



EXTERNAL EVALUATION OF EASO OPERATIONAL INTERVENTIONS IN 2020

SUMMARY REPORT – ITALY OP 2020

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1. INTRODUCTION

1.1 Evaluation objectives and scope

The overall objective of this evaluation is to review and evaluate the European Asylum Support Office's (EASO) intervention in Italy during 2020 as per the EASO-Italy Operating Plan (OP) 2020. It concerns a retrospective, reflective and objective assessment of the degree to which the OP 2020 objectives have been met, identifying the reasons for any shortcomings and suggesting lessons learned from the intervention that might be useful to EASO in the design and implementation of future interventions.

This evaluation is part of a broader evaluation exercise of EASO OPs for the year 2020 in Italy, Malta, Greece and Cyprus, and the Pilot Project for a Resettlement Support Facility (RSF) in Turkey. EASO has contracted the evaluation exercise to Ramboll Management Consulting which further subcontracted experts to carry out the work.

This specific evaluation exercise concerns the host Member State (Italy), for the duration of the intervention (2020), although for contextual reasons, previous operational support interventions and historical asylum statistics have also been considered where deemed appropriate. The evaluation is based on detailed analysis of activities carried out during 2020, through a review of documentary evidence and consultation of stakeholders and partners of the EASO intervention.

1.2 Background to the intervention

Italy has long been known to be a country with high rates of applications for international protection. The rates peaked at 128,855 applications in 2017, in 2018 decreased to 59,955 (-53% from 2017); in 2019 to 43,770 (-27% from 2018); and in 2020 to 23,588 (-40 % from 2019)¹. The decrease is the result of various factors, including national legislative reform in the past years², the change of migratory routes to reach Europe (e.g. Balkan route), the COVID-19³ pandemic and related emergency measures like movement restrictions. Despite this declining trend, there are still a large number of persons seeking international protection in Italy in addition to those waiting for the decision on their application⁴, implying a significant effort of the State to ensure their first and second-line reception, and their early integration.

Since 2013 EASO has been providing support to the Italian authorities when the first Special Support Plan (SSP) was signed between EASO and Italy, focusing on country of origin information (COI) data collection and analysis, Dublin system, reception, and capacity building. In 2015, the relocation programme was established as part of the "hotspot" approach and the SSP was extended until March 2016. Since the first OP in 2017, EASO's operational support to Italian authorities developed from the provision of day-to-day operational support towards more strategic support for capacity building and quality management, thus slowly phasing out support over time.

¹ Data retrieved from EASO's Annual Reports on the Situation of Asylum in the European Union from 2017, 2018, 2019 and 2020.

² Kindly see Legislative decree of 4 October 2018, n. 113, converted in Law 1 December 2018, n. 132 which consistently reduced the applicability of the humanitarian status to people applying for international protection in Italy. The reform contained in Law 132/2018 was recently revised with the adoption of the Legislative decree of 21 October 2020, n. 130 which re-approaches the previous asylum protection system.

³ Coronavirus disease 2019.

⁴ At the end of December 2020, a total of 44,887 cases were still awaiting a first instance decision. Italy is the fifth largest EU+ country in terms of first instance pending cases. At the end of September 2020, about 82,839 cases were still waiting for an appeal decision. Source: [REDACTED].

With a budget of €13,804,323, the OP 2020 had the following key objectives:

- **measure 1** – Improve the quality and standardisation of asylum procedures;
- **measure 2** – Improve the quality management and monitoring of the Italian reception system;
- **measure 3** – Support the reduction of backlog of second instance asylum cases in the Specialised Sections of Tribunals and the Court of Cassation and its General Prosecutor’s Office⁵;
- **measure 4** – Enhance coordination mechanisms amongst Italian asylum authorities;
- **measure 5** – Increase the efficiency and standardisation of procedures and data collection through the development and management of information systems.

2. METHODOLOGY

The evaluation exercise is conceptually based on the European Commission’s Better Regulation Guidelines as well as the EASO Operations Evaluation User Guide, therefore, it assesses the relevance, efficiency, effectiveness, coherence and European Union (EU) added value of the intervention in Italy in 2020. In addition, a few questions of specific interest to the evaluation of the Italy OP 2020 were addressed. The report draws conclusions on lessons learned from the implementation of the intervention that might be useful for the future, including the OP 2021 which was recently launched.

The methodology for the evaluation combined the use of quantitative and qualitative data to enable an in-depth assessment of the results of the intervention. It consisted of desk research, interviews with EASO staff, interviews with authorities in Italy, interviews with the Directorate-General for Migration and Home Affairs (DG HOME) and Frontex, and with the United Nations High Commissioner for Refugees (UNHCR) and the International Organisation for Migration (IOM) representatives.

The COVID-19 health emergency limited implementation of the work, as it did not allow free movement in the country for field visits and in-person interviews, as well as focus groups, which would have enabled collection and more in-depth understanding of qualitative data and a wider range of feedback. The complexity of the monitoring intervention logic adopted by EASO was another limitation, and specifically the high number of indicators established that often did not, or not clearly enough, envisage baselines or targets which could provide reliable data for the purposes of the evaluation.

3. EVALUATION FINDINGS

3.1 Measure-specific findings

3.1.1 Measure 1: Support to the quality and standardisation of asylum procedures

EASO supported the Italian Ministry of Interior (MoI) (specifically the Department of Public Security (DPS) and its local immigration offices, *Questure*, as well as the National Asylum Commission (NAC)) with the quality and standardisation of asylum procedures. Similarly, EASO provided support for the standardisation of handling of outgoing Dublin cases at the Dublin Unit. The **gradual phasing-out of measure 1** in comparison to 2019, visible through a reduction in human resources and operational support, brought about a shift from support to day-to-day operational activities towards quality management, including the development of quality assurance tools, workplans and workflows, informative materials, capacity building activities and the setting up of a helpdesk

⁵ Following amendment of the OP 2020 that entered into force in September 2020.

covering procedural and Dublin transfer components. According to the interviewed partners, **EASO's intervention was relevant** in all cases and was considered suitable to meet their needs.

Overall, **EASO's support to Questure improved the quality of the asylum procedure**. The improvement of the *Modulo C3* registration form⁶ is a good example of this. Nevertheless, the *Questure* still seem highly reliant on EASO's technical assistance and have not yet built the in-house capacity to efficiently and effectively manage registrations in line with EU standards on their own.

Similarly to the quality and completeness of registration, EASO provided substantial resources to the **standardisation of COI research** at the COI Unit of MoI NAC. Almost all targets for this area of support were achieved, including the implementation of a work plan for the COI Unit; organisation of coordination meetings and briefing sessions with Territorial Commissions; train-the-trainer programmes for NAC officials; and the development of tools for the management of standardised procedures and cases at central level. Overall, **EASO managed to improve the capacity of the COI Unit** of MoI NAC to research and handle COI standardised procedures through the abovementioned activities. The two planned outputs that were not achieved were largely outside of EASO's control (due to COVID-19 and postponement by authorities), while some other activities that were within its control were overachieved. Importantly, new tools and working methods were implemented, and the large majority (89%) of COI research was carried out in line with standardised procedures. There was a high level of appreciation for EASO's support from both the NAC as well as from the Territorial Commission of Trapani, in relation to the Trafficking of Human Beings (THB) pilot project.

As regards EASO's **support to process Dublin procedure cases**, the overall aim of processing all Dublin cases was achieved (100%), although the number of take-back and take-charge requests processed came just short (by 116 cases) of the targeted 2,000 cases. EASO also developed six informative materials rather than the planned seven. In both cases, the target was almost achieved, and can largely be explained by the COVID-19 pandemic which slowed down activities - all transfers, including Dublin cases, had to be temporarily suspended. Importantly, however, a new workflow was developed to further support the standardisation of the litigation phase, and the number of *Questure* reached by regional workshops on Dublin transfers significantly exceeded the planned results (86% compared to 50% planned). Thus, the overall results of this sub-measure were good.

Despite the high effectiveness of measure 1, interviewed EASO staff indicated that the **efficiency of the intervention was affected by the COVID-19 pandemic**. The pandemic required EASO staff deployed to *Questure* for support to registration procedures to work remotely, as those offices were physically closed for public health reasons. Moreover, recruitment procedures for the selection of additional staff had to be postponed, along with training activities planned for deployed staff. Similarly, the same situation happened to EASO staff working at the central office of MoI DPS during the strict lockdown period.

3.1.2 Measure 2: Support to the quality management and monitoring of the Italian reception system

Due to Italy experiencing high number of arrivals, the reception system was under pressure, and the COVID-19 pandemic placed additional constraints on the Italian reception system. Containment procedures (i.e. health surveillance, 14-day quarantine in equipped ships or in specific designated areas suitable for isolation) impacted transfers and allocation of asylum seekers including unaccompanied minors (UAMs) in first line reception centres. Against this backdrop, the **support from EASO was considered relevant and corresponded to the needs of the Department**

⁶ The *Modulo C3* is the official application form to request international protection status in Italy. The interviewed UNHCR representative declared that C3 released by *Questure* that were supported by EASO were of higher quality compared to the others.

for Civil Liberties and Immigration (DCLI). This is especially true for the quality management strand, while the strand on the monitoring of reception conditions of centres was considered less relevant during 2020, as DCLI deprioritised its implementation in favour of responding to the immediate effects of the COVID-19 pandemic.

In terms of putting in place a sustainable reception management system, **all the intended targets were achieved and, in some cases, even exceeded.** Less positive was the experience with establishing a sustainable reception monitoring system. A key obstacle in this regard was the COVID-19 pandemic which hindered field presence in the reception facilities that is required to properly establish a monitoring system. However, EASO supported the relevant authorities in the re-organisation of workflows and activities in line with the recent legislative reform in the sector, which entailed the revision of the structure of reception centres. This support was very well received by interviewed stakeholders, despite the limited achievements.

3.1.3 Measure 3: Support the reduction of backlog of asylum cases in the Specialised sections of Tribunals and in the Court of Cassation

According to the latest statistics of MoI DCLI (December 2020), 71% of applicants for international protection are refused any form of protection by the first instance bodies⁷. Because of this, the Specialised Sections of Tribunals, competent for second instance appeal, and the Court of Cassation, competent for third instance claims (only formal issues) were overwhelmed by a considerable number of claims. This created a **clear need for a reduction of backlog in pending cases.** Due to this increase in judicial cases, following the direct request of the Ministry of Justice and also capitalising on the good practice of the pilot project involving the Tribunals in 2020, an amendment to the OP 2020 was signed in September 2020 to include support to both the Supreme Court of Cassation and its General Prosecutor's Office. Given that this support was requested and the OP was amended to make this type of support available, it was **relevant and appropriate.**

In 2020, despite challenges introduced by the COVID-19 pandemic, EASO successfully provided support to the Specialised Sections of Tribunals responsible for immigration, international protection and free movement of EU citizens, and to the Court of Cassation for the management of the reduction of backlogs. In fact, **this measure was the most successful** of EASO's operational support to Italy in 2020. The processing of the appeals of 8,755 persons was supported through either assistance for file preparation, participation in a hearing or scheduling. However, relevant interviewees pointed to a scope for creating a coordination mechanism among the relevant sections of the Supreme Court of Cassation for sharing of the research carried out by EASO temporary workers (especially the jurisprudence of European courts, i.e. European Union Court of Justice (EUCJ) and European Court of Human Rights (ECHR)) and contribute to further alignment of decisions to the EU standards.

Factors that **affected the efficiency** of this measure related to the COVID-19 pandemic, but only at the very beginning of its outbreak, when no one could go to the office and files could not be processed. Judges were already confident with teleworking which helped re-organise the work as the pandemic persisted. The EASO methodology combined with the efficiency of the judiciary helped overcome the initial negative impact of the lockdown.

⁷ MoI DCLI; for more details, see: http://www.libertaciviliimmigrazione.dlci.interno.gov.it/sites/default/files/allegati/mensilita_di_dicembre_2020.pdf

3.1.4 **Measure 4: Enhancement of coordination mechanisms amongst Italian asylum authorities**

Taking into consideration the feedback of EASO, partners and stakeholders (UNHCR and IOM), the **relevance of the intervention is considered high**, even though its impact may not yet be evident.

This **measure was considered highly effective** by stakeholders, as for the first time the three important offices – DPS, NAC and DCLI – sat around the same table to discuss commonly agreed solutions to asylum challenges. According to EASO, the measure had a higher impact at the local level than at the central one thanks to the elaboration and implementation of thematic tables. The latter provided an opportunity to transfer information and strategies from the top down.

The COVID-19 pandemic caused the **postponement of several meetings** and the suspension of the thematic tables, so the measure was revised in favour of remote solutions. Local *sur place* meetings involving local stakeholders were planned before the pandemic outbreak (e.g. *Questure*, Prefectures). Remote solutions implemented later on (remote thematic regional tables i.e. the meeting which envisaged the participation of all Prefectures and *Questure* of a defined Italian region) offered a good alternative. In a very decentralised system such as the Italian one, territories (the local and/or regional dimension) play a key role in the decision-making process: Prefectures, *Questure*, regional and local authorities and non-profit organisations play a substantial role in medium-long term processes. Overall, the indicators developed to measure progress show a high degree of success of the intervention, although the meetings were **not yet fully institutionalised** due to this not being considered a priority among authorities.

3.1.5 **Measure 5: Support the efficiency and standardisation of procedures and data collection through the development and management of information systems**

EASO supported the efficiency and standardisation of procedures and data collection through the development and management of information systems. More specifically, this measure related to the development of the SUA (Sistema Unico Asilo, i.e. Single Asylum System) and other key information systems for the Asylum and Reception System. The aim was to decrease the waiting time for lodging of asylum applications after identification through the development of a scheduling tool; and enhancing the use of available data for analysis and reporting through the automation of data collection and reports. The establishment and proper functioning of such a system, and the broader use of information systems for asylum and reception management, are considered to be of **high relevance to ensure efficiency and effectiveness of the asylum system and management** in the country, which is why EASO continues to support the authorities to complete this complex procedure in 2021.

On the one hand, progress was made on several aspects, including the integration of EASO pilot C3 information into the SUA system, the implementation of the first phase to put in place a central standardised tool for scheduling of registrations and the development of business requirements. On the other hand, limited progress was made on the integration of EASO reception monitoring standards into Gestione Centrale Controllo Accoglienza (GCCA) or the update and adaptation of MoI information system (SAP BO) for reporting and statistical analyses, which could not be done because the establishment of the SUA is a prerequisite and that aspect was delayed. The targets were ambitious, so it is not surprising that they were not fully achieved. The implementation of such a system takes time and should be considered more as a medium to long-term goal rather than one that can be achieved in the framework of a one-year OP.

3.2 Cross-cutting results

The **decision to phase out support and shift from first to second instance was positive**. The feedback was more than satisfactory, though there is a need to continue the process of capacity building of judges and prosecutors in dealing with asylum. Although in 2020 there was an important decrease in claims presented by asylum seekers⁸, partners estimate the need for additional support for approximately 4-5 years and they expressed concerns about the future of claim processing in the absence of EASO's support.

As highlighted throughout the report, there were some **challenges in relation to human resources** that impacted, to a certain extent, the performance of all measures. These include the limitations to the deployment of temporary staff (36 months without possibility of renewal), the COVID-19 pandemic which delayed deployments, and the regular selection procedures.

As regards **training activities**, the Italy OP 2020 reached 298 participations (and 144 individual participants – 121 EASO staff and 23 external stakeholders⁹). Measures 1 and 3 benefited the most from training, the latter having seen 120 participations by research officers. Generally, training is linked to capacity building and the transfer of knowledge and skills to the public sector. It is a point for reflection that the training recipients are mainly EASO staff (which should be considered a transfer of technical skills needed to carry out the work according to the job description and work instructions).

Some minor problems of **communication** were reported among EASO and stakeholders. Communication with civil society organisations could be streamlined as well, for instance by involving them in institutional tables for the purposes of collecting feedback, carrying out gap and need analysis and cross checking, as well as to increase transparency vis-à-vis civil society.

4. CONCLUSIONS

4.1 General conclusions

In general, EASO's operational support to Italy in 2020 contributed, with varying levels of success, to strengthening the national capacity to manage the asylum and reception system. Indirectly, we may assume that the persons in need of protection arriving or being hosted in reception facilities in Italy have benefitted from EASO technical assistance to relevant authorities as well.

The table below presents a scoring of the achievements of each measure of the EASO-Italy OP 2020, formulated on the basis of the results.

Table 1. Scoring of achievements of the EASO-Italy OP 2020

	measure IT1	measure IT2	measure IT3	measure IT4	measure IT5
Relevance	Very good	Very good	Very good	Good	Good
Effectiveness	Good	Good	Very good	Good	Fair
Efficiency	Good	Fair	Good	Good	Fair

⁸ Information provided by the president of one of the Tribunals of the Specialised Sections of the Civil Courts.

⁹ Source: [REDACTED]. As highlighted by EASO, it is worth noting that the planned number of resources receiving training is always approximate for both the stakeholders and the interim staff, so it should be taken as indicative.

Coherence	Good	Good	Very good	Good	Good
EU added value	Very good	Good	Very good	Fair	Fair
Impact	Good	Good	Good	Good	Fair
Sustainability	Good	Good	Very good	Good	Not rateable

The **relevance** of the intervention was **good to very good**. The OP was designed following a needs assessment, and thus seamlessly addressed the needs of relevant stakeholders. The **relevance** of measure 4 is considered **good** because although EASO's support in establishing coordination mechanisms is highly appreciated, the stakeholder landscape is complex and EASO's support might not be the most complete solution (considering the limitations of EASO's mandate). The relevance of measure 5 is also considered good because its aims are highly relevant, but the timeframe envisaged for its implementation was not fit-for purpose, as it requires a longer timeline. The **coherence** of the intervention is quite good, especially in the context of **measure 3** where EASO filled a clear gap in knowledge and expertise. Complementarity between different actions in Italy is facilitated by the stakeholder coordination mechanism established as part of **measure 4**, and the monthly trilateral meetings with UNHCR and IOM established as part of **measure 1**.

As concerns **effectiveness**, results vary. The effectiveness of support to the AHD and voluntary relocation events in **measure 1** was **good** as it fostered standardised procedures and built the capacity of local key actors in a strategic sector. The effectiveness of **measure 2** is considered **good** because a lot was achieved in terms of improving the capacity of authorities to manage reception procedures and providing them with the methodological and organisational tools for planning and monitoring, however, a lack of prioritisation of monitoring led to limited results. The effectiveness of **measure 3** is **very good** because it enhanced the capacity of the judiciary sector to handle appeal cases through increased knowledge and implemented methodologies. The effectiveness of **measure 4** is considered **good** because it led to an improvement in the governance of asylum by fostering the implementation of an interinstitutional coordination mechanism, although the change has not yet been institutionalised by the authorities. The process involved all relevant actors in a country where decision making, competences and responsibilities are decentralised and shared by many actors. Coordination was also fostered internally amongst technical actors, i.e. EASO and international organisations. Finally, the effectiveness of **measure 5** is judged as **fair** because not much could be achieved given that the required SUA system was not developed.

The **efficiency** of the intervention is difficult to measure but is generally judged as being **good or fair**. The efficiency of **measure 3** was **good** because, as one of the largest measures in terms of allocated budget and human resources, it achieved very good results not only thanks to the support of EASO but also to the high commitment of the authorities involved.

With reference to **EU added value** and **impact**, EASO supported the establishment of a governance model within the national authorities, and the establishment of procedures and standards that should remain in the partners' structures in the future. Referring to the first result, although relevant, it does not really have a European dimension but more a typically national one. The same can be said for measure 5, which is why both measures were scored as **fair**. As assessed by relevant stakeholders, the backlog could not have been cleared to the same degree and at the same rate without EASO's support for its management, and the quality of the asylum and reception system would be at a lower level. In relation to **sustainability**, however, although the Italian authorities are aware of and generally welcome the phasing out of EASO's support, they do not have the required capacity to continue operating at the same level and quality should EASO withdraw support completely.

4.2 Recommendations

On the basis of the results and conclusions presented above, the following recommendations are proposed:

Recommendation 1: Agree, together with MoI DPS, on a medium-term phase-out plan for EASO's operational support. In coordination with the authorities, EASO should agree on a medium-term phase-out plan for EASO's operational support. Such a plan could envisage a timeframe, clear strategic topics to focus on and measures to be implemented; as well as the appointment of high-performing local immigration offices (*Questure*) as "Asylum focal points" that would act as a point of reference for the provision of information, guidance and other activities to the other *Questure* in the same region/provincial area. Coaching missions should be used to help identify best practices at *Questure*. EASO should ensure constant liaison with public managers and top ranking officials at MoI DPS (e.g. Head of Department; Directors) to promote ownership, and could create roving teams to provide support with registrations to those local immigration offices more in need, ensuring the direct involvement of police officers.

Recommendation 2: Increase support to SAR disembarkation and relocation. Support to ad hoc disembarkation and relocation should increase and be given special attention, taking into account the possibility of a future sudden rise in the number of arrivals by sea. To this end, it is advisable to extend the good practice of the roving teams in place for registrations and other functional activities to SAR disembarkation and relocation-related activities.

Recommendation 3: Support the setting-up and roll-out of a reception quality monitoring system at central and local level. Given the lack of prioritisation by authorities of reception monitoring during 2020, more work needs to be done in this area. EASO should consider adopting a medium- to long-term strategic plan which envisages the finalisation of tools, indicators and organisational structure already in place¹⁰. This could include the adoption of quantitative and qualitative tools that are adaptable to the specific national and local context in Italy (e.g. a core set of standard fixed indicators and a variable set depending on the type of reception facility concerned); a timely monitoring system which uses a limited number of SMART¹¹, well-conceived quantitative and qualitative indicators that provide authorities with an immediate picture of the situation of reception and early integration; the use of a decentralised approach that is established on a regional or provincial basis, where Prefectures act as responsible bodies; the deployment of additional Reception information system officers in the Prefectures who, coordinated at the central level, support the qualitative and quantitative monitoring of the reception system; and regular liaison with public managers and top ranking officials (e.g., Head of Department; Directors) to foster ownership.

Recommendation 4: Promote synergies across all levels of the judicial authorities involved in EASO operations to maximise impact and sustainability. EASO should promote the use of the already existing IT platform that could be upgraded, translated into Italian and become the starting point of a national coordination mechanism to systematically share important

¹⁰ This should be done starting from EU/EASO tools and policy as well as MIRECO AMIF (Monitoring and improvement of reception conditions - Asylum, Migration and Integration Fund) project outcomes/outputs.

¹¹ SMART is a mnemonic acronym, giving criteria to guide in the setting of objectives. The letters stand for:

Specific – target a specific area for improvement.

Measurable – quantify or at least suggest an indicator of progress.

Assignable – specify who will do it.

Realistic – state what results can realistically be achieved, given available resources.

Time-bound – specify when the result(s) can be achieved.

material such as COI, case law and doctrine, thus ensuring quality and coherence within the judiciary system on asylum case law¹².

Recommendation 5: Establish cooperation with the AMIF Managing Authority. There is scope to improve coordination with the Asylum, Migration and Integration Fund (AMIF) Managing Authority (MoI DCLI, an EASO partner) to discuss strategic issues and avoid duplication and overlaps between EASO operations and the AMIF national programme. This could improve the efficiency and effectiveness of operations and strengthen the overall coherence of EU intervention as a whole. It could also be used as a mechanism to improve the sustainability of the results already achieved. One possible option to explore and discuss, would be the use of AMIF funds for the provision of in-house services relating to cultural mediation at Tribunals, Courts and *Questure*, thereby assisting in the hearings and registrations.

Recommendation 6: Increase the capacity of partners through an enhanced training strategy. The training activities provided by EASO could further increase capacity building with a focused strategy addressing training of partners' institutional bodies. EASO could seek to establish an enhanced training strategy that involves the training of institutional bodies and the promotion of the incorporation in their curricula of EASO training modules on a permanent basis. This training should be either compulsory depending on the specific function concerned or linked to career progression. Yearly, brief updates to the training modules should also be planned and delivered. In agreement with partners, the EASO training office could train in-house trainers who would in turn train the partners' staff to ensure quality and consistency. Staff trained in the framework of such "train-the-trainers" schemes should also be assessed to help ascertain the effectiveness and impact of the scheme. For decision makers (e.g. managers, directors) other capacity building means are preferable, such as round tables and high-level workshops involving senior experts for more policy-oriented lectures. Moreover, the use of blended (online and offline) training is a good option.

Recommendation 7. Consider multi-annual planning for operational support to Italy. In light of time constraints which affected many layers of the OP's implementation (human resources, administrative tasks, etc.) and effectiveness, it is worth considering whether a multi-annual Operating Plan of two to three years would be a more effective way of planning and managing EASO's support operations in Italy. This would also allow for an enhanced logical and temporal sequence between OPs, thus ensuring that relevant evidence is available to support the preparation of new initiatives (i.e. the "evaluate first" principle). One-year operational planning could be employed in emergency situations in the strictest sense only (comparable to Emergency Assistance (EMAS)), and longer-term plans in countries like Italy that are not facing emergency situations and have a certain level of internal capacity.

¹² Please note that the development of the Inter-ministerial COI is included in the OP 2021 and partially addresses this recommendation.