



Internal Evaluation

on the Implementation of the EASO Special Support Plan to Bulgaria

2015 – 2018

March 2019

Summary Report

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EXECUTIVE SUMMARY

The Planning and Evaluation Unit (PEU) of the European Asylum Support Office (EASO) conducted this evaluation on the implementation of the EASO Special Support Plan to Bulgaria, including its Amendment No 1, No 2 and No 3 which took place over the period 1 January 2015 to 31 October 2018.

The evaluation suggests that EASO has made positive efforts to deliver on the intended targets and deliverables set in the SSP and its amendments. EASO was able to increase compliance of the Bulgarian system with the EU Asylum Acquis with targeted interventions, such as the 108 participations of Bulgarian officials in 20 different training sessions. It also improved the capacity to identify vulnerable asylum applicants by delivering the Identification of People with Special Needs (IPSN) tool. Other major achievements concern the professional development of staff working in the reception system and Country of Origin Information (COI) Unit.

Nevertheless, setbacks occurred at times, such as the suspension of the intervention on closed reception centres.

The evaluation exercise observes a relevant level of coordination with the Bulgarian stakeholders, which ultimately played a key role in the implementation of the SSP, despite numerous challenges. During the interviews with different national counterparts, the evaluators observed high appreciation for EASO's support assistance and its well-concerted and flexible working modalities. Nevertheless, this exercise highlights the limits of remote coordination and implementation, and notably in relation to:

- i) Understanding of the Bulgarian context and needs;
- ii) Better design of interventions;
- iii) A more strategic review and adaptation to changing circumstances of ongoing activities;
- iv) A better guidance to deployed MS experts in the definition and implementation of their tasks.

Taking into consideration the volume of the intervention, a stronger EASO presence in Bulgaria throughout the implementation of the SSP could have positively contributed to the achievement of intended results and facilitated liaison between EASO, State Agency for Refugees (SAR) and other relevant stakeholders such as the Ministry of Foreign Affairs, Ministry of Interior, Ministry of Justice, etc.

Several support activities implemented by EASO in Bulgaria could have been better structured if based on a solid needs assessment exercise, whereby needs identified are prioritised according to policy, organisational, financial and technical feasibility. The design of the interventions would have equally benefited from a results-based management approach, including well-defined outputs, outcomes, intended targets and SMART¹ indicators. The implementation of the SSP could have benefited from a better management of human resources turnover (three plan coordinators) and of the handover of tasks.

The current evaluation groups measures in six broader evaluation areas and looks at them separately from the point of view of different evaluation criteria. Overall, EASO's intervention can be considered as relevant. EASO supported Bulgaria during a period of high migration pressure and the SSP played a key role in supporting the compliance of the Bulgarian asylum and reception systems with the EU Asylum Acquis and improving capacity in various domains.

Measuring the effectiveness of the different measures is not an easy task. A number of efforts to achieve deliverables included in the SSP and its amendments were suspended due to the rapidly changing environment,

¹ SMART: Specific, Measurable, Achievable, Relevant and Time-bound

planning limitations and implementation challenges. Overall, EASO's intervention is limited in terms of effectiveness. The efficiency of its action was also fair. The suspension of activities meant an investment in terms of resources that did not produce a real payback in certain areas. This seems to be particularly applicable to evaluation areas 1 (compliance with the EU Asylum Acquis), 3 (reception and social activities) and 4 (capacity building in Country of Origin Information). As the current evaluation is not looking into budget or staff resources, it remains difficult to provide a comprehensive opinion on the efficiency of EASO. The national authorities expressed their highest appreciation of EASO's flexibility, the good level of coordination with EASO and in most cases the quality of the support.

The implementation of the SSP had selective positive effects on the Bulgarian asylum and reception systems, particularly with regards to the evaluation area 5 (development of practical tools for interpreters and remote interpretation). The adoption of a structured planning methodology based on results-based management may have generated wider effects. An implementation based on clearly identified needs and adaptive to changing circumstances can achieve higher levels of effectiveness and therefore positively contribute to major changes.

The element of sustainability was not referred to in the intended results of the SSP and will need to be considered more in detail for future actions. The achievements under the evaluation area 6 (support with external funds) may be regarded as a good practice, which produced effects that are managed by national authorities without EASO's support. Overall, the decision of EASO and the Bulgarian authorities not to renew the SSP or sign a new document seems correct, as the Bulgarian asylum and reception systems no longer appear to be under circumstances of disproportionate pressure.

Main Recommendations

Six main recommendations, listed hereafter, emerge from this evaluation. A more comprehensive analysis is included in chapter three.

Recommendation 1: Improve the intervention logic to make the EASO Special Support Plan strategic, flexible, results-oriented and sustainable.

Recommendation 2: Improve the internal knowledge management systems, including data gathering and analysis, and information storage and sharing (e.g. reporting). Ensure the establishment and implementation of real time monitoring activities and periodic and systematic reflective evaluation exercises.

Recommendation 3: Ensure an adequate presence of EASO's staff in headquarters and on the ground to improve the quality of the support provided and enhance the strategic and operational understanding of the context.

Recommendation 4: Enhance the design of capacity-building programmes and establish an evaluative approach to assess learning and needs.

Recommendation 5: Ensure adequate internal contingency planning, allocation of resources and internal coordination among EASO stakeholders.

Recommendation 6: Consider measure-based costing for financial planning.

1. INTRODUCTION AND METHODOLOGY

This summary report focuses on the evaluation of SSP 2015-2018 for Bulgaria. It was generated by PEU and should be read in pair with the full Internal Evaluation Report, which was produced as a result of information gathered and discussions held at the kick-off meeting in November 2018, the field mission to Bulgaria (Sofia) carried out in January 2019 as well as through interviews with EASO staff providing background documents and planning support.

The current internal evaluation has to be viewed in the context of an EU agency, which, over recent years, had to significantly step up its operational support to MSs under disproportionate pressure within a very short period. This is mainly linked to the massive influx of migrants with which the European Union and, in particular, countries such as Bulgaria, were confronted.

Year	Applications submitted	Refugee status granted	Subsidiary status granted
2013	7,144	183	2,279
2014	11,081	5,162	1,838
2015	20,391	4,708	889
2016	19,418	764	587
2017	3,700	900	804

This is not intended to be a comprehensive evaluation, but a limited exercise that covers a summative overview of the activities and outputs undertaken. It aims at describing the main outputs achieved within the SSP and highlighting selected evaluation findings. This document also provides an analytical appreciation of the relevance, effectiveness, efficiency, possible impact, sustainability and main recommendations in order to contribute to EASO's planning and implementation of technical and operational assistance to the Member States (MS) under disproportionate pressure.

Given the high number of measures included in the original SSP and the merges and changes occurred in the amendments, the evaluators assessed various measures together, grouping those with common programmatic elements. This report therefore presents six broad evaluation areas:

1. Compliance with the EU Acquis and practical application of quality tools;
2. Identification and referral of vulnerable groups, including UAMs;
3. Open and closed reception and social activities;
4. Support with capacity building in Country of Origin Information (COI);
5. Development of practical tools for interpreters and remote interpretation;
6. Support with external funds (e.g. Asylum, Migration and Integration Fund, European Economic Area and Norway Grants, etc.).

The main challenge of the evaluation was the limited time, data and resources available to the evaluators, including the lack of a structured monitoring and evaluation plan, which contributed to the reduction of the

scope of this exercise by excluding elements such as the broader migration context, financial management, human resources and workflows.

2. KEY FINDINGS

Evaluation area 1: Compliance with the EU Asylum Acquis and practical application of quality tools

EASO's intervention aimed at building capacity within Bulgarian authorities on methodology, terminology and structure of the Directives and Regulations of the EU Asylum Acquis, including through quality tools such as templates and checklists. It also intended to deliver hands-on support in applying the EU Asylum Acquis from a legal and practical point of view.

EASO supported Bulgarian authorities on compliance with the EU Asylum Acquis with a training programme on several modules of the EASO training curriculum. Throughout the implementation of the SSP between 2015 and 2018, 108 participations of Bulgarian officials to 20 EASO training sessions can be recorded. Topics include Interview techniques, Evidence Assessment, Interviewing Vulnerable Persons, Interviewing Children, Exclusion, Inclusion, Country of Origin Information, Reception, Dublin Regulation, Module for Managers and Common European Asylum System. Trained officials delivered peers training sessions in Bulgaria to 80 participants on several of the above-mentioned topics such as Inclusion, Interview Techniques Evidence Assessment Interviewing Vulnerable Persons, etc.

Total Number of Participations and Sessions in EASO Training Curriculum

Year	Participations	Sessions
2015	12	5
2016	20	8
2017	72	4
2018	4	3

Relevance - Good: The exposure of SAR and the judiciary to study visits, training sessions and workshops met the demands of Bulgarian authorities with regard to enhancing their capacity and provides them with practical examples of good practices, including those implemented by other EU asylum agencies and services. Unfortunately, there was no mapping of other stakeholders' training programmes, and the evaluators could not assess the complementarity of EASO's intervention with ongoing initiatives.

Effectiveness - Fair: EASO's intervention was able to achieve the deliverables included in the SSP only with regard to the Amendment No 3 in 2018. For previous years, several elements such as the limited nominations of MS experts, affected EASO's implementation of activities under this evaluation area. In 2016, EASO's focus also shifted toward the response to the Greek and Italian crises and limited internal capacity could be spared to continue with the full implementation of activities in Bulgaria.

Efficiency - Fair: The nature of migration flows, with seasonal peaks and fast geographical changes, does not by definition favour efficient deployment operations. Throughout 2015, it proved challenging to deploy the foreseen amount of experts to Bulgaria as nominations would prioritise other MSs where the number of arrivals was higher. Moreover, the efficiency of EASO's intervention, particularly with regard to the coordination of professional development activities and

the identification of needs on quality tools and procedures, was affected by the lack of continuous presence of EASO's representatives in Bulgaria.

Impact - Good: While the evaluators could not interview a sample group of applicants, it seems safe to assume that EASO's intervention on the EU Asylum Acquis and quality tools may have had a positive impact on the asylum procedure and led to better processing of asylum claims. EASO's intervention increased the awareness and knowledge of Bulgarian judiciary on asylum, including stronger synergies between the different stages and stakeholders of the asylum procedures.

Sustainability - Fair: While sustainability was not explicitly mentioned in the SSP, the interviewed national counterparts reported that the awareness and knowledge spread by EASO's intervention trickled down deep into several layers of the asylum system. It seems however that training capacity and curricula were not embedded in the national counterpart.

2.2 Evaluation area 2: Identification and referral of vulnerable groups, including UAMs

EASO's support in the identification and referral of vulnerable groups at entry points started with the signature of the SSP in December 2014 and continued throughout its implementation and the implementation of its three amendments until October 2018. Prior to the SSP, screening of persons with special needs was carried out in a fragmented and non-systematic way and lacked timely intra institutional exchange of information, identification and referral as per the Asylum Procedures Directive.

EASO's intervention contributed to the set-up of an informal task force on vulnerable persons with the participation of all national stakeholders as well as the development of a national identification and referral mechanism for vulnerable persons, including an Identification of People with Special Needs (IPSN) tool.

Relevance - Very Good: The implementation of activities within the framework of evaluation area 2 can be considered as highly relevant, particularly given the needs on identification and referral of vulnerable persons initially expressed by the Bulgarian authorities. EASO's intervention toward the creation of a methodological framework and its practical implementation are considered as cornerstones of the SSP. EASO addressed a temporary vacuum, as the Bulgarian authorities were struggling with this file. EASO's intervention on age assessment responded to an incoming request from the Bulgarian authorities, which seemed relevant if compared to the reported needs.

Effectiveness - Fair: While EASO had the intention to boost both the identification and referral of persons with special needs, its intervention could only focus on aspects related to identification. A national referral mechanism could not be established due to the lack of legislative amendments and therefore EASO was unable to fully achieve its intended objectives for this evaluation area. As for the support on age assessment, while preliminary discussions occurred in 2015, a kick-off workshop was only held in 2017, mostly due to the reallocation of EASO's resources to the emergency response in Greece and Italy. An adequate follow-up to the workshop could not be agreed upon.

Efficiency - Good: The training-of-trainers model on IPSN tool presents efficiency gains, notably limited investments and potential higher returns in terms of learning and knowledge sharing. As for the support on age assessment, despite resources made available, the intervention did not achieve its intended results, highlighting efficiency gaps with regard to delays, limited planning and cancellations from the Bulgarian authorities side.

Impact - Fair: The practical implementation of the identification and referral system for vulnerable persons was affected by limited legislative reforms. Therefore, it may be fair to suggest that the impact of this intervention is limited to identification of vulnerable applicants, knowledge sharing among SAR personnel, and no impact is recorded on the side of systematic referral. EASO's intervention on the age assessment did not have the intended impact as it was suspended before its completion.



Sustainability - Fair: EASO's intervention produced elements of sustainability with regard to the IPSN tools and the capacity built within SAR's personnel. As for the support on age assessment, while the planned intervention had strong sustainability elements foreseen and the presentation of an age assessment method did contribute to enhance the knowledge and expertise of Bulgarian authorities, the implementation was not completed and sustainability could not be achieved.

2.3 Evaluation area 3: Open and closed reception and social activities

EASO engaged the Bulgarian authorities in a series of activities aiming at enhancing the capacity of SAR in managing and developing improved reception facilities in order to maintain the necessary capacity to fulfil national and international obligations in the field of reception. In particular, EASO developed guidelines and SOPs on closed reception centres tailored on the Bulgarian context. However, as of late 2017, Bulgarian authorities decided to suspend efforts within the framework of this intervention due to a revision of the strategy on closed reception centres run by SAR, and notably the lack of willingness to open any on Bulgarian soil.

Six SAR national trainers participated to the Reception Module of EASO Training Curriculum and three study visits were organized for SAR personnel and reception experts to Hungary, Sweden and Belgium. EASO also contributed to design and translation into Bulgarian of relevant documents on reception, social work and vulnerability screening.

Relevance – Fair: While needs were identified by the Bulgarian authorities and a request of support submitted, EASO did not conduct a needs assessment focused on the Bulgarian reception system prior to designing a response. EASO provided expertise that ultimately contributed to designing guidelines and SOPs on closed reception centres as per the request of Bulgarian authorities. Nevertheless, toward the second part of the SSP, conditions on the ground changed, including a lower number of applicants to be accommodated by the Bulgarian reception system (3,700 asylum applications received in 2017). While capacity-building of SAR remains important, a timely reassessment of needs would have allowed EASO to reach a higher degree of relevance.

Effectiveness - Fair: With regard to reception, EASO achieved the initial set of deliverables included in the SSP, notably the delivery of training sessions to SAR personnel, the arrangement of study visits for reception experts, managers and social workers, and the design of SOPs for closed reception centres. EASO was able to provide relevant advisory on the creation of safe zones for UAMs within reception premises. National counterparts reported that due to changes of circumstances there was nevertheless a limited achievement of intended objectives (e.g. creation of safe zones for UAMs, which the Bulgarian system did no longer consider as a priority).

Efficiency - Fair: The resources provided by EASO were reportedly in line with the demands. The deployment of MS experts proved helpful with regard to meeting deliverables such as the drafting of SOPs on closed reception centres and reporting on reception safe zones for UAMs. Nevertheless, while the SOPs on closed reception centres were drafted in an efficient and timely manner, the overall efficiency of this intervention scores average due to the interruption of all efforts following a consistent investment in terms of human and financial resources. Overall, the efficiency of deploying MS experts with limited in-country support from EASO staff can lead to efficiency losses.

Impact - Fair: The evaluators cannot appreciate the impact of EASO's intervention on closed reception as the SOPs developed on closed reception centres were not adopted and could therefore hardly have any impact on the Bulgarian reception system. Reception managers who participated to study visits (e.g. Hungary and Belgium) reported positive effects in terms of exposure to different systems and good practices, which then inspired improvements to the Bulgarian reception system.



Sustainability - Unsatisfactory: The training of trainers on the EASO Reception Training module represents a possible element of sustainability for spreading knowledge within SAR. As for closed reception centres, the sustainability of EASO's intervention is unsatisfactory as the intervention was suspended before its intended results could be achieved.

2.4 Evaluation area 4: Support with capacity building in Country of Origin Information

In 2015, EASO deployed MS experts on missions to map the newly-established Country of Origin Information Unit in SAR and to advise on potential future development and improvements. There was a discussion with SAR's country of origin experts and SAR's leadership on key issues such as experts' responsibilities and the organisation of work at the COI Unit. EASO provided the COI Unit with a list of recommendations, including, but not limited to, recommended trainings, distribution of tasks, establishment of a network with the other national stakeholders, etc.

EASO also drafted reports on Syria and Iraq and organised Specialist Network meetings and workshops in order to increase the knowledge of those two countries of origin. The intervention on COI slowed down consistently due to EASO's reallocation of resources from Bulgaria to Greece in response to the migration crisis in 2016.

Relevance – Good: EASO's intervention aimed at enhancing the knowledge of COI quality standards and capacity to apply those standards when conducting COI research, answering queries and drawing up COI products was relevant. The newly established Unit did need COI expertise and exposure to good practices adopted by other MSs' COI Units.

Effectiveness - Fair: Although the SSP foresaw a structural support to the COI Unit, such as accompanying it in its growth and development, drafting its mission statement and structure and building core capacities, EASO could only build the foundation of that support. EASO's engagement was scaled down due to the reallocation of resources to the Greece migration crisis and deliverables such as technical assistance for the enhancement of the in-house COI database could not be achieved.

Efficiency - Fair: Despite the quality of inputs and resources deployed by EASO were appreciated by the interviewed national authorities, efficiency could have been improved if all intended results were achieved. Delays occurred in 2015 and the organisation of additional workshops foreseen by the SSP on Iraq and Syria was cancelled due to the limited resources available within EASO.

Impact - Fair: As for the COI-related activities, beyond the knowledge sharing effect and the empowerment of the Bulgarian COI Unit, the intervention could lead to a more structural support to further empower the COI establishment and network in Bulgaria.

Sustainability - Fair: Stakeholders interviewed confirmed the scarce availability of funds for Bulgarian authorities to invest in COI training activities and events. EASO's actions were inclusive in nature as they involved capacity building of the key stakeholders. The strengthened network of actors involved in the COI continues to operate beyond the direct liaison of EASO. Further enhancement of that network would have been possible should EASO have carried on with its intervention.

2.5 Evaluation area 5: Development of practical tools for interpreters and remote interpretation

EASO's support to the Bulgarian authorities with developing practical training tools for interpreters in the asylum procedure started with the signature of the SSP in December 2014 and was discontinued before the signature of Amendment No 1 in June 2016. Nevertheless, in order to support the interpretation of uncommon languages (e.g. Mongolian, Tamil, Sinhalese) and to assist in the early identification of vulnerability, EASO and the Bulgarian authorities included a new measure in Amendment No 3, which allowed the agency to make available to SAR interpreters from MSs and external service providers.

EASO's intervention led to a SAR induction training and information package for interpreters (including review of existing Code of Conduct and glossaries for major languages) developed in cooperation with experienced interpreters, SAR caseworkers, legal advisors and the Quality Unit. Two operational training sessions were also delivered by EASO to 26 SAR interpreters in Sofia and Haskovo.

Relevance – Good: EASO's intervention was indeed relevant as a response to the need of increasing the quality of interpretation and translation both in the course of the interviews and with respect to the personal documents provided by foreign nationals. As for remote interpretation services, EASO's intervention met the needs of SAR by making available the framework contract in place and training SAR technicians to use the booking system. The relevance of this action may have allowed the processing of asylum cases, which would have been pending for lack of interpretation.

Effectiveness - Good: In line with the SSP, EASO's intervention led to the development of a common information package for SAR interpreters, which was one of the key objectives of measures focusing on this evaluation area. Training sessions were also delivered as per the deliverables included in the SSP, including two operational training sessions in Sofia and Haskovo. As for remote interpretation, EASO was able to meet all intended objectives included in the SSP. SAR reported its satisfaction for the quality of the service, including punctuality and professionalism of the service provider offered by EASO

Efficiency – Very good: The intervention, particularly with regard to remote interpretation services, proved highly efficient as it allowed Bulgarian authorities to have access to the services included in a framework contract signed by EASO with a service provider. Results were therefore achieved with limited investments and resources.

Impact – Very good: The development of a common information package is expected to raise the awareness of interpreters about the administrative procedure and improve the quality of interpretation. Remote interpretation allowed SAR to process cases of applicants who could indirectly benefit from the wider impact of EASO's intervention.

Sustainability - Unsatisfactory: Unfortunately, due to the conclusion of the SSP, SAR can no longer have access to the interpretation framework contract. Due to budgetary reasons and procurement limitations, SAR is reportedly not in the position to contract a service provider for the interpretation of uncommon languages. The intervention within the framework of this evaluation area has therefore poor elements of sustainability embedded in it.

2.6 Evaluation area 6: Support with external funds (e.g. Asylum, Migration and Integration Fund, European Economic Area and Norway Grants, etc.)

Throughout the implementation of the SSP, EASO worked in closed cooperation with the Responsible Authority of the Bulgarian Ministry of Interior to build capacity and facilitate the access and absorption of AMIF funds. EASO delivered training sessions on the preparation of calls for proposals, the evaluation of project proposals and grant award criteria and the monitoring function. Given the availability of European Economic Area (EEA) and Norway Grants for Bulgaria, a similar initiative, smaller in scale, was developed with that focus.



Relevance – Very Good: The intended deliverables set out within the framework of this evaluation area are relevant as the funds in the field of asylum (e.g. AMIF) available to the Bulgarian authorities were not necessarily made use of. No issues on complementarity were highlighted as the Bulgarian authorities do not reportedly receive support by other stakeholders on this evaluation area.

Effectiveness - Good: EASO was able to deliver on what was foreseen, outreaching personnel from SAR and the Responsible Authority in a timely manner and without delays.

Efficiency – Fair: Resources made available by EASO were judged by the Responsible Authority as adequate to achieve the objectives. Nevertheless, national authorities would have appreciated having MS experts for longer time (e.g. three to six months), as the nature of support on AMIF, EEA and Norway Grants requires a long-term investment and follow-up. The organisation of events such as workshops and trainings proved at times challenging due to the lack of EASO's presence in country and limited proximity to the Bulgarian interlocutors.

Impact - Good: AMIF, EEA and Norway funded-projects are currently implemented in Bulgaria. Evaluators were informed that EASO's intervention was crucial to access the funds as well as to ensure adequate management of the projects implemented within those frameworks.

Sustainability - Good: Knowledge and capacity built within the Bulgarian authorities represent a possible sustainability element and allow the effects of EASO's intervention to be replicated.

3. CONCLUSION AND MAIN RECOMMENDATIONS

3.1 Conclusions

EASO's intervention in Bulgaria between 2015 and 2018 partially achieved objectives and targets included in the SSP and its amendments. EASO was able to address the needs of its Bulgarian counterparts within the framework of several measures, although at times significant setbacks occurred. All stakeholders interviewed provided favourable feedback on EASO's support and the level of coordination established.

EASO's support to the Bulgarian competent authorities was appreciated by the interviewed stakeholders, particularly for the establishment of a strong connection and network with other asylum systems in Europe, and the exposure of Bulgaria to good practices in various domains.

The implementation of EASO's intervention throughout the four years of SSP shows an alternation of peaks of action and periods of slowdown, such as in 2016 when EASO's resources were reallocated to respond to the migration crisis in Greece and Italy. Extending the initial Plan without taking the necessary time to reflect on its achievements through formal evaluation exercises, limited the SSP overall relevance, efficiency, effectiveness and impact. Equally, the intervention suffered the lack of a logical framework, supported by a well-defined logical pathway of inputs, outputs and outcomes, and a supporting monitoring plan. The broad objectives and deliverables set in the SSP did not help structuring the support, particularly in light of the changing environment and staff turnover.

This evaluation was negatively affected by the limited availability of data and reporting documents produced and stored during the implementation of the SSP. High turnover of EASO's staff, including Plan coordinators, and

the lack of proper handover documents also impacted the attempts to reconstruct activity patterns through institutional memory.

EASO's intervention scores positive on relevance, in particular with regard to evaluation areas 2 and 6. Measuring the effectiveness of the different measures was not an easy task. A wide number of efforts to achieve deliverables included in the SSP and its amendments were aborted due to the rapidly changing environment, planning limitations and implementation challenges. Overall, EASO's intervention scores only average on effectiveness as well as on efficiency. The suspension of activities meant an investment in terms of resources that did not produce a payback. This seems to be particularly applicable to evaluation areas 1, 3, 4 and 6. Nevertheless, as the current evaluation is not extensively looking into financial and human resources, it remains difficult to provide a comprehensive opinion on the efficiency of EASO in the implementation of the SSP. The national authorities expressed their appreciation of EASO's flexibility, the good level of coordination with EASO and in most cases the quality of the support.

Overall, the implementation of the SSP may have had a favourable impact on the Bulgarian asylum and reception systems, particularly with regard to the evaluation area 5. Nevertheless, the adoption of a structured planning methodology based on results-based management may have generated wider effects. An implementation that is based on clearly identified needs and is adaptive to changing circumstances can achieve higher levels of effectiveness and therefore positively contribute major changes.

The element of sustainability was not referred to in the intended results of the SSP and will need to be considered more in detail for future actions. The achievements under the evaluation area 6 may be regarded as a good practice which produced effects that are managed by national authorities without EASO's support.

3.2 Main Recommendations

Recommendation 1: Improve the intervention logic to make the EASO Special Support Plan strategic, flexible, results-oriented and sustainable

Improve the intervention logic for better defining the strategic purpose of the EASO Special Support Plan through a results-based management approach, in line with the efforts undertaken by the agency in 2018. The intervention logic of the SSP to Bulgaria has some challenges such as:

- Deliverables are limited to output level. It would be useful to place them in a larger context (outcome and impact levels), by linking them to the CEAS or international standards for example.
- There are no indicators, baseline and limited targets in the SSP which makes it difficult to measure if the intended results were achieved.
- The SSP often outlines very general and/or ambitious deliverables and objectives which could only be partially achieved or not be translated into concrete activities. There appears the need for a logical framework to support the design of an intervention, clearly outlining a logical pathway of inputs, outputs and outcomes.
- Deliverables and objectives seem to mirror requests obtained from EASO's counterparts within the Bulgarian authorities, but were not fully verified by EASO through a structured needs assessment process.

This planning exercise could build on a needs assessment, which includes all relevant stakeholders, including lawmakers, propose a prioritisation of the use of EASO expertise taking into account complementarity and added value elements and properly identify potential risks that could hinder the success of an intervention. EASO



should also filter the priority needs identified making best use of feasibility filters, such policy, organisational, financial and technical feasibility in order to focus on those needs which are realistically addressable.

Where relevant, the special assistance should be framed into a dynamic of progressive handover to the MS. The inclusion of sustainability elements in the SSPs can only produce positive effects on the capacity of MS to respond to their migration needs allowing EASO to plan for exit strategies.

Recommendation 2: Improve the internal knowledge management systems, including data gathering and analysis, and information storage and sharing (e.g. reporting). Ensure the establishment and implementation of real time monitoring activities and periodic and systematic reflective evaluation exercises

The limited availability of data and documented progress of the implementation of activities within the framework of EASO SSP to Bulgaria represents a major challenge for the effectiveness of this exercise. The evaluators were confronted with a situation whereby available information is limited and at times inaccessible or scattered on different platforms, held by separate units and departments within EASO. Cross-checking information proved challenging, particularly due to the turnover of staff, internally and within Bulgarian counterparts, and the limited storage of institutional memory. There appears therefore the need to improve the internal reporting system, including data analysis and information sharing. There is need for the development of a comprehensive reporting system as a part of a wider monitoring approach ensuring effective feedback mechanisms. Suggested tools would include measure-based (or SSP-based, if more relevant) monthly report and for longer interventions, an annual implementation report and an indicators database. A monitoring plan to support measuring the implementation and identifying change requirements in real time within the SSP management cycle would contribute to operations being reflective of the dynamic change environment.

There is need for point-in-time and reflective evaluation exercises. Their contribution is in fact precious to assess the implementation of a Plan and draw lessons learnt for the prioritisation of efforts. This does particularly apply to multiannual interventions or extended plans.

Recommendation 3: Ensure an adequate presence of EASO's staff in headquarter and on the ground to improve the quality of the support provided and enhance the strategic understanding of the context

Throughout the implementation of the SSP to Bulgaria, EASO's efforts were spearheaded by plan coordinators who could unfortunately not take advantage of an EASO presence in Bulgaria. Whereas the evaluators gathered positive feedback from national authorities with regard to coordination with EASO, it is clear that a stronger presence on the ground would have positively contributed to: i) a more thorough understanding of the context; ii) a better design of interventions; iii) a more strategic review and adaptation to changing circumstances of ongoing activities; iv) a stronger representation of EASO and accountability for its action; and, v) a better guidance to deployed MS experts in the definition and implementation of their tasks. A discontinuous presence of EASO in Bulgaria only allowed partial support in the liaison between SAR and other intended stakeholders (e.g. Ministry of Foreign Affairs, Ministry of Interior, Ministry of Justice, etc.), from which the overall support could have incrementally benefited.

Recommendation 4: Enhance the design of capacity-building programmes and establish an evaluative approach to assess learning and needs

The Special Support Plan includes various capacity building events. Some of these build on the core EASO training offer, while others have a tailor-made approach. Overall, those initiatives were mostly organised following the



identification of needs by the Bulgarian authorities and delivered by EASO as consequence of that. While training sessions, workshops and study visits may have contributed to enhancing knowledge and capacity within targeted national authorities, there appears the need to increase the coherence, rational, focus and follow-up on professional development programmes offered. It seems useful to conduct an independent assessment of training needs in order to provide a better-quality service with a clear capacity-building path and intended results, target the most appropriate population and mitigate the risk of overlapping with other stakeholders. Moreover, it seems helpful to develop a tool to evaluate the learning and applied learning of training participants in order to further assess the intervention impact.

Recommendation 5: Ensure adequate internal contingency planning, allocation of resources and internal coordination among EASO stakeholders

In 2016, EASO's response to situations of disproportionate pressure in other MSs, notably Italy and Greece, had a negative impact on the implementation of the SSP to Bulgaria. Whereas emergencies are by definition unpredictable and responses need to be immediate, there is need for the design of an EASO emergency response and contingency planning strategies, which include guidelines on how to ensure the continuation of ongoing businesses while responding to emergencies. The strategies could also look into the option of creating an emergency response roster of EASO staff and deployable MS experts.

Overall, when planning for structural support to units or systems, there is need for a proper allocation of resources, including, but not limited to the identification of human resources needs and a plan organigram. It is also desirable to identify technical expertise required for implementation. For instance, taking into account the complexities around reception systems, this evaluation recommends considering further liaison between EASO's different sectors with the goal of improving the quality and consistency of EASO's intervention and put into practice some of the tools, expertise and knowledge internally developed. There is need for the identification of technical/content focal points among EASO staff, who can support Plan coordination in leading the implementation of activities.

Recommendation 6: Consider measure-based costing for financial planning

Although the evaluation of financial management falls beyond the scope of this exercise, the limited data gathered by the evaluators underline the need of a stronger planning exercise through the implementation of a measure-based costing. Estimate costing for predefined units of intervention may prove very useful in order to prioritise needs as well as to ultimately monitor and appreciate efficiency of operations. It may equally prove useful in the context of contingency planning, by having ready-to-use costed special support packages should emergency conditions apply to a MS. While it must be taken into account that EASO has been progressively moving toward that direction in 2017 and 2018, it is desirable that all EASO operations, including special support plans, would embrace this change.