigations and training programmes), such as initiatives that fostered collaboration in combating organised crime and smuggling (AT, BE, SI); prioritizing cross-border law enforcement training and international coordination of investigations on anti-corruption and financial crime (BG and CY); and modernizing police operations and enhancing cooperation with third countries through liaison officers and joint operational centres (CZ and SK).
- **the development of training schemes aimed at enhancing technical and professional skills and knowledge of human rights and fundamental freedoms across various Member States.** Many Member States implemented law enforcement training programmes, focusing on anti-corruption, cross-border crime prevention, cybercrime, and prevention of trafficking in human beings. Austria, Belgium, and Bulgaria prioritised specialised training on organised crime, anti-corruption measures, and undercover operations, ensuring law enforcement officials were equipped with both theoretical and operational skills. Finland and Slovakia focused on cybercrime and forensic sciences, with Finland's Police University College running multiple cybercrime-related training initiatives. The Netherlands and Cyprus implemented the Law Enforcement Training Scheme (LETS) focusing on international and intercultural competencies, while Estonia and

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<sup>51</sup> Article 3(3)(a) to (d) of the ISF-P Regulation.

<sup>52</sup> PR/0002 – the Prüm (Fingerprints) project.

Czechia developed exchange programmes and conduct international missions to enhance knowledge-sharing.

- the development of measures, safeguard mechanisms, and best practices for **the identification, protection and support of witnesses and victims of crime**<sup>53</sup>. Several Member States created specialised victim support services, awareness raising and improved facilities and technical capabilities for victim protection. These measures included: witness/victim protection programme exceeded its targets (Austria), awareness raising campaign, which was coherent and supported the state-coordinated victim support service and a human trafficking advisory hotline (Estonia); anti-trafficking initiatives by which Finland launched educational projects and Ireland improved victim identification through data collection systems. Several Member States used ISF-P funds to improve facilities and technical capabilities for victim protection.

**Survey results** (Figure 12) – comprising responses from all types of stakeholders, incl. beneficiaries of projects funded under national programmes and Union Actions) – found that increased knowledge and skills of training participants in crime prevention/forensics (78%)<sup>54</sup> and growing stakeholder involvement in information sharing and data collection (74%) were seen as effective.

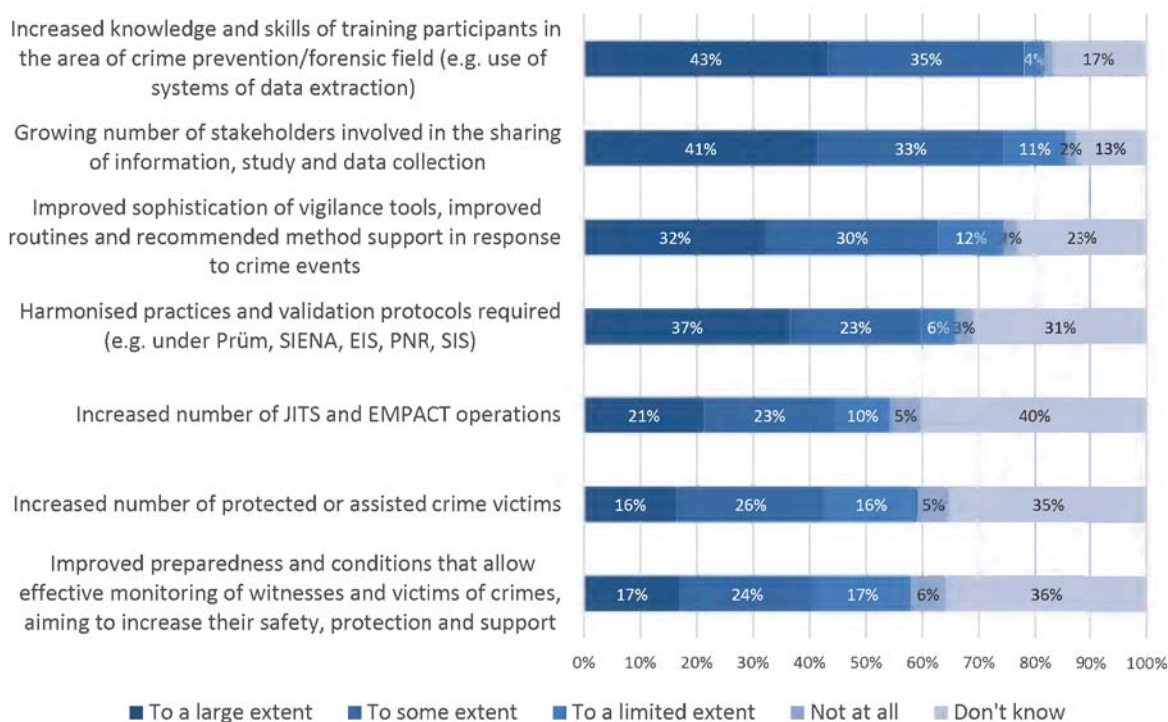
On the other hand, preparedness for monitoring witnesses and victims of crime (41%), increased number of protected or assisted crime victims (42%), increased number of JITs and EMPACT operations (44%) were rated lower in perceived effectiveness. Notably, these categories also had higher percentages of respondents who answered ‘Don't know’ (ranging from 23% to 35%), suggesting some uncertainty about their impact.

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<sup>53</sup> The extent of the implementation of this operational objective was considered lowered when compared to that of other operational objectives under Specific Objective – fight against crime.

<sup>54</sup> Combined % of “to a large extent” and “to some extent”.

Figure 12 - Stakeholder answers to the question: 'To what extent have the funded actions resulted in the following outcomes, which strengthened your country's capacities in preventing and combating cross-border, serious and organised crime, including terrorism?'



Source: Preparatory study based on the stakeholder survey

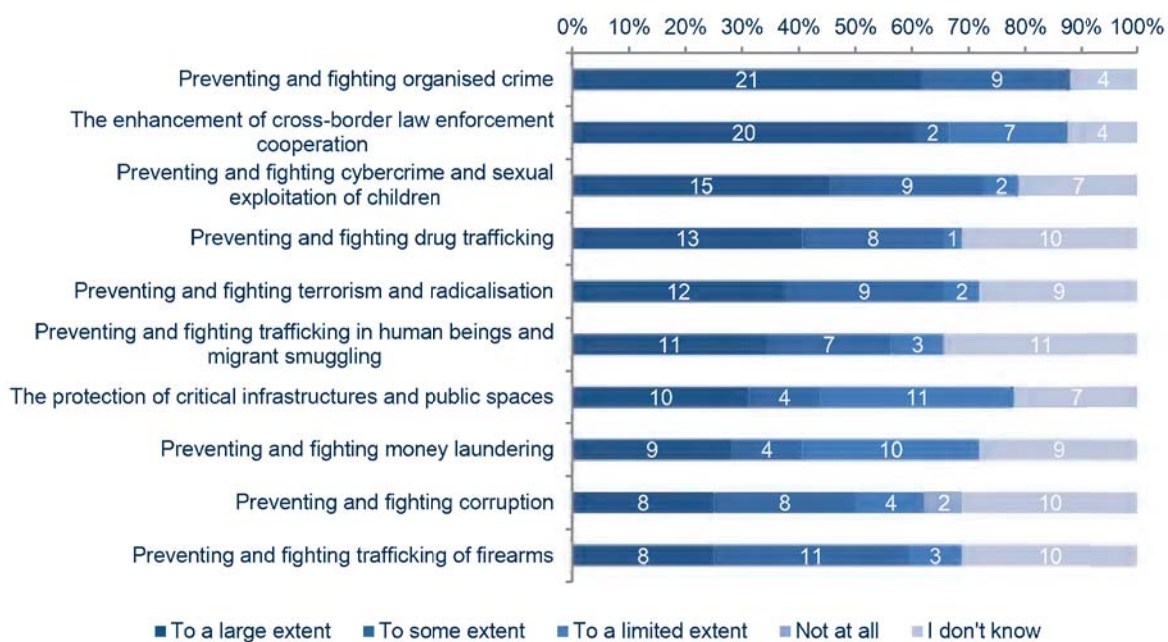
**Interviewees** noted that the funded actions have contributed to prevent cross-border, serious and organised crime and reinforce coordination among law enforcement authorities. Various projects have enhanced investigative capabilities, such as targeting car theft networks and the PNR system for tracking terrorist movements. Investments in cybersecurity, forensic services, and specialised equipment, incl. explosive disposal robots and canine units, have strengthened crime prevention and counter-terrorism efforts.

According to interviewees, cross-border cooperation was facilitated through JITs and EMPACT operations, and secure data exchange systems like the 'Explosives Control and Protection System to Prevent and Fight against Terrorism' (SCEPYLT).

**Public consultation** results (Figure 13) are also generally positive concerning the effectiveness of the ISF-P, particularly on its contribution to prevent and fight organised crime (21 responses 'to a large extent' out of 34) and to enhance cross-border law enforcement cooperation (20 responses 'to a large extent' out of 33).

Nonetheless, participants in the public consultation were less positive about the contribution of the ISF-P towards fighting corruption and money laundering (8 and 9 responses, respectively 'to a large extent' out of 32).

Figure 13 - Stakeholder answers to the question: 'To what extent do you agree that the ISF-P contributed to...'



Source: Preparatory study based on the public consultation

How did the Instrument contribute to the achievement of 'Specific Objective - risk management'?

The ISF-P contributed to 'Specific Objective – risk management' by enhancing the Member States' capacity to manage security-related risks and crises through investments in crisis management centres, early warning systems, and protection of critical infrastructure, including advancements in cybersecurity and CBRN-E threat responses.

Most indicator targets were overachieved, notably with over 1 200 tools implemented for infrastructure protection and more than 3 700 expert events organised. Similarly to 'Specific Objective – fight against crime', the national ex-post evaluation reports and stakeholder feedback confirm improved administrative and operational preparedness, inter-agency coordination, and enhanced skills of competent authorities across the EU.

There were 204 actions under 'Specific Objective – risk management' in the 2014-2020 programming period. Similarly to 'Specific Objective – fight against crime' timelines, the planning of the actions started on time with ca. 62% of them having been planned in the first two years of the programming period (126).

Implementation started somewhat slower than for 'Specific Objective – fight against crime', with ca. 69% of actions starting between 2014 and 2017. Closing of actions also took more time, as only ca. 20% of the actions were closed in the 2014-2019 period. Closure of actions was equally high in 2020 and 2022 (ca. 50%), with a significant drop in 2021 (largely due to the pandemic). More than 40% of the actions were closed in 2022-2023.

Figure 14 - Timelines of Specific Objective – risk management



Source: Preparatory study based on the submitted Final Implementation Reports

The distribution of actions per national objective was more balanced, with ‘Prevention and combating’ (20 MS) and ‘Infrastructure’ (19 MS) being the most numerous actions (42 actions each), followed by ‘Training’ (19 MS) with 39 actions. ‘Exchange of information’ was much less prominent under ‘Specific Objective – risk management’ with 20 actions.

Member States with the highest number of actions under this Specific Objective were Portugal (17), Croatia (16) and Spain (15), while Ireland (1), Luxembourg (2) and Germany (2) had the lowest number of actions. On average, Member States had close to 8 actions under ‘Specific Objective – risk management’.

Table 4 - ‘Specific Objective – risk management’: Number of actions per national objective

National objective	Number of actions	Percentage <sup>55</sup>
NO1 - R - prevention and combating	42	21%
NO2 - R - exchange of information	20	10%
NO3 - R - training	39	19%
NO4 - R - victim support	8	4%
NO5 - R - infrastructure	42	21%
NO6 - R - early warning and crisis	30	15%
NO7 - R - threat and risk assessment	23	11%
<b>Total</b>	<b>204</b>	<b>100%</b>

Source: Preparatory study based on the submitted Final Implementation Reports

The combined indicator target values for this Specific Objective were achieved (see Table 5). The target for the ‘number of tools to facilitate the protection of critical infrastructure by Member States’ was overachieved more than twice.

<sup>55</sup> Some of these percentages have been rounded up.

At national level, almost all Member States reported values for this indicator, with the exception of Belgium (0, even if 5 tools were planned), Ireland and Luxembourg (no targets and no reporting). Only six out of the 24 Member States did not achieve the targets. It should be noted that targets and reported achievements vary significantly between Member States – from 2 (Austria, Germany and Malta) to 433 (Hungary) – which is likely due to a different understanding of what “tools” precisely entail/comprise.

The **number of projects relating to the assessment and management of risks in internal security** was largely in line with what Member States’ envisaged. Twenty-two Member States reported achieved values for this indicator, even if only 20 of them had envisaged target values. Thirteen Member States achieved their targets, while 7 did not. The level of variation is lower between Member States when compared to other indicators, as the number of projects is not an indicator prone to misinterpretation.

The **number of expert meetings, workshops, seminars, conferences, publications, websites and (online) consultations** was overachieved more than 4 times, with most of these events being related to critical infrastructure protection (2 780), while 700 were dedicated to crisis and risk management<sup>56</sup>. Twenty-three Member States reported values for this indicator (different from 0), while 24 had envisaged target values. Seventeen Member States achieved or were very close<sup>57</sup> to achieve their target values. The achieved values vary significantly between Member States with some reporting in the hundreds and thousands (AT, DE, FI, PL, RO), while others reported double-digit numbers. To a large extent, the disparity can be attributed to a different understanding of what this indicator entails, but also due to its “catch-all” characteristics (it combines many different project outputs).

*Table 5 - Specific Objective – risk management: Achievement per main indicator*

Indicator	Target value	Cumulative value	% achievement
C1 - Number of tools put in place or upgraded with the help of the Instrument to facilitate the protection of critical infrastructure by Member States in all sectors of the economy	478	1 216.56	255%
C2 - Number of projects relating to the assessment and management of risks in the field of internal security supported by the Fund	109	129.1	118%
C3 - Number of expert meetings, workshops, seminars, conferences, publications, websites and (online) consultations organised with the help of the Fund	893	3759	421%

*Source: Preparatory study based on the submitted Final Implementation Reports*

At Member State level, the most frequently reported reasons for the underachievement of some target values were the restrictive measures imposed by the COVID-19 pandemic (particularly concerning face-to-face events). At the same time, only a few explanations for the deviations actually explained the reasons for the under or overachievement beyond just stating the percentage deviation (e.g. Germany and Greece). As concerns underachievement, Austria reported that the original target figures were probably

<sup>56</sup> These events do not sum to 3,759 likely due to insufficient granularity of reporting.

<sup>57</sup> Croatia and Greece with 95% achievement each.

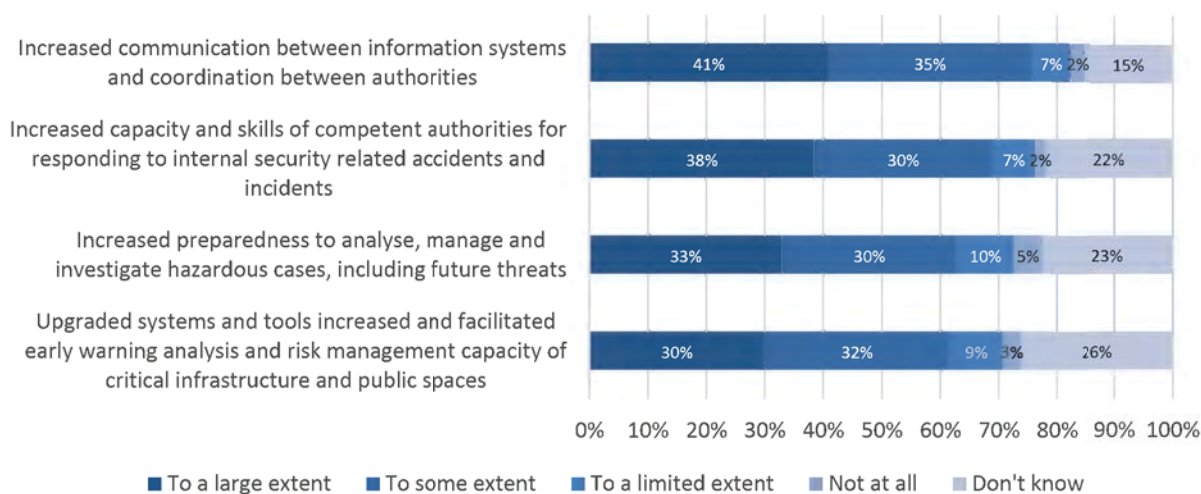
estimated too optimistically, while Poland offered the opposite argument for overachievement - the planned target values were (too) low in retrospect due to lack of practical experience and inconclusive basis in the context of data collection.

The **Final Implementation Reports** show that the ISF-P implementation under ‘Specific Objective – risk management’ contributed to enhancing crisis and risk management capabilities of the Member States. Key achievements include the establishment and modernization of crisis management centres, improved protection of critical infrastructures, advancements in cybersecurity, and the development of systems to counter CBRN-E threats. Despite challenges such as procurement delays and COVID-19 disruptions, Member States reported that most projects met their objectives.

The **national ex-post evaluation reports** evidence the same findings and highlight the significant progress across Member States in enhancing administrative and operational capacities for crisis management, critical infrastructure protection, and risk assessment. Among the key achievements reported by the ex-post evaluation reports are the establishment of early warning systems, cybersecurity centres, and specialised units such as CBRN and cybercrime centres. The reports also concluded that the concrete benefits of projects were difficult to quantify, while the defined indicators were largely met or exceeded (e.g. the evaluation of Austria).

**Survey results** (Figure 15) – comprising responses from all types of stakeholders, incl. beneficiaries of projects funded under national programmes and Union Actions) – show that stakeholders generally perceive ISF-P actions to be effective in enhancing the capacity of Member States to manage security-related risks, crises, and protect critical infrastructure. The most positively rated outcome is ‘increased communication between information systems and coordination between authorities’, with 76% of respondents rating it positively (41% "to a large extent" and 35% "to some extent"). Similarly, ‘increased capacity and skills of competent authorities for responding to security-related incidents’ received a high combined positive rating of 68%.

*Figure 15 - Stakeholder answers to the question: ‘To what extent have funded actions resulted in the following outcomes, ultimately enhancing the capacity of Member States to manage effectively security-related risks and crises and to protect people a*



Source: Preparatory study based on stakeholder survey

## *Challenges identified*

The ISF-P faced several recurring implementation challenges. One of the most common challenges was delays in project implementation due to managing **lengthy procurement procedures**, which slowed down the implementation of essential projects (e.g. the acquisition of specialised equipment for crime detection)<sup>58</sup>. In some cases, these delays were exacerbated by complex decision-making processes within public institutions which lacked sufficient personnel for administrative tasks.

The **COVID-19 pandemic** significantly disrupted project timelines, training activities, and operational measures across multiple Member States. Restrictions on travel and in-person gathering required adjustments, such as transitioning from traditional in-person to hybrid or virtual formats and/or extensions of project duration.

**Staffing shortages/issues** due to high turnover and increased workloads which delayed administrative processes, such as project approvals and payments.

Shifting geopolitical and security priorities, such as the Russian war of aggression against Ukraine, migration crises, and increasing threats from violent extremism led some Member States to reallocate resources or adapt internal security strategies during the programming period. The **war in Ukraine** had mostly indirect effects on the ISF-P implementation. Some Member States reported delays or increased costs affecting procurement, logistics, and availability of supplies and labour (Hungary, Poland and Slovakia), while others (the Netherlands, Slovakia and Latvia) highlighted increased costs for equipment and materials due to global supply chain disruptions linked both to the pandemic and the Russian war of aggression against Ukraine.

Despite these challenges, evidence did not identify major issues affecting the achievement of objectives, thus underscoring the robustness of ISF-P in addressing such obstacles.

The extension by one year of the implementation of the Home Affairs Funds pursuant to Article 1(5) of Regulation (EU) 2022/585, as a response to the Russian war of aggression, contributed to achieving the ISF-P specific objectives and was recognised by stakeholders as playing a crucial role in ensuring the effective and successful delivery of the ISF-P activities at national level.

### **4.1.2. Efficiency**

The assessment of efficiency examines the extent to which the resources used by the ISF-P are used to their best and whether the costs are strictly necessary to reach its objectives.

Based on the national ex-post evaluation reports<sup>59</sup>, interviews, surveys, public consultation and case studies, **there is a general consensus that the ISF-P supported cost-effective interventions**. The national ex-post evaluation reports<sup>60</sup> highlight that in:

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<sup>58</sup> Ex-post evaluation reports from Austria, Cyprus and Slovakia; interim evaluation reports from Croatia, Romania and Slovakia.

<sup>59</sup> Ex-post evaluations of Austria, Belgium, Bulgaria, Germany, Estonia, Finland, Hungary, Ireland, Italy, Lithuania, Luxembourg, the Netherlands, Sweden, Slovenia, and Slovakia.

<sup>60</sup> See Annex V.

**Austria**<sup>61</sup>: the Responsible Authority managed the ISF-P implementation effectively and cost-effectively. Despite measurement challenges, the Instrument's objectives were met using justified financial and human resources within the allocated budget.

**Belgium**: ISF-P-funded projects met expectations at a reasonable cost, particularly regarding planned achievements and financial and human resource efficiency.

**Bulgaria**: the ISF-P demonstrated a high level of efficiency with most objectives being met or even surpassing indicator targets, despite challenges such as delays, project cancellations, and financial constraints. While inflation and global price fluctuations affected procurement contracts, cost savings were achieved in trainings (shift from in-person to digital formats) and reduced international visits.

**Croatia**: successfully implemented its ISF-P programme with sufficient financial and human resources.

**Hungary**: the ISF-P's expected results were largely achieved at a reasonable cost.

**Ireland**: the expected results of the Instrument were generally cost-efficient. Evidence from project stakeholders and programme documentation confirmed that projects were delivered within the budget. Public procurement of equipment and services were utilised for projects such as Interpol FIND, Prüm (Fingerprint)<sup>62</sup>. Similarly, the Cyber Crime Bureau and 'Air Support Unit – Role Equipment' project also relied on competitive tendering with a focus on cost-effectiveness in procuring works, equipment, or services. Although expenditures related to the National Surveillance Unit were subject to security derogations and niche market constraints, budget constraints and close knowledge of suppliers helped maintain cost vigilance. Further efficiencies were achieved through internal training, moderate technical adaptations at no extra cost, and savings from leveraging contractors' existing expertise.

**Italy**: high implementation efficiency, projects were cost-effective as acquisitions followed public tender procedures, ensuring compliance with financial and operational standards. Human resource effectiveness was particularly evident in projects such as PASSIM 3, where flexible personnel allocation enhanced efficiency. Overall, the objectives of the ISF-P were met through a proportional deployment of financial and human resources.

**Luxembourg**: ISF-P investments were well-justified, providing benefits such as enhanced safety. The cost-benefit ratio was deemed positive, reflecting the efficient allocation of financial and human resources.

**Poland**: efficient use of funds was facilitated by a well-planned management and monitoring system. Oversight mechanisms ensured optimal financial resource allocation, leading to high cost-effectiveness.

**The Netherlands**: successfully met the ISF-P objectives at a reasonable cost. While the human resources deployed were substantial, they were considered appropriate to meet EU

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<sup>61</sup> Ex-post evaluation report and interviews with beneficiaries.

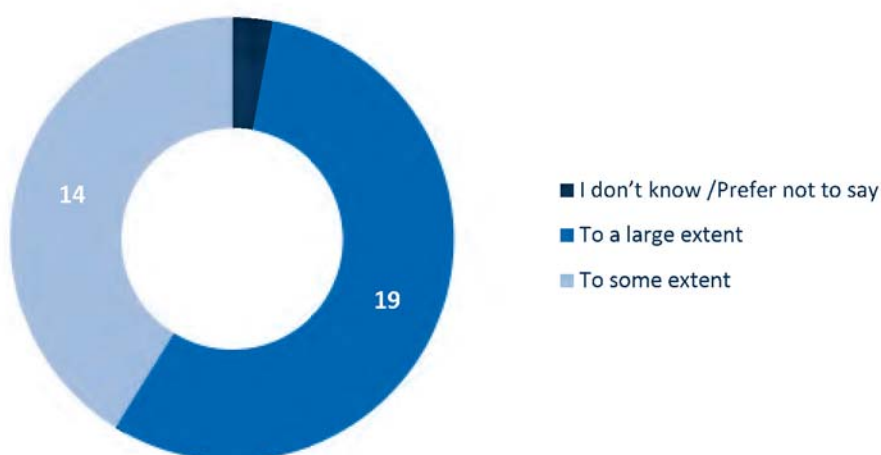
<sup>62</sup> PR/0002 – the Prüm (Fingerprints) project

project implementation standards. Union Actions beneficiaries found the investment to be proportionate to the grants received.

**Czechia, Estonia, Latvia, and Germany:**<sup>63</sup> the ISF-P national programmes were implemented efficiently, with most objectives met despite financial and administrative challenges (especially for smaller projects). These Member States prioritised larger projects (in IT and specialised equipment) to maximise funding effectiveness. Cost-saving measures, such as online training and framework agreements for procurement, contributed to overall efficiency.

The **public consultation** confirmed the findings from the national ex-post evaluation reports and interviews: overall 56% of the respondents (19 out of 34) stated that the results were achieved in a cost-effective manner "to a large extent," while 41% (14 out of 34) believed they were cost-effective "to some extent."

*Figure 16 - Replies to the question "In your opinion, to what extent were the results achieved by the ISF-P reached in a cost-effective manner?"*



*Source: Source: Preparatory study based on the public consultation*

The majority of respondents (65%), i.e. 29 out of 45, considered the administrative burden brought by the ISF-P to be proportionate to the benefits achieved.

### ***Proportionality of administrative burden***

Despite the ISF-P demonstrating strong financial management, findings across Member States revealed a mixed picture regarding administrative efficiency. Some Member States benefited from streamlined processes and flexible fund allocation, while others struggled with high administrative burden, complex procedures, and personnel constraints. Efforts to digitalise reporting, introduce Artificial Intelligence (AI) driven management tools, and reduce bureaucratic hurdles have been suggested to improve cost-effectiveness and ensure a more balanced approach to fund administration in the future.

<sup>63</sup> Interviews and ex-post evaluation reports of Member States.

**Interviews and national ex-post evaluation reports** indicate that the **administrative burden associated with the ISF-P implementation varied across Member States**, with some reporting proportionate costs while others faced challenges due to complex procedures and resource constraints.

While the implementation of the ISF-P remained effective in achieving its objectives, national ex-post evaluation reports show that there is room for further continued simplification of administrative procedures to improve cost-effectiveness. More specifically, in:

**Belgium:** highlighted a disparity between workload and funding, with only 55% of respondents considering the administrative burden proportionate to the level of financing provided.

**Bulgaria:** the management and control system functioned well, ensuring effective cooperation among bodies through clearly defined responsibilities. Although the ISF-P provided necessary financial resources, additional human resources and capacity-building were still required.

**The Netherlands:** the case study identified complexities arising from national-level requirements, leading to duplicated administrative efforts. For instance, applications for the government-wide Framework Agreement, which already included ISF-P funding requests, had to undergo multiple additional checks imposed by the Intermediary and Audit Authorities. In contrast, funding applications to the Commission (for ISF-P funding), Europol, or Horizon programmes were perceived as more transparent and straightforward.

**Germany:** the case study indicates significant challenges in recruiting staff. The internal security sector's financial needs exceeded the ISF-P budget, and costs on administrative and human resources were high. Germany called for EU-wide indicators to measure fund management efficiency and suggested improvements such as AI-driven processes, streamlined reporting and fewer control bodies.

**Malta:** project beneficiaries reported a high administrative burden, with an average of 9.2% of project budgets spent on administration. While accountability was ensured, substantial administrative costs were often absorbed by national budgets. Despite achieving the expected results, the financial and human resources was considerable, suggesting a need for simplified administrative procedures.

**Estonia:** successfully met the objectives of the Instrument at a reasonable cost, with administrative burden being proportionate except for indicator reporting. Project implementation followed planned budgets and schedules.

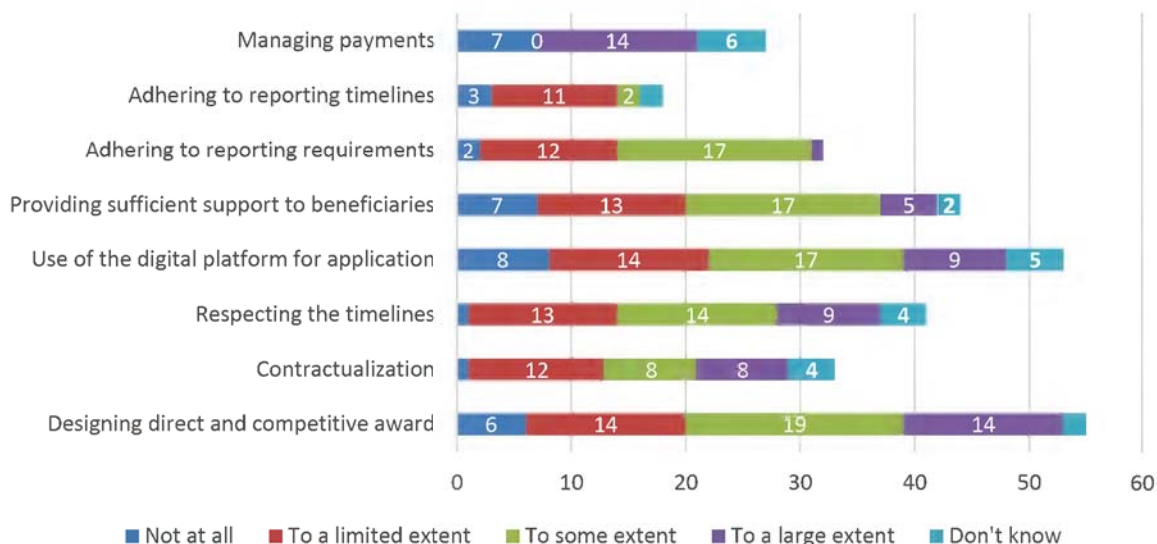
**Spain:** the case study highlights reporting challenges and challenges on preparing accounting records due to limited digitisation. To counter this, a new application, GESTIONA, was introduced to simplify documentation uploads and verifications, making fund management more efficient.

**Latvia:** experienced frequent and extensive reporting requirements under the ISF-P, making the process burdensome.

**Survey findings** (Figure 17) indicate that stakeholders who worked on the implementation of ISF-P only or of both the ISF and ISF-P, **reported mixed experiences**. Based on a total

of 53 respondents, designing direct and competitive awards was reported as challenging ‘to some extent’ by 19 respondents and ‘to a large extent’ by 14, while 6 respondents faced no challenge at all. Respecting timelines followed a similar pattern, with 13 respondents indicating challenges ‘to a limited extent’, 14 ‘to some extent’, and 9 ‘to a large extent’. The use of digital platforms was defined as challenging by 26 respondents (“To a large extent” and “To some extent”).

Figure 17 - Number of replies to the survey question “To what extent have the following points represented a challenge in managing national programmes and related application procedures?”



Source: Preparatory study based on the responses of the stakeholder survey

To estimate the average time spent on the ISF-P implementation, the number of man-days a full-time employee dedicated to the tasks was employed. Based on survey responses, the numbers vary significantly across respondents<sup>64</sup>.

- For **direct and competitive awards** (i.e. information to applicants, preparing calls and guidelines, and contractualisation), respondents indicated ca. 30 to 40 person-days required.
- For the **evaluation of proposals/projects** (screening and selecting applications) under the ISF-P, respondents indicated that the process involves between 9 to 30 person-days.
- The estimates for **monitoring programme** implementation indicate that most tasks require between 8 to 30 person-days.
- For **reporting** ISF-P activities, the majority of estimates include 20, 25, 30 and 50 man-days, i.e. 30 person-days on average.
- In terms of efficiency of time spent by beneficiaries for the **preparation of one project proposal**, most respondents reported approximately 30 to 35 person-days.

<sup>64</sup> It should be noted that the survey results presented challenges in aggregation and averaging due to differences in how questions were interpreted by stakeholders, thus, outliers were excluded.

For Union Actions, beneficiaries reported a range between 30 to 90 person-days for the preparation of one project proposal.

The perception of administrative burden in the implementation of the ISF-P varied across Member States, reflecting differences in resource availability, procedural complexity and national administrative structures. Croatia, Cyprus, Czechia and Estonia highlighted improvements in cost-effectiveness compared to the 2007-2013 programming period, attributing this to increased flexibility in fund allocation and streamlined processes. On the other hand, Germany and Malta faced significant administrative and personnel challenges, extensive reporting requirements and delays in project implementation.

Efforts to enhance efficiency, including digitalisation, simplified reporting, and cost-saving measures, have proven beneficial in some cases. Nonetheless, the **administrative workload remains a concern**, particularly for smaller projects. The diverse estimates of person-days spent on tasks, such as project preparation, monitoring, reporting, and auditing highlight the difference in administrative burden across Member States.

### *Technical Assistance*

The national ex-post evaluation reports show that the cost-effectiveness of technical assistance differ across Member States. For instance, in Germany, technical assistance does not fully cover actual costs, likely due to the country's high wages, whereas in Italy, beneficiaries expressed high satisfaction with the technical assistance highlighting their role in ensuring smooth project management and timely completion of projects.

*Table 6 - Shared management: Technical assistance absorption rate by Member State*

Member State	Absorption rate (Total accounts/NP allocation) %	Total Allocated Amount (Euro)
AT	95.24%	892.660,95
BE	57.52%	1 219.566,40
BG	97.69%	1 426.369,00
CY	100.00%	605.862,85
CZ	96.81%	1 169.777,60
DE	67.92%	4 727.667,05
EE	97.34%	874.013,45
ES	59.34%	1 540.000,00
FI	100.00%	1 093.087,40
FR	25.55%	3 398.780,37
GR	67.69%	1 033.900,00
HR	99.88%	1 154.771,00
HU	96.55%	688.643,00
IE	101.40%	716.380,00
IT	93.57%	3 031.587,05
LT	N/A <sup>65</sup>	0,00
LU	0%	102.689,00
LV	100.11%	1 164.791,45
MT	49.44%	548.955,25

<sup>65</sup> Absorption rate not calculable as allocation was zero

Member State	Absorption rate (Total accounts/NP allocation) %	Total Allocated Amount (Euro)
NL	100.00%	1.996.188,50
PL	97.56%	2.437.752,40
PT	96.47%	1.134.655,20
RO	40.70%	2.057.505,25
SE	134.24%	1.252.857,00
SI	98.16%	521.300,52
SK	99.66%	991.099,80

Source: Preparatory study

### ***Union Actions***

The case study on Union Actions shows its efficiency as projects provide significant benefits (e.g. innovative practices and training materials) which are disseminated to all Member States. If each Member State were to achieve these results individually, this would have required much larger funding.

Beneficiaries ensured efficiency by conducting market research for cost-effective products and services, regularly monitoring and adjusting budgets, adhering to national procurement procedures, and implementing cost-saving measures.

Union Actions beneficiaries<sup>66</sup> report that project outcomes were largely successful and delivered at a reasonable cost by detailed task schedules, careful planning of personnel needs, and support from the Commission. More precisely, one Union Action beneficiary<sup>67</sup> implemented several measures to maintain reasonable costs, such as remote work and cuts in office expenses, use of pro bono service where feasible, minimised travels and implementation of online or hybrid events and use of online publications instead of printed and paper formats. Project leaders made consistent efforts to adhere to EU and national regulations, with the use of subcontractors and regular financial reporting helping to ensure cost efficiency.

### ***Emergency Assistance***

The case study on EMAS evidence that beneficiaries generally found the application process simple and straightforward. EMAS applications can be initiated by any security-related incident or emerging threat which has or may have a significant adverse impact on the internal security in one or more Member States. The application requires submitting a simplified application and budget forms with an expedited review process.

Overall, the application procedure for EMAS was considered lighter and easier compared to other ISF-P proposals and applications under other funding programmes (e.g. Union Actions and Horizon 2020). No unreasonable administrative burden for implementing the project was perceived. Two EMAS stakeholders reported that administrative costs were considerably lower than those of other ISF-P funded projects.<sup>68</sup>

<sup>66</sup> Six interview with Union Actions beneficiaries were conducted.

<sup>67</sup> In-depth interviews with a beneficiary from the Netherlands.

<sup>68</sup> In-depth interviews on EMAS

The managers of four EMAS projects noted that the ISF-P Regulation and the Commission Annual Work Programmes broadly define emergencies, providing flexibility to tailor projects to specific needs, such as those following the Brussels terrorist attacks in 2016.

The EMAS projects EU-SIUTEx, EU Hotspots (Europol Guest Officers) and HORUX demonstrated strong efficiency and cost-effectiveness<sup>69</sup>.

The EU-SIUTEx project efficiently developed and implemented three information and communications technology (ICT) applications aimed at supporting Special Intervention Units in addressing terrorist threats. Two applications are fully integrated and in active use by the Belgian Federal Police, enhancing real-time communication and data accessibility. The third tool required extra time for integration but is being completed and accessible EU-wide via the ATLAS network. The project capitalised on results from a previous EU initiative (EU-ACTION), which helped streamline development efforts and avoided duplications.

The EU Hotspots project enabled the rapid deployment of 278 Guest Officers from 24 Member States to migration hotspots in Greece and Italy. By leveraging trained personnel from across the EU rather than creating new permanent structures, the project was considered highly cost-effective.

Lastly, the HORUX project minimised costs by developing tools which serve both national and EU-wide purposes and by facilitating the sharing of intelligence between Member States.

### *Measures to prevent fraud and other irregularities*

Overall, Member States agree that **Responsible Authorities effectively managed the implementation of the ISF-P**. Findings from ex-post national evaluation reports, interviews with stakeholders, and case studies highlight overarching aspects identified to prevent fraud across all Member States.

**Bulgaria:** the Responsible Authority implemented rules to manage irregularities and ensure efficient resource use.

**Croatia:** the Responsible Authority raised concerns that despite stringent control mechanisms ensuring compliance, they created additional administrative burden and made processes more rigid, potentially undermining operational efficiency. While substantial auditing complexity were observed in some cases, there was no evidence of “gold-plating” that would impose additional administrative burden on beneficiaries.

**Czechia:** ISF-P projects were audited under the same procedures as Cohesion Fund projects, making the auditing process more cumbersome than initially planned. This led to national funding programmes – which tended to have fewer requirements – being preferred over EU funding.

**Estonia:** control measures identified irregularities (negligence or lack of awareness in public procurement), but no fraud was detected. Cooperation between beneficiaries and the Responsible Authority enabled flexible and efficient project implementation.

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<sup>69</sup> Case study on EMAS.

**Finland:** the Responsible Authority assessed project costs for reasonableness before implementation and applied strong financial controls and competitive procurement processes to ensure cost-effectiveness.

**Slovakia:** effective measures were in place to prevent fraud and irregularities, although public procurement issues arose. These issues were addressed with increased controls to ensure transparency and recommendations to improve procurement processes.

**Spain:** the ISF-P Procedures Manual 2014-2020 provided detailed guidelines to prevent, detect, and manage irregularities, which were deemed sufficient and in line with Commission recommendations. These measures allowed for the identification of and addressing irregularities, particularly those related to eligibility rules with various controls and verifications to protect the EU budget.

**The ISF-P has generally demonstrated effective management and control mechanisms and were efficient in safeguarding the EU's financial interests.** Strong collaboration and clear communication between Responsible Authorities and beneficiaries were identified as key enablers of timely and cost-effective project delivery. The measures in place to prevent fraud and irregularities and the cooperation between national authorities and beneficiaries have largely contributed to the efficient use of resources.

Nonetheless, there are areas for improvement, such as the importance of achieving a balance between the need for robust oversight on the one side and streamlined administrative procedures to further operational agility (Section 4.1.3), on the other side.

#### **4.1.3. Simplification and Reduction of Administrative Burden**

This evaluation criterion assesses the extent to which the simplification and reduction of administrative burden contributed to achieving the objectives of the ISF-P.

This analysis compares the 2007-2013 to the 2014-2020 programming period noting that the ISF-P and the Horizontal Regulations have introduced several changes aimed at simplifying the ISF-P management and reducing administrative burden. The main elements are:

- the Horizontal Regulations lays down general rules necessary for enabling the implementation of all Home Affairs Funds with the aim of **ensuring better coordination and management** between them and to harmonise their procedures;
- the introduction of **multiannual programming** and a single seven-year funding cycle which increased flexibility and removed the need to drafting annual programmes and enabled projects with longer life-cycles;
- the introduction of **simplified cost options (SCOs)** and – in accordance with the principle of subsidiarity – **national rules on expenditure eligibility** by the Member States<sup>70</sup>;
- Despite simplification efforts, **control mechanisms** should remain efficient, thus guaranteeing the protection of the EU financial interests.

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<sup>70</sup> Recital (36) of the Horizontal Regulation.

Table 7 - Summary of differences affecting administrative burden between the Instruments

	CIPS and ISEC (2007-2013)	ISF-P (2014-2020)
Structure	Two Instruments addressing internal security	One Instrument
Programming cycle	Two strategic cycles (2007-2010 and 2011-2013)	A singular seven-year cycle and multiannual programming
Implementation measures		National rules on expenditure eligibility and SCOs

The vast majority of Member States<sup>71</sup> reported that these elements have streamlined processes and reduced administrative burden. Many Member States underline that despite procedures remaining cumbersome and further simplification being necessary, the ISF-P is perceived as less burdensome in comparison to the Programmes in the 2007-2013 programming period.

The following section indicates the main evidence concerning the elements introduced to simplify procedures and reduce administrative burden.

### ***Multiannual programming***

The introduction of multiannual programming aimed at making EU funding more efficient and tailored by allowing long-term planning and resource allocation for Member States<sup>72</sup>. It has been seen as a positive development and several Member States<sup>73</sup> highlighted its benefits in allowing for long-term planning, reducing administrative burden associated with annual adoptions, and increasing flexibility in fund allocation. However, a few Member States noted initial difficulties in drafting multiannual plans in line with EU indicators (Cyprus), and that while the concept was beneficial, the administrative burden remained significant due to complex implementation processes (Hungary and Slovakia).

The flexibility of national programmes was seen as a key advantage by some Member States which highlighted that more adaptable national programmes allowed for quicker responses to changing needs and facilitated efficient project adjustments (Hungary, Italy, Lithuania and Luxembourg) and emphasised that flexibility in programme design contributed to effective financial planning and minimized disruptions (Lithuania). However, Cyprus and Slovakia reported that rigid national objectives set within the programmes made mid-term adjustments difficult, adding to the administrative burden.

### ***National Eligibility Rules and Simplified Costs Options***

Several Member States<sup>74</sup> have benefited from the introduction of national eligibility rules as it has created a more flexible framework as they have been tailored to the respective specific national contexts, thus, facilitating their comprehension by beneficiaries and increasing efficiency. Nonetheless, Hungary and Slovakia indicated that the practical impact of these rules was limited as the administrative burden remained high, particularly in public procurement and personnel expenditure.

<sup>71</sup> Interviews and ex-post evaluation reports of Member States.

<sup>72</sup> Recital (7) of the Horizontal Regulation.

<sup>73</sup> Cyprus, Czechia, Finland, Ireland, Italy, Lithuania, Luxembourg, Malta, Slovakia, and Sweden

<sup>74</sup> Bulgaria, Cyprus, Italy, Lithuania, Luxembourg, Malta and Romania.

Under the framework of national eligibility rules, Member States had the option to adopt SCOs to reduce administrative burden by simplifying the control and audit processes. The adoption and implementation of SCOs varied across Member States. While some Member States (CZ, FI, IT, LT, SE and SI) reported that SCOs contributed to streamlined financial management and reduced administrative burden, others (AT, BE, HU, MT and SK) faced challenges in their adoption and either did not use SCOs or only to a limited extent due to perceived administrative complexity, lack of training, or feasibility concerns.

### ***Reporting mechanisms***

The CIPS and ISEC ex-post evaluations highlighted the need for more detailed reporting from project beneficiaries to strengthen overall programme efficiency. The ISF-P introduced more **structured reporting mechanisms**, including Annual and Final Implementation Reports under different management modes, to improve monitoring and accountability.

The **national ex-post evaluation reports** of several Member States<sup>75</sup> show that reporting and indicators remained a challenge for many beneficiaries and indicate a high administrative burden linked to reporting requirements, complex indicator systems, and extensive documentation obligations. Belgium highlighted that annual reporting and expenditure documentation increased administrative burden, with many beneficiaries finding it disproportionate to the funding received.

Based on the **interviews**, beneficiaries must provide full documentation, from fund allocation agreements to final invoices, to verify project expenditures. Nonetheless, while the process is demanding, the reports considered it necessary to ensure accountability and transparency (e.g. proper documentation of purchases and distribution and helping track progress and compliance).

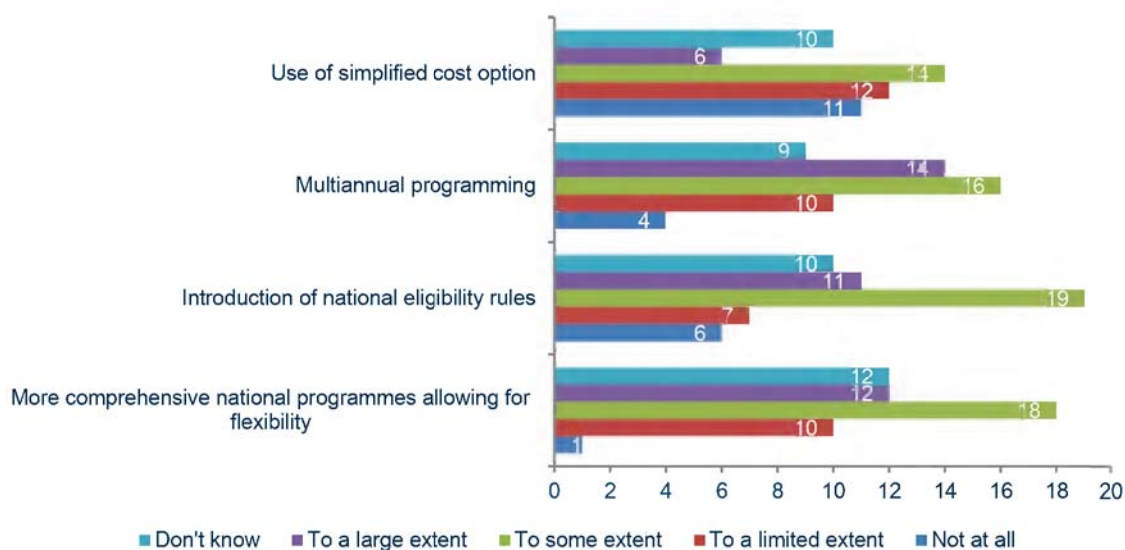
**Survey results** provided input on stakeholder's perceptions of the simplifications measures introduced by the 2014-2020 legal framework (Figure 18). These findings confirm that multiannual programming, the introduction of national eligibility rules and increased flexibility in national programmes brought simplification and reduced administrative burden "to some extent" and "to a large extent" (agreed by 30 respondents).

Survey respondents have expressed mixed views concerning the adoption and implementation of SCOs at national level (23 respondents found it did not bring simplification or only "to a limited extent").

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<sup>75</sup> National ex-post evaluation of Belgium, Czechia, Germany, Hungary, Malta, the Netherlands, Spain and Slovakia.

Figure 18 - Number of replies to the survey question “To what extent had the following changes in procedures introduced by the ISF-P resulted in the simplification of administrative burden for the beneficiaries of the Fund?”



Source: Preparatory study based on survey answers

The effectiveness of the changes aimed at simplifying the ISF-P management and reducing administrative burden varied across Member States. While some Member States benefited from streamlined administrative mechanisms, others faced challenges with their complexity, extensive documentation requirements, and difficulties in fully implementing simplification measures. Despite some progress, **further steps are needed to enhance efficiency and ensure administrative processes are proportionate to the funding provided.**

#### 4.1.4. Coherence and Complementarity

The examination of coherence serves to assess the extent to which the objectives set in the ISF-P were consistent, mutually reinforcing and effectively integrated within the broader context of EU funding. It evaluated both internal coherence (coherence of the components and management modes and how interventions generate synergies through formal or informal cooperation) and the external coherence (complementarities and synergies between ISF-P and other EU policies and priorities, other Home Affairs Funds and EU funding instruments).

##### *Internal Coherence*

The ISF-P is considered generally coherent with other initiatives within its policy domain and across management modes (shared, direct and indirect). Coherence is also present between the Instrument’s components (national programmes, Union Actions and EMAS), although some challenges remain.

The components of the ISF-P were designed to complement each other and to minimise potential overlaps and risks of duplication. National programmes support long-term structural needs at national level, Union Actions respond to emerging needs and supports projects which require a transnational approach, while EMAS facilitates actions that are

difficult to implement within national programmes by addressing urgent and unpredictable needs arising from emergency situations.

Table 8 outlines the complementary purposes of the ISF-P components and management modes. The complementary nature of these components – which may be suited to serving long-term or short term/urgent, national or transnational needs can be observed in practice.

*Table 8 - Complementarity of the funding components*

Purpose	Fund component/Management mode
Contribute to the achievement of the ISF-P general objective by including actions addressing all specific objectives – Recital (27)	National programmes (shared management mode)
Transnational actions or actions of particular interest to the Union – Art. 8 (1)	Union Actions (direct/indirect management modes)
Provide assistance to urgent and specific needs in the event of an emergency situation – Article 10(1)	EMAS (direct management mode) <sup>76</sup>

*Source: ISF-P Regulation*

Formal mechanisms are in place to ensure EMAS and Union Actions (delivered under Annual Work Programmes developed by the Commission) complement the support delivered under the national programmes (developed by Member States in consultation with the Commission at the start of the programming period) at EU and national levels.

At EU level, the internal procedures ensure that financial and policy units within DG HOME, as well as other Commission services, where appropriate, feed into the decision-making processes (i.e. drawing up the Annual Work Programmes). Thus, possible complementarities across funding provided under different components and management modes should be ensured from the outset.

At Member State level, the extent to which complementarities are ensured depends on the day-to-day coordination mechanisms at national level which are within the remit of the Responsible Authority for the ISF-P programme.

Despite there being formal and informal coordination mechanisms in place to ensure complementarities and the lack of duplication or overlaps, the **ISF-P interim evaluation and ISF-P beneficiaries** highlighted the need for improved awareness of projects under this Instrument. In this sense, two Responsible Authorities reported that communication between Responsible Authorities and the Commission – on the selection of projects and beneficiaries under national programmes and Union Actions – has room for improvement. This has been rectified to a certain extent through efforts between national authorities to ensure better coordination between national programmes and Union Actions.

#### *Coherence with the EU internal security policy*

Over the past years, the EU has developed consecutive security strategies to address a spectrum of developments and threats within its internal security. The overarching strategy at the time, the 2010 Internal Security Strategy provided a strategic direction for the ISF-

<sup>76</sup> Despite Article 5(4) of the ISF-P Regulation setting out that EMAS can be implemented under direct and indirect management, all ten ISF-P funded EMAS have been implemented through direct management.

P. Within this framework, the EU has devised various thematic strategies and action plans aimed at combating the most prominent trends in internal security.

Table 9 provides an overview of the strategic priorities and objectives outlined in the 2010 Internal Security Strategy and the European Agenda for Security relevant to the 2014-2020 programming period. The priorities and objectives in the 2010 Internal Security Strategy are echoed in the specific objectives and policy fields of the ISF-P, demonstrating coherence between the two frameworks.

The ISF-P specific objectives are closely aligned with the strategic priorities outlined in the 2010 Internal Security Strategy. 'Specific Objective – fight against crime' of the ISF-P is derived from strategic objectives of the 2010 Internal Security Strategy to disrupt crime networks (Objective 1), prevent terrorism and address radicalisation and recruitment (Objective 2), and raise levels of security for citizens and businesses in cyberspace (Objective 3). 'Specific Objective – risk management' of the ISF-P corresponds to the strategic objectives of the 2010 Internal Security Strategy to Increase Europe's resilience to crises and disasters (Objective 5).

The specific objectives of ISF-P are further translated to operational objectives, strategic priorities and higher-level policy objectives in the field of internal security. This demonstrates the coherence and complementarity of the ISF-P within the broader framework of the Internal Security Strategy. Furthermore, the specific objectives of the ISF-P are well aligned with the strategic priorities outlined in the subsequent 2016 European Agenda on Security.

Table 9 - Alignment between the Specific Objectives of the ISF-P and the 2010 Internal Security Policy

EU Internal Security Strategy	Strategic priorities Union	European Agenda on Security	ISF-P	ISF-P	Taxonomy used for the current evaluation
Objectives	Strategic Priorities	Strategic Priorities	Specific Objectives	Operational objectives	Policy fields
Disrupt international criminal networks	Fighting cross-border, serious and organised crime, in particular projects implementing relevant policy cycles	Tackling terrorism and preventing radicalisation	<b>Specific Objective – fight against crime</b> Crime prevention, combating cross-border, serious and organised crime including terrorism, and reinforcing coordination and cooperation between law enforcement authorities and other national authorities of Member States, including with Europol or other relevant Union bodies, and with relevant third countries and international organisations	Promote and develop measures strengthening Member States' capability to prevent and combat cross-border, serious and organised crime incl. terrorism, through public-private partnerships, exchange of information and best practices, access to data, interoperable technologies, public communication and awareness raising.	Counter-terrorism, including prevention of radicalisation, protection of public spaces, critical infrastructure and entities
Prevent terrorism and radicalisation and recruitment	Preventing and combating cybercrime/raising the levels of security for citizens and business in cyberspace			Promote and develop administrative and operational cooperation, mutual understanding and exchange of information among Member States' law enforcement authorities, other national authorities, Europol or other relevant Union bodies and, where appropriate, with third countries and international organisations.	
	Preventing and combating terrorism and addressing radicalisation/recruitment			Promote and develop training schemes, incl. technical and professional skills and knowledge on respect for human rights and fundamental freedoms, in implementation of European training policies, incl. through Union law enforcement exchange programmes to foster a genuine European judicial and law enforcement culture	
Raise levels of security for citizens and businesses in cyberspace	Raise Member States' administrative and operational capability to protect critical infrastructure	Disrupting organised crime	<b>Specific Objective – risk management</b> Enhancing the capacity of Member States and EU to effectively manage security-related risks and crises and preparing for and protecting people and critical infrastructure against terrorist attacks and other security-related incidents.	Promote and develop measures, safeguards, mechanisms and best practices for early identification, protection and support of witnesses and victims of crime, including victims of terrorism, and in particular for child witnesses and victims, especially those who are unaccompanied or otherwise in need of guardianship.	Organised crime (incl. drugs and firearms trafficking, THB, migrant smuggling, corruption, money laundering)
	Increasing the Union's resilience to crisis and disaster			Strengthen Member States' administrative and operational capability to protect critical infrastructure in all sectors of economic activity, including through public-private partnerships and improved coordination, cooperation, exchange and dissemination of know-how and experience within the Union and with relevant third countries.	
Increase Europe's resilience to crises and disasters	Achieve a closer partnership between the Union and third countries	Fighting cybercrime		Secure links and effective coordination between existing sector-specific early warning and crisis cooperation actors at EU and national levels, incl. situation centres to enable the quick production of comprehensive and accurate overview in crisis situations.	Law enforcement cooperation
				Strengthening the administrative and operational capacity of the Member States and EU to develop comprehensive threat and risk assessment. These must be evidence-based and consistent with priorities and initiatives identified at EU level to enable the EU to develop integrated approaches based on common and shared approaches to crisis situations.	Information exchange Cooperation with third countries

## *External Coherence*

Support provided under the ISF-P complements national and regional intervention as national security remains a competence of the Member States. In doing so, the ISF-P aims to enhance the Union's contribution to achieving its objectives in areas which require cooperation and coordination at EU level.

### *Mechanisms for coordination at the programming and implementation phases*

The Horizontal Regulation sets out the obligation for the Commission and the Member States to ensure that the support provided under the Specific Regulations and by Member States is complementary to other Union instruments.<sup>77</sup> Furthermore, it lays out that Member States shall take into consideration the partnership principle in the preparation and implementation of the national programmes<sup>78</sup>.

Member States implemented several different coordination mechanisms at national level during the programming and implementation phases to ensure the coherence of activities with other programmes funded by EU Instruments with similar objectives to those of the ISF-P<sup>79</sup>.

Several **national ex-post evaluation reports**<sup>80</sup> show that the key coordination mechanism in ensuring coherence between the ISF-P and other EU interventions is played by the Monitoring Committees, which gathers representatives from national institutions and beneficiaries with the objective of fostering coherence and limiting overlaps between interventions.

Other mechanisms employed are the regular coordination between the Responsible Authorities of the different funds, inter-institutional working groups and consultation platforms. By including representatives from various stakeholders, including national ministries, local authorities and EU bodies, these committees ensure that all activities are aligned with national and EU priorities. Furthermore, the employment of risk assessments or analyses throughout the implementation period of the funding Instruments also contributed to supporting coherence between interventions and limiting overlaps (Czechia and Ireland).<sup>81</sup>

The **survey results** corroborate these findings:

- 82% of Responsible Authorities confirmed coordination mechanisms were put in place in the programming and implementation phases of the ISF-P to ensure coherence with other EU-funded initiatives;
- 76% of survey respondents mentioned that establishing a Monitoring Committee alone is a means of coordinating with other interventions,

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<sup>77</sup> Article 3(2) of the Horizontal Regulation.

<sup>78</sup> Article 12(3) of the Horizontal Regulation.

<sup>79</sup> National ex-post evaluation reports of Belgium, Bulgaria, Cyprus, Czech Republic, Germany, Estonia, Greece, Finland, Ireland, Lithuania, Luxembourg, Latvia, Malta, the Netherlands, Romania, Slovenia and Slovakia; 82% of the Responsible Authorities in the survey confirmed this.

<sup>80</sup> Belgium, Bulgaria, Cyprus, Czechia, Estonia, Finland, France, Germany, Greece, Ireland, Lithuania, Latvia and Malta.

<sup>81</sup> National interim evaluation report for Czechia and Ireland.

- One of the most frequently employed measures included coordination and exchanges with coordinators of other funds and EU-funded initiatives, i.e. between relevant ministries, or conducting assessments of interventions with similar objectives.

At times, these coordination mechanisms were employed simultaneously. For instance, in:

**Slovenia:** introduced a three-level verification mechanism involving Monitoring Committees, interministerial working groups, and project-level reviews to ensure that the objectives set forth in the national programme are coherent with other EU instruments.<sup>82</sup>

**Finland:** there is also a structured approach where centralised coordination and regular consultations help maintain coherence.

**Romania:** targeted training and specific project ensure coherence.

**Poland:** experienced management, partnership with relevant authorities, and ongoing consultations help maintain coherence during implementation.

**Spain:** an interview with the Spanish Responsible Authority reports strategic cooperation with other interventions to ensure coherence and avoid duplication and overlaps. Interventions funded by different instruments fostered informal knowledge of other interventions as well as engagement between a wide range of stakeholders at the programming stage.

**Germany**<sup>83</sup>: several coordination mechanisms were mentioned including the coordination role of the Responsible Authority and the establishment of coordination committees. Informal information-sharing settings between Member State institutions and units were cited in the case study on Germany between the Federal Criminal Police (BKA) and the Federal Office for Migration and Flight (BAMF) during meetings and other networking events.

Thirteen Member States<sup>84</sup> explicitly mention having conducted an assessment of other interventions at programming stage. For example, surveys were circulated with beneficiaries (Italy), Responsible Authorities engaged with relevant stakeholders (Bulgaria, Cyprus and the Netherlands). Nonetheless, case studies on Croatia, Germany and Spain suggest stakeholders have limited awareness of assessments carried out in the programming stage.

#### *Coherence with the other Home Affairs Funds (AMIF and ISF-BV)*

The Home Affairs Funds play a key role in tackling changes related to the efficient management of migration, the EU's external borders, and ensuring a high level of security within the EU. The general provisions for all Home Affairs Funds are under a common

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<sup>82</sup> National ex-post evaluation report of Slovenia.

<sup>83</sup> National ex-post evaluation report for Germany and Case study on Germany.

<sup>84</sup> National ex-post evaluation reports of Belgium, Czechia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Lithuania, Luxembourg, Malta and Slovenia.

framework (i.e. the Horizontal Regulation) which ensures coordination, coherence and synergies between them.

Almost all Member States indicate that their programmes are coherent with other EU initiatives and EU funds<sup>85</sup>. Most **national ex-post evaluation reports** positively assessed the coherence between the Home Affairs Funds, and over half of them (17)<sup>86</sup> explicitly refer to having implemented coordination mechanisms to ensure synergies and avoid overlaps between them.

In several Member States, the Monitoring Committee played a key role in overseeing coordination and avoiding duplications, meeting regularly to discuss project proposals and share information on funding opportunities. For instance, Slovenia reports discussion in the Monitoring Committee on the coherence between AMIF and ISF-P to ensure synergies and to avoid duplication.

### *Coherence with other EU funding Instruments*

Some beneficiaries acknowledged connections between ISF-P and other EU funding programmes, such as Horizon 2020, noting that the ISF-P remained distinct in its focus on operational support for law enforcement, while Horizon 2020 concentrated on research and innovation. However, one interviewee highlighted potential overlaps between ISF-P and Horizon 2020 and expressed uncertainty about the relationship between the two funding instruments.<sup>87</sup> This concern was also reflected in the survey results, where a share of respondents from Responsible Authorities indicated that Horizon 2020 did not complement ISF-P activities (17%).

Concerning Fiscalis 2020, the survey results show that actions organised by this cooperation programme were perceived to complement ISF-P actions to a limited extent (26%) and to some extent (28%). This view was also shared by a small portion of beneficiary respondents (7%).<sup>88</sup>

The Annual Implementation Report from Slovenia mentions that the complementarity of ISF-P projects with other EU funds or EU financial instruments is discussed at the Monitoring Committee sessions.

In Romania, targeted training for Ministry of Internal Affairs personnel and coherent projects, such as those conducted under the European Anti-Fraud Office's (OLAF) Hercule III programme<sup>89</sup>, ensured that the objectives remained aligned with broader EU goals.<sup>90</sup> In the Netherlands, information-sharing mechanisms between the Responsible Authority for ISF-P and Horizon 2020 points of contact were put in place.<sup>91</sup>

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<sup>85</sup> National ex-post evaluation reports.

<sup>86</sup> National ex-post evaluation reports of Belgium, Bulgaria, Cyprus, Czechia, Germany, Estonia, Greece, Finland, Ireland, Lithuania, Luxembourg, Latvia, Malta, the Netherlands, Romania, Slovenia and Slovakia.

<sup>87</sup> Country case study on the Netherlands.

<sup>88</sup> See Annex V.

<sup>89</sup> Regulation (EU) No 250/2014 of the European Parliament and of the Council of 26 February 2014 establishing a programme to promote activities in the field of the protection of the financial interests of the European Union (Hercule III programme) and repealing Decision No 804/2004/EC. OJ L 84, pp. 6–13. ELI: <http://data.europa.eu/eli/reg/2014/250/oj>.

<sup>90</sup> National ex-post evaluation report from Romania.

<sup>91</sup> Case study on Netherlands; Ex-post evaluation report for the Netherlands.

Union Actions have been coherent with actions supported by other EU instruments, such as Horizon 2020 and ISF-BV. Furthermore, the objectives and activities of Union Actions projects complement and are coordinated with EU-level agencies and bodies (e.g., project MAOC-N combatting maritime drug trafficking) and Europol-led initiatives.

#### *Coherence with the EU external policy*

Under ‘Specific Objective – fight against crime’, the ISF-P shall contribute to improving and facilitating the exchange of information where relevant with third countries and international organisations. The Horizontal Regulation sets out that measures in and in relation to third countries supported through the Specific Regulations should be taken in synergy and coherence with other actions outside the Union supported through Union (both geographic and thematic) external assistance instrument.<sup>92</sup> More concretely, the Commission and the Member States, together with the European External Action Service, in accordance with their respective responsibilities, must ensure that actions in and in relation to third countries<sup>93</sup>: (a) are coherent with the Union’s external policy, respect the principle of policy coherence for development and are consistent with the strategic programming documents for the region or country in question; (b) focus on non-development-oriented measures; and (c) serve the interests of the Union’s internal policies and are consistent with activities undertaken inside the Union.

With regards to Union Actions in relation to and in third countries, the following actions are supported<sup>94</sup>: actions improving police cooperation and coordination between law enforcement authorities; networking, mutual confidence, identification, exchange and dissemination of know-how, experience and best practice, information sharing, shared situation awareness and foresight, contingency planning and interoperability; acquisition, maintenance and/or further upgrading of technical equipment (incl. ICT systems); exchange, training and education of staff and experts of relevant authorities; awareness raising, dissemination and communication activities; threat, risk and impact assessments; and studies and pilot projects.

From the perspective of external action instruments, while the general objective of the Instrument for Pre-accession Assistance (IPA II) remains broad, its specific objectives and the thematic priorities show a degree of similarity to the ISF-P specific objectives in relation to reinforcing and promoting security and the fight against corruption and organised crime.<sup>95</sup> Under IPA II, ensuring coherence and avoiding duplication with other types of EU or Member States assistance are of key importance.<sup>96</sup> Accordingly, the Commission and the Member States cooperate closely through consultations, and frequent exchanges of information during the different phases of the assistance cycle, especially during the programming processes.<sup>97</sup>

**There appears to be limited complementarity between the ISF-P and other existing EU instruments with an EU’s external action dimension**, as only few Member States specifically report coordination between ISF-P-funded actions in or in relation to third countries.<sup>98</sup>

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<sup>92</sup> Recital (8) and Article 3(4) of the Horizontal Regulation.

<sup>93</sup> Article 3(5) of the Horizontal Regulation.

<sup>94</sup> Article 8(3) of the ISF-P Regulation.

<sup>95</sup> Articles 1 and 2 of Regulation (EU) 231/2014, respectively.

<sup>96</sup> Articles 5(3) and 5(4) Regulation (EU) 231/2014

<sup>97</sup> Article 5(4) Regulation (EU) 231/2014.

<sup>98</sup> National ex-post evaluation reports.

Thus, as far as coherence with external spending programmes is concerned, enhanced cooperation and coordination on programming both between the Commission services and with Member States are needed. Several challenges in the current funding architecture have been identified, including notably: the need to further strengthen the link between internal and external priorities in the Union's external security funding; the persistent challenge to use all existing (policy, funding, investment and other) tools, both at the disposal of the EU and its Member States in a Team Europe spirit, to use strategically and timely leverage in relation to partner countries to improve cooperation on security; the limitations for funding security-related actions in third countries, given that most of spending in the external dimension must comply with the criteria for development assistance eligibility.

## **4.2. How did the EU intervention make a difference and to whom?**

### **4.2.1. EU Added Value**

The ISF-P has generated substantial EU added value at EU level, primarily through fostering a unified framework for addressing cross-border internal security challenges, encouraging knowledge exchange and the promotion of best practices. Its capacity to harmonise national internal security efforts with EU-wide priorities creates a cohesive approach to crime prevention and internal security.

The ISF-P fostered cooperation and synergies among Member States, enhancing collective responses to internal security threats.

Findings suggest that the ISF-P achieves EU added value across Member States under three main aspects: in a higher volume of services offered (volume effect), new types of intervention tackled (scope effect) and increased the capacities of Member States and public authorities to manage the funding (role and process effect).

National interim and ex-post evaluation reports<sup>99</sup> show that ISF-P support has brought significant added value across various Member States by enhancing the *scope and volume* of security-related projects (both in project value and investment levels) and increasing the speed of project implementation (e.g. MEDOCIA4 project).<sup>100</sup>

ISF-P support enhances *roles and processes* through the acquisition of equipment (e.g. IT hardware and software development), enhanced infrastructure capabilities (e.g. systems to enable data sharing across Member States), and a better understanding of processes and know-how for beneficiaries, strengthening their project management skills, capacity for information sharing and advancing international cooperation<sup>101</sup>

In the case study on Germany, beneficiaries report that ISF-P funding allows projects to evolve over time by enabling further development of standardised solutions and involvement of different stakeholders and provide support to prevention and training in the field of organised crime enabling the implementation of projects that would not have been possible absent ISF-P funding.

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<sup>99</sup> The ISF-P interim and national ex-post evaluation reports for Bulgaria, Croatia, Cyprus, Czechia, Germany, Estonia, Greece, Ireland, Lithuania, Luxembourg, Malta, Spain and Sweden.

<sup>100</sup> National ex-post evaluation report from the Netherlands.

<sup>101</sup> Case study for Spain, Croatia and Germany, and ex-post evaluations for Austria, Czechia, Germany, Estonia, Spain, Finland, Hungary, Ireland, Iceland, Italy, Lithuania, Luxembourg, Malta, Sweden, Slovenia, and Slovakia.

Union Actions generate EU added value by supporting initiatives for which national funding would not have been available and by producing outputs and results for the benefit of all Member States. Union Actions beneficiaries emphasised the crucial importance of ISF-P funding for developing and introducing innovative tools and practices as funding for this purpose was not available in the same amount and timeframe as under Union Actions grants.

EMAS have generated EU added value through increased international cooperation, information exchange between Member States against terrorist threats, and crisis management in the aftermath of terrorist attacks. Given the transnational nature of organised crime and terrorism, EMAS projects benefited Member State in advancing the protection of public spaces, the increased capacity to collect intelligence and the development of exercises.

#### *Consequences of absence of ISF-P funding*

Absent ISF-P funding, several Member States would struggle to carry out actions to support the implementation of EU policies in internal security<sup>102</sup>. Findings show that in some Member States, certain projects would have been difficult to implement or would not have been implemented absent ISF-P support (e.g. equipment purchases such as explosive ordnance disposal robots)<sup>103</sup>. In other Member States, certain projects would have been prioritised to ensure compliance with the EU acquis, while others would have received less to no funding due to national budgetary constraints<sup>104</sup>.

The ISF-P supported Member States with national budgetary constraints, enabling them to implement projects critical in strengthening their internal security capabilities and infrastructure. For instance, Bulgaria's law enforcement authorities, have greatly benefited from long-term ISF-P investments in infrastructure and crime prevention, while Croatia has enhanced its internal security infrastructure, ensuring its alignment with EU requirements despite national financial constraints.

Nonetheless, a few Member States would have been able to secure national funding. For instance, the Netherlands reports that absent ISF-P support, projects relating to the implementation of Regulation (EU) 98/2013<sup>105</sup> on the marketing and use of explosive precursors and Directive (EU) 2016/681<sup>106</sup> on the development of a national Passenger Information Unit would have been carried out with national funding<sup>107</sup>.

As highlighted in the case study on Union Actions, beneficiaries agreed that absent ISF-P funding, it would have been impossible to implement their projects in the same scale and

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<sup>102</sup> The national ISF-P interim evaluation report for Latvia, Portugal, Romania; ISF-P ex-post evaluation reports for Belgium, Hungary, Ireland, Italy, Latvia, Romania and Spain.

<sup>103</sup> Case studies for Croatia and Spain; ex-post evaluation reports for Belgium, Bulgaria, Hungary, Ireland, Italy, Lithuania and Slovenia.

<sup>104</sup> Ex-post evaluation report for Czechia, Germany, Finland, Luxembourg, Malta, Sweden and Slovakia.

<sup>105</sup> Regulation (EU) No 98/2013 of the European Parliament and of the Council of 15 January 2013 on the marketing and use of explosives precursors Text with EEA relevance. OJ L 39, 9.2.2013, pp. 1–11. ELI: <http://data.europa.eu/eli/reg/2013/98/oj>.

<sup>106</sup> Directive (EU) 2016/681 of the European Parliament and of the Council of 27 April 2016 on the use of passenger name record (PNR) data for the prevention, detection, investigation and prosecution of terrorist offences and serious crime. OJ L 119, 4.5.2016, pp. 132–149. ELI: <http://data.europa.eu/eli/dir/2016/681/oj>.

<sup>107</sup> Case study on the Netherlands.

timeframe, and that the financial support generated EU added value that no Member State would have been able to achieve on its own.

#### *Consequences of interruption of ISF-P funding*

National ex-post evaluation reports show that interrupting ISF-P support would have had disruptive consequences across Member States to varying degrees, ranging from an inability to meet regulatory requirements to the reduced efficiency and effectiveness of specific individual projects due to changes in priorities.

The case study on Spain indicates that the interruption of ISF-P support would likely result in slower progress, reliance on outdated resources, and challenges in sustaining and adapting projects. Many projects would not continue, although essential projects might still have been implemented, albeit less efficiently and at a slower pace. For instance, Spanish beneficiaries stated that the Civil Guard would have to assume the costs of maintaining equipment like robots, leading to reliance on obsolete means and slower implementation.

The case study on Croatia evidence that an interruption in ISF-P support would likely lead to significant disruptions in implementing internal security projects as many projects would not proceed, given national budget constraints.

The case study on Germany evidence that operating costs of the respective investments (e.g. IT systems, equipment or vehicles) would have been secured by national budgets should the support have been interrupted. Nonetheless, projects involving research organisations or civil society organisations would likely have no longer received funding and some cuts relating to personnel could have taken place following an interruption of the ISF-P funding.

#### *Benefits of ISF-P support at EU level*

Across Member States, benefits identified at EU level primarily relate to information-sharing, data interoperability, cooperation and networking.<sup>108</sup> For instance, the ISF-P has:

- facilitated the exchange of knowledge and resources, acting as a catalyst for further EU actions and supporting innovation (Belgium);
- supported training and information exchange programmes that would have been less frequent and intensive without EU support (Finland);
- improved security and information exchange procedures between Latvian institutions and other Member States, facilitating better cooperation in combating cybercrime and other internal security threats (Latvia);
- strengthened cooperation with other Member States through projects like the “Prüm Exchanges,” which enhanced information sharing and interoperability at EU level (Luxembourg);
- advanced the adoption of standardised processes across Member States, which resulted in wider benefits at EU level (France).

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<sup>108</sup> Case study on Croatia and Germany; national interim and ex-post evaluation reports for Austria, Belgium, Germany, Greece, Ireland, Italy, Lithuania, Luxembourg, Malta, The Netherlands, Portugal, Slovenia, Slovakia and Spain.

As highlighted in the case study, Union Actions projects have generated EU added value at EU level, by:

- having a strong transnational component both in terms of the geographic scope of their beneficiaries and in the impact of their activities. Union Actions projects produce outputs and results which benefit multiple Member States and/or the EU as a whole when new expertise or skills are generated. For instance, the advancement of facial recognition investigation techniques (TELEFI), training on law enforcement response to potential terrorist attacks by drones (SKYFALL), and open information platforms containing EU-wide data on violent incidents involving firearms (INSIGHT).
- supporting the uninterrupted operation of established and newly emerging transnational law enforcement networks which play a critical role in enhancing the cooperation in several policy fields by bringing together practitioners from all Member States interested in a specific field (e.g. forensics, anti-corruption, and crime prevention).
- being the primary instrument for enhancing cooperation with third countries and international organisations. For instance, the Common Operational Partnerships (SCOPE) project sought to enhance collaboration and information sharing with law enforcement agencies in Türkiye and Western Balkan countries against illegal migrant smuggling. Other forms of cooperation with third countries were implemented under indirect management, e.g. contribution contracts with UN bodies, such as the United Nations Office on Drugs and Crime (UNODOC) and the United Nations Interregional Crime and Justice Research Institute (UNICRI).
- promoting innovation and transfer of best practices by developing training materials for building new skills and expertise (SKYFALL, EXIT EUROPE), and exploring new approaches and tools to tackle emerging challenges (TELEFI, INSIGHT, CICERO). For instance, the AIRPOL network contributes to enhancing the security of airports and the aviation sector by exploring and disseminating innovative practices and providing training in behaviour detection, insider threats and reaction to serious incidents at airports.
- contributing to the involvement of civil society and private sector stakeholders in most of the policy fields, and particularly, concerning counterterrorism and prevention of radicalisation, combating cybercrime and child sexual abuse, where most projects were initiated and coordinated by beneficiaries from the private and non-profit sectors.

EMAS has generated substantial EU added value as it supported individual Member States in managing specific internal security incidents or emerging threats (e.g. heightened terrorist threats). It also significantly strengthened operational cooperation and information exchange across the EU through strengthened protection of public spaces, enhanced prevention of terrorist attacks, and improved crisis management in response to terrorist incidents or attacks on critical infrastructure.<sup>109</sup>

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<sup>109</sup> Case study on EMAS.

EMAS actions such as the project of the French Ministry of Interior<sup>110</sup>, EU-ACTION, EU-SIUTEx, HORUX, and COMPSAT generally enhanced the capacities of police and intelligence services in Belgium, Spain and France to gather and exchange intelligence data, process and analyse large volumes of video data by acquiring or developing innovative tools. These projects achieve EU added value to several Member States. First, by raising awareness about effective new approaches, ICT tools, and crisis management solutions and transfer of accumulated experience and results to other countries. For example, the results of EU-ACTION and EU-SIUTEx projects were shared within the EU Special Intervention Units Working Group ATLAS. Second, acquired tools also allow the running of common operations/exercises between EU special intervention and supporting units with the acquired new tools.

As highlighted in the case study on EMAS, projects also benefited EU citizens since criminal investigations of such complex crimes as terrorism and organised crime are usually the result of operational cooperation between Member States, whereby enhanced capacities in one Member State enhance the investigative capacities of the other Member States. For instance, a project implemented by the French Ministry of Interior where the acquired mass video processing device to speed up the investigation of the terrorist attack in Paris was also used by the Belgian police authorities for the investigation of the terrorist attack in Brussels. The French Ministry of Interior shared the gained experience with the police and gendarmerie authorities in all Member States and announced that the tool will also be available to other interested partners. Similarly, the OSINT tool acquired by the Guardia Civil within project HORUX is regularly employed during joint investigations with other EU law enforcement agencies.

#### **4.2.2. Sustainability**

The examination of sustainability serves to assess whether the positive effects of projects supported by the ISF-P are likely to endure once its support ends.

**Findings suggest that the positive effects of ISF-P funded projects are likely to last beyond the programming period.**

Member States put in place strategies to ensure more sustainable outcomes and benefits of ISF-P-funded projects, e.g. allocation of national funds for maintenance support, commitments to maintain key infrastructure, and the establishment of networks for ongoing collaboration. Trainings developed during ISF-P funded projects are often integrated and continued as part of the daily work of national law enforcement authorities.

Overall, stakeholders have reported that many actions and positive effects funded under the ISF-P are likely to last. Nevertheless, seven Member States authorities (Bulgaria, Estonia, Finland, Germany, Malta, Poland and Spain) and some Union Actions beneficiaries reported certain difficulties in measuring the sustainability of project results with quantitative indicators. Project results are not always quantifiable, and stakeholders stated that oftentimes, the evaluation of long-term impact should be complemented with qualitative assessments, such as projects with significant components on trainings and awareness-raising<sup>111</sup>.

*Specific and horizontal mechanisms to ensure sustainability*

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<sup>110</sup> Project 'Acquisition d'une solution informatisée d'analyse des données vidéo de masse'.

<sup>111</sup> First focus group.

To ensure sustainability, **Member States have set mechanisms at both the programming and implementation stages.** The national ex-post evaluation reports, country case studies and interviewed stakeholders show that specific and horizontal mechanisms were in place to phase out EU funding after the ISF-P support has been exhausted.

At the programming stage, national authorities required the alignment of ISF-P-funded projects with national strategic priorities and national programmes. National programmes have often been developed in broad consultation with stakeholders and beneficiaries thereby, allowing targeting the relevant needs and ensuring sustainability<sup>112</sup> before submitting the national programmes to the Commission's approval.

The national ex-post evaluation reports of Belgium, Bulgaria, Germany, Finland, Lithuania and the Netherlands reported that significant emphasis is placed on checking whether project proposals align with national and EU level objectives, thus allowing for the continuation of funding from national budgets after the end of an ISF-P funded project. Moreover, the selection process focused mainly on project proposals targeting trainings, development of IT-systems, investing in equipment and strengthening national institutional capacities.<sup>113</sup> Concrete examples include projects involving technological innovations and the development of databases to be integrated into the existing national systems (Estonia, Germany and Spain).

The national ex-post evaluation reports show that:

- Member States often invest in equipment to ensure sustainability after funding from ISF-P has been exhausted;
- Sustainability checks include application forms where applicants are required to provide statements on how sustainability will be ensured (Bulgaria, France, Germany, Italy, Slovenia and Slovakia), and to provide information on further development and possible follow-up projects after a project ends (Croatia, Finland, Germany, Hungary, Italy and Poland).
- In Belgium, Bulgaria, Estonia, Spain, Finland, Luxembourg, Malta and Slovakia, national funds were allocated for maintenance of systems and equipment at the programming stage to ensure their sustainability after ISF-P funding ends. For instance, Malta allocated budgetary resources to ensure the continued operation and maintenance of ISF-funded infrastructure and equipment, while Luxembourg has made commitments to maintain critical response capabilities (e.g. its involvement in the ATLAS Group for CBRN responses, ensuring that it aligns with EU standards for continued preparedness).

During the implementation stage, Member States have introduced sustainability checks which range from strict requirements to informal check-ins. The national ex-post evaluation reports evidence that beneficiaries are often required to commit to the continued use and maintenance of infrastructure and equipment after the programming period ends. Some Member States conduct regular check-ins and process project evaluations to

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<sup>112</sup> National ex-post evaluation reports of Member States, and case studies on Germany and Croatia.

<sup>113</sup> The case studies on Germany and Croatia; Ex-post evaluation reports of Austria, Bulgaria, Cyprus, Czechia, Estonia, Spain, Finland, Ireland, Lithuania, Luxembourg, Netherlands, Poland, Sweden, Slovenia. Additional interviews with Finland, France, Italy and Bulgaria.

maintain sustainability (Austria, Belgium, Germany, Italy and Poland) and require written declarations on continued use of funded infrastructure and/or equipment and on-site follow-up checks (Malta). On the other hand, the national ex-post evaluation reports of Cyprus, Finland, the Netherlands, Slovenia and Slovakia indicate informal discussions and check-ins are preferred over formal sustainability checks.

### *Dependencies on EU funding*

The analysis of national ex-post evaluation reports, case studies and interviews with stakeholders demonstrate **varying degrees of dependency on EU funding**.

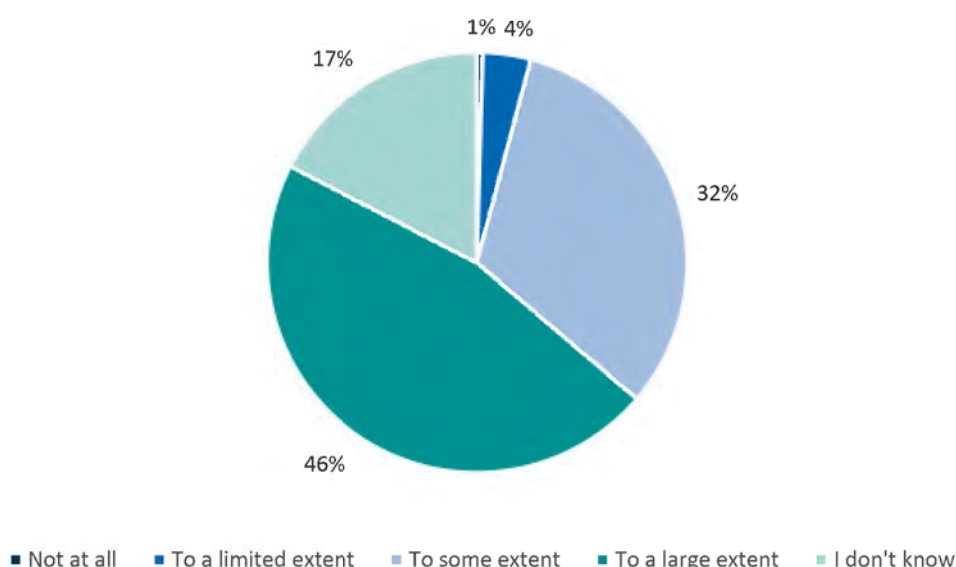
In some Member States<sup>114</sup>, the continuation of ISF-P projects has been secured with national funding, while in others, the ISF (Croatia and Slovenia) or other EU funds, such as Horizon 2020, Border Management and Visa Instrument (BMVI) and AMIF (Finland, Italy and Latvia) have been used to secure funding for projects started with ISF-P support.

**National ex-post evaluation reports and stakeholder views** show that actions and results are expected to continue after the funding under ISF-P has been exhausted and projects have ended.<sup>115</sup> Many projects across the different fund components (national programmes, Union Actions and EMAS) have been replicated, upscaled, continued and/or integrated into existing systems and tools.

**Survey responses** support this finding (Figure 19), whereby 46% of 201 respondents considered the outcomes and benefits of the project to have been sustainable over time to a *large extent* and 32% *to some extent*, whereas only 4% of respondents answered *to a limited extent*.

*Figure 19 - Stakeholder responses on the extent the outcomes and benefits of the projects funded under ISF-P (2014-2020) have been sustainable over time.*

To what extent have the outcomes and benefits of the projects funded under ISF-P (2014-2020) been sustainable over time?



<sup>114</sup> Estonia, France, Germany, Slovakia and Spain.

<sup>115</sup> National ex-post evaluation reports; additional interviews with Member States and UA-projects.

Several Member States' projects **have been transferred, replicated or upscaled**. In Germany the project 'Warning the Population' entailed the ability to extend the number of users receiving alerts to connect to neighbouring countries (Belgium). In Spain, projects on the integration of databases into national systems have produced expertise that can be applied to similar projects in the future. In Croatia, a project in the Service for Crime Operations involved purchasing software which offers extensive educational activities in the field of cybersecurity and criminal intelligence. Finally, in Croatia, Cyprus, Finland and Germany, knowledge and experiences from training courses are transferred to police officers at various levels and units.

**Union Actions** projects have demonstrated sustainability, particularly those focused on networking and cross-border cooperation, which provide a platform for the sharing of best practices, knowledge, and resources, further embedding sustainability into the project from the onset. For instance, the Vulnerability Assessment Tool was tested through funding under Union Actions and is still used in cities within the EU. A handbook was also developed to accompany the tool, and demonstrations were organised to showcase its use. It was also used in the QROC project<sup>116</sup> and closely linked to the ProTECT project, both of which serve as the basis for the Secu4All-project.<sup>117</sup> This example showcases three UA-projects building upon the respective results, which highlights the sustainable nature of the projects.

Some Union Actions projects that received ISF-P funding<sup>118</sup> (ENLETS, AQUAPOL, @ON Network, MAOC-N, and SCOPE) have also been successful in securing funding under the ISF, which indicates the support for sustaining their achievements. Nonetheless, the case study on Union Actions indicate that certain challenges remain in ensuring sustainability, such as difficulties in maintaining project outputs (websites and online platforms) due to their need for ongoing maintenance.

The inherent design of **EMAS** projects is to address immediate needs. The case study on EMAS evidence that despite their short-term duration, most projects have maintained sustainability through several mechanisms, such as:

- the use, integration and further development of tools (e.g. projects EU-ACTION, EU-SUITEx and EU-SIUEV),
- the continuance of operations and experience sharing as illustrated by Europol's initiatives in which it established a lasting presence in migration hotspots expanding from a few stations in Greece and Italy to 31 stations across 11 countries, and
- focus on IT solutions and information exchange systems.

Member States have prioritised the development of skills and expertise to ensure that the benefits of ISF-funded projects persist over time. Training programmes have been integral

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<sup>116</sup> The case study on The Netherlands.

<sup>117</sup> Additional interview with Secu4All.

<sup>118</sup> The case studies on Croatia, the Netherlands and on Union Actions; Additional interview with ENLETS.

in ensuring that personnel are equipped with the knowledge and capabilities to effectively use and maintain new systems and technologies in the long run.

### 4.3. Is the intervention still relevant?

The ISF-P has largely addressed the needs identified at the time of its adoption and remained fit to address the changes and needs which emerged during its implementation.

This Instrument was set up to contribute to ensuring a high level of security within the EU. Within this general objective, the ISF-P shall further two specific objectives. First, its aims at preventing and combating cross-border, serious and organised crime including terrorism ('Specific Objective – fight against crime'). To achieve this, the ISF-P focused on reinforcing coordination and cooperation between law enforcement authorities. Second, the ISF-P aims at managing risks and crisis. This objective is centred on enhancing the capacity of Member States and the EU to manage security-related risks and crises effectively. It also entailed preparing for and protecting people and critical infrastructure against terrorist attacks and other security-related incidents ('Specific Objective – risk management').

To effectively address the internal security challenges, in 2010, the Council of the European Union stressed the need for a more integrated approach to EU internal security. This is in line with the Stockholm Programme, which called for the creation of a Fund to support the implementation of the Internal Security Strategy and a coherent and comprehensive approach to internal security.<sup>119</sup> The ISF-P was designed to respond to the 2010 Internal Security Strategy for the European Union adopted by the Council, which identified the internal security threats and challenges faced across Member States. Furthermore, the ISF-P was designed with the aim of overcoming the limitations of ISEC and CIPS and better respond to evolving internal security threats. To this end, the following key policy areas were identified:

- **Counterterrorism, incl. prevention of radicalisation, protection of public spaces, critical infrastructure:** Since the early 2000s, protecting citizens from terrorist threats has remained central to the EU political agenda. The EU and Member States cooperated closely and increased their counterterrorism efforts over time by pre-empting and disrupting terrorist attacks, coordinating efforts, preventing radicalisation, and sharing information. At the time of the adoption and during the implementation of the ISF-P, terrorist threats were marked by an increasing cross-border dimension, and a corresponding need to enhance and coordinate actions of Member States' relevant authorities, enacting targeted legislation, implementing action plans to tackle terrorism and prevent radicalisation, and limiting terrorists' access to CBRN-E materials, as well as protecting critical infrastructure.<sup>120</sup>
- **Organised crime (drug trafficking, THB, firearms trafficking, migrant smuggling, corruption and money laundering):** When the ISF-P was adopted, organised crime networks had become more transnational and professionalised. Globalisation and technological advancements had enabled the development of more sophisticated criminal structures by organised criminal groups, which was increasingly coupled with corruption, money laundering and the subsequent

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<sup>119</sup> The Stockholm Programme – An open and secure Europe serving and protecting citizens, 2010/C 115/01.

<sup>120</sup> SEC(2011) 1358 final.

infiltration into the legal economy. The ISF-P was set to significantly contribute to the prevention of and fight against cross-border organised crime and was part of the EU's response to tackling new forms of organised crime.

- **Cybercrime and child sexual abuse:** The exponential increase in internet connectivity and subsequent interconnectedness of different parts of the world has allowed the increase in cyber-attacks and cybercrime. Similarly, child sexual abuse has become more prevalent during the rise of online platforms and digital communications, and law enforcement authorities faced difficulties in gathering evidence in the online environment. The ISF-P was designed to better tackle the rise in cyber-attacks and cybercrime.
- **Law enforcement cooperation (cross-border operational cooperation):** Criminal activities have increased their cross-border dimension, and criminal groups cross borders and jurisdictions to exploit the gaps left by non-fully integrated national systems. To deliver on the priorities identified by the 2010 Internal Security Strategy, the ISF-P aimed to provide support to Member States to effectively tackle cross-border crimes, enhance operational cooperation between national law enforcement authorities, and support the development of the necessary capabilities.
- **Information exchange:** The increased cross-border nature of serious and organised crime requires a continuous exchange of information among Member States' competent authorities. The 2010 Stockholm Programme highlighted the need to further develop law enforcement cooperation instruments in the EU.<sup>121</sup> The 2015 European Agenda on Security reiterated this priority, highlighting the need to further develop and maintain existing information exchange systems. In light of internal security concerns increasingly having a cross-border nature, the ISF-P had the objective to improve information exchange between law enforcement authorities.
- **Cooperation with third countries:** The links between EU internal and external security threats have become more apparent during the ISF-P programming period. Events occurring outside the EU had spill-over effects on the EU's internal security. The ISF-P aimed at strengthening the links and coherence between the internal and external security.

During the 2014-2020 programming period, major events led to changes in the EU internal security landscape, which prompted revisions in the internal security approaches at EU level and in the national programmes of Member States. The terrorist attacks in Europe highlighted the need for the EU to provide a quick response to these significant challenges<sup>122</sup>, and formulated the European Agenda on Security.

The interim evaluation of the ISF-P concluded that its objectives were relevant and comprehensive to the main internal security challenges at both national and EU level. ISF-P-funded projects delivered relevant results in counterterrorism and radicalisation, serious and organised crime, responding to the increasing need of Member States and the EU to respond to the internationalisation and professionalisation of organised criminal networks

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<sup>121</sup> Council document 17024/09 of 1-2/12/2009; The Stockholm Programme.

<sup>122</sup> SWD(2018) 341 final.

in a changing security environment. The interim evaluation also found that changes in the internal security landscape occurring during the programming period were considered during the implementation of the ISF-P. For instance, in view of evolving needs, some Member States adjusted their national programmes.

### **Correspondence of the objectives of the ISF-P funded interventions to actual needs**

The objectives of the ISF-P generally corresponded to the actual needs identified by stakeholders when addressing the main internal security challenges. Some adjustments to the initially set priorities were made at EU and national levels to ensure adaptability to emerging needs during the Instrument's implementation

#### *National Programmes*

Member States designed their national programmes and submitted them to the Commission for their assessment and approval to ensure that the programmes priorities and objectives responded to the key needs and policy priorities identified at EU and national level<sup>123</sup>. Furthermore, the programmes provided information specific to their internal security national context (national strategies, policies and legislation).

Prior to submitting the national programmes for Commission approval, a consultation process took place at EU and national level.

At EU level, the consultation process consisted of a policy dialogue between Member States and the Commission<sup>124</sup> to ensure alignment of the national mapping of needs/trends with the ISF-P's objectives and with those identified at EU and national levels. These high-level policy dialogues were considered particularly useful and offered the opportunity to exchange views and highlight specific policy fields/activities that should be considered in the preparation and approval of the national programmes<sup>125</sup>.

At national level, Member States conducted needs assessments and consulted relevant stakeholders to ensure that national programmes reflected key needs and policy priorities.<sup>126</sup> Three Member States (Cyprus, Czechia and Italy) reported that the consultation process mostly involved national authorities active in the ISF-P policy fields as they had a better understanding of the issues at stake and could better contribute to the identification of needs<sup>127</sup> The consultation of civil society organisations in the needs assessment (and implementation of ISF-P projects) took place in certain policy fields, such as the fight of human trafficking, where these organisations are often involved.

The ISF-P Regulation required each Member State to allocate the amounts for national programmes (indicated in Annex III) as follows: at least 20 % for actions relating to 'Specific Objective – fight against crime'; and at least 10 % for actions relating to 'Specific Objective – risk management'.<sup>128</sup> Member States may depart from these minimum percentages provided that they include an explanation in the national programme as to why

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<sup>123</sup> Articles 14(3) and 14(5) of the Horizontal Regulation.

<sup>124</sup> Article 13(1) of the Horizontal Regulation.

<sup>125</sup> See Annex V.

<sup>126</sup> Country case study on Spain and additional interviews with the Responsible Authorities from Italy, Spain and Latvia.

<sup>127</sup> Additional interviews with the Responsible Authorities from Cyprus, Czechia and Italy.

<sup>128</sup> Articles 5(6)(a) and 5(6)(b) of the ISF-P Regulation.

allocating resources below that level would not jeopardise the achievement of the relevant objective<sup>129</sup>.

There are also certain limitations on the total allocation under national programmes, i.e. Member States shall not use more than 8% of their total allocations under the national programme for the maintenance of EU and national IT systems, and not more than 8% for actions in relation to or in third countries which implement the strategic Union priorities set out in Annex I to the ISF-P Regulation<sup>130</sup>.

The national programmes were prepared in line with the respective key EU and national strategies adopted by national governments. A **comprehensive needs analysis conducted at national level** provides an overview of the Member States' key needs in the relevant policy fields, with a particular focus on counterterrorism and organised crime.

*Table 10 - Overview of needs identified in the National Programmes per policy fields*

MS	Counter-terrorism, incl. prevention of radicalisation, protection of public spaces, critical infrastructure/entities	Organised crime, incl. drug and firearms trafficking, s, migrant smuggling, corruption, money laundering	Cybercrime, incl. child sexual abuse	Law enforcement cooperation (cross-border operational cooperation)	Information exchange	Cooperation with third countries
AT	X	X	X			X
BE	X	X	X	X	X	
BG	X	X	X			
CY	X	X			X	X
CZ		X	X			
DE	X	X	X		X	X
EL	X	X				
EE	X	X		X	X	
ES	X	X				X
FI	X	X		X	X	X
FR	X	X				
HR	X	X				
HU	X	X		X		
IE		X	X		X	
IT	X	X			X	
LT	X	X				
LU					X	
LV	X	X				
MT	X	X	X			X
NL	X	X	X		X	
PL	X	X			X	
PT	X	X				X
RO	X	X	X		X	

<sup>129</sup> Articles 5(6) of the ISF-P Regulation.

<sup>130</sup> Article 7(2) of the ISF-P Regulation.

SE	X	X	X	X	X	
SI		X	X	X	X	X
SK	X	X	X			

Source: Preparatory study based on the analysis of national programmes

The national ex-post evaluation reports confirm that the objectives set by the Member States' national programmes responded to the identified needs.

Some Member States expressed the preference to focus strategically on a limited number of policy fields and activities based on their national context given the limited resources of the ISF-P and to avoid dispersion of resources among all possible fields.<sup>131</sup>

There is a **general consensus among stakeholders that the ISF-P-supported activities adequately addressed the needs of various target groups involved in internal security**.<sup>132</sup> The national interim evaluation reports evidence that the objectives of the ISF-P-funded projects generally corresponded to the needs identified in Member States programmes.

The Final Implementation Reports evidence that Member States adopted varied approaches to engage stakeholders and ensure transparency in the programming and implementation phase, as well as to ensure alignment of objectives with actual needs. For instance, in Austria, Poland and Romania, the alignment of objectives with actual needs was ensured through the early involvement of (potential) beneficiaries<sup>133</sup>.

The COVID-19 pandemic posed some challenges to the consultation of stakeholders and functioning of the Monitoring Committees, necessitating swift adaptations, such as adopting digital communication tools to keep the stakeholders connected and informed, and transitioning from traditional in-person meetings to virtual meetings.<sup>134</sup>

The national ex-post evaluation reports, the Annual and Final Implementation Reports highlighted changes in needs throughout the 2014-2020 programming period. As a result, several **Member States dedicated allocations to organised crime (13)<sup>135</sup> and exchange of information (14)<sup>136</sup>**, with many national-level projects setting up and/or further developing national ICT capabilities to respond to internal security concerns.

Figure 20 provides an overview of allocations under shared management per policy field and Member State during the entire implementation period.

<sup>131</sup> Additional interviews with the Responsible Authorities from Cyprus, Czechia and Italy.

<sup>132</sup> Survey question Q7: 'Which approach did you follow to define your strategy and identify your needs when preparing the National/ Member State Programme for your country?'. 25 responses for option: 'The needs assessment and programme strategy was done primarily based on consultations with relevant stakeholders'.

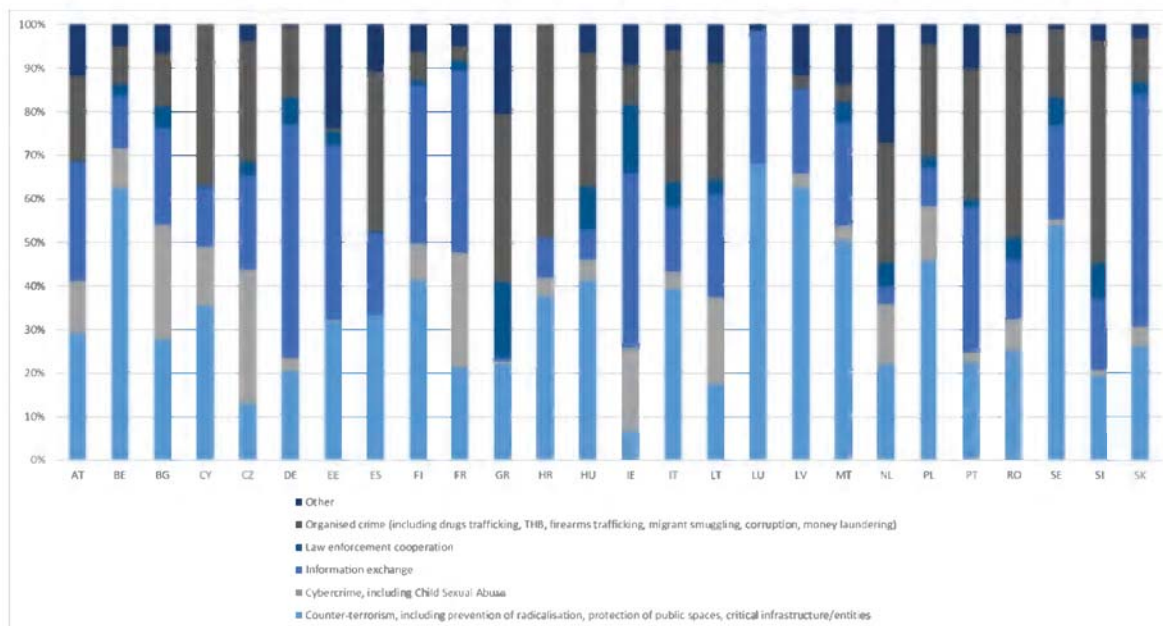
<sup>133</sup> National interim evaluation reports.

<sup>134</sup> Based on the review of the Annual and Final Implementation Reports.

<sup>135</sup> BG, CZ, DE, EL, ES, FI, FR, HR, NL, PL, RO, SI, and SE.

<sup>136</sup> CZ, EE, ES, FI, HU, IT, LT, MT, NL, PL, PT, SK, SI, and SE.

Figure 20 - Allocation of paid resources under shared management by policy field and by Member State



Source: Preparatory study

### Measures to address changing needs

During the implementation period, **Member States amended their national programmes to respond to the changing internal security environment and emerging needs.**

The interim evaluation of the ISF-P reported that the scope of the national programmes were sufficiently broad and flexible to accommodate changing needs in the internal security landscape.

The ISF-P original rationale and objectives were still relevant in the aftermath of the migratory and related security challenges confronted by the EU. Monitoring and evaluation mechanisms played a significant role in maintaining the relevance of its objectives and ensuring national programmes effectively responded to evolving policy needs.

The mid-term review also allowed for a more comprehensive reassessment of needs and a dialogue with the Commission, including the possibility to amend the national programme where necessary<sup>137</sup>. Member States have performed **needs assessments on a regular basis**, and several of which have reviewed and updated their respective national programmes during the mid-term review process.<sup>138</sup> For instance, in Latvia changing needs included the construction of new training facilities and a laboratory for ballistic and the growing interest in training and information exchange.

Furthermore, additional amounts were allocated to the Member States national programmes to adapt to changes and evolving needs, i.e. to support the Implementation

<sup>137</sup> Articles 10, 13(4) and 15(1) of the Horizontal Regulation.

<sup>138</sup> Country case studies on Germany, Croatia and Spain; interim evaluation reports and Annual Implementation Reports of Croatia, Germany, Hungary and Latvia.

Plan for Directive (EU) 2016/681 and the development of information exchange and interoperability tools (Section 3.3).

While acknowledging the Instrument's flexibility, the interim evaluation of the ISF-P reported that Member States called for more room for manoeuvre by way of not requiring minimum allocations to 'Specific Objective – fight against crime' and 'Specific Objective – risk management'.

The national interim evaluation reports of Austria, Estonia, Germany, Latvia, Slovenia and Slovakia highlight that structured governance frameworks overseeing the implementation and monitoring of ISF-P projects have been established. Monitoring Committees were set up to support the implementation of the national programmes and facilitate coordination and discussion of evolving national needs among various stakeholders, including governmental bodies, civil society organisations, and beneficiary entities.

During the implementation phase, some Member States faced challenges in fully addressing all relevant needs due to budget constraints (Greece and Portugal), and consequences of the COVID-19 pandemic and the Russian war of aggression against Ukraine, such as inflation (Finland, Malta and Poland), limited availability of (construction) materials<sup>139</sup> delays in public procurement procedures (e.g. to acquire specialised equipment and/or services).<sup>140</sup> The Annual and Implementation Reports of 18 Member States<sup>141</sup> report delays and difficulties in continuing projects during the pandemic which led to extending projects to ensure completion.

### ***Union Actions***

The ISF-P financed transnational actions or actions of particular interest to the Union concerning the general, specific and operational objectives under primarily direct and, to a lesser extent, indirect management. Union Actions complemented the support provided under shared management.

The Commission defined in the Annual Work Programmes the priorities and objectives for each year, including the priorities for the calls for proposals. The objectives set in the Annual Work Programmes<sup>142</sup> for Union Actions were in line with those of the EU Internal Security Strategy, the European Agenda on Security and also addressed the actual needs identified in the key policy fields based on threat assessments.

To deliver on the Annual Work Programmes objectives, the calls for proposals focused on supporting projects capable of delivering results. Nonetheless, the interim evaluation of the ISF-P reported that some stakeholders raised concerns on the definition and presentation of the rationale for the selection of priorities and calls for proposals, which were considered by some stakeholders as not sufficiently clear.

Support was provided via action grants (calls for proposals and direct awards), procurement contracts and delegation agreements. The bulk of funding under action grants

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<sup>139</sup> Final Implementation Report for EE, IE, MT and PL. Additional interview for the ISF-P: CY MA.

<sup>140</sup> Review of Final Implementation Report for IT, LV, PT, and SK, and additional interview with responsible Authorities of Czechia and Italy.

<sup>141</sup> Austria, Belgium, Cyprus, Czechia, Estonia, Finland, Germany, Hungary, Ireland, Italy, Latvia, Lithuania, Poland, Portugal, Romania, Spain, Slovakia and Sweden.

<sup>142</sup> 2014-2020 Annual Work Programmes.

was given to projects tackling counterterrorism and organised crime, while procurement contracts was channelled to the prevention of radicalisation, combatting organised crime and corruption and, particularly, to counterterrorism by ensuring the functioning of the Radicalisation Awareness Network (RAN).<sup>143</sup>

The case study on Union Action evidence that in addition to law enforcement authorities, the implementation of projects had the involvement of civil society organisations and academic and research institutions as projects' coordinators and partners. Private sector actors contributed expertise in developing advanced technologies, particularly in projects focused on using AI and other digital solutions. These initiatives have strengthened the capacity of law enforcement authorities to conduct criminal investigations, process large volumes of data, and apply innovative methods such as facial recognition and encrypted communication analysis.

As highlighted in the thematic case study for Union Actions, all ISF-P participating Member States (excepting Luxembourg and Slovakia) had at least one organisation coordinating Union Actions projects based in their territory. The involvement of coordinators from most Member States indicates that the objectives of the calls responded well to the needs of beneficiaries, and that organisations capable of initiating and managing Union Actions projects existed in every Member State.

Union Actions played an important and indispensable role in addressing the needs identified in the EU strategic documents and those of beneficiaries and proved instrumental in enhancing the EU's internal security and responding to emerging changes. The funded projects strengthened the capabilities to respond adequately to internal security threats and fostered meaningful cooperation among national law enforcement authorities, relevant EU agencies and the private sector, enhancing the EU's collective resilience.<sup>144</sup>

Projects successfully delivered on the key needs in counterterrorism and organised crime. The nature of the challenges addressed by Union Actions often required a transnational approach. The case study on Union Actions evidence that projects advanced the sharing of knowledge and skills; deploying innovative practices, technologies, and tools that aided stakeholders (particularly law enforcement authorities) in addressing complex internal security challenges; and benefitted multiple Member States and/or the Union as a whole.

Despite these positive results, two issues were raised during the interim evaluation of the ISF-P: limitations in funding for certain policy fields (e.g. cybercrime) and a geographical imbalance, with some Member States less active in securing grants, potentially affecting the uniformity of the projects' impact across the EU.

### ***Emergency Assistance***

Overall, EMAS-funded projects aligned well with the ISF-P objectives, enhancing internal security response capabilities and collective efforts against organised crime and terrorism, and proved essential in addressing urgent internal security needs within the EU and Member States. The thematic study on EMAS evidence that rapid financial assistance allowed Member States to mobilise resources promptly, supporting their ability to protect public spaces, prevent terrorist attacks, and manage critical infrastructure crises. As

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<sup>143</sup> Thematic case study on Union Actions.

<sup>144</sup> Thematic case study on Union Actions.

highlighted in the thematic case study on EMAS, beneficiaries confirmed that grants enabled them to meet urgent and specific needs efficiently. This finding was supported by consulted stakeholders via survey, who also reported positive outcomes from EMAS-funded projects.<sup>145</sup>

Despite the overall positive results, several challenges were noted, such as complex procurement procedures were perceived as an obstacle, which often delayed and hampered effective project implementation. Delays in the review and approval processes for EMAS funding were flagged as limitations to providing rapid emergency response. However, it should be noted that the limited timeframe is inherent to the emergency aspect of this funding component, which is not intended to support projects of a structural nature.

As highlighted in the case study on EMAS, during the 2014-2020 programming period, a total of ten projects were funded under the EMAS component of the ISF-P amounting to EUR 12 026 708. Seven of these projects were implemented as action grants by Member States and three by Europol and Interpol. The international-level projects managed by Europol and Interpol also expanded their focus to address counter-terrorism efforts.

## **5. WHAT ARE THE CONCLUSIONS AND LESSONS LEARNED?**

### **5.1. Conclusions**

#### **5.1.1. Effectiveness**

**The ISF-P proved effective in supporting Member States in progressing towards their objectives of preventing and combating cross-border, serious and organised crime, including terrorism and to enhance their capacity to effectively manage security-related risks and crises.**

The ISF-P contributed to ‘Specific Objective – fight against crime’ by enhancing Member States’ capabilities to combat cross-border, serious and organised crime, including terrorism, through investments in modernising law enforcement tools, intelligence sharing, and cross-border operational projects. It also reinforced cooperation between national authorities, Europol and international partners by supporting IT interoperability and data exchange.

At EU level, the combined indicator target values for most ‘Specific Objective – fight against crime’ indicators were achieved. At Member State level, the analysis shows that depending on the indicator, between 5 and 13 Member States did not meet their targets. There were at times discrepancies between target and achieved values and inconsistent reporting of sub-indicators.

Findings indicate positive levels of perceived overall effectiveness in furthering ‘Specific Objective – fight against crime’ across different security-related actions. The national ex-post evaluation reports concluded that the funded actions have contributed to preventing cross-border, serious and organised crime, as well as reinforcing coordination among law enforcement authorities.

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<sup>145</sup> Survey question: Your country received EMAS under the ISF-P and/or ISF. To what extent do you believe it generated the intended results?

The ISF-P contributed to ‘Specific Objective – risk management’ by enhancing the Member States’ capacity to manage security-related risks and crises through investments in crisis management centres, early warning systems, and protection of critical infrastructure, including advancements in cybersecurity and CBRN-E threat responses.

At EU level, the combined indicator target values for ‘Specific Objective – risk management’ indicators were all overachieved. At Member State level, the analysis shows that depending on the indicator, between 5 and 7 Member States did not meet their targets. The most frequently reported reasons for the underachievement of some target values of indicators were the restrictive measures imposed in many areas by the COVID-19 pandemic (particularly in the case of face-to-face events).

The findings all confirm that ISF-P actions were effective in furthering ‘Specific Objective – risk management’ and highlight the significant progress across Member States in enhancing administrative and operational capacities for crisis management, critical infrastructure protection, and risk assessment.

The ISF-P faced recurring challenges – procurement issues, COVID-19 pandemic and the Russian war of aggression against Ukraine – which at times, led to delays in project implementation due to disrupting project timelines, training activities, and operational measures. Despite these challenges, evidence did not identify major issues affecting the achievement of objectives, thus underscoring the robustness of ISF-P in addressing such obstacles.

### **5.1.2. Efficiency and Simplification and reduction of administrative burden**

**The ISF-P implementation was efficient, with projects across Member States generally meeting their objectives within reasonable budgets.** Cost savings were achieved through digitalisation, procurement, and efficient allocation of financial and human resources, particularly in areas such as training and IT system development. The use of public tendering processes ensured transparency and compliance with financial and operational standards, strengthening overall cost-effectiveness.

While the Instrument achieved its intended objectives, the administrative burden varied across Member States, with some facing inefficiencies due to complex procedures and high personnel costs, and stakeholders highlighting excessive reporting requirements and bureaucratic hurdles.

The ISF-P has demonstrated effective management and control mechanisms that were efficient to safeguard the EU’s financial interests. Strong collaboration and clear communication between Responsible Authorities and beneficiaries were identified as key means of timely and cost-effective project delivery. The measures in place to prevent fraud and irregularities and cooperation between national authorities and beneficiaries have largely contributed to the efficient use of resources.

The ISF-P and the Horizontal Regulations introduced several changes aimed at simplifying the ISF-P management and reducing administrative burden, such as the introduction of multiannual programming, national eligibility rules and SCOs. Overall, Member States perceived these changes as a positive development.

### **5.1.3. Coherence and complementarity**

The national programmes and Annual Work Programmes are coherent with other national and EU funding instruments.

The architecture of the ISF-P was fit for purpose as it enhances internal coherence by fostering complementarity across components. The combination of fund components (national programmes, Union Actions and EMAS) and management modes (shared, direct and indirect) enables flexible fund management.

Member States implemented several different coordination mechanisms at national level during the programming and implementation phases to ensure the coherence of activities with other programmes funded by EU Instruments with similar objectives to those of the ISF-P. The findings show that the key coordination mechanisms in ensuring coherence between the ISF-P and other EU interventions is played by the Monitoring Committees, which gathers representatives from national institutions and beneficiaries with the objective of fostering coherence and limiting overlaps between interventions.

As far as coherence with external spending programmes, there appears to be limited complementarity between the ISF-P and other existing EU instruments with an EU's external action dimension, as only few Member States specifically report coordination between ISF-P-funded actions in or in relation to third countries, which are also supported by national foreign policy with a view to ensuring coherence and complementarity.

### **5.1.4. EU added value**

The ISF-P has generated substantial EU added value at EU level, primarily through fostering a unified framework for addressing cross-border internal security challenges, encouraging knowledge exchange, and the promotion of best practices.

Findings suggest that the ISF-P achieves EU added value across Member States under three main aspects: in a higher volume of services offered (volume effect), new types of intervention tackled (scope effect) and increased the capacities of Member States and public authorities to manage the funding (role and process effect).

The ISF-P achieves EU added value by enabling a higher volume of investment or funding, supporting projects with a larger scope and streamlining of internal and external processes, the development of standards supporting cooperation, information sharing and the adoption of good practices.

The consequence of the absence or interruption of ISF-P would affect Member States to varying degrees, ranging from an inability to meet regulatory requirements to the reduced efficiency and effectiveness of specific individual projects due to changes in priorities. Whereas a few larger member States consider that some projects could still be funded, though potentially at a slower pace and smaller scale, other Member States report that absent ISF-P support, they would have received less to no funding due to national budgetary constraints.

At EU level, benefits under national programmes primarily relate to information-sharing, data interoperability, cooperation and networking. Union Actions projects have created EU added value due to having a strong transnational component, supported the uninterrupted operation of transnational law enforcement networks, enhanced cooperation with third

countries and international organisations, promoted innovation and transfer of best practices, and has contributed to the involvement of different stakeholders. EMAS has strengthened operational cooperation and information exchange across the EU through strengthened protection of public spaces, enhanced prevention of terrorist attacks, and improved crisis management in response to terrorist incidents or attacks on critical infrastructure.

#### **5.1.5. Sustainability**

The sustainability of ISF-P funded projects is underpinned by a multifaceted approach that integrates financial planning, operational continuity, personnel training, and international cooperation. Overall, stakeholders have reported that many actions and positive effects funded under ISF-P are likely to last. During the programming stage, there seems to be rather coherent approaches across Member States in ensuring that project proposals align with national and EU objectives and priorities. This contributes to the sustainability of selected projects, as they are relevant to the objectives and national priorities at national and EU-levels. During the implementation stage, the use of sustainability checks is more fragmented, ranging from strict requirements to informal check-ins and to no sustainability checks at all. Furthermore, some Member States demonstrate dependencies on EU funding and consider it the main option for the continuation of projects funded under ISF-P.

In general, Member States have prioritised the development of skills and expertise to ensure that the benefits of ISF-funded projects persist over time. Training programmes have been integral in ensuring that personnel are equipped with the knowledge and capabilities to effectively use and maintain new systems and technologies in the long run. Similarly, Union Actions projects that have demonstrated sustainability over time are often focused on networking and cross-border cooperation. These networks provide a platform for the sharing of best practices, knowledge, and resources, further embedding sustainability into the fabric of the project from the beginning. Regarding EMAS, despite the short-term duration of these projects, the integration and further development of tools have been continued after the projects formally ended. Moreover, the continuance of operations and experience sharing has been a key strategy in contributing to the sustainability of EMAS projects.

#### **5.1.6. Relevance**

The ISF-P has largely addressed the needs identified at the beginning of the programming period to achieve the overall objective of ensuring a high level of security in the Union through the fight against organised crime and managing risk and crises. It has also demonstrated adaptability to evolving needs and challenges throughout the implementation period.

At EU level, the consultation process consisted of a policy dialogue between Member States and the Commission to ensure alignment of the national mapping of needs/trends with the ISF-P's objectives and with those identified at EU and national levels.

At national level, the ISF-P supported Member States in implementing targeted actions under shared management, as national programmes were structured to address country-specific internal security needs and were developed through needs assessments and stakeholder consultations, ensuring alignment with both EU-level policy priorities and national security requirements.

Union Actions played a crucial role by funding transnational projects producing outputs and results which bring high EU added value to multiple Member States and the EU as a whole which proved essential in strengthening cooperation between stakeholders, thereby enhancing the EU's collective resilience to internal security threats. Furthermore, it has supported the uninterrupted operation of established and newly emerging transnational law enforcement networks which play a critical role in enhancing the cooperation in all policy fields, it is the primary instrument for enhancing cooperation with third countries and international organisations, promotes innovation and transfer of best practices, and has contributed to expanding the involvement of different stakeholders such as civil society and the private sector. EMAS-funded projects significantly enhanced internal security response capabilities, enabling Member States to mobilise resources quickly in crisis situations.

## **5.2. Lessons Learned**

Member States have a general dissatisfaction with the ISF-P indicator system as defining, applying and reporting on indicators has proven to be very challenging. In particular, the ISF-P indicators have been criticised for their poor and late definition and weak correlation with the intended objectives. Future instruments may benefit from improved monitoring and performance assessment mechanisms to better capture and monitor the progress towards the achievement of the established objectives.

The one-year implementation extension to all Home Affairs Funds for the 2014-2020 programming period contributed to achieving the two specific objectives of the ISF-P. This flexibility was praised for allowing the completion of projects and helping to overcome certain delays particularly caused by the COVID-19 pandemic. The positive impact of the one-year extension highlights the importance of adaptable timelines in ensuring programme continuity and completion during crisis situations. Future instruments should retain the flexibility to respond to external events through mechanisms such as the extension of the implementation period.

Overall, Member States perceived efforts to further simplification and reduce administrative burden as a positive development. Nonetheless, some Member States encountered challenges related to burdensome documentation requirements and difficulties in effectively implementing SCOs. Thus, despite some progress having been made, additional efforts are necessary to further simplification and reduce administrative burden. For instance, the use of SCOs could be further encouraged and promoted.

While the architecture of the ISF-P was fit for purpose, there is room for strengthening the complementarity between Union Actions and national programmes to improve awareness and knowledge of the other's respective projects.

The ISF-P has particularly enabled Member States with limited financial resources to implement critical internal security projects in line with EU standards. For instance, projects under the certain national programmes support Member States in overcoming national budgetary limitations which posed significant challenges for enhancing internal security via needed long-term investments in IT infrastructure and crime prevention. The Instrument's ability in supporting Member States underlines its importance in not only generating several benefits at EU level beyond those Member States could achieve on their own but also in supporting Member States in implementing the EU acquis which at time could not been implemented absent ISF-P funding.

Union Actions have particularly contributed to creating benefits at EU level due to having a strong transnational component with projects producing outputs and results which bring high EU added value to multiple Member States and the EU as a whole. Furthermore, it has supported the uninterrupted operation of established and newly emerging transnational law enforcement networks which play a critical role in enhancing the cooperation in all policy fields, it is the primary instrument for enhancing cooperation with third countries and international organisations, promotes innovation and transfer of best practices, and has contributed to expanding the involvement of different stakeholders such as civil society and the private sector. The ability of Union Actions to swiftly adapt to emerging internal security challenges further underlined their relevance within the ISF-P framework.

## **ANNEX I. PROCEDURAL INFORMATION**

This evaluation has been carried out by DG HOME, as responsible for the implementation of the ISF-P in the Commission.

The evaluation has been carried out in accordance with the rules of Better Regulation, by applying the methods and requirements established in the Toolbox. The evaluation was also based on the requirements set in the monitoring and evaluation framework for the 2014-2020 Home Affair Funds, as defined in the Commission Delegated Regulation (EU) 2017/207. In this regard, the five standard criteria for evaluation defined in the Better Regulation (Effectiveness, Efficiency, Relevance, Coherence and EU Added Value) were complemented by three additional ones: simplification and reduction of administrative burden, complementarity and sustainability

The evaluation has been steered by an Interservice Group, with the participation of the operational and policy units in DG HOME, as well as the following DGs and services: SG, SJ, OLAF, DG BUDG, DG JUST, DG INTPA, DG REGIO, DG EMPL, DG MARE, DG RTD, DG DEFIS, JRC and DG ECHO.

The first meeting of the Interservice Group was held on 30 June 2023. The meeting discussed the Specifications for the preparatory study to be carried out with the assistance of external consultants. Additional meetings of the Interservice group took place to discuss the deliverables of the preparatory study on 29 February 2024, 26 April 2024, 22 July 2024, 15 November 2024 and 8 April 2025. The draft version of this Staff Working Document was submitted to the Interservice Group in written consultation on 1 July 2025, and the final meeting with the Interservice Group was held on 15 July 2025.

The preparatory study was confided to a consortium made up of ECORYS, Rand, Wavestone and the Centre for the Studies of Democracy following an open call for tender launched on 3 October 2023. The contract was signed on 27 February 2024. The final report of the preparatory study was submitted to the Commission on 19 May 2025.

The evaluation is mostly based on the work done during the preparatory study, as explained in Annex II and III, in line with the requests in the Specifications drafted by the Commission.

## ANNEX II. METHODOLOGY AND ANALYTICAL MODELS USED

This Annex presents the methodology employed for the Evaluation of the ISF-P 2014-2020 and the limitations encountered.

### Methodology

The evaluation was supported by an external study that was divided into four phases: inception, data collection, analysis and finalisation.

The inception phase was characterised by preparing the work to be done. This included preliminary desk research, a literature review, scoping interviews, stakeholder mapping, developing an intervention logic, and the refinement of the methodological approach to be used. The phase concluded with the production of an inception report which was discussed during a meeting of the Steering Group, revised by the contractors to incorporate the Commission's feedback, and later the final inception report was approved.

The data collection phase focused on gathering data by synthesising and analysing the annual implementation reports and the final implementation reports, a review of the ex-post evaluations of the national programmes, reviewing a sample of target setting methodologies, mapping the allocations by type of intervention and target group, launching a targeted survey and public consultation, and conducting semi-structured interviews and focus groups.

During the analysis phase, the focus was on collecting the remaining data necessary for the study as well as answering the evaluation questions. This included obtaining quantitative and qualitative data from SFC2021 and creating an overview of costs and benefits. The data was then triangulated to develop replies to each evaluation question.

In the final phase, the findings were synthesised, a synopsis covering the consultation activities was drafted. Furthermore, the third EU level focus group was held to validate the evaluation findings and develop lessons learned.

Furthermore, data on financial allocations, financial progress and implementation progress was extracted from SFC2014. The data was reviewed by management mode, specific objective, Member State and field of intervention to develop the state of play.

Regarding the **consultation activities**, EU level interviews were conducted with officials from DG HOME units D1, D2, E1, E2, E3 and E4. The interviews included scoping interviews and semi-structured interviews to gather data for the analysis, including the country case studies and thematic case studies. Further interviews were conducted for the case studies including with national authorities and beneficiaries.

Two EU level focus groups on the ISF-P were held during the study (first and third focus groups). The first EU level **focus group** was held in person on the 25 June 2024. The focus group consisted of Managing Authorities and project beneficiaries, for a total of 50-60 participants. After a plenary session the participants were divided into six break-out groups to facilitate more targeted discussions. The aim of the focus group was to collect views on whether and how well the ISF-P is addressing needs while also supporting activities that generate EU added value.

The third focus group was held on 3 April 2025 and aimed to collect feedback from relevant stakeholders (total of 60 participants) and validate the findings of the study, ensuring that the conclusions presented in the Draft Final Report for the ex-post evaluation

of the ISF-P are accurate and comprehensive and reflect the perspectives of all key stakeholders.

In addition to the focus groups, two **targeted surveys** were launched to target various stakeholders (one for Member State authorities and another for beneficiaries of Union Actions and the national programmes). The results of the survey fed into the main analysis.

The study included five **country case studies** (Croatia, Germany, Latvia, the Netherlands and Spain) to dive deeper into the implementation of the ISF-P to identify challenges encountered, specific processes, and best practices. The study also included two **thematic case studies** on Union Actions and EMAS. The thematic case studies allowed for deep-dives into certain aspects of the instrument and specific topics by reviewing specific projects.

**Based on the described methodology, the final report for the ex-post evaluation was drafted.**

### **Limitations and mitigation measures**

The evaluation faced challenges related to data quality, availability, and consistency across Member States. Differences in the level of detail in the Annual Implementation Reports, Final Implementation Reports and national ex-post evaluations made cross-country comparisons difficult. Data on result and impact indicators transmitted by the Member States via SFC2014 included a number of omissions, clerical errors, and revealed differences in how Member States interpret, measure and report data. Additionally, turnover within key stakeholders impacted institutional memory and the continuity of information. To address these challenges, the study applied triangulation methods and cross-referenced multiple sources.

### **Indicators for the evaluation of the specific objectives of ISF-P Regulation<sup>146</sup>**

#### 1. Indicators by specific objectives

(c) Crime prevention, combating cross-border, serious and organised crime including terrorism, and reinforcing coordination and cooperation between law enforcement authorities and other national authorities of Member States, including with Europol or other relevant Union bodies, and with relevant third countries and international organisations:

(i) results of actions supported by the Fund leading to the disruption of organised crime groups;

(ii) number/value of frozen, seized and confiscated criminal assets as a result of actions within the scope of Regulation (EU) No 513/2014;

(iii) number of police-recorded offences, suspects, prosecutions and convictions resulting from actions falling within the scope of Regulation (EU) No 513/2014;

(iv) quantity of drugs seizure within the scope of the Fund on organised crime;

(v) number of protected or assisted crime victims;

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<sup>146</sup> Annex IV of Commission Delegated Regulation (EU) 2017/207.

(vi) volume of exchange of information in the Prüm framework (based on the measurement of total number of DNA matches per year; total number of fingerprint matches per year; total number of vehicle registration data matches per year);

(vii) volume of exchange of information in the Secure Information Exchange Network Application (SIENA) framework (based on the measurement of SIENA cases initiated per year by Member States, Europol and third parties; SIENA messages exchanged per year by Member States, Europol and third parties);

(viii) volume of sharing of data via the Europol Information System (EIS) (based on the measurement of number of persons and objects inserted in the EIS by Member States per year; number of person and objects inserted in the EIS by Member States per year (suspects, convicts); number of EIS searches performed by Member States per year).

(d) Enhancing the capacity of Member States and the Union for managing effectively security-related risks and crises, and preparing for and protecting people and critical infrastructure against terrorist attacks and other security-related incidents:

(i) volume of terrorist attacks (based on the measurement of failed, foiled and completed terrorist attacks; number of casualties resulting from terrorist attacks).

## ANNEX III. EVALUATION MATRIX

### Effectiveness

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
1. How did the Fund contribute to the achievement of the following specific objectives: Prevention of cross-border, serious and organised crime, including terrorism?; Reinforcement of the coordination and cooperation between law enforcement authorities and other national authorities of Member States, including with Europol or other relevant Union bodies, and with relevant third countries and international organisations?	1.1 What progress was made towards the achievement of the expected results of strengthening Member States' capacity to combat cross-border, serious and organised crime, including terrorism and to reinforce their mutual cooperation in this field, and how did the Fund contribute to the achievement of this progress?	<p>1.1.1 Output indicators related to combatting cross-border, serious and organised crime, including terrorism, have achieved their targets, provided these were correctly defined and in line with evolving needs</p> <p>1.1.2 Result indicators related to combatting cross-border, serious and organised crime, including terrorism, have achieved their targets, provided these were correctly defined and in line with evolving needs</p> <p>1.1.3 Impact indicators related to combatting cross-border, serious and organised crime, including terrorism, have achieved their targets, provided these</p>	<p>1.1.1 OI SO-fight against crime C3: Number of projects in the area of crime prevention (i)</p> <p>1.1.1 OI: SO-fight against crime R1: Number of joint investigation teams (JITs) and European Multidisciplinary Platform against Criminal Threats (EMPACT) operation projects supported by the Fund, including the participating Member States and authorities</p> <p>1.1.1 OI: Number of projects supported by the Fund, aiming to improve law enforcement and information exchange, which are related to Europol data systems, repositories, or communication tools (SO-fight against crime C4) (i)</p> <p>1.1.1 OI: (SO-fight against crime R2) Number of law enforcement officials trained on cross-border related topics with the help of the Fund, and the duration of their training (person days) (i)</p> <p>1.1.1 OI: Number of studies/platforms/guidance/risk and threat assessments reports</p> <p>1.1.1 OI: Number of expert meetings, workshops, seminars, conferences, publications, websites and online consultations organised with the help of the Instrument</p> <p>1.1.1 OI: Number of EU/national equipment and IT systems acquired ex.: n. of laptops, software, apps, video surveillance</p> <p>1.1.1 Output indicators for EMAS and Union actions (see revised IILs)</p>	<ul style="list-style-type: none"> <li>• Mapping of allocations (Task 1b)</li> <li>• Review of methodology for target setting (Task 1c)</li> <li>• Synthesis of implementation reports (Task 1d)</li> <li>• Systematic review of MS evaluations (Task 1e)</li> <li>• Quantitative analysis (Task 1f)</li> <li>• Final project reporting (UAs and EMAS) (Task 1f)</li> <li>• Interviews/survey with MS authorities (RA, IB), beneficiaries, and participants</li> <li>• Case studies (Task 4)</li> <li>• Public consultation (Task 2d)</li> <li>• Desk research on indicators</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
		<p>were correctly defined and in line with evolving needs</p> <p>1.1.3 Stakeholder perception on Funds contribution to achievement of expected results</p> <p>1.1.4 Contribution of Fund measures to strengthening MS capacities to combat cross-border serious and organised crime, including terrorism, (positive contribution of the Fund to the trend of any impact indicators)</p> <p>1.1.5 Identification of factors hampering the achievement of intended objectives</p>	<p>1.1.2 RI: Number of protected or assisted crime victims (SO-fight against crime I4)</p> <p>1.1.2 RI: Number of Member States and authorities participating in investigations teams and platform operation (JIT, EMPACT) (SO-fight against crime R1) (i)</p> <p>1.1.2 RI: EU agencies involvement in the area of crime prevention, data systems or communication tools (EUROPOL, CEPOL, Frontex, Eurojust)</p> <p>1.1.2 Result indicators for EMAS and Union actions (see revised ILs)</p> <p>1.1.3 II: Improved coordination, cooperation and cross-border information exchange between MSs and EU agencies, institutions such as Europol (ex: PNR data exchange) (d)</p> <p>1.1.3 II: More strategic and operational intelligence, strengthening capabilities and investigation activities to prevent and fight crime, terrorism and support to victims of crime</p> <p>1.1.3 II: Increased awareness and responsiveness to challenges linked to radicalisation, or crime/cyber crime</p> <p>1.1.3 Impact indicators for EMAS and Union actions (see revised ILs)</p> <p>1.1.4 Degree of supporting evidence from consultations (opinion of stakeholders)</p> <p>1.1.4. Strength of linkages between output, results and impact indicators</p> <p>1.1.5. Challenges identified that affect implementation and the progress towards the objectives of the fund</p> <p>1.1.5 Identified delays in implementation of actions</p>	
	1.2 What progress was made towards developing	1.2.1 Output indicators related to developing administrative operational	1.2.1 OI: Number of projects supported by the Fund, aiming to improve law enforcement and information exchange, which are related	<ul style="list-style-type: none"> <li>• Mapping of allocations (Task 1b)</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
	administrative and operational coordination and cooperation among Member States' public authorities, Europol or other relevant Union bodies and, where appropriate, with third countries and international organisations, and how did the Fund contribute to the achievement of this progress?	<p>coordination and operational cooperation have achieved their targets, provided these were correctly defined and in line with evolving needs</p> <p>1.2.2 Result indicators related to developing administrative operational coordination and cooperation have achieved their targets, provided these were correctly defined and in line with evolving needs</p> <p>1.2.3 Impact indicators related to developing administrative and operational coordination and cooperation among MS</p> <p>1.2.4 Stakeholder perception on Funds contribution to achievement of expected results</p> <p>1.2.5 Identification of factors hampering the achievement of intended objectives</p>	<p>to Europol data systems, repositories, or communication tools (SO-fight against crime C4)</p> <p>1.2.1 (i) Output indicators for EMAS and Union actions (see revised ILs)</p> <p>1.2.2 RI: Number of joint investigation teams (JITs) and European Multidisciplinary Platform against Criminal Threats (EMPACT) operation projects supported by the Fund, including the participating Member States and authorities (SO-fight against crime R1) (i)</p> <p>1.2.2 RI: Growing number of stakeholders involved in the sharing of information, study and data collection</p> <p>1.2.2 RI: Harmonised practices and validation protocols (e.g. under Prüm, SIENA, EIS) (d)</p> <p>1.2.2 Result indicators for EMAS and Union actions (see revised ILs)</p> <p>1.2.3 II: Improved coordination, cooperation and cross-border information exchange between MSs and EU agencies, institutions such as Europol (ex: PNR data exchange) (d)</p> <p>1.2.3 Impact indicators for EMAS and Union actions (see revised ILs)</p> <p>1.2.4 Degree of supporting evidence from consultations (opinion of stakeholders)</p> <p>1.2.5 Challenges identified that affect implementation and the progress towards the objectives of the fund</p> <p>1.2.5 Identified delays in implementation of actions</p>	<ul style="list-style-type: none"> <li>• Review of methodology for target setting (Task 1c)</li> <li>• Synthesis of performance and implementation reports (Task 1d)</li> <li>• Systematic review of MS evaluations (Task 1e)</li> <li>• Quantitative analysis (Task 1f)</li> <li>• Final project reporting (UAs and EMAS) (Task 1f)</li> <li>• Interviews/survey with MS authorities (RA/MA, DA/IB), beneficiaries, and participants</li> <li>• Case studies (Task 4)</li> <li>• Public consultation (Task 2d)</li> <li>• Desk research on indicators</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
	<p>1.3 What progress was made towards developing training schemes, such as those regarding technical and professional skills and knowledge of obligations on human rights and fundamental freedoms, in implementation of EU training policies, including through specific Union law enforcement exchange programmes, and how did the Fund contribute to the achievement of this progress?</p>	<p>1.3.1 Output indicators related to developing training schemes have achieved their targets, provided these were correctly defined and in line with evolving needs</p> <p>1.3.2 Result indicators related to developing training schemes have achieved their targets, provided these were correctly defined and in line with evolving needs</p> <p>1.3.3 Impact indicators related to developing training schemes</p> <p>1.3.4 Stakeholder perception on Fund's contribution to achievement of expected results</p> <p>1.3.5 Identification of factors hampering the achievement of intended objectives</p>	<p>1.3.1 OI: Number of law enforcement officials trained on cross-border-related topics with the help of the Instrument, and the duration of their training (person days) (SO-fight against crime R2) (i)</p> <p>1.3.1 OI, UA: Number of technical visits and thematic workshop with involvement of key-stakeholders</p> <p>1.3.1 OI, UA: Number of training material, guidance addressing different law enforcement authorities needs (ECTEG) (i)</p> <p>1.3.1 OI, UA and EMAS: Number of trainings/trained staff (i)</p> <p>1.3.1 OI, EMAS: Number of guidance produced at the end of workshops, seminars, missions, meetings, conferences etc.</p> <p>1.3.1 OI, EMAS: Number of technical guidance, studies, manuals methodologies best practices developed</p> <p>1.3.2 RI: Increased knowledge and skills of training participants in the area of crime prevention/forensic field (e.g. use of systems of data extraction) (d)</p> <p>1.3.2 RI, UA: Increased exchange of best practices or qualitative knowledge for preventing crime, terrorism and radicalisation (ex.: ESCN) (d)</p> <p>1.3.2 RI, UA: Increased awareness and civic engagement on the issues surrounding radicalisation and violent extremism</p> <p>1.3.2 RI, EMAS: Improved knowledge about the methods and means used by terrorists due to information dissemination</p> <p>1.3.2 RI, EMAS: Improvement of capabilities for the exchange of information and coordination</p> <p>1.3.3 II: More strategic and operational intelligence, strengthening capabilities and investigation activities to prevent and fight crime, terrorism and support to victims of crime (d)</p>	<ul style="list-style-type: none"> <li>• Mapping of allocations (Task 1b)</li> <li>• Review of methodology for target setting (Task 1c)</li> <li>• Synthesis of performance and implementation reports (Task 1d)</li> <li>• Systematic review of MS evaluations (Task 1e)</li> <li>• Quantitative analysis (Task 1f)</li> <li>• Final project reporting (UAs and EMAS) (Task 1f)</li> <li>• Interviews/survey with MS authorities (RA/MA, DA/IB), beneficiaries, and participants</li> <li>• Case studies (Task 4)</li> <li>• Public consultation (Task 2d)</li> <li>• Desk research on indicators</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
			<p>1.3.3 II, UA: Increased awareness, cooperation and referral amongst frontline professionals to quickly identify criminal activities (d)</p> <p>1.3.4 Degree of supporting evidence from consultations (opinion of stakeholders)</p> <p>1.3.5 Challenges identified that affect implementation and the progress towards the objectives of the fund</p> <p>1.3.5 Identified delays in implementation of actions</p>	
	<p>1.4 What progress was made towards putting in place measures, safeguard mechanisms and best practices for the identification and support of witnesses and victims of crime, including victims of terrorism, and how did the Fund contribute to the achievement of this progress?</p>	<p>1.4.1 Output indicators related to putting in place measures, safeguard mechanisms achieved their targets, provided these were correctly defined and in line with evolving needs</p> <p>1.4.2 Result indicators related to putting in place measures, safeguard mechanisms achieved their targets, provided these were correctly defined and in line with evolving needs</p> <p>1.4.3 Impact indicators related to putting in place measures, safeguard mechanisms and best practices for the identification and support of</p>	<p>1.4.1 OI: Number of introduced programmes or infrastructure for victim support (e.g. psychological assistance, modernisation of control system of centres of witnesses and victims) (i)</p> <p>1.4.1 OI, UA: Number of specialised support services for victims of crime (i)</p> <p>1.4.2 RI: Number of protected or assisted crime victims (SO-fight against crime I4) (i)</p> <p>1.4.2 RI: Improved preparedness and conditions that allow effective monitoring of witnesses and victims of crimes, aiming to increase their safety, protection and support (d)</p> <p>1.4.3 II: More strategic and operational intelligence, strengthening capabilities and investigation activities to prevent and fight crime, terrorism and support to victims of crime (d)</p> <p>1.4.4 Degree of supporting evidence from consultations (opinion of stakeholders)</p> <p>1.4.5 Challenges identified that affect implementation and the progress towards the objectives of the fund</p> <p>1.4.5 Identified delays in implementation of actions</p>	<ul style="list-style-type: none"> <li>• Mapping of allocations (Task 1b)</li> <li>• Review of methodology for target setting (Task 1c)</li> <li>• Synthesis of performance and implementation reports (Task 1d)</li> <li>• Systematic review of MS evaluations (Task 1e)</li> <li>• Quantitative analysis (Task 1f)</li> <li>• Final project reporting (UAs and EMAS) (Task 1f) (where relevant)</li> <li>• Interviews/survey with MS authorities (RA/MA, DA/IB), beneficiaries, and participants</li> <li>• Case studies (Task 4)</li> <li>• Public consultation (Task 2d)</li> <li>• Desk research on indicators</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
		<p>witnesses and victims of crime</p> <p>1.4.4 Stakeholder perception on Funds contribution to achievement of expected results</p> <p>1.4.5 Identification of factors hampering the achievement of intended objectives</p>		
<p>2. How did the Fund contribute to improve the capacity of Member States to manage effectively security-related risks and crises, and protecting people and critical infrastructure against terrorist attacks and other security-related incidents?</p>	<p>2.1 What progress was made towards reinforcing Member States' administrative and operational capability to protect critical infrastructure in all sectors of economic activity, including through public-private partnerships and improved coordination, cooperation, exchange and dissemination of know-how and experience within the Union and with relevant third Countries, and how</p>	<p>2.1.1 Output indicators related to reinforcing Member States' administrative and operational capability to protect critical infrastructure in all sectors of economic activity</p> <p>2.1.2 Result indicators related to reinforcing Member States' administrative and operational capability to protect critical infrastructure in all sectors of economic activity</p> <p>2.1.3 Impact indicators related to reinforcing</p>	<p>2.1.1 OI: Number and tools put in place and/or further upgraded with the help of the Instrument to facilitate the protection of critical infrastructure by Member States in all sectors of the economy (SO-risk management R1) (i)</p> <p>2.1.1 OI: Number of trained staff (i)</p> <p>2.1.1 OI, UA: Number of transnational/cross border collaborations or platforms established (i)</p> <p>2.1.1 OI, UA: Number and type of partners and beneficiaries reached (i)</p> <p>2.1.1 OI, UA: Number of technical equipment, infrastructure, ICT systems acquired, provided or upgraded (i)</p> <p>2.1.1 OI, EMAS: Number of hotspot manned (i)</p> <p>2.1.1 OI, EMAS: Number of referrals/security checks (i)</p> <p>2.1.1 OI, EMAS: Number of investigations supported (i)</p> <p>2.1.1 OI, EMAS: Number of staff deployed (i)</p> <p>2.1.2 RI: Upgraded systems and tools increased and facilitated early warning analysis and risk management capacity of critical infrastructure and public spaces (d)</p>	<ul style="list-style-type: none"> <li>• Mapping of allocations (Task 1b)</li> <li>• Review of methodology for target setting (Task 1c)</li> <li>• Synthesis of performance and implementation reports (Task 1d)</li> <li>• Systematic review of MS evaluations (Task 1e)</li> <li>• Quantitative analysis (Task 1f)</li> <li>• Final project reporting (UAs and EMAS) (Task 1f)</li> <li>• Interviews/survey with MS authorities (RA/MA, DA/IB), beneficiaries, and participants</li> <li>• Case studies (Task 4)</li> <li>• Public consultation (Task 2d)</li> <li>• Desk research on indicators</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
	did the Fund contribute to the achievement of this progress?	Member States' administrative and operational capability to protect critical infrastructure in all sectors of economic activity 2.1.4 Stakeholder perception on Funds contribution to achievement of expected results 2.1.5 Identification of factors hampering the achievement of intended objectives	2.1.2 RI, UA: Increased effectiveness and efficiency of infrastructure (e.g. airports, rails) controls (d) 2.1.2 RI, UA: Number of ICT systems made interoperable within and beyond the MS (d) 2.1.3 RI, EMAS: Improved secondary security checks in hotspots (d) 2.1.3 II: Enhanced administrative and operational capacity to protect critical infrastructure and related facilities (d) 2.1.3 II, UA: Improved protection of public spaces and critical infrastructures (d) 2.1.3 II, UA: Fostered cooperation between private entities and law enforcement authorities 2.1.3 II, EMAS: Addressed emergency issues through enhanced international cooperation and between bodies/authorities (e.g. Europol, Frontex etc.) (d)  2.1.4 Degree of supporting evidence from consultations (opinion of stakeholders) 2.1.5 Challenges identified that affect implementation and the progress towards the objectives of the fund 2.1.5 Identified delays in implementation of actions	
	2.2. What progress was made towards establishing secure links and effective coordination between existing sector-specific early warning and crisis	2.2.1 Output indicators related to establishing secure links and effective coordination between early warning and crisis cooperations actors	2.2.1 OI: Number of projects relating to the assessment and management of risks in the field of internal security supported by the Instrument (SO- risk management C2) (i) 2.2.1 OI: N. of studies/platforms/risk assessment produced (i) 2.2.1 OI: Number of trained staff (i) 2.2.1 OI, UA: Number of transnational/cross border collaborations or platforms established (i)	<ul style="list-style-type: none"> <li>• Mapping of allocations (Task 1b)</li> <li>• Review of methodology for target setting (Task 1c)</li> <li>• Synthesis of performance and implementation reports (Task 1d)</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
	cooperation actors at Union and national level, and how did the Fund contribute to the achievement of this progress?	<p>2.2.2 Result indicators related to establishing secure links and effective coordination between early warning and crisis cooperations actors</p> <p>2.2.3 Impact indicators related to establishing secure links and effective coordination between early warning and crisis cooperations actors</p> <p>2.2.4 Stakeholder perception on Funds contribution to achievement of expected results</p> <p>2.2.5 Identification of factors hampering the achievement of intended objectives</p>	<p>2.2.1 OI, UA: Number of events, conferences organised, and public-private partnership established (i)</p> <p>2.2.1 OI, EMAS: Number of developed and acquired tools (i)</p> <p>2.2.2 RI: Improved preparedness for future threats by developing know-how e.g. in the sphere of chemical, nuclear materials and explosives (d)</p> <p>2.2.2 RI: Increased participation of different organisations and associations in risk management operations (e.g. CBRN operations) (d)</p> <p>2.2.2 RI: Increased operative readiness of response and capability to analyse and investigate hazardous cases (d)</p> <p>2.2.2 RI: Increased communication between external information systems and coordination between authorities (d)</p> <p>2.2.2 RI, UA: Increased cross-border investigations and wider EU variety law enforcement cooperation (d)</p> <p>2.2.2 RI, UA: Growing amount of networks interest and members, fostered cooperation (including PPPs) (d)</p> <p>2.2.2 RI, EMAS: Increased information exchange among Special Intervention Units across Europe and facilitated direct access to data (d)</p> <p>2.2.3 II: Improved information sharing mechanism between Member States (d)</p> <p>2.2.3 II, UA: Fostered innovative approaches (incl. ICT/AI) to tackle security threats (d)</p> <p>2.2.3 II, UA: Increased awareness, cooperation and referral amongst frontline professionals to quickly identify criminal activities</p> <p>2.2.3 II, UA: Increased international operational cooperation between networks of national law enforcement authorities (ATLAS, AIRPOL)</p>	<ul style="list-style-type: none"> <li>• Systematic review of MS evaluations (Task 1e)</li> <li>• Quantitative analysis (Task 1f)</li> <li>• Final project reporting (UAs and EMAS) (Task 1f)</li> <li>• Interviews/survey with MS authorities (RA/MA, DA/IB), beneficiaries, and participants</li> <li>• Case studies (Task 4)</li> <li>• Public consultation (Task 2d)</li> <li>• Desk research on indicators</li> <li>• Database review (Task 1d Synthesis of evaluation reports)</li> <li>• Portfolio analysis (annual implementation reports)</li> <li>• Interviews/survey with MS authorities (RA/MA, DA/IB), beneficiaries, and participants</li> <li>• Case studies (geographical and thematic)</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
			<p>2.2.3 II, EMAS: Addressed immediate needs for improved information exchange for threats or crisis situations on issues such as terrorist attack prevention (d)</p> <p>2.2.4 Degree of supporting evidence from consultations (opinion of stakeholders)</p> <p>2.2.5 Challenges identified that affect implementation and the progress towards the objectives of the fund</p> <p>2.2.5 Identified delays in implementation of actions</p>	
	<p>2.3 What progress was made towards improving the administrative and operational capacity of the Member States and the Union to develop comprehensive threat and risk assessments, and how did the Fund contribute to the achievement of this progress?</p>	<p>2.3.1 Output indicators related to improving administrative and operational capacity of the Member States</p> <p>2.3.2 Result indicators related to establishing secure links and effective coordination between early warning and crisis cooperations actors</p> <p>2.3.3 Impact indicators related to establishing secure links and effective coordination between early warning and crisis cooperations actors</p> <p>2.3.4 Stakeholder perception on Fund's</p>	<p>2.3.1 OI: Number of trained staff (i)</p> <p>2.3.1 OI: Number of expert meetings, workshops, seminars, conferences, publications, websites and online consultations organised with the help of the Instrument (SO-risk management R2) (i)</p> <p>2.3.1 OI, UA: Number of new or tested developed detection and investigation methodologies (i)</p> <p>2.3.1 OI, UA: Number of expertise, information sharing, cooperation and coordination activities (i)</p> <p>2.3.1 OI, UA: Number of communication campaigns launched (i)</p> <p>2.3.1 OI, UA: Number of studies and pilot projects conducted (ex.: EPRIS) (i)</p> <p>2.3.1 OI, UA: Number of technical visits and thematic workshops with involvement of key stakeholders (i)</p> <p>2.3.1 OI, UA: Number of specialised support services for victims of crime (i)</p> <p>2.3.1 OI, UA: Number of training material, guidance addressing different law enforcement authority's needs (ECTEG) (i)</p> <p>2.3.1 OI, EMAS: Number of staff trained (i)</p>	

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
		<p>contribution to achievement of expected results</p> <p>2.3.5 Identification of factors hampering the achievement of intended objectives</p>	<p>2.3.1 OI, EMAS: Number of guidance produced at the end of workshops, seminars, missions, meetings, conferences etc. (i)</p> <p>2.3.1 OI, EMAS: Number of technical guidance, studies, manuals methodologies best practices developed (i)</p> <p>2.3.1 OI, EMAS: Number of participants in workshops, seminars, events etc. (i)</p> <p>2.3.2 RI: Increased capacity and skills of competent authorities for responding to accidents and incidents (d)</p> <p>2.3.2 RI: Increased awareness among stakeholders regarding best practices and threats (e.g. radicalisation) (d)</p> <p>2.3.2 RI, UA: Increased exchange of best practices or qualitative knowledge for preventing crime, terrorism and radicalisation (ex.: ESCN) (d)</p> <p>2.3.2 RI, UA: Increased awareness and civic engagement on the issues surrounding radicalisation and violent extremism (d)</p> <p>2.3.2 RI, UA: Improved preparedness and skills of law enforcement authorities to investigate crime threats or launch joint operations in EU (d)</p> <p>2.3.2 RI, UA: Increased capacity of personnel, including for information and data exchange (e.g., PIU interconnectivity of PNR data)</p> <p>2.3.2 RI, EMAS: Improved knowledge about the methods and means used by terrorists due to information dissemination (d)</p> <p>2.3.2 RI, EMAS: Improvement of capabilities for the exchange of information and coordination (d)</p> <p>2.3.2 RI, EMAS: Improved trust between law enforcement officers and increased awareness (d)</p>	

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
			<p>2.3.3 II: Increased capabilities of police services to intervene in crisis and catastrophe situations caused by terrorist attacks (d)</p> <p>2.3.3 II, UA: Fostered innovative approaches (incl. ICT/AI) to tackle security threats (d)</p> <p>2.3.3 II, UA: New investigations and administrative responses to crime-related irregularities (d)</p> <p>2.3.3 II, EMAS: Improved crisis management response to terrorist attacks and protection of critical infrastructure, particularly from attacks from foreign terrorist fighters (d)</p> <p>2.3.4 Degree of supporting evidence from consultations (opinion of stakeholders)</p> <p>2.3.5 Challenges identified that affect implementation and the progress towards the objectives of the fund</p> <p>2.3.5 Identified delays in implementation of actions</p>	

## Efficiency

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
3. Were the general objectives of the Fund achieved at	3.1 To what extent were the expected results of the Fund achieved at reasonable cost in terms	<p>3.1.1 The fund supported types of interventions that are known to be cost-effective, based on available evidence</p> <p>3.1.2 Appropriate arrangements were used to select cost-effective operations</p> <p>3.1.3 The evidence coming from the operations indicates that the cost per unit is in line or below existing benchmarks and estimates</p>	<p>3.1.1 Application of cost-effectiveness analysis in designing measures under the ISF-P</p> <p>3.1.1 MS authorities / Beneficiaries / end beneficiaries' opinion on cost-effectiveness</p> <p>3.1.2 Evidence of cost-effectiveness arrangements in the ISF-P Guidance documents / Calls for proposals</p>	<ul style="list-style-type: none"> <li>• Synthesis of implementation reports (Task 1d)</li> <li>• Systematic review of MS evaluations (Task 1e)</li> <li>• Quantitative analysis (Task 1f)</li> <li>• Calls for proposals documents / ISF-P Guidance documents at EU/national level</li> <li>• Interviews/survey with MS authorities (RA/MA, DA/IB), beneficiaries, and target population</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
reasonable cost?	of deployed financial and human resources?	<p>3.1.4 The differences in the cost per unit among similar operations within the fund can be explained and justified (e.g. by differences in the intensity or quality of the support offered, innovativeness, purchase power, emergency context etc.)</p> <p>3.1.5 The administrative burden is proportionate for all implementing actors (Responsible Authorities and other delegated authorities), compared to the previous programming period similar services offered to comparable target groups without the support of the Fund</p> <p>3.1.6 The administrative burden is proportionate for all beneficiaries, compared to the previous programming period/ similar services offered to comparable target groups without the support of the Fund</p> <p>3.1.7 The administrative burden is proportionate for all end-users, e.g. compared to the previous programming period/ similar services offered to comparable target groups without the support of the Fund</p> <p>3.1.8 Absence of ‘gold-plating’ at the national level (e.g. from Responsible Authorities, Intermediate Bodies, national Audit Authorities), i.e. requirements are not interpreted more restrictively than the legal basis or relevant documents providing methodological advice to the MS and unless a justified reason exists</p> <p>3.1.9 Absence of ‘gold-plating’ at the EU level, i.e. requirements are not interpreted more restrictively than in the legal basis and unless a justified reason exists</p>	<p>3.1.3-3.1.4 Unit costs – e.g. costs per person trained, cost per event / overall absorption rate</p> <p>3.1.5 Costs for Responsible Authorities and other delegated authorities</p> <p>3.1.5 Costs for the EC (for direct and indirect management)</p> <p>3.1.6 Costs for beneficiaries</p> <p>3.1.7 Costs for end users (if any)</p> <p>3.1.5-3.1.7 Benchmarking with previous programming period / services</p> <p>3.1.8-3.1.9 Stakeholders’ interpretation (at national and EU level) of the ISF-P requirements and experience in applying them</p> <p>3.1.8-3.1.9 Timelines and requirements of the ISF procedures</p> <p>3.1.10 (i) 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 the number of projects implemented and to the amount of the Funds claimed for the financial year;</p> <p>(ii) technical assistance plus the administrative (indirect) cost of projects as compared to the amount of funds claimed for the financial year;</p>	<ul style="list-style-type: none"> <li>• Operations budgets (portfolio analysis of operations and to be extracted in case studies)</li> <li>• Data sheet on costs Responsible Authorities / Managing Authorities, Delegated Authorities / Intermediate bodies, COM (to be considered)</li> <li>• Evaluations / budgetary information for previous programming period / services</li> <li>• Case studies data on timelines and the application of the ISF-P procedures (Task 4)</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
	3.2 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>3.2.1 The management and control system of the MS, described as per the legal basis, ensures quality of the of the implementation of national programmes and the prevention, detection and correction of irregularities, including fraud, and the recovery of amounts unduly paid, together with any interest on late payments</p> <p>3.2.2 <i>The management and control systems do not inflict unnecessary administrative burden</i></p>	<p>3.2.1 MS authorities / Beneficiaries / participants' opinion on the quality of the management and control system</p> <p>3.2.1 Audit authorities and EU institutions' opinion on the quality of the management and control system</p> <p>3.2.2 MS authorities / Beneficiaries / participants' opinion on the administrative burden related to the management and control system</p>	<ul style="list-style-type: none"> <li>• Documents describing the management and control system of the MSs</li> <li>• Audit reports</li> <li>• Systematic review of MS evaluations (Task 1e)</li> <li>• Interviews/survey with MS authorities (RA/MA, DA/IB), beneficiaries, and participants</li> </ul>

## Relevance

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
4. Did the objectives of the interventions funded by the Fund correspond to the actual needs?	4.1 Did the objectives set by the Member State in the National Programme respond to	<p>4.1.1 A needs assessment is performed and updated on a regular basis or whenever there are relevant contextual changes</p> <p>4.1.2 The partnership / monitoring committee is able to provide timely input on evolving needs and relevant developments on the ground</p> <p>4.1.3 There is an adequate degree of flexibility in the design of the projects, call for proposals, procurement</p>	<p>4.1.1 Evidence on current and emerging threats not covered by the Regulation</p> <p>4.1.2 Extent to which needs and objectives are set in National Programmes</p> <p>4.1.3 Extent to which the identified needs and projects are implemented in MSs</p>	<ul style="list-style-type: none"> <li>• Needs assessment (Task 1a)</li> <li>• Mapping of allocations (Task 1b)</li> <li>• Calls for proposals/procurement/awards documents</li> <li>• Systematic review of MS evaluations (Task 1e)</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
	the identified needs?	<p>4.1.4 Where necessary, non-substantial changes to the programme strategy and work programmes can be applied swiftly</p> <p>4.1.5 There are rules and procedures in place that ensure that the substantial adjustments of the programme can be implemented in due time if new needs arise</p> <p>4.1.6 If there have been changes in the needs after the programme adoption, the programme strategy or operations have been adapted in due time</p> <p>4.1.7 The National programmes funded by the initiative adequately cover the specific objectives of the fund</p>	<p>4.1.4 Degree of supporting evidence from consultations</p> <p>4.1.5 Trends of criminality rate/organised crime/terrorist attack at EU and national level yearly</p> <p>4.1.6 Degree of flexibility for the design or revisitations of the programmes</p> <p>4.1.7 Degree of supporting evidence from consultations</p>	<ul style="list-style-type: none"> <li>• Project reporting (UAs and EMAS) (Task 1f)</li> <li>• Public consultation (Task 2d)</li> <li>• Surveys/thematic interviews with Responsible authorities / Managing and relevant Delegated Authorities / Intermediate Bodies in the Member States</li> <li>• Surveys/thematic Interviews with Beneficiaries of the National programmes</li> <li>• EUROPOL SOCTA</li> <li>• Desk research</li> <li>• Case studies (Task 4)</li> </ul>
	4.2 Did the objectives set in the Annual Work Programme (Union Actions) address the actual needs?	<p>4.2.1 A needs assessment is performed and updated on a regular basis or whenever there are relevant contextual changes</p> <p>4.2.2 The partnership / monitoring committee is able to provide timely input on evolving needs and relevant developments on the ground</p> <p>4.2.3 There is an adequate degree of flexibility in the design of the projects, call for proposals, procurement</p> <p>4.2.4 Where necessary, non-substantial changes to the programme strategy and work programmes can be applied swiftly</p>	<p>4.2.1 Evidence on current and emerging threats not covered by the Regulation</p> <p>4.2.2 Extent to which needs and objectives are set in the Annual Work Programme for Union Actions</p> <p>4.2.3 Extent to which needs and projects actually are implemented</p> <p>4.2.4 Degree of supporting evidence from consultations (opinion from stakeholders)</p>	

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
		<p>4.2.5 There are rules and procedures in place that ensure that the substantial adjustments of the programme can be implemented in due time if new needs arise</p> <p>If there have been changes in the needs after the programme adoption, the programme strategy or operations have been adapted in due time or, alternatively, the new needs have been duly addressed via the thematic facility</p> <p>The UA Work programmes adequately cover the specific objectives of the fund</p>		
	<p>4.3 Did the objectives set in the Annual Work Programmes (EMAS) address the actual needs?</p>	<p>4.3.1 A needs assessment is performed and updated on a regular basis or whenever there are relevant contextual changes</p> <p>4.3.2 The partnership / monitoring committee is able to provide timely input on evolving needs and relevant developments on the ground</p> <p>4.3.3 There is an adequate degree of flexibility in the design of the projects, call for proposals, procurement</p> <p>4.3.4 Where necessary, non-substantial changes to the programme strategy and work programmes can be applied swiftly</p> <p>4.3.5 There are rules and procedures in place that ensure that the substantial adjustments of the programme can be implemented in due time if new needs arise</p>	<p>4.3.1 Evidence on current and emerging threats not covered by the Regulation</p> <p>4.3.2. Extent to which identified needs and objectives are set in the Annual Work Programme for emergency assistance</p> <p>4.3.3 Degree of alignment between identified needs and projects actually implemented in Member States</p> <p>4.3.4 Degree of supporting evidence from consultations (opinion of stakeholders)</p>	

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
		<p>4.3.6 If there have been changes in the needs after the programme adoption, the programme strategy or operations have been adapted in due time</p> <p>4.3.7 The EMAS Work programmes adequately cover the specific objectives of the fund</p>		
	4.4 Which measures did the Member State put in place to address changing needs?	<p>4.4.1 A needs assessment is performed and updated on a regular basis or whenever there are relevant contextual changes</p> <p>4.4.2 The partnership / monitoring committee is able to provide timely input on evolving needs and relevant developments on the ground</p> <p>4.4.3 There are rules and procedures in place that ensure that the substantial adjustments of the programme can be implemented in due time if new needs arise</p>	<p>4.4.1 Frequency of needs assessment</p> <p>4.4.2 Type of measures put in place to address changing needs</p> <p>4.4.3 Degree of supporting evidence from consultations (opinion of stakeholders)</p>	

## Coherence

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
5. Were the objectives set in the national	Was an assessment of other interventions (e.g.	5.1.1 Adequate degree of assessment of other interventions carried out	5.1.1 Number and type of other EU interventions covered in the assessments	<ul style="list-style-type: none"> <li>Synthesis of implementation reports (Task 1d)</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
programme Fund coherent with the ones set in other programmes funded by EU resources and applying to similar areas of work?	<i>AMIF, ISF-BV, Fiscalis 2020, Horizon 2020, Hercule, ESF, ERDF, etc)</i> with similar objectives carried out and taken into account during the programming stage?	during the programming phase.	5.1.1 Extent to which the assessment affected the design of the national programme  5.1.1 Degree of supporting evidence from consultations (opinion of stakeholders)	<ul style="list-style-type: none"> <li>• Systematic review of MS evaluations (Task 1e)</li> <li>• Final project reporting (UAs and EMAS) (Task 1f)</li> <li>• Interviews/survey with MS authorities (RA/MA, DA/IB), beneficiaries, and target population</li> <li>• Project reporting (union actions and emergency actions); additional studies and literature</li> <li>• Joint monitoring reports or cross-check of individual (project level) monitoring reports</li> <li>• Desk analysis, at aggregate level as well as a sample of projects-level information</li> <li>• Interviews with EU officials</li> <li>• Focus groups (validation)</li> </ul>
6. Was the coherence ensured also during the implementation of the Fund?	Were coordination mechanisms between the Fund and other interventions ( <i>e.g. AMIF, ISF-BV, Fiscalis 2020, Horizon 2020, Hercule, ESF, ERDF, etc.</i> ) with similar objectives established for the implementing period?	<p>6.1.1 Structures, organisational arrangements or coordination mechanisms were used to ensure coordination, complementarities and, where relevant, synergies across the different management modes of the same Fund</p> <p>6.1.2 Coordination mechanisms and arrangements were used regularly and to good effect</p> <p>6.1.3 Alleged overlaps were in fact justified on objective</p>	<p>6.1.1 Number of MS with coordination mechanisms Established</p> <p>6.1.2 Frequency of coordination</p> <p>6.1.2 Assessment of different instruments/Funds' synergies</p> <p>6.1.3 Mechanisms ensure there are no/few overlaps or Duplications</p> <p>6.1.1-6.1.3 Degree of supporting evidence from consultations (opinion of stakeholders)</p>	

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
		grounds(e.g. same target group but different type of measure/ different need addressed/ different readiness of the type of funding support chosen)		
	Were the actions implemented through the Fund coherent with and non-contradictory to other interventions with similar objectives?	<p>6.2.1 The fund is coherent with the current policy agendas at EU and national level</p> <p>6.2.2 The knowledge generated by the fund provided feedback in to the policy making</p>	<p>6.2.1 Mechanisms ensure there are no/few overlaps or Duplications</p> <p>6.2.1-6.2.2 Degree of supporting evidence from consultations (opinion of stakeholders)</p> <p>6.2.2 Extent to which synergies have been realised</p>	

## Complementarity

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
7. Were the objectives set in the national programme and the corresponding implemented actions	7.1 Was an assessment of other interventions with complementary objectives carried out and taken into account during the programming stage?	7.1.1 Adequate degree of assessment of other interventions carried out during the programming phase	<p>7.1.1 Number and type of other EU interventions covered in the assessments</p> <p>7.1.1 Extent to which the assessment affected the design of the national programme</p> <p>Degree of supporting evidence from consultations (opinion of stakeholders)</p>	<ul style="list-style-type: none"> <li>• Synthesis of implementation reports (Task 1d)</li> <li>• Systematic review of MS evaluations (Task 1e)</li> <li>• Final project reporting (UAs and EMAS) (Task 1f)</li> <li>• Interviews/survey with MS authorities (RA/MA, DA/IB),</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
complementing and supporting those set in the framework of other policies, in particular those pursued by the Member States	7.2 Were coordination mechanisms between the Fund and other interventions ( <i>e.g. AMIF, ISF-BV, Fiscalis 2020, Horizon 2020, Hercule, ESF, ERDF, etc</i> ) with similar objectives established to ensure their complementarity for the implementing period?	<p>7.2.1 Structures, organisational arrangements or coordination mechanisms were used to ensure coordination, complementarities and, where relevant, synergies across other EU funds, in particular the AMIF and the ISF-BV, but also cohesion policy, Fiscalis 2020, Horizon 2020, Hercule, and EU's external action</p> <p>7.2.2 Coordination mechanisms and arrangements were used regularly and to good effect</p> <p>7.2.3 The Fund offers support to cross cutting policy agendas by complementing the support offered by other EU funds</p> <p>7.2.4 The knowledge generated by the Fund provided feedback into the policy making</p>	<p>7.2.1 Mechanisms ensure coordination, complementarities and synergies across other EU funds</p> <p>7.2.1-7.2.3 Degree of supporting evidence from consultations (opinion of stakeholders)</p> <p>7.2.3 – 7.2.4 Extent to which synergies have been realised</p>	<p>beneficiaries, and target population</p> <ul style="list-style-type: none"> <li>• Project reporting (union actions and emergency actions); additional studies and literature</li> <li>• Joint monitoring reports or cross-check of individual (project level) monitoring reports</li> <li>• Desk analysis, at aggregate level as well as a sample of projects-level information</li> <li>• Interviews with EU officials</li> <li>• Focus groups (validation)</li> </ul>
	7.3 Were mechanisms aimed to prevent overlapping of financial instruments put in place?	7.3.1 Alleged overlaps were in fact justified on objective grounds(e.g. same target group but different type of measure/ different need	<p>7.2.1 Mechanisms ensure there are no/few overlaps or Duplications</p> <p>7.2.1-7.2.3 Degree of supporting evidence from consultations (opinion of stakeholders)</p>	

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
		addressed/ different readiness of the type of funding support chosen)		
	7.4 Are the objectives set in the national programme complementary to other policies pursued by MS?	7.4.1 Evidence of complementarity of national programme objective complementary with other policies pursued by MS	7.4.1 Degree of supporting evidence from consultations (opinion of stakeholders)	

## EU Added Value

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
8. Was any value added brought about by the EU support?	8.1 What are the main types of added value resulting from the Fund support (volume, scope, role, process)?	8.1.1 Evidence of additionality	8.1.1 – 8.5.1 Established evidence on volume, scope effects, role and process effects  8.1.1 – 8.5.1 Existence of national funds available for policy	<ul style="list-style-type: none"> <li>• Synthesis of implementation reports (Task 1d)</li> <li>• Systematic review of MS evaluations (Task 1e)</li> <li>• Final project reporting (UAs and EMAS) (Task 1f)</li> <li>• Quantitative analysis (Task 1f)</li> <li>• Interviews/survey with MS authorities (RA/MA, DA/IB), beneficiaries, and target population</li> </ul>
	8.2 Would the Member State have carried out the actions required to implement the EU policies in the Fund areas without the financial support of the Fund?	8.2.1 Evidence demonstrates that the fund achieved additionality; it successfully mobilised resources and reached areas that would have otherwise been inaccessible without the fund.	8.1.1 – 8.5.1 Evidence of funding influencing national policy implementation  8.1.1 – 8.5.1 Assessment of contribution from each instrument  8.1.1 – 8.5.1 Degree of supporting evidence from consultations (opinion of stakeholders)	

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
	8.3 What would be the most likely consequences of an interruption of the support provided by the Fund?	8.3. 1 Evidence demonstrates that the fund achieved additionality; it successfully mobilised resources and reached areas that would have otherwise been inaccessible without the fund.	8.1.1 – 8.5.1 Evidence of decrease/weakened policy implementation if interruption  8.1.1 – 8.5.1 Evidence of unchanged policy implementation if interruption	<ul style="list-style-type: none"> <li>• Project reporting (union actions and emergency actions); additional studies and literature</li> <li>• Desk analysis, at aggregate level as well as a sample of projects-level information</li> <li>• Interviews with EU officials</li> <li>• Focus groups</li> </ul>
	8.4 To which extent have actions supported by the Fund resulted in a benefit at the EU level?	<p>8.4.1 The Fund focuses on areas, interventions and target groups where the results at the EU level can go beyond what can be achieved by the MS acting on their own.</p> <p>8.4.2 There is evidence of scope effects, i.e. of additional target groups addressed or additional types of intervention offered</p> <p>8.4.3 There is evidence of scale effects, i.e. of a higher volume of services offered/end-users addressed</p> <p>8.4.4 There is evidence of function/role/process effects, i.e. of learning and increased capacity to manage the provision of public support within the administrations involved</p> <p>8.4.5 There is evidence of function/role/process effects, i.e. of learning and increased capacity to manage the</p>	<p>8.1.1 – 8.5.1 Likely scenario consequences at different levels (EU/MS/beneficiary/target group)</p> <p>8.1.1 – 8.5.1 Degree of supporting evidence from consultations (opinion of stakeholders)</p>	

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
		provision of public support within the administrations involved		
	8.5 What was the added value of operating support?	8.5.1 The knowledge generated by the Fund provided feedback into the policy making		

## Sustainability

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
9. Are the positive effects of the projects supported by the Fund likely to last when the support from the ISF-P will be over?	9.1 What were the main measures adopted by the Member State to ensure the sustainability of the results of the projects implemented with the Fund support (both at programming and implementation stage)?	Adequate arrangements put in place to check the sustainability of the project proposals There is no evidence of dependency, i.e. of systematic lack of investment based on national resources for relevant services that are provided entirely through support from EU funds.	9.1.1 Number and type of measure adopted to ensure sustainability at programming stage 9.1.1 Number and type of measures adopted to ensure sustainability at implementation stage 9.1.1 Absorption rate of the Fund 9.1.1 Absorption rate at project level 9.1.2 Number of projects with exist strategies (plan for phasing out of external support)	<ul style="list-style-type: none"> <li>• Calls for proposals documents / ISF-P Guidance documents at EU/national level</li> <li>• Targeted survey to MS competent authorities and beneficiaries.</li> <li>• Interviews with: EU Agencies (Europol, CEPOL); MS competent and responsible authorities; Beneficiaries and target population.</li> <li>• Systematic review of MS evaluations (Task 1e)</li> </ul>
	9.2 Were mechanisms put in place to ensure a sustainability check at programming and implementation stage?	9.2.1 Evidence of employed mechanisms to ensure sustainability 9.2.2 Securing the training of personnel for the services involved in the implementation of actions 9.2.3 Degree of supporting evidence from consultations (opinion of stakeholders)	9.2.1 Examples of sustainability checks at programming stage 9.2.1 Examples of sustainability checks at implementation stage 9.2.2 Evidence of investments in adequate and regular in-house staff training 9.2.3 Degree of supporting evidence from consultations (opinion of stakeholders)	

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
	9.3 To what extent are the outcomes/benefits of the actions sustained by the Fund expected to continue thereafter?	9.3.1 Evidence of projects transferred, replicated or upscaled 9.3.2 Examples of sustainability of results at EU/MS/beneficiary level	9.3.1 Examples of projects replicated at national level 9.3.2 Equipment in use 2 years after their acquisition/number of equipment acquired under the Fund (> than EUR 10 000);	<ul style="list-style-type: none"> <li>• Case studies (Task 4)</li> <li>• Public consultation (Task 2d)</li> </ul>
	9.4 What measures were adopted to ensure the continuity of the activities carried out thanks to the operating support?	9.4.1 Adequate arrangements put in place to check the sustainability of the project proposals	9.4.1 Evidence of extended lifespan of equipment delivered with the fund support	

### Simplification and reduction of administrative burden

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
10. Were the Fund management procedures simplified and the administrative burden reduced for its beneficiaries?	10.1 Did the innovative procedures introduced by the Fund (simplified cost option, multiannual programming, national eligibility rules, more comprehensive national programmes allowing for flexibility, operating support and Special Transit Scheme for Lithuania) bring about simplification for the beneficiaries of the Fund?	10.1.1 SCOs were used were relevant and created simplification for the different stakeholders concerned 10.1.2 The national programmes allowed steering resources towards new and emerging needs at a low administrative cost 10.1.3 Operating support was used in a cost-effective manner and reduced administrative burden for the actors involved 10.1.4 Special schemes were used in a cost-effective manner and reduced administrative burden for the actors involved	10.1.1 Application of SCOs in implementing measures under the ISF 10.1.2 MS authorities / Beneficiaries / participants' opinion on the administrative burden related to changes in national programmes (allowing flexibility) 10.1.2 Change in number of FTE to manage the Fund (compared to 2007-2013)	<ul style="list-style-type: none"> <li>• Systematic review of 20 evaluations (Task 1e)</li> <li>• Case studies (Task 4)</li> <li>• Project reporting (union actions and emergency actions).</li> <li>• Interviews/survey with MS</li> </ul>

Question	Sub-question	Indicative judgement Criteria	Indicator	Data Source and analytical tool
			10.1.3 Evidence of cost-effectiveness arrangements in the use of operating support 10.1.4 Evidence of cost-effectiveness arrangements in the use of special schemes	authorities (RA/MA, DA/IB), beneficiaries, and participants

## ANNEX IV. OVERVIEW OF BENEFITS AND COST

The table provides an indication of the main costs<sup>147</sup> and benefits of the ISF-P implementation. As mentioned in the Efficiency section: Overall, the proportionality of administrative burden in ISF-P implementation varied across Member States, reflecting differences in resource availability, procedural complexity, and national administrative structures.

Cost or benefit		Citizens/consumers		Businesses		Administrations		Other?	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
ISF-P funding (overall financial envelope)	<i>One-off</i>					The financial envelope for ISF - P initially set at EUR 1 004 million, increased to approximately EUR 1 138 million			
ISF-P funding (already planned)	<i>One-off</i>					EUR 1 219 414 116			
ISF-P funding (paid)						EUR 940 025 997			
Direct compliance costs (adjustment costs, administrative costs, regulator charges)	Recurrent					Approx. 30-40 person-days per call	Direct and competitive awards (i.e. info to applicants, preparing calls and guidelines) <sup>148</sup>		
	Recurrent					Typically between 9-30 person-days per project.	Costs for MAs for evaluation of proposals/projects (screening and		

<sup>147</sup> Based on information received from Responsible Authorities and beneficiaries through the conducted targeted survey.

<sup>148</sup> The costs for Responsible Authorities vary across member States: Some provided specific figures per call, such as 6 man-days per call, while others reported total time spent, ranging from 15 to 60 man-days. One estimate mentioned 15-20 man-days, while another stated 15 man-days for 57 procedures. A few responses indicated longer durations, such as 40 or 60 man-days.

							selecting applications) under the ISF-P		
	Recurrent					Approx. 30 person-days.	Time spent on reporting per year by a full-time employee		
	One-off					The most common value reported is 30 FTE.	The time spent by beneficiaries for the preparation of one project proposal varies significantly.		
Indirect costs (compliance costs or other indirect costs such as transaction costs)	n/a								
Direct (short-term) benefits									
Direct (mid-term) benefits (expected)						Strengthened Member States' capacities to combat cross- border, serious, and organised crime, including terrorism, and reinforcing mutual cooperation	The effects cannot be quantified and are assessed in mostly qualitative terms and through output indicators, e.g. Number of law enforcement officials trained on cross-border-related topics with the help of the Fund.		

							The results of the synthetic control method suggest positive effects of participation in ISF-P on the exchange of information between MS.		
						Enhanced capacity of Member States to manage security-related risks, crises, and protect critical infrastructure	The effects cannot be quantified and are assessed in mostly qualitative terms and through output indicators, e.g. Number of tools put in place or upgraded with the help of the ISF-P to facilitate the protection of critical infrastructure by Member States in all sectors of the economy		
Indirect (long-term) benefits (expected)			Increased internal security in the EU						

## ANNEX V. STAKEHOLDER CONSULTATION – SYNOPSIS REPORT

### Call for evidence

Prior to the start of the evaluation, in line with the Better Regulation Provisions, a call for evidence was launched in the Have Your Say platform from 28 August 2023 to 25 September 2023. No contributions were received<sup>149</sup>.

### Consultation strategy and methodology

The consultation strategy for this ex-post evaluation included the targeted interviews and surveys, a public consultation and two focus groups. The objective of the consultations was to collect relevant information and insights on the effectiveness, efficiency, simplification and reduction of administrative burden, coherence, complementarity, EU added value, sustainability and relevance of the ISF-P, as well as to collect inputs on lessons learned. To this end, a wide range of stakeholders were consulted, including Member States, Commission officials, implementing partners and beneficiaries.

Table 11 provides a short description of the targeted stakeholder per each activity and the number of participants.

*Table 11 – Description of targeted stakeholders*

Activities	Stakeholder targeted	Timing, stakeholder engagement
<b>Public consultation</b>	The public consultation was open to a wide audience, including those who have been involved in the management, coordination and supervision of the ISF-P, those who have benefitted from the ISF-P (e.g., police station which has received equipment purchased through the Fund), those responsible for implementing and/or initiating a project supported by the ISF-P (beneficiary) and citizens.	The public consultation was open for a period of 12 weeks between 29 August 2024 - 21 November 2024. The survey was designed using EU Survey. It was published on the “Have Your Say” portal.
<b>Targeted surveys</b>	Survey for National authorities within Member States (Managing Authorities, Delegated Body, audit Authority, other relevant national authority)	8 August 2024 - 18 September 2024, 53 respondents (45 involved in ISF-P or both ISF-P and ISF)
	Survey for beneficiaries, experts, civil society and businesses	8 August 2024 - 18 September 2024, 165 respondents (123 involved in ISF-P or both ISF-P and ISF)
<b>Interviews</b>	Stakeholders covered with scoping interviews (ISF-P and ISF combined): EU institution (DG HOME) Member State Responsible Authority  Stakeholder categories targeted via the interview programme for ISF-P and ISF (combined): <sup>150</sup>	June 2024 – March 2025  Number of interviews: <ul style="list-style-type: none"><li>Total scoping interviews for ISF-P and ISF: 5.</li></ul>

<sup>149</sup> Internal Security Fund (ISF) Police 2014-2020 – ex post evaluation.

<sup>150</sup> Section 3.3 of the Synopsis Report presents a breakdown of interviews (into three major groups). Interviews were grouped into targeted interviews for country case studies, targeted interviews for thematic case studies, and additional interviews for the ex-post evaluation of the ISF-P. For the country case studies, interviews covered the assessment of the ISF and the ISF-P (combined). For the thematic case studies, interviews cover the ISF and the ISF-P separately, unless beneficiaries received funding under both the ISF-P and the ISF. Additional ISF-P interviews solely covered the ISF-P period.

Activities	Stakeholder targeted	Timing, stakeholder engagement
	EU institutions; Member State Managing/Responsible Authorities; Monitoring Committee members; Beneficiaries of national programmes (ISF-P) Beneficiaries of Union Actions; Beneficiaries of EMAS; Final recipients, participants and representatives of stakeholders not directly involved	<ul style="list-style-type: none"> <li>• Total targeted interviews for ISF-P and ISF (combined): 89 (out of these, two are scheduled for the week of the 24 March 2025).</li> <li>• Targeted interviews covering the ISF-P (see section 3.3):               <ul style="list-style-type: none"> <li>- as part of the country case studies;</li> <li>- as part of the thematic case studies;</li> <li>- as additional ISF-P interviews (12 up to 21 March 2025; remaining two scheduled for the week of 24 March 2025)</li> </ul> </li> </ul>
<b>Focus Groups</b>	EU agencies; Relevant national authorities (selection of Responsible Authorities, Delegated Authorities, Intermediate Bodies, and Audit Authorities in Member States); Beneficiaries under the ISF and ISF-P components: National Programmes, Emergency Actions and Union Actions.	First Focus Group <sup>151</sup> : 25 June 2024, 77 participants  Second Focus Group: only on ISF: 20 November 2024  Third Focus Group on ISF-P: 3 April 2025, 60 participants

Source: Preparatory study

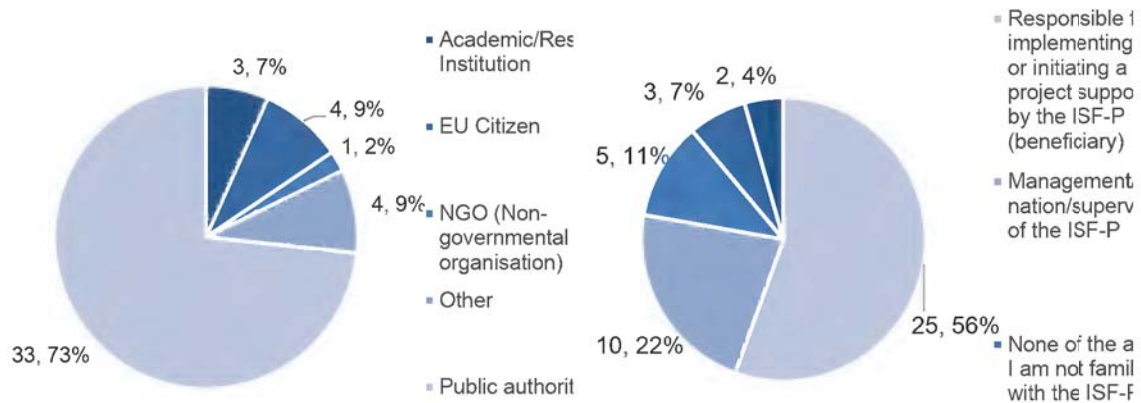
## Results of the consultation activities

### *Feedback from the public consultation*

In total, 45 stakeholders responded to the public consultation. The largest proportion of respondents, 73% (33 out of 45), represented public authorities. Other stakeholder groups included academic or research institutions (7%, 3 out of 45), NGOs (2%, 1 out of 45), EU citizens (9%, 4 out of 45), and those who identified as "Other" (9%, 4 out of 45).

<sup>151</sup> The First Focus Group covered mostly the ISF, but participants were invited to share their experiences with the ISF-P when presenting comparisons, if relevant.

Figure 21 - Distribution of responses by stakeholder type



Responses were received from a diverse range of EU Member States. The highest representation came from France (13%, 6 out of 45), Hungary (13%, 6 out of 45), and Bulgaria (11%, 5 out of 45). Other countries with multiple responses included Greece, Italy, and Romania (each with 11%, 5 out of 45), while individual responses were recorded from several other Member States.

Among the respondents, the majority (56%, 25 out of 45) had been responsible for implementing or initiating a project supported by the ISF-P. Another 22% (10 out of 45) were involved in the management, coordination, or supervision of the Fund, while 7% (3 out of 45) had directly benefitted from the ISF-P. A smaller proportion (11%, 5 out of 45) stated they were not familiar with the Fund, and 4% (2 out of 45) selected "Other." Most beneficiaries participated as representatives of law enforcement authorities, with 67% (2 out of 3) indicating they represented police agencies.

When asked to evaluate the importance of various security challenges, the overwhelming majority of respondents (91%, 41 out of 45) regarded organized crime, terrorism and radicalisation, and cybercrime (including child sexual exploitation) as highly important challenges. Similarly, drug trafficking (78%, 35 out of 45), corruption (78%, 35 out of 45), and money laundering (76%, 34 out of 45) were also considered critical. Other issues such as firearm trafficking (73%, 33 out of 45) and the protection of critical infrastructure and public spaces (78%, 35 out of 45) were also highlighted as significant concerns.

A large majority of respondents (93%, 42 out of 45) believe that EU Member States should cooperate on internal security matters, while only 2% (1 out of 45) believe Member States should cooperate "to a limited extent." When asked whether EU-funded initiatives effectively contribute to improving internal security, 76% (25 out of 33) responded "to a large extent," while 24% (8 out of 33) stated "to some extent."

Respondents largely agreed that ISF-P had a positive impact on key security areas. For example, 47% (21 out of 45) believed that ISF-P contributed to preventing and fighting organized crime "to a large extent", while 20% (9 out of 45) rated it as having contributed "to some extent." Similarly, 44% (20 out of 45) rated ISF-P's contribution to cross-border law enforcement cooperation as highly effective.

When asked about the cost-effectiveness of ISF-P, 56% (19 out of 34) stated that the results were achieved in a cost-effective manner "to a large extent," while 41% (14 out of 34) believed they were cost-effective "to some extent." The majority of respondents, specifically 65% (29 out of 45), considered the administrative burden brought by ISF-P proportionate to the benefits. However, qualitative feedback indicated concerns about excessive bureaucracy, with some respondents suggesting a need for simplification in procedures.

A strong majority (76%, 25 out of 33) believed EU-funded initiatives significantly contributed to internal security, with some respondents emphasizing that cooperation mechanisms improved considerably. Most respondents expressed strong support for EU-funded initiatives, with many highlighting their role in fostering international cooperation, improving intelligence sharing, and supporting law enforcement capabilities. Several responses emphasized the necessity of EU-wide coordination in tackling cross-border crime. However, a few respondents suggested that while the initiatives are valuable, their effectiveness could be enhanced by reducing administrative burdens, increasing funding for law enforcement agencies, and improving coordination between EU-level and national-level initiatives.

82% (27 out of 33 responses) believed that ISF-P activities sufficiently addressed the needs of law enforcement authorities, while views were more divided regarding civil society and private entities, with 30% (10 out of 33) stating these groups were only addressed "to some extent." 73% (24 out of 33) agreed that ISF-P-supported activities were necessary for improving operational cross-border cooperation, with 61% (20 out of 33) emphasizing the importance of information exchange mechanisms.

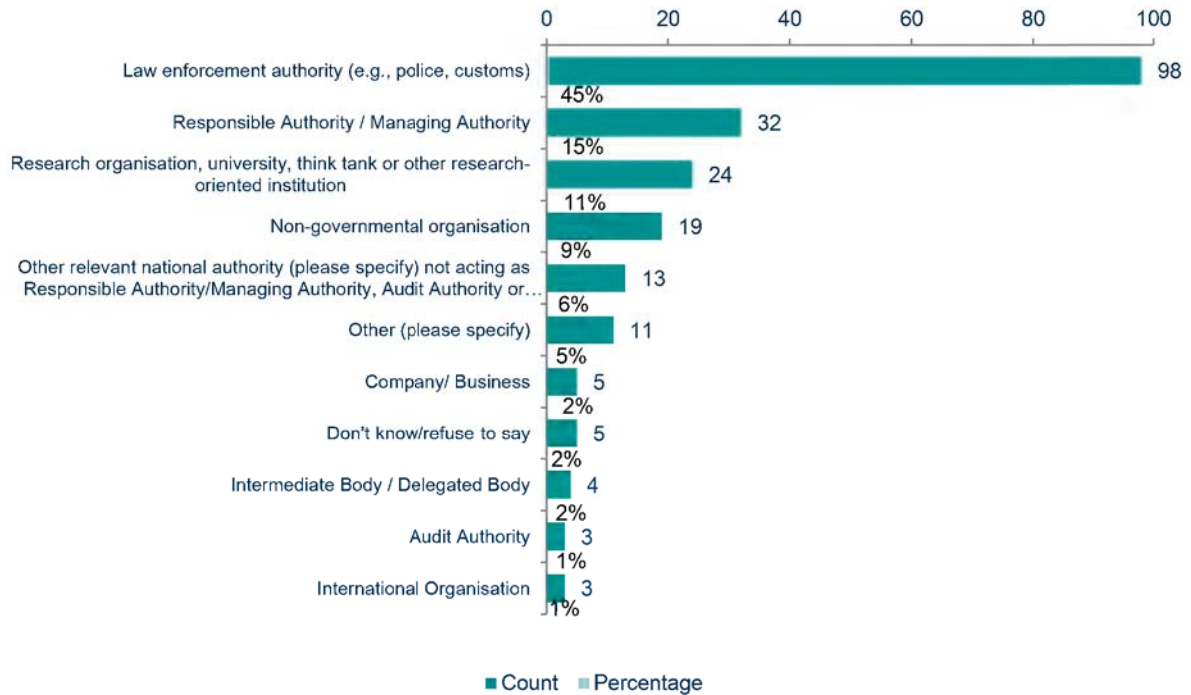
Regarding the complementarity of ISF-P with initiatives at different levels, 40% (18 out of 45) found it to be highly complementary at the EU level, while 33% (15 out of 45) believed it was complementary at the national level. Regional and international complementarity was perceived as slightly lower.

A notable 59% (20 out of 34) indicated that projects funded under ISF-P would have been implemented on a smaller scale or with lower quality without the Fund's support. Only 3% (1 out of 34) believed the projects would have been carried out in full without ISF-P, while 35% (12 out of 34) stated they would not have taken place at all.

### ***Feedback from targeted surveys***

Two targeted surveys were launched on 7 August 2024 and closed the 18 September 2024. One of the targeted surveys addressed the key Member States competent authorities involved in the management, coordination, and supervision of the ISF, while the other targeted survey aimed at targeting the Union Actions beneficiaries and national programme beneficiaries. The total number of responses amounts to 218. The majority of respondents, 98 (45%), come from law enforcement authorities such as police or customs (Figure 21). There is also a notable representation of NGOs (9%, 19 respondents) and other relevant national authorities (6%, 13 respondents). The smallest groups include businesses (2%, 5 respondents), audit authorities (1%, 3 respondents), and international organisations (1%, 3 respondents). Half of the respondents (50%, 108 respondents) have dealt with both the 2014-2020 and 2021-2027 programming periods of the ISF-P and ISF. A quarter of respondents (26%, 56 respondents) have experience solely with the ISF-P, and only a small proportion of respondents (2%, 4 respondents) did not know or refused to answer.

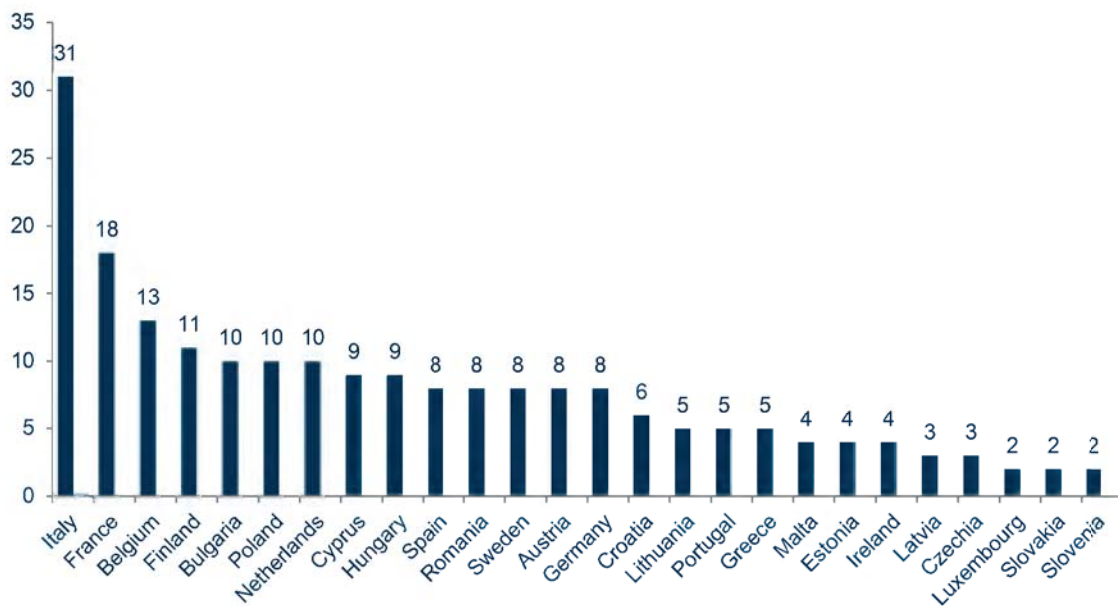
Figure 22 - Breakdown of responses by stakeholder group



N=218

The largest number of respondents are located in Italy, with 31 respondents (15%). France follows with 18 respondents (9%), while Belgium ranks third with 13 respondents (6%). Countries like Finland (11 respondents, 5%) and Bulgaria (10 respondents, 5%) are also relatively well-represented. Countries with fewer responses include Latvia, Ireland, Luxembourg, Slovakia, and Slovenia, with only 1% or 2% of total respondents. This distribution demonstrates a balanced representation across several EU Member States, but with a slight concentration in southern and western European countries. Italy, France, and Belgium collectively account for 30% of the total responses, indicating significant participation from these regions (Figure 22).

Figure 23 - Breakdown of responses by country of origin

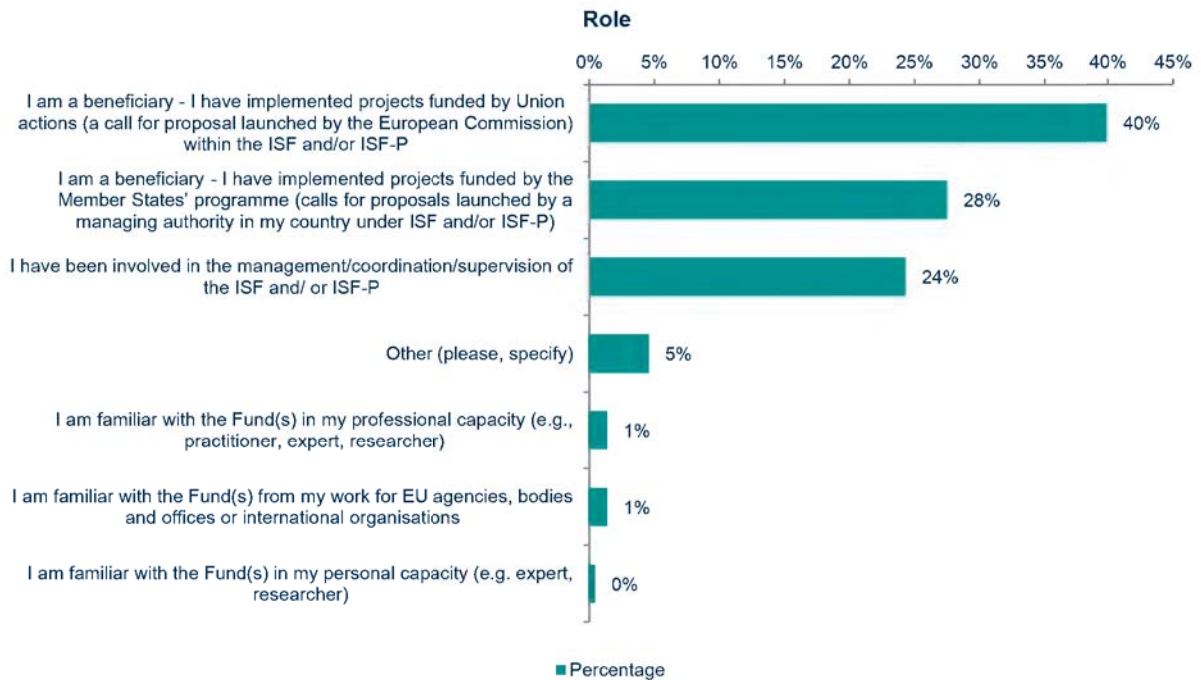


*n*=218

Data shows that most respondents are beneficiaries, benefitting either from Union Actions or Member State Actions (Figure 23). 32% of respondents (68 respondents) identified themselves as beneficiaries of projects funded by Union actions within the ISF-P or both ISF-P and ISF. Another 19% (41 respondents) have been beneficiaries of projects funded by national programmes within the ISF-P or both ISF-P and ISF. 21% (45 respondents) have been involved in the management, coordination, or supervision of the ISF-P and both ISF-P and ISF. A smaller proportion of respondents indicated familiarity with the Funds from their work for EU agencies, bodies and offices or international organisations (2%, 3 respondents).<sup>152</sup>

<sup>152</sup> It should be noted that, while 21% (45 respondents) are involved in the management and coordination of the Funds, only 10% (21 respondents) identified as Managing Authorities, while 1% (2 respondents) said they were an Delegated/Intermediate Body and 1% (1 respondents) were an Audit authority. This means that a maximum of 10% (21 respondents) were involved in the management, coordination and supervision of the Funds in line with the intended meaning of the response to the question “What best describes your role or relationship to the ISF and/or ISF-P? Please select the option that most closely matches your situation.”<sup>152</sup>. The original responses of survey respondents have not been changed. It is possible that respondents to the survey have changed their affiliation in the meantime and were providing responses in the role of a managing or supervising body even though they know find themselves working for a different organisation. Another possibility is that respondents wrongly interpreted the response to mean management or supervision of projects, in which case they should have selected the role of beneficiary under the same question.

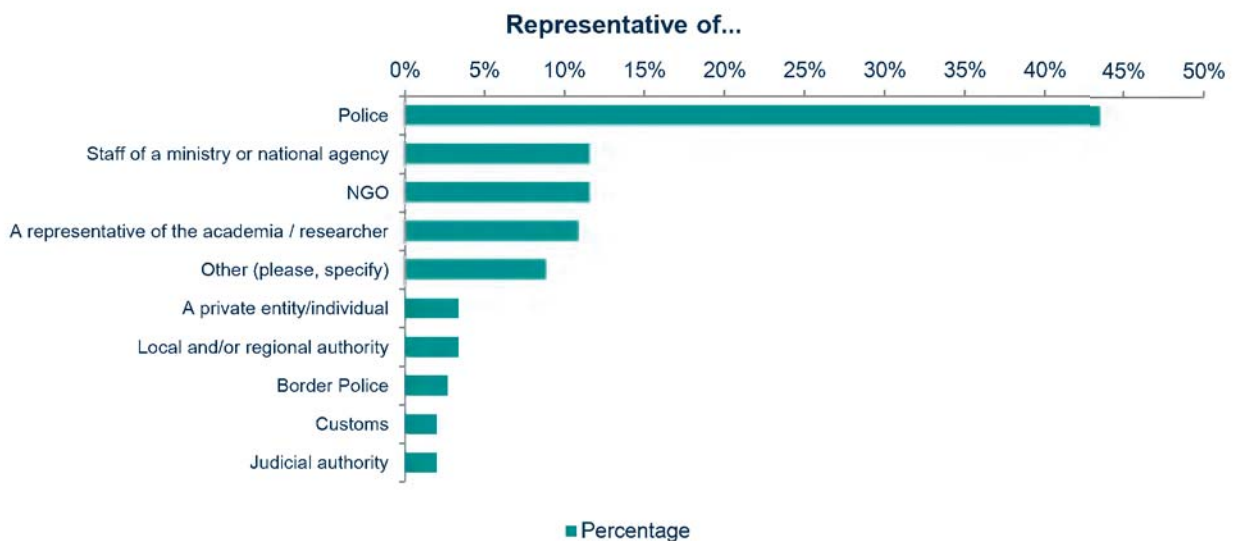
Figure 24 - Breakdown of responses by geographic scope of business



N=218

The largest group of respondents, 43% (43 respondents), participated in Fund actions as representatives of the police. This is followed by staff of ministries or national agencies at 14% (14 respondents) and NGOs at 13% (13 respondents). Academia or researchers also make up a significant portion, at 10% (10 respondents). Other groups, such as private entities (5%, 5 respondents), border police (2%, 2 respondents), and customs (2%, 2 respondents), represent smaller portions of the respondents.

Figure 25 - Breakdown of responses by organisation type



N=214

The largest share of beneficiaries have implemented actions in the field of terrorism and radicalisation (33 out of 186, 18%), organised crime (27 out of 187, 15%), and cybercrime, including child sexual abuse (20 out of 187, 11%).

### *Survey for Competent authorities*

The survey targeting Member State Competent authorities gathered 53 responses from 23 Member States.

#### Effectiveness

Actions promoting **collaboration, knowledge sharing and operability** are seen as the most effective in enhancing the EU's internal security (66%, 35 respondents indicating "to a large extent"). Exchange, training, and education of staff and experts is viewed as highly effective, with 53% (28 out of 53) indicating it was effective "to a large extent.". Efforts related to analytical, monitoring and evaluation activities as well as actions concerning third countries are also recognised for their contribution, though to a much lesser degree (respectively 19%, or 10 out of 53 and 17%, or 9 out of 53, indicating relevance to a large extent).

As concerns the involvement of relevant partners during the programming, implementation, monitoring and evaluation of the Programme, ensuring the active participation of partners during the implementation was considered as a major challenge to a large extent (19% of respondents, 10 out of 53).

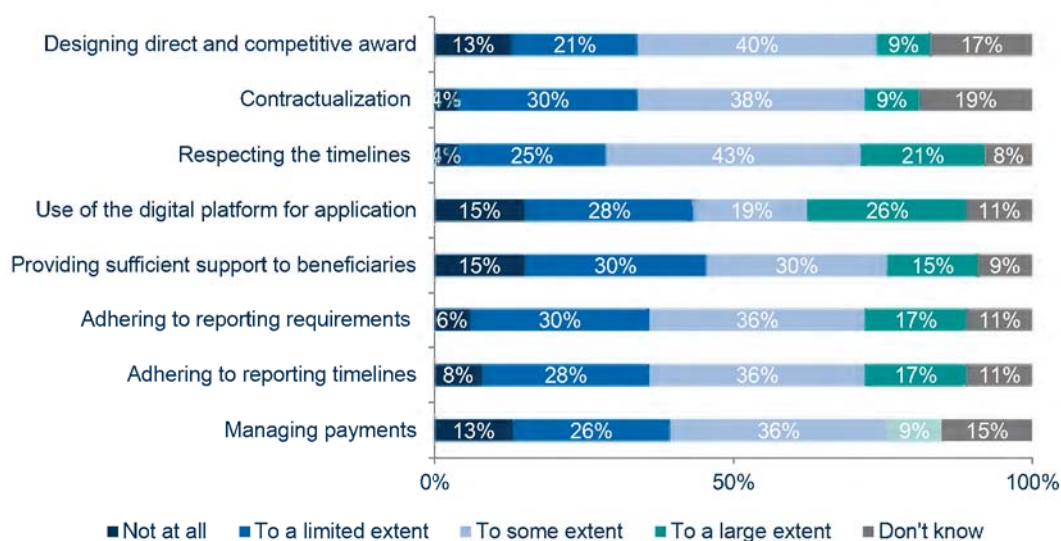
While the **control systems and anti-fraud mechanisms are viewed positively** to some extent, there is a considerable proportion of respondents unsure about some aspects of this mechanism. Coordination with relevant bodies is seen as effective "to a large extent" by 19% (10 respondents), and follow-up actions on fraud detection received similar feedback, with 45% indicating effectiveness to a large or to some extent (24 out of 53). While fraud prevention training is seen as adequate by 19%, many respondents (10) indicate challenges "to a limited extent." The majority of respondents (64%, 34 out of 53) believe that effective fraud detection mechanisms have been established in their country, i.e. there are clear procedures for reporting fraud and irregularities have been established. The timelines of reporting requirements are considered adequate, with 64% of respondents indicating they are effective to a large or to some extent (31 out of 53). Among those countries that benefitted from EMAS, 26% feel it was effective "to a large extent" (5 out of 19 responses) while 21% see it working "to some extent" (5 out of 19).

#### Efficiency

Respecting timelines emerged as the most significant issue in managing Member States Programmes and related application procedures, with 64% of respondents (28 out of 53 respondents) finding it difficult to adhere to deadlines to some extent and to a large extent jointly, particularly concerning reporting and program management. Second, **adhering to reporting requirements and timelines** also proved challenging, with 53% of participants (23 out of 53 and 24 out of 53, respectively) reporting difficulties, while 45% (22 out of 53) struggled with payment management. Lastly, providing support to beneficiaries and using digital platforms were notable issues. A substantial 40% (21 out of 53) of respondents indicated challenges in offering adequate support to beneficiaries, with the same percentage reporting obstacles in using the digital platform for applications (21 out

of 53), and 23% of respondents (12 out of 53), finding this challenge relevant to a large extent.

Figure 26 - Degree to which the following points represented a challenge in managing Member States Programmes and related application procedures



N=53

The estimated number of person-days spent by a full-time employee on **preparing direct and competitive awards** under ISF-P varies significantly across respondents. Some provided specific figures per call, such as 6 person-days per call, while others reported total time spent, ranging from 15 to 60 person-days. One estimate mentioned 15-20 person-days, while another stated 15 person-days for 57 procedures. A few responses indicated longer durations, such as 40 or 60 person-days. Estimates for **monitoring programme implementation** under ISF-P range widely, from 2 to 120 person-days. Some reported 8 person-days per year, while others cited 10, 20, 30, 60, or 70 person-days. Estimates for **reporting activities** vary from 2 to 120 man-days. Some reported 20 person-days per year, while others cited 10, 25, 30, 50, or 60 person-days. One estimate detailed 2 person-days for 9 financial accounts and 20 person-days for 8 Annual Implementation Reports. Another mentioned for both monitoring programme implementation and reporting two employees for eight months. The estimate for the average number of person-days spent on **auditing and on-the-spot controls** of ISF-P projects varies: 60 person-days per project for 35 projects, 60 person-days for 5 projects, 70 person-days for 2 projects, and 120 person-days for 2 employees over 8 months.

The majority of Managing Authorities consider the administrative burden of the ISF-P **proportionate to its benefits** (38%, or 20 out of 53) and to the burden associated with other EU funding sources (28%, or 15 out of 53) **to some extent**. In contrast, a significant portion of Managing Authorities view the ISF-P's burden as proportionate to that of activities funded solely from national sources only to a limited extent or not at all (42%, or 22 out of 53).

The most common approach typically followed by the Managing Authorities to gauge the cost-effectiveness of the projects selected for support is the **assessment of market prices**

**for similar products and services** (29 out of 94 responses, 30%)<sup>153</sup>, followed by the estimates from prospect beneficiaries (22, 23%) and the **qualitative explanations on cost-effectiveness from prospect beneficiaries** (20 out of 94, 21%).

## Relevance

Responses showed that 26% of respondents involved in managing and coordinating the fund (14 out of 53) believed that **the Fund had been flexible to a large extent in responding to crises**. Another 32% (17 out of 53 respondents) felt that the Fund was flexible "to some extent." Another notable proportion (26%, 14 respondents of 53) felt the Fund was flexible "to a limited extent," while only 2% (1 respondent) felt it had not been flexible at all.

**Regular dialogue and consultation activities with stakeholders and potential beneficiaries** (if coming from channels other than the Monitoring Committee) was the most common mechanism to ensure that the operations funded by the Funds best match the evolving needs in the Member States (27 out of 94 responses, 29%)<sup>154</sup>, followed by the regular feedback from the Monitoring Committee (16 out of 94 responses, 14%) and establishing baselines, and monitoring and evaluation mechanisms to track changes in needs over time (12 out of 94, 13%).

The Funds' activities sufficiently **address the needs of law enforcement authorities** with respect to their role in internal security matters to a large extent for 74% of respondents (39 out of 53). Similarly, it addresses the needs of relevant union agencies and bodies to a large extent for 25% of respondents (13 out of 53), but with another significant portion of respondents indicating to some extent (36%, 19 out of 53). For 28% of respondents (15 out of 53), the needs of the private sector are addressed to a limited extent, with 17 respondents (32%, 17 out of 53), believing that the needs are not addressed at all.

Respondents who have been involved in the management, coordination or supervision of the ISF-P **generally support maintaining the current funding thresholds for most areas** in the 2014-2020 period. Some support for slight increases is evident, particularly for crime prevention, combating cross-border crime, and maintaining IT systems. A significant portion of respondents (17 out of 53, 32%) favour keeping the 5% maximum for technical assistance unchanged, while 12 respondents (23%) support a slight increase. Only 2 respondents indicated a preference for a slight decrease. For the minimum of 20% allocated to crime prevention and combating serious and organised crime, respondents are evenly split between maintaining the threshold (15 out of 53, 28%) and supporting a slight increase (15 out of 53, 28%), while only a small minority (2 out of 53) suggest a decrease. The allocation for enhancing the capacity to manage security-related risks (minimum 10%) sees the strongest support for maintaining the current level (20 respondents out of 53, 38%), with 11 respondents (21%) preferring a slight increase. While 12 respondents (23%) support keeping it unchanged the minimum allocation of 8% for IT system maintenance, 14 (26%) favour a slight increase, and a smaller proportion (3 respondents) suggest a slight decrease. While 15 respondents (28%) support maintaining the current allocation of 8% maximum for third-country actions, a notable portion (6 respondents) advocate for a decrease, and 9 (17%) favour an increase.

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<sup>153</sup> Multiple choice question.

<sup>154</sup> Multiple choice question.

## Coherence

Among the most common measures implemented during the programme designing and implementation phase to ensure coherence with other programmes funded by EU resources in similar areas of work, **the coordination with other EU-funded initiatives** (e.g., exchanges with coordinators of other funds and between relevant ministries) stood out, with 38% of Managing Authorities indicating it (32 out of 83 responses), followed by **assessing interventions with similar objectives** (21 out of 83 responses, 25%), and the **establishment of a Monitoring Committee** or inter-institutional group (19 out of 88, 23%)<sup>155</sup>.

According to responses from the Managing Authorities, most respondents (37%, or 20 out of 53) indicated that **national interventions complement ISF-P activities to some extent**, while 26% (14 out of 53) reported a large extent of complementarity. On the other hand, actions organised by the AMIF and the Integrated Border Management Fund (IBMF) were seen to not at all complement ISF-P activities to some extent by 22% of respondents (12 out of 53) and actions supported by the BMVI and the Instrument for Financial Support for Customs Control Equipment were noted as complementary to a limited by 25% of respondents (13 out of 53).

A significant share of respondents observed that the EU structural funds **complemented ISF-P activities to some extent** (36%, or 19 out of 53). Similarly, actions organised by Horizon 2020 are seen to not at all **complement ISF-P activities** by 17% (9 out of 53). Actions organised by Fiscalis 2020 are perceived to be complementing ISF-P actions to a limited (26%) and some extent (28%).

## EU added value

For more than half of the Managing Authorities (57% of the respondents, 30 out of 53) the projects funded under the ISF and or ISF-P (e.g. for improving cooperation and coordination between different Member States, exchange of information, and joint operations) **would not have been carried out without the support of the Fund**. On the other hand, 38% of the Managing Authorities (20 out of 53) believe these projects would have been carried out without the support of the Fund, but **on a smaller scale of quality, for example, involving fewer Member States or with fewer participants**.

The **exchange of best practices** is the most common choice as the main value added brought by the Fund according to Managing Authorities (45 responses out of 212, 21%), followed by the **increased operational cross-border cooperation** (41 responses out of 212, 19%), and the improved mutual trust and confidence between law enforcement authorities and other national authorities of Member States (34 responses out of 212, 16%). The establishment of public-private partnerships (14 out 212, 6%) figured as the least selected option among Managing Authorities.<sup>156</sup>

With regards to the sustainability of results, the majority of Managing Authorities indicated that the outcomes and benefits of the projects funded under ISF-P have been sustainable over time (with 48, or 90% of respondents, rating it to some or to a large extent).

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<sup>155</sup> Multiple choice questions.

<sup>156</sup> Multiple choice questions.

## *Survey for beneficiaries*

The survey received responses from 147 beneficiaries, both implementing projects funded by the Union actions (87, 59%) and the national programmes (60, 41%), where respondents represented all Member States except for Luxembourg.

### Effectiveness

Actions promoting **collaboration, knowledge sharing and interoperability** are seen as the most effective in enhancing the EU's internal security according to beneficiaries (63%, 93 beneficiaries indicating "to a large extent" out of 147). Exchange, training, and education of staff and experts is viewed as highly effective, with 53% (78 respondents out of 147) indicating it was effective "to a large extent.". Similarly, actions improving police cooperation and coordination, including with relevant Union bodies, are also viewed by beneficiaries as highly effective (79 out of 147, 54%).

Beneficiaries pointed out that the ISF-P funded activities resulted to a large extent in **increased knowledge and skills of training participants** in the area of crime prevention/forensic field (59 out of 147, 40%), to a growing number of stakeholders involved in the sharing of information, study and data collection (66 out of 147, 52%) and improved sophistication of vigilance tools, improved routines and recommended method support in response to crime events (44 out of 147, 30%).

The ISF-P funded actions implemented by beneficiaries resulted in increased communication between information systems and coordination between authorities for the largest share of respondents (44%, 66 out of 147), to increased capacity and skills of competent authorities for responding to internal security related accidents and incidents (59 out of 147, 40%). These actions ultimately contributed to enhancing the capacity of Member States to manage effectively security-related risks and crises and to protect people and critical infrastructure against terrorist attacks and security-related incidents.

According to a majority of beneficiaries (52%, or 31 out of 60 responses), the current indicators effectively capture their projects' benefits to a large extent. However, they identify several opportunities for improvement in the evaluation framework. Beneficiaries suggest enhancing the system by giving project teams more flexibility to define success metrics aligned with their specific objectives. They particularly emphasise the value of longer assessment periods, especially for specialised projects such as financial crime investigation training, to better measure sustained impact. Additionally, they recommend developing more targeted indicators for different project types, such as infrastructure upgrades and technology implementations, to provide more meaningful insights into project value and effectiveness.

### Efficiency

39% of beneficiaries (58 out of 147) pointed out that **the ISF is proportionate to its benefits to a large extent**, and more than half of the respondents (51%, 75 out of 147) believe that the Fund is **proportionate to the burden** associated with other EU fundings (rating to some or to a large extent) and with national interventions (50%, 73 out of 147). The majority of beneficiaries, across both shared management and Union Actions, expressed that the **timelines for reporting requirements were generally adequate and deadlines allowed for sufficient time for comprehensive reporting**, ensuring that the necessary information could be gathered and reviewed. Specifically, according to 58% (83

respondents out of 147 respondents) of beneficiaries, the timelines were adequate “to a large extent” and “To some extent” according to 27% (39 replies out of 100 responses) of respondents.

Beneficiaries of actions funded by national programmes see the coordination with the Responsible authority as timely and effective (48 out of 60, 80%) and the beneficiaries implementing projects funded by Union Actions view the coordination with the Commission as timely and effective (51 out of 87, 60%).

For project proposals, the estimated time ranges from 1 to 45478 man-days, with typical estimates around 60, 50, 40, and 30 man-days, depending on the project’s complexity, the number of people involved, and the role within the project (e.g., coordinator vs. partner). In some cases, teams of 3 people worked full-time for 2 to 4 months on proposal preparation.

For annual reporting, the estimates range from 2 to 1800 hours, with reports typically requiring 20 to 100 man-days. The time spent on reporting also depends on factors like the complexity of the project and the number of partners in a consortium, with some cases requiring significant administrative tasks (e.g., gathering timesheets, invoices, and procurement documents). For larger consortia, up to one person per year may be dedicated to reporting. Some responses indicate that the time required can vary widely, with one report mentioning 365 days for an entire year.

#### Relevance

The majority of Member States’ actions beneficiaries agree to a large extent that the Fund has been **flexible in responding to new challenges and crisis situations**, which emerged in the EU during its implementation (50%, 30 out of 60). Similarly, a significant portion of Union Actions beneficiaries believe to a large extent that the fund has been flexible in responding to new challenges and crisis situations (38 out of 87, 44%). The majority of beneficiaries pointed out that organised crime and terrorism and radicalisation are some of the most important challenges for safeguarding the internal security of the EU (119 out of 147 responses each, 81%). Challenges like money laundering and firearm trafficking are seen as critical but receive slightly less emphasis, with 57% (84 respondents out of 147) and 53% (78 respondents out of 147) rating them as important “to a large extent.”

According to beneficiary survey responses, **the Funds effectively meet internal security needs**, but the level of support varies significantly across different groups. Among beneficiaries, 63% (92 out of 147) indicate that law enforcement authorities’ needs are well addressed. For Union agencies and bodies, 33% of beneficiary respondents (48 out of 147) report their needs are met to a large extent. However, beneficiaries indicate lower support levels for civil society and private organisations, with only 25% (37 out of 147) and 13% (19 out of 147) respectively reporting their needs being met to a large extent.

#### Coherence

Beneficiaries of Union Actions and national programmes indicated that **national interventions complement the activities provided by the ISF-P** to a large extent (27 and 23 respectively, out of 147, 34%).<sup>157</sup> On the other hand, most beneficiaries indicated that

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<sup>157</sup> With the exception of “I don’t know”.

actions organised by the AMIF do not complement at all ISF-P funded initiatives (11 out of 147, 7%) and actions organised by the BMVI and the Instrument for Financial Support for Customs Control Equipment to some extent (13 out of 147, 9%).<sup>158</sup> The majority of beneficiaries is unsure whether ISF-P funded actions complement with Cohesion Policy Funds (90 out of 147, 62%), and actions organised by Horizon 2020 not at all complement ISF-P funded actions to some extent (10 out of 147, 7%).

#### EU added value

More than half of the Union Actions and Member States' beneficiaries believe that the projects funded under the ISF-P **would not have been carried out without the support of the Fund** (76 out of 147, 52%), while 36% of respondents (54 out of 147) pointed out that projects would have been carried out but **in a smaller scale or quality**, i.e. involving fewer Member States or fewer participants.

Also among Union Actions beneficiaries, the survey shows that the majority of responses (117 out of 514, 23%) see **the exchange of best practices** as the main value added by the Fund. Increased **cross-border cooperation** (95, 18%), **fostered innovative solutions** to tackle internal security threats (84, 16%) and **improved mutual trust and confidence** between law enforcement authorities and other national authorities of Member States (79, 15%) also figure as prominent results brought by the Fund.<sup>159</sup>

The survey shows that beneficiaries have widely transferred the knowledge and skills gained through their projects to colleagues. A significant number of beneficiaries (?) distributed materials developed as part of the project (97) and made a presentation at an internal workshop in their institution (82).<sup>160</sup> Formal training courses for colleagues who have not participated in the project are the least common activity performed by beneficiaries (50).

With regards to the sustainability of results, the majority of beneficiaries indicated that the outcomes and benefits of the projects funded under ISF-P have been sustainable over time (with 48, or 80% of Member States' actions beneficiaries and 67, or 77% of Union Actions beneficiaries rating it to some or to a large extent).

#### *Summary of the interviews*

In line with the stakeholder consultation strategy, the study team conducted an extensive interview programme (simultaneously covering the ISF and ISF-P).

At the inception stage of the study, five scoping interviews<sup>161</sup> were organised to gather a better understanding of the context in which the ISF operates and any key elements to consider for the research.

Targeted interviews were grouped into:

- Targeted interviews for five country case studies;

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<sup>158</sup> With the exception of "I don't know".

<sup>159</sup> Multiple choice question. The total number of respondents is 100.

<sup>160</sup> Multiple choice question.

<sup>161</sup> One interview with a Member State National Authority and four interviews with a number of representatives of DG HOME (cumulative interviews with different Units).

- Targeted interviews for four thematic case studies;
- Targeted additional interviews for the ex-post evaluation of ISF-P (to address data gaps faced during the research and following the Interim Report).

The study team selected the stakeholders to be interviewed in close cooperation with the Commission and developed the interview questionnaires jointly. The questionnaires were targeted to relevant stakeholder categories and included questions covering the ISF-P (and the ISF, when relevant and covering both funding periods). The interviews were semi-structured, and appropriate questions were selected depending on the interviewees' backgrounds and knowledge.

#### *Targeted interviews for country case studies*

The objective of these interviews was to collect country-specific insights on what has worked, and what has not with the implementation of the ISF-P (and of the ISF) at the Member State level in five selected Member States (Croatia, Germany, Latvia, Netherlands, and Spain). They also served to identify opportunities and challenges in the implementation of the ISF, as well as recommendations for future implementation.

For the country case studies, interviews covered the assessment of the ISF and the ISF-P (combined).

In total, the study team conducted 29 interviews with various stakeholder groups as part of the five country case studies, including:

- six interviews for Croatia;
- 11 interviews for Germany;
- three interviews for Latvia;
- five interviews for the Netherlands; and,
- four interviews for Spain.

#### *Targeted interviews for thematic case studies*

For the thematic case studies, interviews cover the ISF and the ISF-P separately, unless beneficiaries received funding under both the ISF-P and the ISF.

In total, the study team conducted 37 interviews with various stakeholder groups as part of the thematic case studies, notably:

- interviews for the Union Actions case study;
- interviews for the EMAS case study;

#### ***Additional interviews for the ex-post evaluation of ISF-P***

These additional interviews aimed to address the information gaps that became evident after submitting the Interim Report. The study team selected the stakeholders and the topics of discussion closely with the Commission.

The selection included:

- seven interviews with the Responsible Authorities of (seven) Member States;

- one interview with the members of the Monitoring Committee of a Member State;
- one interview with a beneficiary of EMAS;
- two interviews with beneficiaries of Union Actions;
- two interviews with two beneficiaries under the national programme (to be conducted during the week of 24 March 2025);
- one interview with a beneficiary of direct grants.

Based on the information gaps, the interviews included (will include) the following specific questions, among others:

- Comparisons of the ISF-P with preceding programmes (ISEC, CIPS), and with the ISF;
- Coherence with other initiatives;
- Complementarity of the ISF-P's components;
- Difference in the distribution of resources to the specific objectives;
- Rationale behind the differences in the absorption rate;
- Effects of the extension of the implementation deadline;
- Gold-plating in relation to National Programmes;
- Systems in place to detect fraud and irregularities and the functioning of Responsible Authorities;
- Information on admin requirements, specifically monitoring and reporting;
- Use of technical assistance;
- Results of projects under Union Actions and EMAS;
- Sustainability of ISF-P projects;
- EU added value of the ISF-P (e.g. what actions have brought the most cooperation between Member States and replicable results).

In total, 12 interviews were conducted up to 21 March 2025, and the remaining two will be carried out during the week of 24 March 2025.

### ***Summary of interviews***

The following sections present an overview of stakeholders' views on the the functioning of the ISF-P following evaluation criteria: effectiveness, efficiency, relevance, coherence, complementarity, EU added value, sustainability, simplification, and reduction of the administrative burden.

#### Effectiveness

According to the interviews, the ISF-P contributed significantly to achieving its objectives in enhancing Member States' capacity to combat cross-border, serious, and organised crime, including terrorism, and improving coordination and cooperation among law enforcement authorities.

Several beneficiaries highlighted that tools developed with projects funded by the ISF-P were crucial in addressing organised crime. For example, the PRoTECT project<sup>162</sup> used

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<sup>162</sup> Country case study interview with the beneficiary of the Union Action from the Netherlands

vulnerability assessment tools to assist local authorities, while explosive disposal robots played a key role in counterterrorism efforts and the prevention of cross-border crime in another Member State.<sup>163</sup>

Many stakeholders emphasised the Fund's role in improving cooperation and coordination among Member States. In this respect, two beneficiaries reported improved cross-border information exchange and coordination in fighting organised crime, significantly increasing intelligence sharing between national authorities, Europol, and other relevant bodies.<sup>164</sup> One beneficiary implemented projects that brought together government, private-sector, and civil society organisations to protect children from online sexual abuse.<sup>165</sup> Similarly, another beneficiary worked with a range of sectors to strengthen the fight against cross-border crime, demonstrating the value of a multi-stakeholder approach in enhancing internal security.<sup>166</sup>

Training and knowledge transfer were also identified by several beneficiaries as key contributions of the fund. For example, AIRPOL trained over 200 officers annually<sup>167</sup>, while the facial recognition training implemented by another beneficiary<sup>168</sup> became a significant platform for sharing expertise and improving criminal investigations across Europe. These training initiatives were essential in strengthening law enforcement capabilities.

Two stakeholders highlighted the key contribution of the ISF-P to improve the capabilities of Member States, with funding allocated to acquiring specialised equipment and building crucial infrastructures, such as IT systems for information exchange<sup>169</sup>, and equipment for rescue operations, which significantly enhancing preparedness and response to crises.<sup>170</sup>

Another key area covered by the ISF-P projects was countering terrorism and radicalisation. In particular, one Managing Authority reported the success of anti-radicalisation programs implemented by third-sector organisations,<sup>171</sup> while a beneficiary stressed the importance of specialised counter-terrorism training,<sup>172</sup> both of which supported national efforts to prevent and respond to terrorist threats.

Regarding the ISF-P's capacity to engage a wide range of stakeholders, several interviewees expressed challenges in involving civil society organisations, research institutions and/or the private sector. This was also considering that national authorities were mainly active in the ISF-P policy fields as they better understood the issues at stake. The involvement of other categories of stakeholders, such as civil society organisations and research institutions, was not considered a priority given the limited expertise in the

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<sup>163</sup> Country case study interview with the beneficiary of the National Programme from Spain

<sup>164</sup> Country case study interview with the beneficiary of the National Programme from Croatia; Thematic case study interview with the beneficiary of the Union Action from Belgium

<sup>165</sup> Thematic case study interview with the beneficiary of the Union Action from the Netherlands

<sup>166</sup> Thematic case study interview with the beneficiary of the Union Action from Belgium

<sup>167</sup> Thematic case study interview with the beneficiary of the Union Action from Sweden

<sup>168</sup> Thematic case study interview with the beneficiary of the Union Action from Estonia

<sup>169</sup> Additional interview with the Managing Authority from Bulgaria

<sup>170</sup> Country case study interview with the beneficiary of the National Programme from Latvia

<sup>171</sup> Additional interview with the Managing Authority from Finland

<sup>172</sup> Country case study interview with the beneficiary of the National Programme from France

policy fields and knowledge of challenges experienced by Member States at a more operational level.<sup>173</sup>

Many consulted stakeholders shared that the ISF-P projects had a positive impact (29).<sup>174</sup>

## Efficiency

While the funded projects achieved the objectives to a significant degree, stakeholders stressed the challenges in the projects' implementation related to the availability and management of human and financial resources. The ISF-P foresaw the implementation of systems to ensure cost efficiency, though the complexity of these systems often increased workloads.

Several Managing Authorities emphasised the significant challenges related to administrative tasks, particularly the personnel-intensive nature of managing European funds.<sup>175</sup> One Managing Authority<sup>176</sup> reported the need for additional staff at the national level to deal with the complexities of the ISF-P.

Beneficiaries under the national envelope highlighted the cost-effectiveness of their projects but also noted challenges in resource allocation and reporting. One beneficiary stated that the implementation, monitoring, and reporting of projects required significant involvement from the entire project team.<sup>177</sup> Another beneficiary<sup>178</sup> pointed out the frequent and extensive reporting requirements, which were burdensome and led to significant administrative effort. A beneficiary also pointed out that the complexity of procurement procedures made the entire process time-consuming.<sup>179</sup>

Due to the COVID-19 pandemic, cost savings were achieved in areas such as training, where digital formats replaced in-person activities.<sup>180</sup>

Beneficiaries of Union Actions projects and EMAS provided mixed feedback on efficiency and cost-effectiveness, underlining the need for improving reporting and cost management. One beneficiary<sup>181</sup> explained that reporting requirements could be streamlined by providing advance notice of data collection needs, which would help to speed up the final

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<sup>173</sup> Additional interviews for the ISF-P: CY MA, CZ MA, IT MA.

<sup>174</sup> Country case study interviews with the Managing Authorities from Spain (2), Croatia and Germany

Country case study interview with one beneficiary of the Union Action from the Netherlands

Country case study interviews with the beneficiaries of the National Programme from Croatia (2), Spain, Latvia and Germany; Thematic case study interviews with the beneficiaries of the Union Action from Sweden, Belgium, Estonia, Netherlands, Italy (2) and one on the EU level; Thematic case study interviews with the beneficiaries of the EMAS from Belgium, Spain and on one the EU level; additional interviews with the Managing Authority from Bulgaria, Italy, Finland, France and Latvia; additional interview with one beneficiary of the National Programme from France; and additional interviews with the beneficiaries of the Union Action from the Netherlands (2) and Greece.

<sup>175</sup> Country case study interview with the Managing Authority from Spain

<sup>176</sup> Additional interview with the Managing Authority from Italy.

<sup>177</sup> Country case study interview with the beneficiary of the National Programme from Croatia.

<sup>178</sup> Country case study interview with the beneficiary of the National Programme from Latvia.

<sup>179</sup> Country case study interview with the beneficiary of the National Programme from France.

<sup>180</sup> Additional interview with the Managing Authority from Bulgaria.

<sup>181</sup> Country case study interview with the beneficiary of the Union Action from Croatia.

reporting process. Similarly, a beneficiary<sup>182</sup> shared that while results were achieved at reasonable costs, the rush to complete reporting at the end of the project was a challenge.

A beneficiary appreciated the guidance and assistance from the Commission and a dedicated financial manager which helped keep the projects cost-effective.<sup>183</sup>

Other beneficiaries mentioned that the stringent financial rules created challenges for law enforcement, which had to reduce costs and limit spending to minimise financial risks.<sup>184</sup>

Many stakeholders believed the results were achieved efficiently, with reasonable costs and human resources.<sup>185</sup>

## Relevance

Most consulted stakeholders considered the ISF-P's objectives generally aligned with policy needs, and it could address the needs identified at the time of its adoption and adapt to evolving ones during its implementation period.<sup>186</sup>

The ISF-P's objectives generally aligned with policy needs, with sufficient financial resources to address them as mentioned by one Managing Authority<sup>187</sup> and mid-term reviews enabling adjustments mentioned by another.<sup>188</sup> One beneficiary expressed how the Fund helped to focus on their needs related to crime prevention, crisis management, cross-border cooperation, and equipping law enforcement,<sup>189</sup> while another also mentioned it supported security cooperation among EU Member States and international partners.<sup>190</sup> Another beneficiary mentioned the objectives met the EU and national priorities in combating child sexual exploitation but lacked broader resilience-building efforts. Stakeholders emphasised the need to address general crime, insecurity, and victimisation beyond terrorism.<sup>191</sup>

The objectives set by Member States in the National Programme were generally considered relevant to the needs identified at national level. A Managing Authority<sup>192</sup> noted that before

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<sup>182</sup> Thematic case study interview with the beneficiary of the Union Action from Belgium.

<sup>183</sup> Thematic case study interview with the beneficiary of the Union Action from Estonia.

<sup>184</sup> Additional interview with the beneficiary of the Union Action from the Netherlands.

<sup>185</sup> Country case study interview with one Managing Authority from the Netherlands; Country case study interview with one beneficiary of the National Programme from Latvia; Country case study interview with one beneficiary of the Union Action from Croatia; Thematic case study interviews with the beneficiaries of the Union Action from Belgium, Estonia, the Netherlands and Italy (2); Thematic case study interviews with the beneficiaries of the EMAS from Spain and one on EU level; Additional interviews with the Managing Authorities from Bulgaria, Cyprus, Italy, Latvia, Finland and France; and Additional interviews with one beneficiary of the Union Action from Greece.

<sup>186</sup> Country case study interviews with the Managing Authority from Spain, Germany (2), Croatia and Latvia; Country case study interviews with beneficiaries of the National programme from Spain and Croatia (2); Country case study interview with one beneficiary of the Union Action from Croatia; Thematic case study interviews with beneficiaries of the Union Action from Sweden, Belgium, Estonia, Netherlands (2), and Italy (2); Additional interview with the Managing Authority from Bulgaria; and Additional interview with the beneficiary of the Union Action from Greece.

<sup>187</sup> Country case study interview with the Managing Authority from Spain.

<sup>188</sup> Country case study interview with the Managing Authority from Germany.

<sup>189</sup> Country case study interview with the beneficiary of the National Programme from Croatia

<sup>190</sup> Thematic case study interview with the beneficiary of the Union Action from Sweden

<sup>191</sup> Thematic case study interview with the beneficiary of the Union Action from the Netherlands

<sup>192</sup> Country case study interview with the Managing Authority from Spain.

drafting the Operational Programme, a needs assessment was conducted at the beneficiary level to inform funding decisions. Another Managing Authority<sup>193</sup> Stated that, while some adjustments were made overtime, the initial needs were largely financed. A Managing Authority<sup>194</sup> highlighted that funding was instrumental in promoting priorities within respective policy areas, while another Managing Authority<sup>195</sup> emphasised the direct engagement between the Managing Authority and national authorities to ensure that the National Programme responded to current needs. However, a Managing Authority<sup>196</sup> pointed out that the Programme's focus was sometimes unclear, as it was structured around activities rather than thematic priorities, making it challenging to determine its exact focus. Overall, all respondents (17)<sup>197</sup> agreed that the needs were met.

In the case of Union Actions, the objectives set in the Annual Work Programme were considered to significantly address actual needs. However, financial limitations restricted the full scope of work. A beneficiary stated that, while needs were partly covered, financial resources were insufficient to meet all work requirements.<sup>198</sup> Another beneficiary noted that the objectives effectively addressed both national and EU-level needs, contributing to the organisation's activities.<sup>199</sup> Many respondents (12)<sup>200</sup> agreed that the objectives addressed the identified needs.

For EMAS, the objectives were generally relevant, but this component lacked sufficient flexibility, especially when compared with the EMAS under the ISF.<sup>201</sup> A beneficiary pointed out that, although despite the lack of a clear definition of what constituted an emergency situation, it was possible to adapt funding to the applicants' needs.<sup>202</sup>

For shared management, several measures were taken to adapt the National Programme to changing needs. A Managing Authority described the implementation of a pilot framework project, allowing committees to decide on relevant topics and tailor projects to current needs.<sup>203</sup> Another Managing Authority reported that needs were reassessed, and operations that no longer provided value were replaced with those aligned with EU policy priorities.<sup>204</sup> A beneficiary<sup>205</sup> highlighted that their project required continuous adaptation to evolving threats appearing on social media trends to address new challenges, such as online hate. A Managing Authority<sup>206</sup> explained that the ISF-P framework allowed for procedural

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<sup>193</sup> Country case study interview with the Managing Authority from Latvia.

<sup>194</sup> Interview with the Managing Authority from Cyprus.

<sup>195</sup> Interview with the Managing Authority from Italy.

<sup>196</sup> Interview with the Managing Authority from Finland.

<sup>197</sup> Country case study interviews with the Managing Authorities from Spain (2), Germany and Croatia; Country case study interviews with the beneficiaries of the National programme from Croatia, Latvia (2), and Spain; Country case study interview with one Monitoring Committee from Germany; Additional interviews with the Managing Authority from Bulgaria, Cyprus, Italy, Latvia, Czechia, Finland and France.

<sup>198</sup> Thematic case study interview with the beneficiary of the Union Action from the Netherlands.

<sup>199</sup> Thematic case study interview with the beneficiary of the Union Action from Italy.

<sup>200</sup> Case study interviews with the Managing Authorities from Spain, Germany and Latvia.

Thematic case study interviews with the beneficiaries of the Union Action from Sweden, Estonia, Germany, Italy (2), Netherlands and on the EU level; Additional interviews with the beneficiary of the Union Action from Greece.

<sup>201</sup> Thematic case study interview with the beneficiary of the EMAS on the EU level.

<sup>202</sup> Thematic case study interview with the beneficiary of the EMAS from Belgium.

<sup>203</sup> Country case study interview with the Managing Authority from Germany.

<sup>204</sup> Country case study interview with the Managing Authority from Spain.

<sup>205</sup> Country case study interview with the beneficiary of the National programme from Germany.

<sup>206</sup> Country case study interview with the Managing Authority from Czechia.

adjustments, including alignment with EU frameworks such as the Passenger Name Record (PNR) and adapting to online meetings during COVID-19. However, some projects, such as knowledge-sharing initiatives, were cancelled due to resource constraints.

Despite the flexibility, a Managing Authority noted that making changes to the National Programmes to ensure their relevance to evolving needs and priorities was administratively burdensome, as amendments required approval at several levels.<sup>207</sup>

Regarding the Union Actions component, projects demonstrated significant adaptability, especially due to the COVID-19 emergency, and necessary adjustments were made.<sup>208</sup>

## Coherence

Most consulted stakeholders indicated that the ISF-P aligned with other relevant policy initiatives and maintained coherence with other EU funds. Coherence was ensured through coordination mechanisms, strategic alignment with other EU funding instruments, and internal collaboration among the Commission, Managing Authorities and beneficiaries.

Consulted stakeholders highlighted coordination efforts to ensure internal coherence, i.e. within the ISF-P, among the different components, and external coherence, with other initiatives.

On the internal coherence, during the consultation, two stakeholders reported concerns about the communication and alignment between the Managing Authorities and the Commission regarding the selection of projects and beneficiaries, respectively, under shared management and the Union Actions component.<sup>209</sup> One stakeholder indicated that the Managing Authority generally had a more limited scope to make changes to the National Programme and to the selection of projects that were foreseen at the beginning of the funding period to align with the relevant needs identified at the national level.

Regarding external coherence, some beneficiaries acknowledged connections between ISF-P and other EU funding programmes like Horizon, noting that ISF-P remained distinct in its focus on operational support for law enforcement. In contrast, Horizon focused more on research and innovation.<sup>210</sup>

Managing Authorities in several Member States actively worked to align funding priorities and avoid duplication. For example, one Ministry of Interior established coordination mechanisms to collect information on project ideas from various institutions and ensure coherence with national and EU funding instruments.<sup>211</sup>

For Union Actions and EMAS, interviewed beneficiaries found that ISF-P funding aligned well with other initiatives. Some beneficiaries leveraged multiple funding sources, such as

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<sup>207</sup> Country case study interview with the Managing Authority from Finland.

<sup>208</sup> Country case study interviews with the Managing Authorities from Germany, Croatia, Spain; Country case study interviews with beneficiaries of the National programme from Germany and Croatia; Additional interview with one beneficiary of the Union Action from the Netherlands; and Additional interviews with the Managing Authority from France and Czechia.

<sup>209</sup> Additional interview with the Managing Authority from Czechia and Latvia.

<sup>210</sup> Country case study interviews with the beneficiaries of the National Programme from Croatia, Latvia and Spain.

<sup>211</sup> Country case study interview with the Managing Authority from Latvia.

national co-financing, to sustain project results.<sup>212</sup> Effective coordination with similar initiatives was emphasised to avoid redundancy, and collaboration with EU-level agencies helped ensure coherence, as seen in the work of MAOC-N, which coordinated with agencies to avoid overlapping activities during operations.<sup>213</sup>

However, one beneficiary pointed out potential overlaps between ISF-P and Horizon, particularly around internal security themes, and expressed uncertainty about how the two funding instruments related to each other.<sup>214</sup>

Overall, a high number of stakeholders agreed that coherence was ensured throughout the funding period (12).<sup>215</sup>

### Complementarity

Member States and the Commission generally ensured complementarity between ISF-P projects and other funded components.

For example, one Managing Authority highlighted the coordination of border surveillance equipment, which was used for both border protection (ISF-BV) and internal security (ISF-P), optimising resources and avoiding duplication.<sup>216</sup> Another Managing Authority noted that a Project Coordination Committee was established to harmonise projects' ideas and prevent overlap with other funding sources.<sup>217</sup> One Managing Authority<sup>218</sup> also mentioned the importance of internal coordination within ministries and collaboration with the Commission to maintain complementarity.<sup>219</sup> However, one beneficiary under the National Programme mentioned that equipment was not mutually used between different funds.<sup>220</sup>

To ensure complementarity, one beneficiary under the Union Actions component reported that their project was built on existing research and networks, aligning with national programs.<sup>221</sup>

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<sup>212</sup> Country case study interview with the beneficiary of the Union Action from Croatia.

<sup>213</sup> Thematic case study interview with the beneficiary of the Union Action on the EU level.

<sup>214</sup> Country case study interview with the beneficiary of the Union Action from the Netherlands.

<sup>215</sup> Country case study interviews with the Managing Authorities from Spain, Latvia, Czechia and France. Country case study interviews with the beneficiaries of the National Programme from Latvia, Croatia and Spain; Country case study interview with the beneficiary of the Union Action from the Netherlands; Thematic case study interview with the beneficiary of the Union Action from Italy and one on the EU level. Thematic case study interview with the beneficiaries of the Emergency Action from Spain and one on the EU level.

<sup>216</sup> Country case study interview with the Managing Authority from Spain.

<sup>217</sup> Additional interview with the Managing Authority from Latvia.

<sup>218</sup> Additional interview with the Managing Authority from France.

<sup>219</sup> Additional interview with the Managing Authority from France.

<sup>220</sup> Country case study interview with the beneficiary of the National Programme from Croatia.

<sup>221</sup> Thematic case study interview with the beneficiary of the Union Action from Italy.

Overall, many stakeholders<sup>222</sup> acknowledged alignment with other instruments, although some concerns about overlapping activities remained, particularly regarding coordination between police bodies and different funds.<sup>223</sup>

## EU added value

Overall, consulted stakeholders widely agreed that the ISF-P provided significant EU added value, especially by enhancing cross-border cooperation and improving the exchange of information between the authorities of Member States.

Three stakeholders (Managing Authorities)<sup>224</sup> emphasised that the financial support of ISF-P allowed for the successful implementation of critical projects that would have been difficult to carry out with only national level or other EU funds. They pointed out that the ISF-P resources enabled the implementation of projects vital to addressing national-level security challenges, including developing new practices, which otherwise would not have been possible. Nine stakeholders agreed they could not have implemented their actions without the ISF-P support.<sup>225</sup>

For beneficiaries, the ISF-P played a crucial role in enabling cross-border cooperation and making possible initiatives that national budgets alone could not have supported. Several beneficiaries reported that while some projects might have been possible without the EU funding, their implementation would have been significantly more challenging due to financial constraints at the national level.<sup>226</sup> In particular, projects like EU-SUITEx, which focused on international cooperation and technical tool development, were realised primarily because the EU covered most of their costs.<sup>227</sup> Several beneficiaries (8) indicated that they would not be able to implement projects without the support of ISF-P.<sup>228</sup>

Some stakeholders acknowledged the ISF-P's value in fostering transnational cooperation and enhancing law enforcement capabilities. Two (two Managing Authorities)<sup>229</sup> highlighted the importance of experience exchange and improved information exchange

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<sup>222</sup> Country case study interviews with the Managing Authorities from Spain (2x), Latvia and Croatia; Country case study interview with one beneficiary of the National Programme from Croatia; Thematic case study interview with one beneficiary of the EMAS from Belgium; Thematic case study interview with one beneficiary of the Union Action from Italy; Additional interviews with the Managing Authorities from Finland and France; Additional interview with the beneficiary of the National Programme from France.

<sup>223</sup> Country case study interviews with the Managing Authorities from Spain (2x), Latvia and Croatia; Country case study interview with one beneficiary of the National Programme from Croatia; Thematic case study interview with one beneficiary of the EMAS from Belgium; Thematic case study interview with one beneficiary of the Union Action from Italy; Additional interviews with the Managing Authorities from Finland and France; Additional interview with the beneficiary of the National Programme from France.

<sup>224</sup> Country case study interviews with the Managing Authorities from Spain, Finland and Germany.

<sup>225</sup> Country case study interviews with the Managing Authorities from Spain, Germany (2), Croatia (2) and Latvia; Country case study interviews with beneficiaries of the National Programme from Croatia (2) and Latvia.

<sup>226</sup> Thematic case study interview with one beneficiary of the Union Actions from Germany.

Thematic case study interviews with the beneficiaries of the EMAS from Spain, Belgium and one on the EU level.

<sup>227</sup> Thematic case study interview with one beneficiary of the EMAS from Belgium.

<sup>228</sup> Thematic case study interviews with beneficiaries of the Union Actions from Germany and Italy; Thematic case study interviews with the beneficiaries of the EMAS from Spain, Belgium and one on the EU level.

Additional interviews with the beneficiaries of the Union Action from Greece and France.

<sup>229</sup> Country case study interviews with the Managing Authorities from Spain and Croatia.

between Member States. Another (a Managing Authority) noted that ISF-P enhanced internal security in their territory and the EU, with interconnected security policy areas positively affecting multiple Member States.<sup>230</sup>

Most stakeholders agreed that ISF-P contributed substantially to EU-level security and cooperation (37 respondents).<sup>231</sup>

### Sustainability

According to consulted stakeholders, the ISF-P projects have demonstrated significant long-term results, with many continuing to impact beyond completion.<sup>232</sup>

Several collaborations and cooperation between stakeholders have extended beyond their initial funding period.<sup>233</sup> Specialised equipment procured with the ISF-P, such as armoured vehicles and drones for law enforcement, has been in use for years to support law enforcement efforts and improve public security across Member States.<sup>234</sup>

The deliverables of training projects, such as manuals and the know-how acquired by participants, are being shared across Member States, used during participants' lifelong careers, and have lasting effects.<sup>235</sup> Tools, such as the firearms monitor, are regularly updated to track firearm incidents,<sup>236</sup> and interactive tools for civil society and journalists continue to be maintained, though funding challenges persist.<sup>237</sup> Equipment acquired through ISF-P also continues to support law enforcement efforts to improve public security across Member States.<sup>238</sup>

To ensure the sustainability of projects, applicants were to provide sustainability plans before the projects' approval,<sup>239</sup> while social media projects within the National Programme reuse content across platforms to maintain relevance for training.<sup>240</sup>

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<sup>230</sup> Additional interview with the Managing Authority from Italy.

<sup>231</sup> Case study interviews with the Managing Authorities from Spain (2), Germany (2), Croatia and Latvia (2); Case study interviews with the beneficiaries of the National Programme from Croatia (2), Latvia (2), Spain (2) and Germany; Thematic case study interviews with beneficiaries of the Union Actions from Belgium, Estonia, Germany, Hungary, Netherlands, Malta, Italy (2), and one on the EU level; Thematic case study interviews with beneficiaries of the EMAS from Belgium, Finland and one on the EU level; Country case study interview with relevant members of the Monitoring Committee from Croatia; Additional interviews with beneficiaries from the Union Actions from the Netherlands (2) and Greece; Additional interviews with the Managing Authorities from Bulgaria, Cyprus, Italy, Latvia, Czechia, France and Finland.

<sup>232</sup> Country case study interviews with the Managing Authorities from Germany, Croatia and Spain; Country case study interviews with the beneficiaries of the National Programme from Spain, Croatia and Latvia; Thematic case study interviews with the beneficiaries of the Union Action from Italy and Belgium; Thematic case study interviews with the beneficiaries of the Emergency Assistance from Belgium (2); Additional interviews with the Managing Authorities from Bulgaria, Cyprus, Italy, Latvia, Finland, France and Czechia; Additional interviews with the beneficiaries of the Union Actions from the Netherlands and Greece; Additional interview with the beneficiary of the EMAS from France.

<sup>233</sup> Country case study interview with the Managing Authority from Germany

<sup>234</sup> Country case study interview with Managing Authority from Croatia; Additional interview with the Managing Authority from Italy.

<sup>235</sup> Country case study interview with the Managing Authority from Spain.

<sup>236</sup> Thematic case study interview with the beneficiary of the Union Action from Belgium.

<sup>237</sup> Additional interview with the beneficiary of the National Programme from Latvia.

<sup>238</sup> Additional interview with the Managing Authority from Italy.

<sup>239</sup> Country case study interview with the Managing Authority from Croatia.

<sup>240</sup> Country case study interview with the beneficiary of the National Programme from Germany.

Additionally, longer durations for EU-level grants have helped organisations focus on their core missions, reducing the need for constant reapplications and supporting long-term impact.<sup>241</sup>

### Simplification and reduction of administrative burden

Consulted Managing Authorities generally found the monitoring and reporting (including dedicated communication systems) functional, with regular reports and digital platforms ensuring proper documentation.<sup>242</sup> However, concerns were raised about the administrative burden such monitoring and reporting mechanisms would impose on Managing Authorities and beneficiaries.

Challenges were reported concerning the definition and quality of the indicators, which were not always easily applicable to specific projects and required adaptation.<sup>243</sup> Some authorities found the need for continuous amendments burdensome, as they had to revise projects' descriptions and interventions based on external decisions rather than their own planning.<sup>244</sup> Others highlighted the necessity of maintaining traceable communication at every step due to audit requirements, though this slowed processes significantly.<sup>245</sup> While a dedicated desk officer from the Commission helped streamline procedures, monitoring and reporting obligations remained demanding, especially considering the limited capacity of national authorities.<sup>246</sup>

Several stakeholders criticised especially the complexity of shared management, noting excessive justification requirements for even minor project adjustments<sup>247</sup> and frequent regulatory changes that created inefficiencies.<sup>248</sup> Others pointed out that the heavy administrative workload discouraged applicants, particularly national authorities, who had limited capacity for operational tasks (such as police forces).<sup>249</sup> Some welcomed certain measures adopted during the implementation of the Fund, such as the deadline extensions for projects<sup>250</sup> but overall, simplification efforts were seen as insufficient.<sup>251</sup>

Most consulted Managing Authorities agreed that the management procedures had not been significantly simplified (5).<sup>252</sup> While some flexibility was noted in adapting indicators to projects' goals,<sup>253</sup> and SCO,<sup>254</sup> the overall administrative burden remained high.

Beneficiaries under the National Programmes found administrative monitoring and reporting requirements highly demanding, particularly due to the extensive documentation

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<sup>241</sup> Thematic case study interview with the beneficiary on the EU level.

<sup>242</sup> Country case study interview with the Managing Authority from Croatia.

<sup>243</sup> Country case study interview with the Managing Authority from Germany.

<sup>244</sup> Country case study interview with the Managing Authority from Cyprus.

<sup>245</sup> Country case study interview with the Managing Authority from Croatia.

<sup>246</sup> Country case study interview with the Managing Authority from Latvia and France.

<sup>247</sup> Case study interview with the Managing Authority from the Netherlands.

<sup>248</sup> Case study interview with the Managing Authority from Cyprus.

<sup>249</sup> Case study interview with the Managing Authority from France.

<sup>250</sup> Case study interview with the Managing Authority from Italy.

<sup>251</sup> Case study interview with the Managing Authority from Finland.

<sup>252</sup> Country case study interviews with the Managing Authorities from Croatia, Finland, Netherlands, Cyprus and Italy.

<sup>253</sup> Case study interview with the Managing Authority from Germany.

<sup>254</sup> Case study interview with the Managing Authority from Croatia.

required to use allocations, including proof of fund allocation and distribution.<sup>255</sup> Police officers implementing operational support projects faced significant administrative burdens, as expenses, such as daily fees and fuel costs, had to be meticulously documented, leading to excessive paperwork, which is not usually required for national funding.<sup>256</sup> A stakeholder acknowledged that reporting is inherently burdensome; they considered it necessary to justify large funding amounts and ensure transparency.<sup>257</sup> Another stakeholder pointed out that audits were particularly difficult, requiring a large volume of additional documentation to be submitted within short timeframes.<sup>258</sup>

The impact of innovative procedures on simplification for beneficiaries of National Programmes was mixed. While multiannual programming was seen as beneficial in reducing administrative burden by some,<sup>259</sup> others found it challenging to predict needs over a seven-year period, especially in a rapidly changing security environment.<sup>260</sup> Strict procurement laws further complicated implementation by prolonging tender processes.<sup>261</sup> Shared management was perceived as more administratively complex than direct management, which, despite requiring multi-Member State participation, was considered more straightforward to implement.<sup>262</sup> Overall, few beneficiaries of the National Programme stated that there was no simplification.<sup>263</sup>

Beneficiaries of Union Actions and EMAS generally reported fewer administrative difficulties. Overall, a little over half of the respondents agreed that the administrative burden was manageable (11 out of 18).<sup>264</sup> Some described the process as straightforward, although complex.<sup>265</sup> Beneficiaries with experience on EU-funded projects did not consider the administrative workload unreasonable.<sup>266</sup>

### ***Summary of the First Focus Group***

The results of the First Focus Group were reported in the Synopsis Report for the study supporting the ex-post evaluation of the ISF-P.

### ***Summary of the Third Focus Group (ISF-P)***

The third Focus Group took place on 3 April 2025 (online format). It aimed to collect feedback from relevant stakeholders and validate the findings of the study, ensuring that the conclusions presented in the Draft Final Report for the ex-post evaluation of the ISF-P are accurate and comprehensive and reflect the perspectives of all key stakeholders. A total

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<sup>255</sup> Country case study interview with the beneficiary of the National Programme from Croatia.

<sup>256</sup> Country case study interview with the beneficiary of the National Programme from Croatia.

<sup>257</sup> Country case study interview with the beneficiary of the National Programme from Germany.

<sup>258</sup> Country case study interview with the beneficiary of the National Programme from Spain.

<sup>259</sup> Case study interview with the beneficiary of the National Programme from Spain.

<sup>260</sup> Case study interview with the beneficiary of the National Programme from Croatia.

<sup>261</sup> Case study interview with the beneficiary of the National Programme from Croatia.

<sup>262</sup> Case study interview with the beneficiary of the National Programme from France.

<sup>263</sup> Country case study interviews with the beneficiaries of the National Programme from Spain and Croatia. Additional interview with one beneficiary of the National Programme from France.

<sup>264</sup> Country case study interviews with the Managing Authorities from Croatia, Latvia, Spain and Italy; Thematic case study interview with the beneficiary of the EMAS on the EU level; Country case study interviews with the beneficiaries of the National Programme from Latvia (3); Additional interviews with the beneficiaries of the Union Action from the Netherlands (2) and Greece.

<sup>265</sup> Thematic case study interview with the beneficiary of the EMAS on the EU level; Additional interviews with one beneficiary of the Union Action from the Netherlands.

<sup>266</sup> Additional interviews with one beneficiary of the Union Action from Greece.

of 60 participants (including eight members of the study team) took part in the Focus Group. Participants reflected the various stakeholder groups. The study team presented the key findings of the Draft Final Report and reported the results per evaluation criterion.

Stakeholders provided a range of insights regarding the effectiveness of the ISF-P, highlighting both enduring and emerging challenges. A National Programme representative noted that the ISF-P differs from previous funds, such as the ISEC and CIPS, due to its shared management structure, and clarified that reductions in law enforcement training were largely driven by the COVID-19 pandemic. Persistent issues around procurement and staffing, particularly affecting final beneficiaries, were emphasised by both National Programme beneficiaries and Responsible Authorities, with the restrictions around the security component adding complexity. Challenges related to the use and interpretation of indicators were also raised, including the rigidity and level of required details of the evaluation template and insufficient training on the use of indicators, which hinder effective progress tracking. One Responsible Authority reported that delayed project closures should not be viewed negatively. The ISF-P started in 2014, however, most of the projects started in 2016 or 2017, inevitably delaying their closure. Additionally, stakeholders expressed strong support for the Commission-level initiatives calls, under Union Actions, as they allow for addressing emerging needs that are not necessarily captured in national programmes at the time of their adoption, such as the Russian war of aggression against Ukraine and the pandemic.

Stakeholders highlighted a variety of challenges and observations related to the efficiency of the ISF-P. A Responsible Authority agreed with the findings of the efficiency analysis but pointed to difficulties with procurement in the security field, where national security concerns complicate standard procedures. They noted divergences in interpretation between Member States and the Commission on appropriate procurement methods, emphasising the need for clearer procedural differentiation. Issues with digitalisation of procedures were also raised by a Union Action beneficiary, who considered the Commission Funding Portal to be unintuitive and difficult to navigate, citing problems with communication, reporting, amendments, and procedural complexity. The administrative burden of Union Actions is seen differently from the burdens that are under shared management, given that they are managed directly by the Commission without the involvement of the Responsible Authority. A Union Action beneficiary found ISF-P-funded actions more efficient due to their shorter duration, simpler implementation under the Commission management, and absence of intermediary administrative layers. Some concerns included delays and shifting strategies that influenced project costs, and the need to consider the link between procurement and gold-plating. One Responsible Authority warned against attributing efficiency to understaffing, as it could compromise the long-term sustainability of programmes.

Participants generally supported the findings related to simplification and reducing administrative burdens under the ISF-P, though challenges remain. One Responsible Authority stressed the simpler management of national funding compared to EU funding. Another Responsible Authority reported that SCOs had only been applied to indirect costs, citing difficulties in defining direct costs in advance. They recommended greater transparency and information-sharing among Member States, specifically proposing a shared list of already adopted SCOs to enhance efficiency and guide national-level implementation based on existing best practices.

Regarding relevance, both a Responsible Authority and a National Programme beneficiary confirmed that ISF-P funding was highly beneficial in supporting the achievement of key objectives, especially in areas such as cybercrime and ICT systems. While the findings on relevance were generally supported, another Responsible Authority noted the difficulty in assessing this aspect in depth, given that the original programming period began over ten years ago, making it challenging for stakeholders to recall specific details from that time.

Participants generally agreed with the findings on coherence. One Responsible Authority explained that coherence in their Member State is facilitated by centralising all EU funding under a single ministry and assigning both AMIF and ISF to the same Responsible Authority, with regular updates to Monitoring Committees helping to prevent overlaps. However, another Responsible Authority highlighted that this setup is not universal; in their country, the Responsible Authority operates under the Police Authority rather than a ministry, which creates coherence challenges. To address these, they maintain close collaboration with the Department of Justice and ensure ongoing engagement with the Monitoring Committee.

Participants agreed with the overall findings on complementarity. One Responsible Authority highlighted the crucial role of Monitoring Committees in ensuring alignment and avoiding overlap between funding sources. Another Responsible Authority pointed out that the actions selected for their national programme were intentionally designed to prevent double funding from other EU instruments, thereby reinforcing complementarity across instruments.

On EU added value, participants overall agreed with the overall findings. One Union Action emphasised the importance of Union Actions, highlighting the potential for exchanging best practices and bringing together stakeholders from different EU Member States to develop tools and guidelines.

Participants generally agreed with the findings related to sustainability. They shared several perspectives on sustainability, particularly in relation to the implementation of National Programmes. One Responsible Authority highlighted key measures to maintain positive outcomes over time, including enhanced cooperation with EU agencies such as Eurojust, Europol, CEPOL, and Frontex, as well as ongoing training for service personnel involved in delivery. Another Responsible Authority pointed to the potential of leveraging Horizon funding to develop innovations that could later be implemented under ISF-P to support long-term sustainability.