Special EU Programmes Body
Foras Um Chláir Speisialta An AE
Boord O Owre Ocht UE Projecks

Implementation Evaluation Year 2

Implementation Evaluation of the PEACE IV Programme and INTERREG VA Programme

Executive Summary

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I EXECUTIVE SUMMARY

The Special EU Programmes Body (SEUPB) commissioned SJC Consultancy to undertake the Implementation Evaluation of the European Union's Programme for Peace and Reconciliation 2014-2020 (otherwise known as the PEACE IV Programme (PIV)) and the European Union's Cross-border Programme for Territorial Co-operation, Northern Ireland, the Border Region of Ireland and Western Scotland 2014-2020 (otherwise known as the INTERREG VA Programme (IVA)).

The Implementation Evaluation is required to evaluate the extent to which the Programmes have been implemented as defined by the European Commission's (EC) adopted Cooperation Programme, with an emphasis on the reduction of the administrative burden. The Implementation Evaluation will be carried out over a three-year period and will result in three reports - first interim report (2017), second interim report (2018) and a final report (2019). The link to the Year 1 (2017) Implementation Evaluation Executive Summary can be found on SEUPB's website: https://www.seupb.eu/piv-evaluation-plan

Method Summary

Effective implementation will lead to enhanced outcomes; therefore, the Implementation Evaluation plays an important role in ensuring that administrative functions are being delivered effectively and efficiently.

Our approach to the evaluation involved the following research strands: extensive quantitative review of administrative and monitoring data: detailed review of processes; key stakeholder interviews; focus groups with SEUPB staff; online survey of successful and unsuccessful applicants; interviews with project beneficiaries (including a focus group with the PEACE Managers Forum); and interviews with unsuccessful applicants.

Key Findings and Recommendations

The PIV and IVA Programmes represent a long-standing partnership between the EC, Northern Ireland, Border Region of Ireland and Western Scotland, supported by the government departments of the UK, Ireland and Scotland. Since 1994, over £3.3billion has been invested in the eligible region, between EU and national contributions, to cement the journey towards cross-border co-operation, peace and reconciliation - the conditions needed to promote economic growth and prosperity.

The budget for PIV is €269.61m (ERDF and Government Department match funding) and for IVA is €282.76m (ERDF and Government Department match funding); totalling a substantial investment of €552.37m across the eligible area for the period 2014-2020.

There is evidence of effective practice and of SEUPB's ability to manage and implement the PIV and IVA Programmes. This provides a firm foundation on which to ensure the successful implementation i.e.

- As Managing Authority, SEUPB has over 19 years' experience of managing large-scale EU funded Programmes.
- It is evident that the Managing Authority and the Certifying Authority meet EC requirements with regard to procedures, based on a review carried out by the Audit Authority (i.e. notification of formal Designation took place on 27 April 2017).

- SEUPB has also engaged in effective negotiations with the EC, Member States and Accountable/Policy Departments to agree an ambitious agenda for simplification to reduce the administration burden of the programme.
- SEUPB has demonstrated a strategic approach to communication, evidenced by the robust Communications Plan, which meets EU regulatory requirements.
- SEUPB is active in the ERDF community and has attended various international conferences for the purpose of knowledge sharing and networking. Maximising awareness levels of EU funding and associated benefits will become even more pertinent going forward as there will be a focus on communicating results at a project level as outputs become realised and learning disseminated.
- SEUPB has taken a lead role in promoting the PIV and IVA Programmes across the EU community. There has been an increased level of advocacy work to promote the outcomes of the funding to enhance sustainability of funds.
- The respective governments are committed to the successful implementation of current Programmes and exploring the potential for successor Programmes post 2020.

The following section outlines key observations and recommendations under specific implementation areas: underpinning most recommendations is the need for enhanced delivery structures and systems, additional training for both staff and project partnerships, the requirement for pre-development support, and a more tailored support and implementation package per Programme theme.

Delivery/Staffing Structures

- The Programme Monitoring Committee and Steering Committee have good cross-representation and high levels of engagement are evident.
- SEUPB currently manages 130 projects across 8 specific themes within the PIV and IVA Programmes, therefore the task of providing support to this number of projects, with in excess of 400 partners, is resource intensive.
- There are 57 full-time equivalent members of staff in SEUPB. Based on the evaluator's interaction with staff members, it is evident that they are highly committed to the success of the Programme implementation and supporting project beneficiaries.
- In the last 18 months, there has been staff turnover of four senior positions, for reasons relating to personal circumstances and development opportunities. Whilst this presents challenges in terms of loss of corporate knowledge and memory, it also presents an opportunity to reflect on and improve structures. SEUPB has responded by actively recruiting and filling posts.
- **Recommendation 1:** New staff members bring with them a renewed energy and desire to improve and change, however this should be managed sensitively to ensure that all staff are bought-in to any new system/process change.
- **Recommendation 2:** Given the recent staff turnover and the induction of new staff members, coupled with amendments to various processes, it is an opportune time to review SEUPB's staff training and development strategy and create a coordinated approach across the organisation. This should include a skills audit/training needs analysis which will identify key strengths and any skills gaps to be met via training, for example: project management, client engagement, and leadership/managerial training. This investment will enhance the competencies, confidence and capacity of SEUPB and will empower and motivate staff to manage project delivery more effectively.

- **Recommendation 3:** Training should be supplemented with a suite of guidance and reference points, available on SEUPB's website or internal staff portal. Consideration should be given to creating short videos on how to carry out processes.
- **Recommendation 4:** Clear job specifications, with a list of competencies, should be communicated to each unit and relevant grade. This will help focus the attention of staff, particularly for those who are ambitious for self-development with an appetite for greater responsibility and promotion to the next grade.
- **Recommendation 5:** For key performance indicators set for staff, related to caseloads, it is important that these are fair and within the control of staff to deliver, as often external factors and project partnerships' performance can affect achievement levels.
- **Recommendation 6:** It is important that recruitment drives and promotional opportunities continue to be aligned to business needs, but that opportunities for development are provided in all three offices, to ensure that staff maintain motivation levels and have access to personal development opportunities.
- **Recommendation 7:** There appears to be silo working across the various functions of SEUPB, with teams largely working independently of each other and not fully appreciating the linkages and the impact of their work on others. There is a need for increased delivery and systems mapping to help understand why processes are designed in such a way to identify potential inefficiencies. Subsequently, staffing allocation can be aligned to the required processes to best deliver the programmes.
- **Recommendation 8:** Consideration should be given to creating Key Account Managers (KAM), particularly for projects representing large amounts of spend and of strategic importance to the success of the Programme. This will provide a single point of contact for the Project Partner and ensure that SEUPB is close to each project to identify any issues in meeting spend or output targets, as per agreed contracts. In the event of KAMs leaving/reallocated to other duties, a succession plan and contingency arrangements should be in place to ensure a smooth transition.
- **Recommendation 9:** Project teams (including Managing Authority (MA), Joint Secretariat (JS) and Financial Control Unit (FCU) representation) should be set up on a theme basis, and where possible said theme should be within the same office location to allow for case officers to liaise and share learning. This will help to create efficiencies and also offer a greater level of consistency and quality assurance per theme.
- **Recommendation 10:** Internal Communications provide a quarterly newsletter and various briefings to keep all staff members abreast of new Programme developments. All staff would welcome communication on any immediate actions or acknowledgements from the PMC (to maintain engagement levels) and for minutes to be circulated thereafter ensuring communication is consistent across the organisation.

Budget and Expenditure

- The HM Treasury funding guarantee to March 2019 has now been extended until the end of the programming period (2020), including Technical Assistance. Considerable efforts have been made by SEUPB to achieve full commitment of the Programme and mobilisation of approved projects. For PIV, 78% of the total project budget has been approved. For IVA, 81% of total project budget has been approved (as of April 2018). This activity will ensure progress towards the 2018 Performance Framework milestones. Whilst some targets have been met and others are on schedule to be met, targets relating to expenditure will be challenging.
- Expenditure levels are behind what would be expected and represent 22% of the overall annual expenditure target. It is important to note that these year-to-date (YTD) out-turn figures are as of July 2018, therefore there are still opportunities for expenditure levels to increase. SEUPB is addressing a backlog in claims and payments and is hopeful that targets will be met.

- Although the Managing Authority has experience in manging these funds and previous Programme records indicate that any potential risk will be minimised to avoid de-commitment (i.e. failure to draw down full allocation of funds), at the end of the programming period we regard the current de-commitment risk as '**low-medium**' based on the percentage commitment and cumulative expenditure to date.
- **Recommendation 11:** It is imperative that the Managing Authority expedites the project expenditure to ensure that targets are achieved (whilst balancing the need for robust processes) and adherence to the financial profile (n+3), business plan and performance framework targets. Delays increase the risk of failing to meet these targets and therefore financial penalties to the Programme. The Managing Authority will continue to stringently monitor the Programme and have systems in place to take timely corrective action to ensure that the Programme is fully implemented. The Managing Authority should consider over-commitment to ensure fund maximisation. Nb. To ensure that funds are ultimately 100% drawn down, additional funds of 105-110% would normally be committed (in line with benchmarking), however this should be balanced with the potential financial liability to Member States. It is important to note that the extension of scope of the UK government guarantee has reduced immediate need for over-commitment.
- To facilitate accurate forecasting, Lead Partners also have a responsibility to profile/forecast spend as accurately as possible, in line with their agreed business plan, and to declare underspends without delay. **Recommendation 12:** Despite training and advice provided by SEUPB to Lead/Project Partners, quality issues are still apparent in forecasts submitted – highlighting the need for support to ensure honest and accurate forecasting. The introduction of KAMs will help to build trust between SEUPB and Lead/Project Partners to aid this process.

Pre-application Support

- SEUPB has met regulatory requirements by publishing a rolling 24-month programme of calls for applications, to include detailed descriptions of the processes, outputs and funding allocation under each theme.
- SEUPB has met regulatory requirements by facilitating pre-application development workshops and a range of thematic workshops to coincide with funding calls. Feedback from attendees is overwhelmingly positive regarding the content and delivery of these workshops. The benefit of this preparation work is evident in the low rate of ineligible applications.
- The second funding call for Shared Spaces and Services has piloted a new way of working with the introduction of more in-depth, tailored pre-development support – comprising of three workshops and technical support for applicants to provide guidance on how to robustly evidence the need for the project. Furthermore, support was also offered in the form of a consultant for 1.5 days to review the applications and to advise applicants on how to strengthen their case. This is a welcomed addition to SEUPB's application process. This funding call is currently undergoing assessment; therefore the outcomes are not yet known. However, anecdotal evidence suggests that the approach has been welcomed and it is anticipated that higher quality applications and ultimately projects have been developed.
- **Recommendation 13:** To introduce a robust pre-development support package, tailored per Programme theme for any future calls or successor Programmes. This will result in good quality applications and reduce the level of administration surrounding the clarification process and help improve processing times.

Application Process

- SEUPB introduced a two-stage application process, where applicants complete a shorter Stage 1 application and a decision is made within 12 weeks. There remains merit in maintaining a two-stage process for competitive calls, with a timely decision being made as to the outcome of the application. However, on reflection, a different application approach should have been considered for pre-identified projects, such as Local Action Plans (LAPs) to reduce the administration burden for Local Authority applicants.
- **Recommendation 14:** The overall application and assessment process should be reviewed in more detail. There may be opportunities to increase the efficacy of the assessment process, as some of the successful/approved projects are not performing as would be expected – with outputs and spend behind schedule. It must be determined if the case is that projects score well on paper but in practice these projects are not being implemented effectively, perhaps due to governance/management issues and/or external market issues preventing outputs being met.
- **Recommendation 15:** A thorough risk assessment and due diligence of delivery partners/governance arrangement and financial standing should form part of the assessment and conclusions presented to the Steering Committee as to the capacity of the partnership.
- **Recommendation 16:** There is a need to contextualise the application process to the Programme Rules and Regulations and Lead/Project Partners should be asked to sign that they have fully considered and understand these rules. In addition, for the Lead/Project Partner to confirm that senior staff will be in place with the capacity to deliver projects on time, as per the Letter of Offer.
- **Recommendation 17:** Whilst we acknowledge and appreciate that the Co-operation Programme outlines that a single set of guidance notes and common rules is applied, this is not always an effective approach given the variation of projects. A more tailored pre-application support, application and assessment should be considered. For example, the process adopted for Shared Spaces and Services should be more detailed when compared to the Regional Theme which focus on smaller local, voluntary and community led projects. It is recommended that the application and assessment process should be designed on a Programme theme basis – this will involve more resources and time during the Programme development stages, however this will lead to more effective management of delivery.
- **Recommendation 18:** There should be a central repository for applicant information. For example, a section on the website should be allocated to 'Essential Information' including Output Indicator Guidance. For future funding calls/Programmes, SEUPB should consider consolidating 'The Guide for Applicants' and Output Indicator Guidance into one document, for ease of reference for applicants. To avoid the document becoming too large, consideration should be given to a tailored guidance per funding call.

Assessment

- The assessment process has taken account of respective Member State guidance, views and best practice.
- The Steering Committee makes the final decision on all funding applications. There is no additional approval process post Steering Committee. The shift to a single assessment process represents a marked improvement as all necessary approvals, including those from Accountable Departments, are in place at the Steering Committee.
- It is noted that in some cases, internal Departmental approval processes have run beyond the Steering Committee date. For instance, for the recent PIV Shared Spaces funding call involved a process post-Steering Committee, to allow Accountable Departments to consider all necessary information to make a final decision. Although this flexibility was valuable and welcomed, the ideal process is to have all approvals in place before the Steering Committee.

- Based on feedback and on a review of the support materials provided to applicants, insufficient emphasis was placed on the economic appraisal process and in particular, aspects such as assessment of need and potential for displacement.
- **Recommendation 19:** It is important that sufficient time is dedicated to explaining the economic appraisal aspect of the assessment process to ensure that applications meet the requirements of same. It is acknowledged that SEUPB has since addressed this issue in the most recent funding call 'Shared Spaces and Services'.
- The excessive clarification process has hampered progress and negatively impacted on perception of a reduction in administration as well as causing delays in the assessment timescales. **Recommendation 20:** The Managing Authority must take action to avoid the introduction of any unnecessary additional procedures or checks. A procedure for clarifications should be set, in terms of the type of clarifications that are permitted, and a reasonable word count applied to responses to avoid excessive additional documentation forming part of the application that is not afforded to all applicants. A maximum of two rounds of clarifications should be sufficient, with the option of one of these via face-to-face discussion with the applicant. Applicants should be permitted one week to provide evidence, as this should be readily available and not generated as a result of the clarification – this will help to maintain a level playing field for applicants in a competitive call.
- **Recommendation 21:** To avoid duplication of effort, Accountable Department and SEUPB comments should be integrated and themed on key areas of the economic appraisal and/or SEUPB assessment report.
- It is evident that the SEUPB's assessment reports are influenced by the economic appraisal commentary. **Recommendation 22:** It is important that SEUPB carries out a due diligence of the economic appraisal process and assumes a higher-level and robust critique of all available information before presenting a conclusion as to the outcome of each application.
- SEUPB's value for money assessments are now being carried out in parallel with the external economic appraisers, as a means of improving efficiencies and ensuring that SEUPB guidance on eligible expenditure is considered at this stage. **Recommendation 23:** To reduce the administration burden and increase efficiencies further, value for money assessments should only take place once need and demand is robustly evidenced – to avoid unnecessary work by appraisers and SEUPB's Financial Control Unit.

Processing Times

- As of April 2018, a total of 184 applications have been received, to include 123 applications for the PIV Programme and 61 applications for the IVA Programme.
- PIV Processing times:
  - 100% applicants met Stage 1 target (12 weeks).
  - 52% applicants met Stage 2 target (36 weeks).
  - 21% applicants met LOO target (36 weeks).
- IVA Processing times:
  - 100% applicants met Stage 1 target (12 weeks).
  - 52% applicants met Stage 2 target (36 weeks).
  - 0% applicants met LOO target (36 weeks).
- It is important to note that SEUPB has been met with extenuating circumstances in the aftermath of the UK decision to leave the EU resulting in the Programmes operating in an environment of unprecedented uncertainty in the weeks that followed the referendum. This clearly has an adverse effect on processing times. It is evident that every effort has been put in place to minimise the impact on the Programme and on applicants.

- Other factors impacting on processing times are also evident: issues relating to the quality of the applications; time taken to clarify applicant's project activity and assumptions to enable a value for money assessment to be completed; need for information to be updated to take account of the lapse of time (from application submission to Letter of Offer); some applicants experienced delays in collating relevant documentation to support their application – hampered by the complexity of working within a partnership arrangement requiring input from all Project Partners.
- Processing times have also been extended to fit with eMS processes. For example, prior to the introduction of eMS Letters of Offer were issued upon Steering Committee approval. However the process now involves additional steps i.e. upon Steering Committee approval the Project Partners must reprofile their budget on eMS (if necessary- to reflect value for money assessment), which requires sign-off by the project partnership and any relevant trustees/boards, SEUPB reviews and approves this reprofiling and modification exercise and the Letter of Offer is subsequently generated from eMS and issued to projects for their signature before the project can be mobilised.
- The issues outlined have collectively contributed to a negative perception among some project beneficiaries and influenced their opinion that the level of bureaucracy associated with the Programme remains high. **Recommendation 24:** The processing times are in excess of what is anticipated, and processes should be brought forward in a more efficient structure and in line with the Co-operation Programme agreed timescales of 36 weeks, to include issuing the Letter of Offer. To expedite the process, Lead/Project Partners should be given a strict timescale in which to reprofile their budget on eMS along with modifying the associated work packages to ensure that the Letter of Offer is reflected and for sign-off to be agreed by SEUPB thereafter to allow projects to be mobilised. The option of issuing the Letter of Offer on the proviso that the reprofiling and modifications are made within 30 days (6 weeks) should be considered as a means of reducing processing times. Although, the focus should remain on issuing and agreeing final Letters of Offers.
- **Recommendation 25:** Given the importance of value for money and to minimise the number of project modifications and budget reprofiling, pre-development support should focus on providing more tailored guidance on eligible expenditure and how the FCU assesses value for money to facilitate the development of more robust applications and thereby reducing processing times.

Outputs focused

- There is support for the move towards a 'results'-based approach, with 62% of the online survey respondents agreeing that it has helped them to develop projects with measurable outputs to make a contribution to the result indicator(s), as per the Cooperation Programme.
- Due to the diverse nature of the projects there is a need for SEUPB to be flexible and responsive to ensure that overall output targets will be met, for example SEUPB has permitted a change to some output indicators, for example, in the second funding call for Shared Spaces, adjustments have been made to allow a split in project participants which is more aligned to the demographic profile of the Border Region of Ireland.
- **Recommendation 26:** It is incumbent on SEUPB to communicate to projects the requirements of the EC and the fact that the Programme is outcomes focused. There is a minimum requirement to achieve at least 85% of the agreed outputs and outcomes to meet the performance framework targets. It is important that this is effectively communicated to all projects and that failure to reach targets may result in a reduction in funding. If targets are not met, funds may be stalled and adjusted going forward until corrective action is taken to address shortfall in outputs. In cases where outputs are being exceeded, projects should be supported to maximise achievements.

Claims and Payment

- A greater focus on projects with high error rates will be given to examine any issues or risks to expenditure targets. Applying risk-based methods of sampling for controls by the Managing Authority will allow for a more efficient use of resources.
- Effective management and control of funds will be demonstrated by a low error rate of the Programme (i.e. below the 2% EC threshold. In the previous Programming period most errors related to procurement, resulting in ineligible expenditure.
- 77% of the online survey respondents agreed that they are confident that they understand the rules relating to eligible expenditure. 67% agreed that FCU adopts a robust process to verification. 59% agreed that all Project Partners submit accurate and timely documentation to FCU to evidence claims. In terms of payment, only 30% agreed that they are satisfied that payment has been received in a timely manner.
- It is evident that there are blockages in the systems with regard to submission of claims, verification and payments to Lead Partners, and corresponding reduced drawdowns for the EC. There is evidence where a significant project has not met the targets set, which was only uncovered upon submission of the first-year claim, which will result in a potential underspend. This was not foreseen by SEUPB due to the lack of forthcoming information from the project and SEUPB checks not identifying this at an earlier stage. This has significant implications on the achievement of expenditure levels.
- **Recommendation 27:** It is imperative that SEUPB has efficient systems for determining the amount of spend and that checks are more robust and timelier to identify any issues, to allow for reprofiling and remedial action to be taken. There is a requirement to review this aspect of operations in more detail to identify any areas where activity can be streamlined to ensure effective resource utilisation. It is acknowledged that SEUPB has recently commissioned a review of same, the outcome of which will inform processes for this Programme and future Programme periods.
- Processes adopted as part of the submission of claims has resulted in partners working in isolation, for example, claims are submitted by individual partners and the Lead Partner has no oversight role until all Project Partner claims are verified, where they are then responsible for collating a consolidated progress report. **Recommendation 28:** There should be a requirement on Lead Partners to have a resource in place to monitor the partnership's claims prior to submission to SEUPB, this resource/individual could liaise directly with the FCU as one contact point per partnership.
- **Recommendation 29:** The level of clarifications and sampling errors identified suggests a training need for claims and verification. This will be best served via the one-to-one visits to Project Partners. Whilst this will be resource intensive initially, it is anticipated that this will help to resolve issues and establish best practice approaches, ultimately reducing errors and sampling levels to greater efficiencies going forward.
- Payments are only made upon a First Level Control (FLC) Certificate being issued to each Project Partner and the receipt of the consolidated Lead Partner report. This effectively means that partners who are compliant and timely with their claim submissions are subject to waiting for payment until all partners are approved – this issue becomes more apparent in larger partnerships. Early warning signs of potential partnership breakdown should be monitored by Lead Partners, and actions put in place to address any issues.
- **Recommendation 30:** SEUPB should consider a penalty or notice period for Project Partners that are consistently underperforming and negatively impacting the effectiveness of the overall partnership.
- **Recommendation 31** For future Programmes, a cap on the number of partners should be explored to enhance opportunities for greater relationship building and cohesion (the optimum number to be determined and to be based on a benchmarking review).

Simplified Cost Options (SCOs)

- The Managing Authority proactively promoted the use of simplified costs, for example: calls for applications identified opportunities for SCOs and encouraged projects (via funding calls and pre-application workshops), where possible, to adopt these in their projects. The Managing Authority also introduced some mandatory unit costs and flat rates tailored to each theme. Despite efforts to promote the uptake of additional SCOs, these have not been applied to an optimum level (where relevant), and, consequently, has resulted in additional admin burden associated with the verification of actual costs.
- **Recommendation 32:** A more concentrated effort by SEUPB should be taken to encourage the wider adoption and application of unit costs across projects, as this would not only reduce administration but also act as an incentive to meet and exceed targets - as eligible costs are based on the real output. Although, it is noted that not all Project Partners would have the three years of evidence required by the EC to prove specific unit costs. Going forward for any future Programmes (post 2020), Project Partners will be able to use the evidence gained from this Programme period.

e-Cohesion

- Following a period of bespoke development to ensure that the eMS system could host the specific needs of the Programme, the eMS went live on 1st March 2017. The first claims were received from projects via eMS by the 30 June 2017 with verification and payment of valid claims following.
- At this stage of implementation all Lead Partners and Project Partners have experience using the system (although not all have submitted claims). Overall, feedback about eMS is very negative, with the majority (57%) disagreeing or strongly disagreeing that that 'eMS is easy to use', 46% disagree that it is an efficient tool for submitting claims. Almost half (47%) disagree or strongly disagree that overall, they are satisfied eMS is an effective tool.
- It was anticipated that eMS would have the capacity to generate analysis and output/financial reporting, however this function is not yet available (at the time of writing report). Therefore, often information is not readily available in a useable format, requiring a lot of downtime to align data and address queries. Various case officers/units have adopted their own monitoring systems, but there is an inconsistent approach. SEUPB has engaged CPB, the eMS host and service provider, to develop a bespoke suite of additional reports and one centralised reporting tool – this will remove the need for internal reporting databases currently in use. However, a full reporting function is not yet available.
- In the absence of a timely solution from eMS, SEUPB commissioned the development of a PIV and IVA Dashboard. This Dashboard has been developed as an online survey tool with SEUPB interface and aims to capture timely information from each Project Partner, which will be consolidated at a theme level to quickly assess the extent to which targets are being met – therefore allowing for an immediate response to any issues.
- The Year 1 Implementation Evaluation recommended that SEUPB respond to the demand for training on the use of eMS, particularly as Lead/Project Partners are embarking on the submission of their first claim. However, SEUPB considers eMS to be an intuitive system and has released comprehensive user guidance to all users. It is the evaluator's view that early introductory sessions to eMS was a missed opportunity, as the demand for training remains, and in the meantime, projects have become increasingly anxious and frustrated with the perceived inflexibility of the system, coupled with technical glitches.
- As well as projects requesting support, it is evident that SEUPB staff would have welcomed training as well. At this stage of project implementation, introductory sessions on eMS are not required (although introductory sessions on eMS should be provided for Project Partners to any forthcoming approved projects).

- Project Partners have, through a process of trial and error, navigated their way through the system and are becoming increasingly confident in its use. The biggest challenge now relates to the technical problems associated with eMS which have been experienced by SEUPB staff and Project Partners alike. There is significant down-time waiting for the system to respond, coupled with cumbersome processes to email and communicate with projects, as well as having to repopulate information for each reporting period.
- **Recommendation 33:** eMS as an EU wide system, fully meets designation requirements, however difficulties have emerged with system glitches and downtime evident during submission/processing claims and is therefore not operating at an optimum level. This can only be addressed at a programming level and requires detailed discussions with the developers.

Support and Training

- SEUPB currently manages 130 projects across 8 specific themes within the PIV and IVA Programmes, therefore the task of providing support to this number of projects, with in excess of 400+ partners, is resource intensive.
- All projects are allocated a specific JS and FCU case officer to provide a high level of support in relation to implementing projects. To increase efficiencies in the recording and reporting of JS quarterly monitoring visits, SEUPB is currently scoping the design of an online tool, based upon the 8 specific themes, to capture project information associated with the monitoring visits (e.g. progress against work packages, performance against contracted outputs and record any areas of concern).
- The Managing Authority has developed a comprehensive support and training programme, commencing with information seminars, workshops and various resources/guidance materials at the early pre-application stage. This support has evolved in line with the stage of implementation, which will now focus on supporting project beneficiaries as they progress project mobilisation.
- **Recommendation 34:** Investment in capacity building such as training, information exchange platforms and networking are essential at this stage of the Programme, and it is encouraging that SEUPB is responding to this demand with a comprehensive programme for Local Authorities. For PIV Local Action Plans, this includes training on peace and reconciliation issues (such as racism, sectarianism and conflict resolution). Importantly training will upskill lead and Project Partners in the creation of standardised monitoring tools and methods to best capture short and medium-term outcomes achieved by projects funded. Effective monitoring will ensure that money is being effectively spent across the eligible jurisdiction.
- Further training is planned for next year on developing partnership working, which the evaluators consider to be of utmost importance, as this will form the foundation and underpin the extent to which outcomes are achieved – as a strong, effective partnerships will be able to meet and, in some cases, exceed targets set. SEUPB has also planned Thematic Sessions for all projects focusing on: output indicator guidance; accuracy of claims; simplified cost options; project reporting and performance; fraud and irregularities; and the General Data Protection Regulation (GDPR).
- Lead/Project Partners must be proactive and use resources and ask for assistance, where required. It is expected that individuals will avail of the training provided and the Managing Authority is committed to meeting/reacting to demand.
- The allocation of a dedicated JS and FCU case officer to support the Lead Partner in the implementation of the project is seen as a very beneficial element of Programme management.
- **Recommendation 35:** Resources permitting, there is a demand for increased visibility of case officers among project beneficiaries to support implementation. Onsite input from the FCU team prior to the submission of a claim should be considered as a means of reducing the level of verification and improving error rates.

- **Recommendation 36:** Prior to any onsite visits, either the JS and/or FCU case officer should prepare in advance and be equipped with the most up-to-date information, for example, outputs achieved, spend, financial drawdowns and financial forecast. A short project status form should be created and issued to projects 1-2 weeks in advance of the onsite visit to minimise follow-up requests for information.
- **Recommendation 37:** Staff use of eMS also appears to differ, with some citing various short-cuts and better means of working, of which others are not aware. This further highlights the need for systems mapping to create better efficiencies and ensure that a consistent approach is adopted. Training will be reviewed on an ongoing basis and will be amended as required to ensure effective internal staff training.
- **Recommendation 38:** Consideration should be given to creating short YouTube videos and/or webinars as a suite of training for projects. For example, basic videos of case officers' walking through a claim process and/or applying a simplified cost.

Rebid and Modifications

- The total allocation set aside for Local Authority Actions Plans (LAPs) was €81,176,479. At the end of 2017, all LAPs had been assessed, resulting in 83% (€67,313,465) of the allocation approved by the Steering Committee, an underspend of €13,863,014. SEUPB introduced a rebid exercise which permitted Councils to reapply for these unallocated funds (relating to 16 of the 17 councils). The aim of which was to ensure maximum benefits towards peace building activity in each of the council areas. This has resulted in the award of an additional €5,387,675, equating to 90% of the total budget committed to date. There is a further €8,341,771 pending Steering Committee approval, which if awarded will result in a small overall underspend of €153,567.
- The rebids effectively represent a project modification. It was originally conceived that project modifications would only occur in exceptional circumstances; however, this has not been the case. SEUPB has permitted project modifications, mainly as a result of underspend across LAPs rendering the need for a rebid process to meet commitment levels. This extensive process, coupled with the limitations of eMS to permit project modifications and claims taking place in parallel, has resulted in a significant backlog of claims and payments. Modifications have not been confined to rebids, but are also apparent in other strands of activity in PIV and IVA.
- **Recommendation 39:** The Managing Authority is committed to working in partnership with project beneficiaries to respond to local demand, but project modifications should not be a constant and iterative amendment process. On reflection, the rebid process should not have been introduced, instead a separate pool of funding should have been set aside as a competitive call (possibly as part of a small grants scheme to enhance accessibility to EU funds and to maintain the levels of grass roots work associated with LAPs).

Partnership Working

- At this stage of implementation, the approved partnerships appear to be working effectively, although partnerships are at different stages of their project lifecycle. Overall, partners agree that communication is good and there is an exchange of experience and mutual learning.
- Diverse partners and complexities resulting from new partnership arrangements may present challenges as the projects evolve and circumstances change.
- The Lead Partner role has been diminished in some cases, as projects are often divided into separate delivery parts, this coupled with individual partners submitting claims without Lead Partner oversight, has resulted in partners working in isolation.

- Partnerships working across different jurisdictions can be challenging, with different policy environments to consider. This is further compounded by geographic separation, reducing opportunities for face-to-face contact which is more conducive to relationship building. Therefore, Project Partners have had to make a concentrated effort and willingness to invest in building structures to support partnership working.
- It is imperative that the Managing Authority maintains close contact with Lead Partners to identify any issues that may impact effective partnership working. The PIV Managers Forum (comprised of Local Authorities) represents a good vehicle in which the Managing Authority can answer queries, dispel any myths/ uncertainties and ensure that a consistent response is presented to all projects.
- **Recommendation 40:** The development of Forums (either via face-to-face meetings and/or electronic means) should be encouraged for other PIV and IVA themes, with input provided by SEUPB, should Project Partners require representation. This could also facilitate real-time learning and information sharing, as well as document exchange. This will become increasingly important as mid-term and Post Programme Evaluations become available and can act as a central repository of information for projects and wider audience to access and appreciate the benefits of PIV and IVA funding.
- **Recommendation 41:** Creative means of communicating should be encouraged, as evident in some partnerships. As part of the planned thematic workshops on networking, SEUPB should consider introducing partnerships to online tools for real time communications and draw on the experience from existing partnerships that are operating effectively.
- **Recommendation 42:** The need for capacity building to ensure that partnerships are working at an optimum level has become increasingly apparent. It is acknowledged that, as part of SEUPB's training programme a leadership and networking workshop is planned for Local Authorities as part of the PIV Programme. It is recommended that leadership and capacity building training is rolled out for all themes, as issues are not isolated to LAPs. Case studies of effective partnership working should be presented as part of this training programme.
- **Recommendation 43:** The Lead Partners and Project Partners should be asked to review their respective responsibilities (as per the Programme) and ensure that they are committed to same – this could form part of any future networking events and/or the introduction of capacity building training for partnerships. These responsibilities should also be listed on SEUPB's website as a reference point.
- **Recommendation 44:** Every effort should be made to identify opportunities for strong and sustainable cross-border partnerships, as a key basis of the Programmes. Investing in partnership development is vital, especially when creating new cross-border alliances.

Compliance with Programmes' Review Procedure

- Based on a review of SEUPB's 'Review Procedure for Unsuccessful Applications', it is clear that a robust process has been devised and implemented. The notification letter outlines the assessment scores and the rationale against the selection criteria. In the interest of fairness and transparency, a de-briefing session is offered to *all* applicants (to be availed of within 14 days of the notification letter, although SEUPB has accommodated debriefing sessions after this deadline).
- In the event that an applicant appeals the decision of the Steering Committee at Stage 1 and/or Stage 2, the Project Review procedures have been met.
- From April 2018, an alternation to the Review Procedure was incorporated. This involved the introduction of a 'Review Request Template' which provided a structure and word limit to capture the required evidence to support an appeal. This change was in response to the excessive documentation, in varying formats, being provided by applicants and ensures that, going forward, a consistent approach will be adopted for all.

- Up to May 2018, only seven unsuccessful applicants requested a formal Project Review procedure (six decisions made by the Steering Committee were upheld). This suggests that the assessment process is effective and that applicants are content that the outcome was justified based on either the written notification and/or the debriefing session offered to all unsuccessful applicants.

Communications and Awareness Raising

- SEUPB has demonstrated a strategic approach to communication, evidenced by the robust Communications Plan, which meets EU regulatory requirements.
- Although the Communications Team is small, they are experienced, dedicated and have effectively managed an extensive programme of communication and publicity work.
- Significant levels of communications activity have taken place to reflect the progress in the approval of projects. This includes 66 case studies (for PIV and IVA) which highlight the achievements of the Programme and 93 press releases in relation to funding announcements, representing 33% and 47% of overall 2023 Performance Framework targets.
- To address lower levels of media awareness, a PR company based in Western Scotland was commissioned to assist SEUPB with enhanced media relations activity within this eligible area, as recommended in the Year 1 Implementation Evaluation.
- Feedback from the Implementation Evaluation online survey and consultations also confirms that the majority of projects are satisfied that the Programmes are effectively promoted.
- **Recommendation 45:** To create more value-added, it is recommended that the General Public Survey is maintained and used as a control group, with an additional survey (with same/similar questions) commissioned to target areas/communities/general public where PIV and IVA funds are directed – in order to gain an appreciation of the programme's reach and whether it is having a positive impact in targeted areas.
- **Recommendation 46:** Increase SEUPB's combined social media presence in terms of engagement on all of its existing channels. A social media strategy should be developed to increase engagements and content dissemination (e.g. use of dynamic digital content, promote use of campaign hashtags (#) for events; drive content between media channels to reinforce messages, increase use of infographics, focus on increased engagements, for example, introduce a more conversational tone and opinion polls, seeking interaction with audience.