

Midterm evaluation of local development programmes (2014-2021)

Final Report

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Acronyms and abbreviations

Acronym/ Abbreviation	Definition
ACoR	Associations of Communes in Romania
CLLD	Community Led Local Development
CoE	Council of Europe
COVID-19	Coronavirus Disease 2019
DG REGIO	European Commission Directorate General for Regional and Urban Policy
DPP	Donor Programme Partner
EEA	European Economic Area
EU	European Union
EUR	Euro
FMO	Financial Mechanism Office
GrACE	Grants Administration and Collaboration Environment
IPO	International Partner Organisation
KS	Norwegian Association of Local and Regional Authorities
NFP	National Focal Point
NGO	Non-Governmental Organization
OECD	Organisation for Economic Co-operation and Development
PA	Programme Area
PDP	Predefined Project
PN	Project Number
PO	Programme Operator
PP	Project promoter
RSDF	Romanian Social Development Fund
SGS	Small Grants Scheme
STEM	Science, Technology, Engineering and Mathematics

Country codes

Country code	Country
BG	Bulgaria
CY	Cyprus
EE	Estonia
GR	Greece
HR	Croatia
LV	Latvia
MT	Malta
PL	Poland
RO	Romania
SK	Slovakia

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Executive summary

Introduction

This report covers the evaluation of the EEA & Norway Grants local development programmes in 10 countries.¹ The evaluation was carried out between May and October 2021.

The EEA and Norway Grants ('the Grants') are the contribution of Iceland, Liechtenstein and Norway to reducing economic and social disparities and to strengthening bilateral relations with 15 European Union (EU) member states in Central Europe, Southern Europe, and the Baltics. The current Financial Mechanism 2014-2021 supports local development programmes in 10 beneficiary states with total funding of EUR 297.53 million (excluding co-financing). These programmes are the subject of this evaluation.

Each programme is organised around the host programme area, PA10 'Local Development and Poverty Reduction'. The objective of PA10 is to strengthen social and economic cohesion at the local level. PA10 itself comes under the priority sector 'Social inclusion, Youth Employment and Poverty Reduction', which aims to break the cycle of disadvantage by supporting early interventions, investing in prevention and boosting systemic change, and encouraging social innovation pilot projects.

The 10 programmes are highly diverse in terms of both design and size of investment. They combine the host programme area, PA10, with between one and seven other programme areas. The programmes are at different stages of implementation. Only three programme agreements were signed in 2018, four in 2019, and three were signed only in 2020.

Purpose and methodology

The main purpose of this mid-term evaluation is to *'identify and assess the extent to which the EEA and Norway Grants, through the implementation of local development programmes, are contributing to the creation of structural change at the local level and under the supported themes'* in each country. The evaluation addresses 17 evaluation questions, which are grouped under four evaluation criteria: effectiveness, efficiency, coherence, and bilateral cooperation. The evaluation is intended to inform strategic learning for the programming of the next financial mechanism in the area of local development, poverty reduction, and social inclusion.

Structural change is an important concept for this evaluation. We define this as one or more sustained changes in the functioning or performance of local development systems that positively impact the situation of one or more target groups. Such changes may be the result of changes in the structures of systems, processes, or interactions between different elements within systems. Key elements of local development systems include local authorities and institutions, civil society, and representatives of vulnerable groups. Structural change unlocks the potential of target groups, and the overall local development system, to break the cycle of disadvantage affecting regions and socially excluded groups.

The evaluation involved extensive desk research covering over 160 programme and project level documents and other contextual documents; numerous scoping consultations and several interviews with the Financial Mechanism Office (FMO); approximately 100 interviews with diverse stakeholders,

¹ Bulgaria, Croatia, Cyprus, Estonia, Greece, Latvia, Malta, Poland, Romania and Slovakia

including national focal points, programme operators (PO), a fund operator, a sample of 65 project promoters (PP), donor programme and project partners, and two international partner organisations (IPO); a survey of donor project partners; and a case study on the Grants' support to Roma inclusion and empowerment through the local development programmes.

The evaluation faced several challenges. It has not been possible to assess actual results as supported projects are at an early stage of implementation. The launch of the evaluation coincided with the summer vacation period and data gathering had to be extended to the end of September 2021 due to the limited availability of stakeholders. There were few responses to the survey of donor project partners, which necessitated additional interviews.

Key Findings

Effectiveness

The local development programmes have significant potential to generate structural change at the local level, but this is not always sufficiently reflected in programme design. In many cases, programme results frameworks lack any link to this priority.

The lack of a clear focus is also reflected in the combination of different programme areas under one programme. Approximately half of the programmes have a more focused strategic design aiming at structural change at the local level. For example, in Poland, there is a focus on systemic change in the functioning of local administrations, and in Bulgaria, Romania and Slovakia, the core focus is on social inclusion of vulnerable groups, including Roma. In these programmes, there are clearer synergies between the different programme areas they each cover. The other programmes lack a clear focus, and the combination of programme areas was motivated mainly by the desire of donors and national actors to continue support to themes from the previous financial mechanism, and to streamline management. This group of programmes spreads resources too thinly and there is little evidence of synergies between diverse programme areas.

The programmes started late and have been further delayed by the COVID-19 pandemic. The majority of activities must now be implemented in the 28 months remaining for project implementation. More than two thirds of the 161 contracted projects are at an early stage of implementation, or have been delayed due to the pandemic. This is reflected in the low rate of payments to projects. Some open calls for proposals are still in the process of selecting and/ or contracting projects. As the pandemic enters its third year, there may be further disruption and delays. There is still time to implement project activities, but many are likely to be rushed. This may constrain the quality of projects and undermine the achievement of planned outcomes.

The Grants' investment of approximately EUR 34 million in targeted measures for Roma inclusion in Bulgaria, Romania, and Slovakia through the local development programmes is far too little to make a real difference to direct service provision, which is the primary focus of these programmes. However, they show considerable promise in modelling new approaches, which are less evident in EU-funded actions. Some examples include the emphasis on empowerment of Roma, partnerships with Roma civil society organisations, and mandatory antidiscrimination measures in Roma inclusion interventions. Nevertheless, implementation is also revealing serious gaps in the capacities of both local authorities and Roma communities to engage effectively in such innovations. Sustained structural change requires that these gaps are effectively addressed.

Open calls for proposals and small grants schemes (SGS) with a focus on disadvantaged areas and groups have greater potential than pre-defined projects to ensure a fair distribution of effects to

diverse groups. They are more flexible and allow for implementation of initiatives that better fit the needs of these groups.

Evidence from Romania shows that requiring multi-stakeholder partnerships significantly increases the potential to generate structural change at the local level. These partnerships promote a new collaborative problem-solving culture, which is needed to address the complexity of social exclusion.

Efficiency

POs have the necessary institutional and administrative capacities. They are experienced in managing EEA & Norway Grants funding and/ or EU funding. They are well positioned to link the programmes with relevant country development priorities, especially when collaboration with other institutions is required.

Interviewed project promoters are likely to deliver the expected results (to the extent that this is possible given extensive disruption and delays). They have subject matter expertise and are capable of utilising funds effectively and efficiently. The main bottlenecks for project implementation relate to the COVID pandemic, which remains a threat. This is particularly affecting education projects, community-based social work, infrastructure, procurement, and bilateral activities.

At present, the majority of project promoters are public entities (74%). Non-governmental organisations (NGO) account for only 24% of project promoters and they are eligible only in some countries. Only three project promoters are private entities. Each type of project promoter has its strengths and weaknesses, but it is too early to assess them based on their performance. The entities best suited to addressing the complexity of local development are those that can work effectively in partnership with public bodies and NGOs.

Coherence

Local development activities are aligned with local and regional strategies, but local commitment and sustainability depend on how local strategies were developed – top-down or bottom-up.

Local development programmes are well-aligned with EU-funded support. However, while important, this alone does not confirm mutual benefit. In some cases, the Grants may be providing financing to maintain activities or services, rather than adding value. Interventions are more effective when they complement other funding by piloting new approaches, further developing existing initiatives, and improving access to, and utilisation of, other funding.

The main added value of the Grants is not necessarily in addressing thematic gaps, but rather in addressing the way local systems function, which is not always adequately addressed by EU funding. This includes better targeting of specific vulnerable regions or groups, greater emphasis on capacity building of local stakeholders and empowerment of vulnerable groups, multi-stakeholder partnership and networking, and integrated multi-sectoral and multi-modal approaches.

Almost 90% of local development programme funding (including co-financing but excluding programme management) is clearly addressing the EUROPE 2020 'Inclusive Growth' priority.

Bilateral Cooperation

Bilateral partnerships at both programme and project levels bring knowledge, innovation, and joint problem solving with partners that are experiencing similar challenges in donor states. Donor programme partners have contributed to programme design and the work of the cooperation committees, and have organised matchmaking events at project level. Including more than one donor programme partners (DPP) or IPO has proved effective in meeting the multidimensional nature of the

programmes. Project partnerships that have continued from the previous financial mechanism tend to add more value, as they build on existing trust and experience. Without bilateral partnerships, programmes and projects would be implemented with less social innovation.

Bilateral partnerships enable donor programme and project partners to expand their networks at both national and international levels. Donor project partners consider that bilateral partnerships generate new knowledge and experience that is useful for them in their own local contexts.

Bilateral partnership activities have been significantly disrupted by COVID-19 travel restrictions. Limited awareness in donor states of the Grants, and more specifically the local development programmes, makes it difficult to find partners, especially for the beneficiary states that do not have a DPP. There is generally less interest amongst potential donor state partners in working in countries that they perceive as less relevant to their own contexts. While very helpful, matchmaking events on their own do not necessarily lead to substantive partnerships, and some additional steps would support the overall effectiveness of new partnerships. Language barriers make it harder for PPs from disadvantaged areas to identify and work with donor partners.

Main Recommendations

- The FMO should consider extending the deadline for project implementation by at least six months. This will help to ensure that projects can deliver results of the expected quality and support achievement of programme outcomes as envisaged.
- For the local development programmes in the next financial mechanism, the FMO and the national focal points should ensure a clear strategic focus on generating systemic change at the local level, and this expectation should be clearly expressed by the donors and reflected in programme documents and results frameworks.
- To accelerate the launch of the next programmes, rather than developing a separate concept note, the FMO and the national focal points should consider the development of a detailed programme strategy/proposal, which is annexed to the programme agreement, as was the practice of the previous financial mechanism.
- To promote the fair distribution of results to diverse vulnerable groups, the FMO and POs and fund operators should consider increasing the use of open calls for proposals and SGSs for local initiatives. There should be greater emphasis on soft measures.
- It is recommended that the FMO and the POs consider shifting the prevailing focus on providing social services, to a clear focus on creating capacities and practices to systematically address service delivery, equal treatment, and Roma inclusion.
- The FMO should require, and the national focal points and POs should ensure, that the complementarity of proposed EEA & Norway Grants interventions with EU and national programmes, and the justification for the funding, are always explicitly identified and clearly explained in programme agreements.
- The FMO should consider engaging more systematically with DG REGIO after negotiations have been concluded. This would enable identification and better use of complementarities, especially in the application of policies such as community-led local development in marginalised urban and rural areas.
- Rather than relying only on matchmaking events to establish new project partnerships, the FMO, DPPs and POs should consider a more strategic and systematic approach to raising awareness in the donor countries about the contexts and priorities of the local development programmes.

1. Introduction

This report covers the evaluation of the EEA & Norway Grants local development programmes in 10 countries.² The evaluation was carried out between May and October 2021.³

1.1. Background and context

The EEA and Norway Grants are the contribution of Iceland, Liechtenstein and Norway to reducing economic and social disparities and to strengthening bilateral relations with 15 European Union (EU) member states in Central Europe, Southern Europe, and the Baltics. During the 2014-2021 Financial Mechanism period, the EEA and Norway Grants provide funding for twenty-three programme areas within five priority sectors.

The current Financial Mechanism 2014-2021 supports local development programmes in 10 beneficiary states with total funding of EUR 297.53 million (excluding co-financing). This is summarised in Table 1 below.

Table 1: Overview of the local development programmes

Country	Budget (million EUR, without co-financing)	Start-up date	Programme operator (PO)	Donor programme partner (DPP) International partner organisation (IPO)
Bulgaria	35	23.5.2018	Ministry of education and science	DPP: KS ⁴ Norway; IPO: Council of Europe (CoE)
Croatia	26	16.9.2020	Ministry of Regional Development and EU Funds	DPP: Norwegian Agency for International Cooperation and Quality Enhancement in Higher Education
Cyprus	7.14	29.6.2020	Directorate General for EU programmes, Coordination and Development	
Estonia	18	13.9.2019	Ministry of Social Affairs	DPPs: Norwegian Directorate for Cultural Heritage ; Norwegian Directorate of Health; Norwegian Institute of Public Health; Arts Council Norway
Greece	6.5	21.6.2019	Fund Operator: Crowe SOL Management Consulting Services SA, in partnership with Human Rights 360	
Latvia	10	21.5.2020	Ministry of Environmental Protection and Regional Development	DPP: KS Norway
Malta	5.99	5.6.2018	Ministry for Foreign and European Affairs	

² Bulgaria, Croatia, Cyprus, Estonia, Greece, Latvia, Malta, Poland, Romania and Slovakia

³ The evaluation team was comprised of regional team and authors Mariana Milosheva-Krushe, Roderick Ackermann, Anna Ivanova, Nicolò Franceschelli and country contributors Claudia Grosu and Anca Socolovschi (Romania), Anna Manoudi (Greece and Cyprus), Merit Tatar (Estonia)

⁴ Norwegian Association of Local and Regional Authorities

Country	Budget (million EUR, without co-financing)	Start-up date	Programme operator (PO)	Donor programme partner (DPP) International partner organisation (IPO)
Poland	100	25.3.2019	Ministry of Development Funds and Regional Policy	DPP: KS Norway; IPO: OECD ⁵
Romania	73.9	19.6.2018	Romanian Social Development Fund	DPP: KS Norway; IPO: CoE
Slovakia	15	13.11.2019	Ministry of Investments, Regional Development and Informatisation	IPO: CoE

The support provided through the local development programmes addresses the EEA and Norway Grants' core objectives of overcoming regional disparities to reduce poverty and social exclusion in the poorest regions, with a particular focus on deprived communities across the beneficiary states. The support also reflects the priorities of the Europe 2020 strategy for smart, sustainable and inclusive growth, in particular (but not only) its Fighting Poverty priority, which focuses on the unemployed and low skilled, non-EU migrants and single-parent families, as well as structural unemployment and exclusion of ethnic minorities such as Roma.

Following the programme approach of the EEA Grants, each of the local development programmes is organised around the host programme area PA10 'Local Development and Poverty Reduction' which is one of the five programme areas under the priority sector of '*Social inclusion, Youth Employment and Poverty Reduction*'. The local development programmes include support from other programme areas, including those under different priority sectors.⁶

As a result, the ten local development programmes **are highly diverse in terms of both design and size of investment**. They combine the host programme area, PA10, with between one and seven other programme areas. The programmes are at different stages of implementation. Only three programme agreements were signed in 2018, four in 2019, and three were signed only in 2020.

1.2. Objective and purpose of the mid-term evaluation

The main purpose of this mid-term evaluation is to '*identify and assess the extent to which the EEA and Norway Grants, through the implementation of local development programmes, are contributing to the creation of structural change at local level and under the supported themes*'⁷ (depending on chosen priorities by the different countries - education, business support, infrastructure development, Roma inclusion, local governance functioning, effectiveness of social and health services etc.)

The terms of reference specify four evaluation criteria – *effectiveness, efficiency, coherence and bilateral cooperation*. The evaluation is required to answer 17 questions that are grouped under these four criteria. As agreed during the inception phase, the report also provides a general analysis of the strategic rationale of programmes' design.

⁵ Organisation for Economic Cooperation and Development

⁶ Priority sectors and programme areas are explained in EEA & Norway Grants (undated), '*Priority sectors and programme areas 2014-2021*' [the Blue Book], https://eeagrants.org/sites/default/files/resources/FMO_170774%2BBlue%2BBook%2BFinal%2BUpdate_2017_FIN.pdf

⁷ Terms of reference, p5

In line with the terms of reference, this evaluation is both formative and summative. Its **primary purpose is to extract strategic learning for the next EEA Grants programming**. The evaluation should also assess progress so far.

The main users of the evaluation include the donor states, the Financial Mechanism Office (FMO), beneficiary states, donor programme partners, international partner organisations (IPO) and programme/ fund operators.

1.3. Approach and methodology

As well as answering the 17 specific evaluation questions specified in the terms of reference, the evaluation had to address the core horizontal question of the programmes' contribution to **structural change**.

Thus structural change is an important concept for this evaluation. We define this as **one or more sustained changes in the functioning or performance of local development systems that positively impact the situation of one or more target groups**. Such changes may be the result of changes in the structure of systems (e.g. who is involved) or key actors, changes in processes, or changes in interactions between different elements within systems. Key elements of local development systems include local authorities and other institutions, civil society, and representatives of vulnerable groups. Structural change unlocks the potential of target groups, and the overall local development system, to break the cycle of disadvantage that constrains regions and areas, and socially excluded groups.

The evaluation considered both programme and project levels:

- At **programme level**, the analysis was based on desk research covering programme and contextual information, and interviews with all national focal points and all programme operators (PO) and fund operators, as well as with all donor programme partners (DPP) and international partner organisations (IPO).
- At **project level**, the review was based on analysis of project documents and interviews with a sample of project promoters (PP) in the 10 beneficiary states. There was also a survey of 38 donor project partners (although responses were limited).

Group and individual meetings and interviews were held with representatives of:

- The FMO (multiple meetings)
- 10 national focal points
- 9 POs and one fund operator
- 3 IPOs: Council of Europe, Organisation for Economic Cooperation and Development (OECD), Fundamental Rights Agency
- 14 DPPs and donor project partners
- 64 project promoters (PP) in the 10 beneficiary states

A case study was undertaken to assess the effectiveness of addressing Roma inclusion and empowerment through the local development programmes in Bulgaria, Slovakia and Romania. This is presented in **Error! Reference source not found.**

The evaluation was carried out by Blomeyer & Sanz and CREDA Consulting between May and October 2021.

1.4. Constraints for the evaluation

Projects at early stage of implementation. In view of the slow evolution of the programmes, it was difficult to address the summative aim of the evaluation. For the majority of the programmes, project implementation was at an early stage, especially for projects funded by open calls for proposals. This constrained the assessment of actual performance at project level, which was needed to answer several of the evaluation questions. Therefore, in some areas, the assessment is based more on potential, rather than actual, results.

Number and scope of evaluation questions. The terms of reference specified 17 evaluation questions. Several of these questions individually merit a study of their own. This, together with the wide variety of programme design, the different local contexts, and the different stages of implementation, made it difficult to analyse some topics in depth.

Timing of the evaluation. The start of substantive evaluation activities coincided with the summer vacation period. The limited availability of many stakeholders during this period meant that substantive evaluation activities for most countries had to be deferred from August to September.

Contact information in GrACE.⁸ Many of the contact details in GrACE were out of date and time was consumed in identifying the relevant individual stakeholders in various institutions. For some donor project partners, only the generic institutional contact information was available – the requested personal emails of the people responsible for the partnerships were not provided. This constrained the results of the online survey of 38 donor project partners. The survey was launched on 29 July 2021 and closed on 15 October 2021. Three reminders were sent between late August 2021 and early October 2021. Only 8 donor project partners responded to the survey, i.e. 21% of the surveyed population. Six additional individual interviews were conducted with donor project partners in October 2021, increasing the percentage of participating donor project partners to 37%.

2. Findings

2.1. Strategic rationale: were the programmes designed with a focus on structural change?

The strategic rationale of the different programmes indicates that structural change at the local level was not always the guiding priority in programme design. This is also confirmed by the results frameworks, which in many cases lack any linkage with structural change. Only half of the programmes have a clear focus on consistent systemic change. Other programmes have more fragmented strategic design, motivated mainly by donor and national interests to accommodate previous programmes and projects and streamline management and administration. Such programmes may generate some structural change within specific themes, but with limited synergies between the different themes. There is one example of where combining programmes has delayed implementation of activities in a programme area that was ready to launch.

⁸ Grants Administration and Collaboration Environment

PA10 and Poverty Reduction is one of the five programme areas of the priority sector 'Social Inclusion, Youth Employment and Poverty Reduction'. As outlined in the Blue Book,⁹ ***all programme areas under this sector promote well functioning societies by supporting social inclusion and empowerment of vulnerable groups, equal access to education, employment and health care, and capable and responsible institutions. The added value of this priority sector is its contribution to breaking the cycle of disadvantage by supporting early interventions, by investing in prevention and boosting systemic change, and by encouraging pilot projects in the area of social innovation***.

Guided by this overarching framework, the **PA10 objective** is to *strengthen social and economic cohesion at the local level* through the following areas of support:

- Social and economic development in specific geographic areas;
- Anti-discriminatory activities focusing on groups vulnerable to social and economic exclusion;
- Interventions to increase job prospects and to increase job capacity, especially among the most vulnerable;
- Quality of, and access to, social/ welfare services;
- Networking and policy exchanges between municipalities.

This common objective generated diverse strategic approaches in the design of the 10 local development and poverty reduction programmes. Four interrelated factors shaped this diversity:

- **Development needs for local development as identified by national stakeholders**, including identified niches, as well as the interest to continue investment in issues addressed in the previous Financial Mechanism (2009-2014);
- **Donor interests and concerns** related to specific niches and approach to addressing them, priority attention to certain areas of vulnerability or disadvantaged groups and/ or partnership with international organizations;
- **The Grants' programme development approach** providing flexibility to combine areas of support from different programme areas under one programme, provided they contribute to one programme area objective,¹⁰ as well as reducing the number of programmes with a view to increasing effectiveness and streamlining management and administration;
- **The size of the grants allocated per country** in the current Financial Mechanism (2014-2021)

The review of the concept notes and programme agreements, and feedback from key programme development stakeholders (POs, fund operators, national focal points, DPPs, IPOs and the FMO) **do not provide clear evidence that structural change at the local level was an intentional objective guiding the design of all programmes**. A systemic approach was present as a donor requirement only in some countries (e.g. Poland and Bulgaria, and to some extent in Romania and Slovakia in programme areas related to social inclusion of vulnerable groups). The design of the majority of programmes was guided by a desire to reduce the number of programmes and streamline management and administration. These local development programmes thus served as a 'box' to accommodate diverse strategies and projects.

As a result, there are differing degrees of strategic focus between the ten programmes.

⁹ EEA & Norway Grants (undated), 'Priority sectors and programme areas 2014-2021' [the Blue Book], p27, https://eeagrants.org/sites/default/files/resources/FMO_170774%2BBlue%2BBook%2BFinal%2BUpdate_2017_FIN.pdf

¹⁰ EEA & Norway Grants (undated), 'Priority sectors and programme areas 2014-2021' [the Blue Book], p3, https://eeagrants.org/sites/default/files/resources/FMO_170774%2BBlue%2BBook%2BFinal%2BUpdate_2017_FIN.pdf

Only five programmes (PL, BG, SK, RO and HR) follow a clear **strategic path** with explicit focus on key stakeholders, clear developmental challenge and/ or sector:

- **Focus on key stakeholder.** The programme in Poland is organized around systemic change at the level of local administration in vulnerable small and medium cities.
- **Focus on social inclusion of disadvantaged groups, including empowerment of Roma.** The programmes in Bulgaria, Romania and Slovakia aim to make local service delivery systems more inclusive in order to improve the wellbeing of the most vulnerable groups in the most disadvantaged areas. This is to be achieved through an integrated approach (supporting individuals or communities with a combination of services), multi-sectoral cooperation, anti-discriminatory activities, and empowerment of vulnerable communities, especially Roma.
- **Focus on investment in education to ensure access to future jobs.** The programme in Croatia has a clear thematic focus on education and addresses a specific niche to improve access to the future labour market. The programme aims to increase STEM¹¹ skills by enhancing teaching competences and improving equipment in primary schools. This core focus under PA10 is accompanied by one predefined project (PDP) planned under PA16.

The other five programmes (LV, EE, MT, GR and CY) address multiple areas reflecting the combination of several programmes or diverse projects under the umbrella of local Development. Here the emphasis was on continuation of previous programmes or projects and/ or a desire to streamline management and efficiency.

- **The Latvian programme covers multiple themes** including economic development through support to entrepreneurship in the five regions, inter-municipal cooperation and good governance, a PDP to support integration of asylum seekers and migrants in one community, and two culture open calls.
- **The programme in Estonia covers eight PAs** organized under four outcomes. In practice 'hosts' five programmes from different programme areas (some of which were present in the 2009-2014 Financial Mechanism but with much higher budgets).
- The programmes in **Malta and Greece do not combine different programme areas.** Cyprus has a single PA16 project, but groups diverse projects under PA10. The programme in Greece is most focused, with all three PDPs aiming to support vulnerable individuals or integrate refugees and asylum seekers.¹² In both Malta and Cyprus, the design of the programmes was largely influenced by a desire to streamline management and administration in view of the small programme budgets (with 12 PDPs in Cyprus and 4 in Malta).

Another important aspect of programme design was the combination of different implementation modalities and the extent to which they were intended to generate change at local level. There are two main types of modality:

- **'Top down' modalities – PDPs** that were agreed during the initial negotiations and incorporated into of the memoranda of understanding with the donors.
- **'Bottom up' modalities** – including open calls for proposals and small grants schemes (SGS)
- **Restricted calls for proposals** are a third type of modality which is pre-defined, because it continues support to projects from the previous financial mechanism. The calls for proposals

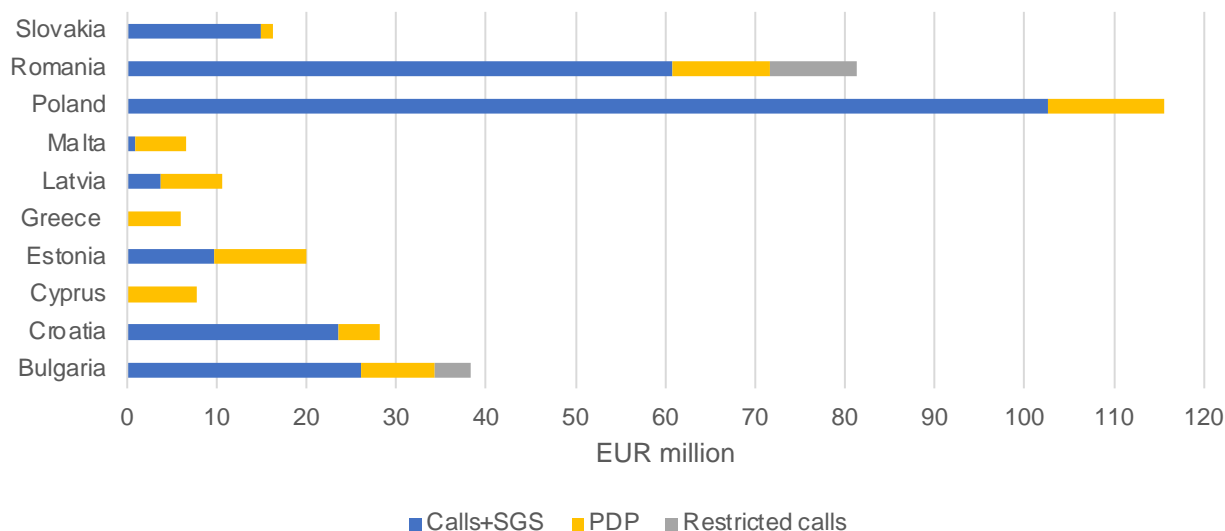
¹¹ Science, Technology, Engineering and Mathematics

¹² Continuation of 2 PDPs from the predecessor of the local development programme GR08 'Local and Regional Initiatives to Reduce National Inequalities and to Promote Social Inclusion' (2009-2014 Financial Mechanism), adding one new PDP on inclusive education for refugees.

are restricted existing PPs (from the previous financial mechanism) to promote further development of the results of initiatives supported by the previous financial mechanism.

Currently, PDPs account for 24% of all funding (including co-financing but excluding programme management). If Poland is excluded from the calculation, the share of funding allocated to PDPs increases to 31%. As illustrated in Figure 1 below, the ratio between PDPs and bottom-up modalities differs between beneficiary states.

Figure 1: Funding by type of modality (million EUR)



Source: Author based on GrACE data

This ratio gives a general indication of the allocation of funding to the local level. The bottom-up modalities (open calls and SGSs) usually support local actions developed by local stakeholders in the priority disadvantaged areas (with the exception of some of the projects funded under the call PA17 Human rights – National implementation (RO)).

Bottom-up modalities account for a higher proportion of funding (excluding management cost) in countries with clearly focused strategies. The proportion of funding allocated to bottom-up modalities is highest in Slovakia (92%) followed by Poland (89%), Croatia (84%), Romania (75%), and Bulgaria (68%). Among these countries Bulgaria has the highest level of funding for small grants, followed by Estonia and Romania. There are also SGSs in Slovakia, Latvia and Malta.

Only Bulgaria and Romania make use of restricted calls. The supported projects include continuation existing/ previous initiatives at the local level.

The locus of action of PDPs is highly diverse. These projects are predefined because the development challenges they address are important, they correspond to national or donor priorities, or the activities and PPs capable of implementing them are unique.

- A large number of PDPs are focused **on policy issues at national level**, for example: new methods or reforms in a given sector (e.g. RO - education, EE- juvenile justice); application of national policy priorities related to reform in certain sectors (EE – health, BG- health in Roma communities); gaps in data on vulnerable populations (BG – Roma inclusion), etc. They do not directly address local structural change, but aim to create an **enabling policy environment that can indirectly influence local effectiveness in addressing the relevant policy area.**

- Another group of PDPs aims to **enhance the capacities of local administrations**. These are usually implemented in partnership with local government associations together with KS,¹³ the Norwegian local government association (BG, PL, RO and MT) and the OECD (PL). PDP2 in Croatia focuses on enhancing local and regional administration capacities to support implementation of the long-term National Development Strategy (together with OECD).
- Other PDPs involve targeted development of local and/or regional capacities to implement sector policies (e.g. EE- health).
- A number of PDPs implement **issue-based action in one municipality or locally nationwide** (e.g. GR, BG, EE, CY, and MT). Some pilot new service (e.g. HR– children with severe disabilities, BG – telemedicine in remote areas).

Some PDPs are implemented as stand-alone initiatives (e.g. GR, CY), while others are linked with SGS (e.g. BG, EE,) or are an integral technical assistance part of the overall programme (PL).

The results frameworks are a third important aspect of the programmes' design which indicate the extent to which the programmes were designed intentionally to contribute to structural change at local level. While some outcomes may involve such change, the review of the outcome level indicators of the 10 programmes shows that only some relate to structural change (primarily in Poland, and to some extent Romania). Some indicators, following the Grants' core indicator guidance,¹⁴ are more output, rather than outcome, indicators. As noted by a number of POs and PPs in different countries, there is an over-emphasis on numbers (e.g. number of people served, number of people with new skills etc.), and much less on the qualitative meaning of these numbers (i.e. how this is changing the situation of target groups and localities for the better). Only some programmes include outcome indicators oriented at qualitative change.¹⁵

Analysis of the results frameworks indicate that structural change at the local level was not a priority in the design of all programmes. Even where programmes or projects have promising elements that could lead to such change, the current formulation of outcomes and corresponding indicators may constrain tracking of emerging structural change within and across programme areas. Monitoring at outcome level would provide a better idea of the Grants' actual contribution to systemic change. The next financial mechanism would benefit from greater emphasis on monitoring local structural change outcomes.

¹³ Norwegian Association of Local and Regional Authorities

¹⁴ FMO (2021), Results Guideline. Rules and Guidance on how to design, monitor and evaluate programmes, manage risks, and report on results. Adopted by the Financial Mechanism Committee on 9 February 2017, updated March 2021.

¹⁵ Some examples include: 'Level of acceptance by majority population of Roma' measured as percentage (in BG, RO and SK), 'Early school leaving from rate in primary and secondary education decreased' (in RO), 'Level of understanding of principles of inclusive education by teaching personal and education professionals' (in RO), 'Level of knowledge of good governance principles' (in RO), 'Share of public and private buildings in selected municipalities with improved energy efficiency (in PL), 'Unemployment rate among graduates in selected municipalities' (in PL), 'Annual number of published vacancies suitable for people with disabilities' (in PL).

2.2. Effectiveness

2.2.1. How likely are the programmes to achieve the planned outcomes, considering the special concerns about each programme?

The 10 local development programmes have planned, in total, 35 ambitious and diverse outcomes which require time to be achieved. Finalisation of the contracting process for 46 of the 47 PDPs and 17 of the 30 different calls and SGS resulting in 115 contracted projects is a positive indication of progress towards achieving the planned outcomes. However, many of the projects are just starting, or are in the early stages of implementation. COVID-related constraints continue to affect implementation. Thus, the most intense work will be concentrated in the remaining 28 months available for project implementation up to 30 April 2024. Many activities are likely to be implemented in a rush and under continuing threat of disruption from the ongoing COVID pandemic. Granting the programmes an extension of at least six to nine months would facilitate better quality implementation and thus increase the likelihood of achieving the planned outcomes.

What needs to be achieved?

Table 2 summarises the main outcomes grouped by thematic focus and share of total funding (excluding programme management costs). Local development outcomes account for the highest allocation of resources (44.1%). This is followed by three groups of outcomes focusing on inclusion of specific marginalized and vulnerable groups, including Roma (36.1%). Two groups covering institutional capacity development account for 16.6% of allocated resources. Access to health services, arts and culture, environment, and gender equality account for 6.3% of total allocated resources.

Table 2: Summary of outcomes grouped by thematic focus and share of total funding (excluding programme management costs)

Group of outcomes by priority theme or target group (in bold) with individual countries' definition of outcomes (in regular typeface)	Eligible expenditure in EUR	% of total funding
Local development Improved access to social and economic services (CY, PA10); Improved quality of life in small and medium-sized Polish municipalities (PL, PA10); Improved quality of life of deprived communities in urban localities (MT, PA10); Improved quality of life of deprived communities in urban localities (PA10); Increased social and economic development in disadvantaged municipalities (BG, PA10); Social and economic development of the least developed districts strengthened (SK, PA10); Strengthened economic development at local and regional level (LV, PA10)	145,753,423	44.1
Enhanced inclusion of vulnerable children and youth Enhanced inclusion of children and youth (BG, PA08); Enhanced social inclusion of children and youth (RO, PA08); Enhanced tools creating equal opportunities in education for pupils with disabilities (HR, PA10); Enhanced wellbeing of children and youth (EE, PA08/PA09); Improved well-being of vulnerable children and youths (MT, PA10)	52,256,731	15.8%
Roma inclusion and empowerment Enhanced inclusion and empowerment of Roma (BG, PA07); Enhanced Roma inclusion and empowerment (RO, PA07); Social inclusion of marginalized Roma communities enhanced (SK, PA07)	33,894,118	10.3%
Vulnerable groups inclusion Increased employment among recently unemployed people (GR, PA10); Increased	33,177,227	10%

Group of outcomes by priority theme or target group (in bold) with individual countries' definition of outcomes (in regular typeface)	Eligible expenditure in EUR	% of total funding
opportunities for integration and social inclusion for vulnerable individuals (GR, PA10); Integration of refugee children in Greek schools improved (GR, PA10); Increased use of social services by disadvantaged groups (RO, PA10)		
Improved capacity and performance of educational institutions Capacity of schools for inclusive education enhanced (SK, PA08); Enhanced STEM skills' and 'Improved skills and competences of teachers and other professionals in primary schools' (HR, PA10)	24,835,068	7.5%
Good governance and rule of law Improved responsiveness of local governance/administration to citizens' needs (PL, PA16); Increased knowledge of central and local government to enact good governance principles (RO, PA16); Integrity and accountability of public administration at local level improved (LV, PA16); Strengthened capacity of businesses on Corporate Social Responsibility (CY, PA16) Enhanced strategic planning at national and regional level (HR, PA16); Increased implementation of the recommendations by the European Court of Human Rights issued after 2015 (RO, PA17)	19,798,196	6%
Access to health services Improved access to and quality of health services (MT, PA10); Improved access to health care (CY, PA10); Improved prevention and reduced inequalities in health (EE, PA06)	9,061,059	2.7%
Arts and culture Access to professional contemporary arts and culture improved in all regions (LV, PA14); Cultural Heritage Management enhanced (MT, PA10); Historic town centres revitalised through heritage-based local development (EE, PA14)	8,525,530	2.6%
Environment Enhanced capacity to preserve the environment and improve air quality (CY, PA10)	2,232,353	0.7%
Gender equality Reduced domestic and gender-based violence and gender inequalities (EE, PA22, PA4)	1,114,676	0.3%
Total	330,648,381	100%

The review of the results frameworks shows that **some of the outcomes have broadly formulated objectives that require longer-term efforts to be achieved.**¹⁶ Such broad outcomes also require a large array of indicators to be tracked over time (continuing after project completion). Even where programmes have well formulated results frameworks pointing to structural change (e.g. Poland), more time will be needed to achieve the planned changes than is available within the timeframe of the current financial mechanism.

Some outcomes are much more concrete and measurable (e.g. access to health care or other service(s) increased), **or are formulated as short term, immediate effects** (e.g. increased skills, increased tools, and increased competences of certain stakeholders). While they will be achievable as a direct result of the relevant interventions, it is not always clear how these developments will lead to systemic improvement in the situation of vulnerable groups.

¹⁶ For example, wellbeing of towns, cities, or of certain group (e.g. children) improved, Roma inclusion and empowerment enhanced, economic development at local and regional levels enhanced.

Implementation status of programmes and progress towards outcomes

The 10 local development programmes are progressing well in launching and finalizing 63 of the planned 77 actions (PDPs, open calls, restricted calls and SGS). 161 have been contracted projects,¹⁷ with much contracting activity in 2021 – during the course of this evaluation 64 new projects were contracted.

Table 3 (below) outlines the progress of the individual programmes in the 10 countries (starting date, months remaining for implementation until 30 April 2024 by when all projects must be finished, number of contracted projects, percentage of the overall budget contracted, and the status of the planned actions.

¹⁷ Based on data from GrACE as of 14.12.2021

Midterm evaluation of local development programmes (2014-2021 Financial Mechanisms)

Table 3: Implementation status of the local development programmes

Country	Implementation time (until 30.04.2024)			Budget eligible for project support (with co-financing)		Planned actions		Contracted projects			Remaining actions
	Starting date	Total months	Elapsed time	Total budget excluding management cost (EUR)	Contracted rate by 14.12.2021	PDP	Calls	PDPs	Calls	Total	
BG	23.5.2018	71	61%	38,355,234	49.25 %	6	5	6	8	14	2 open calls under selection; 1 SGS not announced
HR	16.9.2020	43	35%	28,147,059	12.5 %	3	2	1	0	1	2 PDPs to be signed; 1 open call and 1 SGS under selection
CY	29.6.2020	46	39%	7,729,353	100 %	12		12	0	12	
EE	13.9.2019	55	49%	20,055,558	80.46 %	8	8	8	28	36	1 call under selection, 1 published
GR	21.6.2019	58	52%	5,968,000	100 %	3		3	0	3	
LV	21.5.2020	47	40%	10,641,177	64.9 %	7	3	7	0	7	2 calls under selection, 1 not published
MT	5.6.2018	70	60%	6,563,765	88.2 %	4	1	4	3	7	2nd round of SGS under selection
PL	25.3.2019	61	54%	115,647,059	11.24 %	1	1	1	0	1	2nd stage open call: 29 selected projects to be contracted
RO	19.6.2018	70	60%	81,294,117	81.22 %	3	7	3	64	67	2nd call (PA7) - 12 selected projects to be contracted; SGS2 (3d round) and SGS1 under selection.
SK	13.11.2019	53	47%	16,247,059	60.64 %	1	3	1	12	13	1 SGS under selection
Total				330,648,381		48	30	46	115	161	

The 10 local development programmes are of different durations and at a different stage of implementation. **Slow programme development and approval have reduced the time available for implementation.** The time between the signing of the memoranda of understanding and programme agreements varied between 15 and 39 months.¹⁸

Several national focal points and POs noted the excessively long time taken for the development of the concept notes, which involved many revisions. Some even question the need for concept notes, which duplicate the content of programme agreements. However, other key actors consider that concept notes are important as they provide the guiding strategic rationale – they consider that a joint concept note/ programme agreement would be a more efficient solution. The slow programme development process was also noted in the recent assessment of the programme development approach.¹⁹

Programme progress to date is also influenced by other factors, such as the complexity of design, amount of funding, the capacity of the PO/ fund operator, and the time taken to reach agreement with the FMO and donors' secretariat on programme design. Disruption caused by the ongoing **COVID-19 pandemic**, which emerged in Europe in early 2020, has had the most serious impact on progress.

All of the envisaged 47 PDPs have been contracted except for two PDPs in Croatia. The project contract for one of these (PDP2) is expected to be signed in the near future. The other (PDP3) is in the process of development and approval.²⁰

Most of the contracted PDPs (34 out of 46) are in the early stages of implementation, with 14 having started in 2021. Only 12 PDPs were contracted in 2018 and 2019²¹ and are well advanced. Only PDP2 in Greece.²²

For six programmes, 10 to 13 months elapsed between the start of the programme and the contracting of the first (HR, SK, BG, LV, RO and GR). The process was much faster in CY, PL, and MT, where the first projects were contracted between one and four months after the start of the programme. In some cases, delays were due to difficulty in reconciling the IPOs' internal rules and the Grants' regulations.²³ In other cases it was difficult to reach agreement between the PO/ fund operator and the FMO on the quality of the proposals.

Implementation of bottom-up approaches is much more complicated. In total, the 10 programmes have planned 30 diverse calls for proposals (18 open calls, 10 SGS of which some have several rounds, and two restricted calls).

As of 14 December 2021, 17 of the 30 calls for proposals and SGS have been finalized and 115 project have been contracted with a total value of EUR 81,428,887. The number value of contracted projects is highest in Romania (64 projects, EUR 55,359,132), followed by Estonia with 28 projects contracted with a value of EUR 5,809,945. These two countries have the highest number of bottom-up actions.

In Estonia, from four to five months elapsed between the deadline for the submission of proposals and decision on the selection of projects to be funded. However, funding allocated to calls and awarded to individual projects was limited, and relatively few proposals were received (between two and 29 depending

¹⁸ 15 to 17 months for PL, CY, GR, MT and BG; 20 to 29 months for RO, HR and LV; and 36 to 39 months for SK and EE.

¹⁹ Centre for Strategy and Evaluation Services, Assessment of the Programme Development Approach (November 2020), <https://eeagrants.org/sites/default/files/resources/Assessment%20of%20the%20Programme%20Development%20Approach.pdf>

²⁰ PDP3, on seismically vulnerable areas in Croatia, will be added with an allocation of approximately EUR 1.8 M from the reserve of the Norway Financial Mechanism

²¹ Four PDPs in MT, one in EE, one in GR, one in PL and two in RO)

²² The project is managed by the Athens Solidarity Centre in Greece. The project received additional funding from the reserve funds (€500 000) and will again operate with EEA Grants funding in 2022

²³ This affected all projects where the OECD is the IPO, and one project (restricted call) in Romania where UNICEF is the PP

on the call). In Romania, it took between eight and nine months to evaluate proposals and reach a decision on which projects were to be funded. This was due to the greater complexity of the calls and larger number of proposals received, with more than 100 proposals submitted in response to some calls.

In some cases, the **poor design of calls and selection criteria slowed down the selection process** – for example, the open call for the selection of new youth centres in Bulgaria took more than one year because of this. In other cases, the process was slow due to the **limited quality of proposal appraisal services** – for example, the finalization of the call ‘Inclusive Education’ (PA8) in Romania took nearly 18 months.

Other challenges were linked to **low quality of the proposals**.

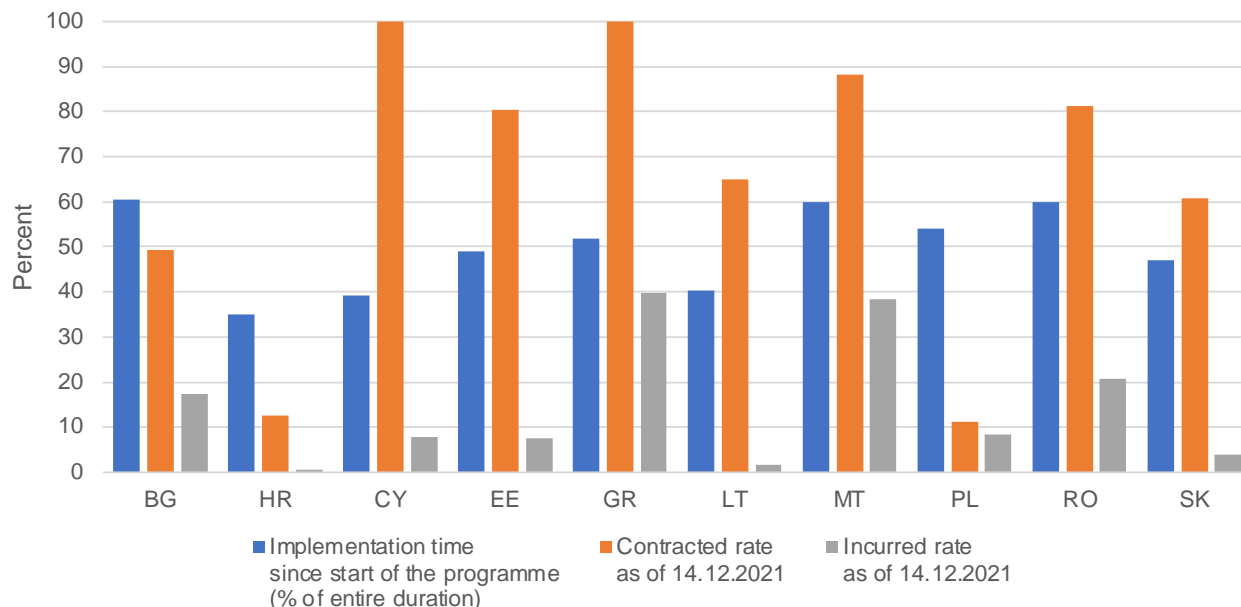
For some calls, especially related to Roma inclusion and empowerment, it was **not possible to allocate all funding, as not enough proposals of the required quality were received** – this provided evidence of a serious gap in the capacity of local stakeholders to develop meaningful initiatives. This led to the launch of a second round of the relevant call in Romania under PA7 with simplified guidelines – additional projects were selected and are in the process of being contracted.

Several calls are still in the process of appraisal or final project selection or contracting and this poses a risk to the achievement outcomes:

- **In Poland** the finalization of the second stage of the open call is significantly delayed. Firstly, due to the COVID-19 pandemic, the PDP capacity building activities with applicants were slightly delayed and the application deadline was extended. Secondly, the selection of proposals took eight months instead of four to five months due to the complexity of applications. Thirdly, the process of finalizing the selection of projects was delayed by the PO’s decision to increase the number of grants to 29 from the initially planned 15. As a result, all project budgets had to be reduced to a maximum of approximately EUR 3 million. The delay in contracting the projects is a risk to the programme, as this call accounts for the majority of the programme’s funding in Poland.
- **In Bulgaria** the SGS (PA10) has not yet been launched and two open calls are initial stages of project selection: the open call for early child education (PA8) and the open call Roma integrated measures (PA7). These delays present a significant risk as the open calls are expected to achieve important programme outcomes. The calls target the most marginalized communities with a high proportion of Roma population, and it is possible that there will not be enough compliant proposals due to the limited capacity of local actors to meet the requirement of the calls.
- **In Croatia**, the open call and SGS account for 83.6% of the programme’s eligible expenses. Project appraisals started in August 2021. There were many proposals responding to the open call ‘Stem Skills’ and the amount of funding requested was four to six times greater than the available funding. Nevertheless, the PO anticipates that the selection process will be finalized by the end of 2021 and that the projects will be contracted in early 2022.
- **In Estonia**, the PO noted that complications may arise in relation to the open call ‘Smart Youth Work Solutions’. This is open to businesses and concerns about state aid may limit the number of applications. The PO was in the process of consulting donors about this to mitigate the risk and ensure utilisation of available funding.

The contracting rate suggests that the programmes are moving towards delivery of planned outputs. This is summarised in Figure 2 below, which shows the percentage of programme implementation time²⁴ that has elapsed, the contracted rate (including management costs), and the incurred rate.²⁵

Figure 2: Implementation time elapsed vs. contracted rates and incurred rates (%)



Source: author based on GrACE data

Nevertheless, Figure 2 also shows that the **payment rate in most countries is significantly lower than the contracting rate**. In practice, the rate of payments to projects is even lower than indicated here, as GrACE data includes payments for management costs. Thus the majority of projects are in the early stages of implementation and **the bulk of project activities will be concentrated in the 28 months remaining for project implementation** (until 30 April 2021).

While all POs and national focal points remained positive about achieving the planned outcomes, some recognised that activities may be rushed. The ongoing COVID continues to pose serious challenges, especially in view of deteriorated situation of the most vulnerable groups. One national focal point noted that preventing the situation from getting worse could be considered a success.

The evaluators consider that implementation in a rush to complete project activities by 30 April 2024, (the final date for eligible project expenses) risks undermining the quality of outputs and thus achievement of the planned outcomes, especially in view of the complexity of the processes needed to generate structural change in the areas of fighting social exclusion, discrimination and poverty at the local level. It should also be noted that the ongoing COVID pandemic may cause new disruptions and thus additional delays to project implementation. In view of this, the evaluators suggest that **a time extension of between six months and one year would facilitate the quality of outputs and achievement of outcomes**.

²⁴ Here, the time available for programme implementation refers to the time available for the implementation of projects from the starting date for eligible costs. The time available for the completion of programme management tasks is several months longer.

²⁵ The incurred rate is the actual expenditure incurred as a percentage of total programme eligible costs. The contracted rate is the share of programme eligible expenditures available to contracted projects.

Meeting special Donors' concerns as a factor for progress towards outcomes

Addressing the donors' special concerns in the memoranda of understanding was mandatory. All concept notes outline how it planned to address them and this is also covered in the POs' annual reports. The special concerns cover various issues including programme objectives, specific focus, the distribution of funding distribution between hard and soft measures, programme partnerships, etc.

The donors' concerns helped to focus the programmes on specific disadvantaged regions or vulnerable groups or national minorities. The need for a systemic approach was emphasised, for example in the memoranda of understanding with Poland, Bulgaria, Romania and Slovakia.

In some cases, negotiations on the incorporation of the donors' concerns into programme design prolonged the concept note development and approval and delayed the signing of programme agreements. As noted above, this reduced the time available for substantive programme implementation.

Pre-defined projects in partnership with IPOs such as the Council of Europe and OECD, or with specific donor partners, have helped to enhance project design and implementation, but project contracting was in some cases delayed by the mismatch between the Grants' regulations and IPOs' internal regulations.

In some cases, the donor's recommendations to include specific elements in programmes have also contributed to delays. For example, the restricted EUR 20 million call under PA10 in Romania which merged the Poverty Reduction programme of the previous financial mechanism with seven PDPs. Only three of the seven invited PPs were able to submit quality proposals, and the other PPs had to drop after trying for a long time to improve their proposals.

2.2.2. To what extent are the combinations of different programme areas under one programme proving to be effective? What synergies/ complementarities exist, if any, taking into account the respective country context?

The reasoning behind combining programme areas, and the clarity of programme focus, have a significant influence on the extent of synergies between programme areas combined in a single programme. Synergies are more evident where there is a clear focus on specific challenges. However, in some countries two or more programme areas are combined in a single programme, primarily to reduce the number of programmes and streamline overall programme management and administration. These programmes tend to lack a clear common focus, synergies between programme areas are weak or non-existent, and resources are spread too thinly across themes. Moreover, implementation of activities under different programme areas may be unnecessarily delayed by combining unrelated programme areas in a single programme.

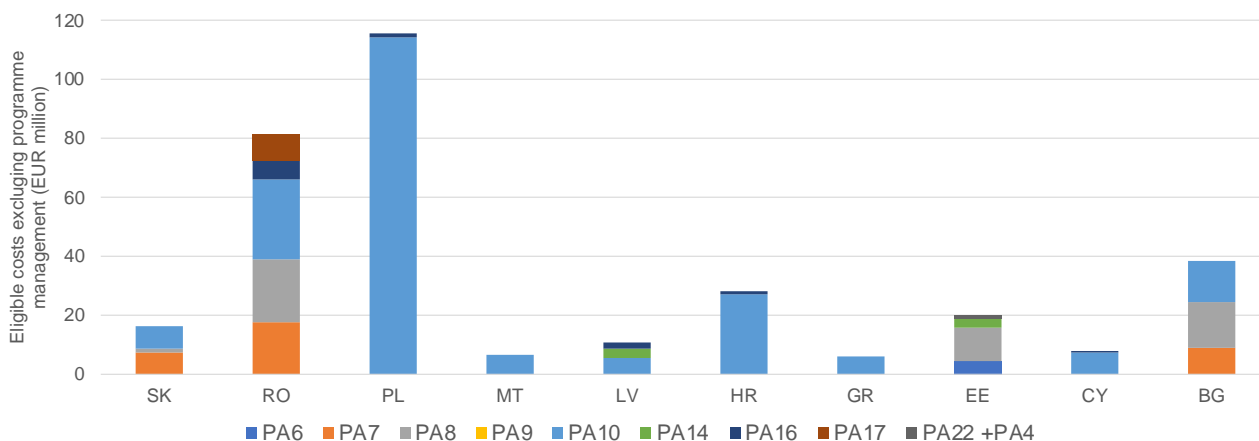
The local development programmes cover 10 programme areas in four priority sectors as defined in the 'Blue book':

- Priority Sector 'Social Inclusion, Youth Employment and Poverty Reduction':
 - PA10 'and Poverty Reduction';
 - PA06 'European Public Health Challenges';
 - PA07 Roma Inclusion and Empowerment;
 - PA08 'Children and Youth at Risk';
 - PA09 'Youth Participation in the Labour Market', (PA10);
- Priority Sector 'Culture, Civil Society, Good Governance and Fundamental Rights and Freedoms':
 - PA14 'Cultural Entrepreneurship, Cultural Heritage and Cultural Cooperation';
 - PA16 Good Governance, Accountable institutions, Transparency;
 - PA17 Human Rights – National Implementation;

- Priority Sector ‘Justice Affairs and Home Affairs’:
 - PA22 ‘Domestic and Gender-based Violence’
- Priority Sector: ‘Innovation, Research, Education and Competitiveness’:
 - PA04 ‘Work-life Balance’

Figure 3 below shows the combinations of these programme areas in each of the local programmes. Further details are provided in Table 5 (Annex 5).

Figure 3: Combinations of programme areas in the local development programmes – eligible costs (EUR) excluding programme management



Source: Author based on GrACE data

The local development programme in Estonia combines eight PAs from all four priority sectors. In Romania, three core PAs (PA10, PA7 and PA8) focusing on social inclusion are combined with two PDPs under PA16 (requested by the donors), and open call²⁶ under PA17 (requested by the national focal point²⁷). The programmes in Bulgaria and Slovakia combined PA10 with PA7 and PA8 following their focus on inclusion of vulnerable groups. The programme in Latvia combined PA10 with PA14 and PA16, each with a different focus. In Poland, Croatia and Cyprus PA10 is combined only with PA16, and in Greece and Malta all outcomes are under PA10.

PA10 has the highest allocation of resources, accounting for 65% of the total budget for the 10 countries. It accounts for 100% of the budget in Greece and Malta, 99% in Poland, 96% in Croatia and Cyprus, 51% in Latvia, 47% in Slovakia, 36% in Bulgaria, and 33% in Romania. There is no budget allocation for PA10 in Estonia, as this is considered a crosscutting theme covered by other programme areas (likewise PA16).

PA8 has the next highest allocation of the budget. It accounts for 15% of the total allocation for the 10 countries, but is limited to Bulgaria, Estonia, Romania and Slovakia. PA7 accounts for 10% of the total allocation for the 10 countries, and is limited to Bulgaria, Romania and Slovakia.

The logic of including certain thematic outcomes under PA10 is unclear, as they appear to be a better fit with other programme areas. For example, in Bulgaria, PDPs supported under PA10 in Bulgaria relating to public health would be a better fit for PA6 ‘European Public Health Challenges’, which is not included in

²⁶ Open call for the national implementation of human rights.

²⁷ The main reason as explained by the national focal point is that the Romanian Social Development Fund as PO of the Local Development programme had better capacities to handle the human rights open call in an effective way due to its experience with grants to NGOs, as well as work with both NGOs and public institutions, as compared to the PO of Justice Programme).

the programme in Bulgaria. In Croatia, the focus of PA10 on education, in particular on primary pupils in disadvantaged regions, including vulnerable groups, could easily fit under PA8 'Children and Youth at Risk', which is not included in the Croatian local development programme. This indicates some overlap between programme areas in practice, and that PA10 itself has been used as a 'box' to group diverse, and not always related, PDPs.

Combining different programme areas under the local development programmes **makes sense when activities under different programme areas are addressing a clear, common strategic focus**. However, it **makes less sense (from the perspective of programme effectiveness) when the justification is primarily to streamline programme administration** – indeed, this may constrain overall effectiveness.

Combining programme areas with lack of clear focus and primarily to reduce the number of programmes and streamline programme management and administration does not promote synergies and is not effective.

In Estonia, the local development programme combines multiple programme areas without a clear common focus. Resources are spread too thinly, limiting the impact in any of these areas. This also limits the opportunity for creating synergies between different initiatives within the programme. The programme **includes 80 indicators**.²⁸ Presumably, tracking these 80 indicators must consume a lot of resources (which has implications for programme efficiency), or perhaps fewer resources are dedicated to tracking the indicators than is ideal (which has implications for the quality of monitoring). Ideally, the indicators would have been rationalised at the design stage, but this does not seem to have happened, which **tends to emphasise the absence of a strategic approach to the programme**. National stakeholders consider that overall effectiveness would have been greater if the programme areas had been divided between several separate programmes, each with a stronger focus.

The recent assessment of the Grants programme development approach recommends focusing future programmes on fewer programme areas with a narrower focus to make the programme development process more efficient.²⁹ It recommends not to develop programmes covering more than one programme area simply to reduce the total number of programmes.

In theory there is a logical connection between PA10 and PA16 in Latvia, although there appear to be no practical synergies. Culture (PA14) is considered to be relevant to, and important for, local development. However, in practice there are no synergies between PA14 and the other two programme areas and one key actor reports that synergies involving PA14 have not been considered at any stage, including the development of the concept note and programme agreement. There is limited knowledge about PA14 amongst actors involved in PA10 and PA16 and vice versa.

Combining of programme areas such as PA7, PA8 and PA10 around a clear strategic focus on social inclusion is effective and enables more synergies to be generated.

Combining PA10, PA7 and PA8 has proved to be effective and synergetic in Romania and Slovakia, and most recently in Bulgaria where the programme was significantly refocused in early 2021. The programmes in these countries are guided by the overarching strategic framework of the same priority sector, 'Social Inclusion, Youth Employment and Poverty Reduction', which focuses on overcoming social exclusion and poverty and boosting empowerment of vulnerable groups, as well as systemic change to break the cycle of disadvantage .

²⁸ In Estonia the programme includes 28 outcome level indicators and 52 output level indicators.

²⁹ Centre for Strategy & Evaluation Services. (2020). Assessment of the Programme Development Approach: Final Report, p57, <https://eeagrants.org/resources/assessment-programme-development-approach>

The three programme areas address this through different entry points, including vulnerable youth, vulnerable minorities, or vulnerable territories. Poverty and exclusion of vulnerable regions and groups is a structural issue resulting from multiple mutually reinforcing challenges. Focusing on children and youth reduces the continuation of exclusion and poverty across generations. This requires an integrated approach with measures to address multiple challenges and involving diverse stakeholders, including service providers, local administrations, civil society, and the disadvantaged communities themselves.

Interviewed stakeholders in the three countries all consider that this consolidated programme approach is much more effective, than separate programmes each addressing specific programme areas. National stakeholders, especially in Bulgaria and Slovakia consider that the local development programmes provide a unique opportunity to overcome working in 'sector silos' by creating a new collaborative space across sectors to address complex developmental challenges at the local level. This integrated approach, involving multi-stakeholder, multi-level partnerships is new for Bulgaria and Slovakia, where most of the programmes implemented under the European Structural Funds have reinforced the culture of sectoral rather than cross-sectoral work.

PA16 'Good Governance, Accountable institutions, Transparency' promotes systemic change needed to achieve local development and poverty reduction objectives, especially if activities address a clear, common programme focus.

The focus of PA16 on public administration integrity and accountability is a natural fit with PA10 when applied to the local level. It can:

- Improve the delivery, accessibility and quality of public services at local level;
- Promote the inclusiveness and accountability of local governments, including cooperation with local civil society groups and representatives (including vulnerable groups);
- Promote the efficiency and effectiveness of local governance systems.

The local development programme in Poland stands out as an example of the strategic synergy between PA10 and PA16.

The objectives of PA16 are integral to the achievement of PA10 objectives. Their activities are mutually supportive and interdependent. PA10 provides a concrete opportunity to apply and operationalise PA16 tools and approaches assisting participatory and collaborative local strategy development. Synergies between the two programme areas are promoted by the fact that there is a single PDP and a single PP – the Association of Polish Cities. However, KS notes that in order to account separately to the two donors, it was necessary to keep a clear distinction between the two financial mechanisms. This meant it could not work with the OECD on PA16 to the extent expected and potential synergies were lost.

In other countries PA16 activities tend to be more a standalone, with limited synergies with other parts of the programme. They mainly aim to enhance the general governance capacities of local authorities and consist primarily of predefined projects of the relevant local governance associations in partnership with KS.

For example in Romania there are limited synergies between PA16 activities, and PA7, PA8, and PA10 which complement each other well. Increasing the general good governance capacities of the Associations of Communes in Romania (ACoR) is important for the overall focus of the programme on disadvantaged areas, but it is not specifically linked with its main priority on the social inclusion of the most vulnerable groups, including Roma. Some of ACoR's member communes have limited capacities to address the multiple challenges faced by the most marginalised groups. Nevertheless, ACoR's participation as a PP has helped to raise awareness amongst its members, and this encouraged some communes to get involved in partnerships applying to the PA10 call, which in turn has increased the programme's outreach and accessibility.

In Croatia, the PDP under PA16 will enhance the capacities of regions and municipalities to implement the long term National Development Strategy. OECD's involvement as an IPO is also important in view of the country's forthcoming membership in the organization. However, at this stage the PDP does not have a direct link with the core focus of the programme, STEM education, but there could be a link if STEM is included as a national priority in the Long Term Development Strategy.

2.2.3. To what extent are the results likely to be inclusive in the sense of ensuring fair distribution of effects across diverse groups of population?

The focus on territorial vulnerability and work with specific vulnerable groups are the main factors ensuring diverse groups will benefit from programme results. In particular, the open calls and SGSs specifically require that supported projects will benefit diverse vulnerable groups. Bottom-up modalities (open calls and SGSs) are more likely to ensure diverse vulnerable groups benefit from the programmes, as these approaches allow for implementation of initiatives that are directly relevant to the needs of these groups, especially if supported projects are designed and implemented with their active involvement.

The overarching aim of local development programmes is to combat poverty by promoting inclusive local development of disadvantaged regions and social inclusion of vulnerable groups. This was addressed by overall programme design and the selected delivery modalities.

Table 2 above shows that approximately 36% of total funding addresses services for, or inclusion of, disadvantaged groups. Another 44% of funding addresses local development, including in disadvantaged regions and areas.

The focus on territorial vulnerability and work with specific vulnerable groups help to ensure that diverse groups will benefit from programme results. This is also reflected in the programmes' delivery mechanisms. For example, some PDPs address the provision of specific services, or the development of an enabling environment for improved provision of services for vulnerable groups and better development opportunities in disadvantaged regions. All open calls have specific requirements to ensure that supported projects will benefit diverse vulnerable groups.

Bottom-up modalities (open calls and SGSs) are more likely to ensure diverse vulnerable groups benefit from the programmes, as these approaches allow for implementation of initiatives that are directly relevant to the needs of these groups, especially if supported projects are designed and implemented with their active involvement.

This is confirmed by findings from the assessment of the different programmes. For example:

- The Polish programme works only with small and medium urban municipalities with serious socio-economic problems.³⁰ 54 municipalities selected in the first call benefited from significant support in developing new/ updated local development strategies and actions plans. 29 of these municipalities have subsequently been awarded grants to support implementation of their action plans. It is anticipated that the entire population of the participating municipalities, including vulnerable groups will benefit from infrastructure and/ or soft measures envisaged in local development strategies and action plans. This includes, for example, improved accessibility for people with disabilities.
- In Estonia, priority is given to regions with higher socio-economic deprivation or with Russian speaking populations. These are supported with measures for developing the social and health sector (both PDPs and some of the open calls). The programme also has several calls and PDPs that target specific

³⁰ 255 were identified by the Polish Academy of Science as being particularly vulnerable.

vulnerable groups. The large share of soft measures in the programme ensures that those groups will be directly involved in activities, or will benefit from improved services.

- In Croatia, the open calls are aimed at all regions, but the participation of the most disadvantaged regions is encouraged by the allocation of additional points in the project appraisal process. Children with special needs are also prioritised, and one of the PDPs specifically aims to improve the situation of children with severe disabilities, who cannot attend regular school.
- A few programmes that are comprised exclusively of PDPs, have a clear focus on working with vulnerable groups (all projects in Greece and some in Cyprus and in Malta).
- Three programmes focusing on social inclusion, including Roma specifically. They combine mainstream approaches³¹ and measures specifically targeting Roma inclusion with a focus on most vulnerable settlements and communities. The inclusion of targeted disadvantaged groups, especially Roma, are mandatory criteria for the selection of projects under all calls in Romania and Slovakia and in the majority of those in Bulgaria.

2.2.4. How effective have the mandatory local partnerships at the project level been (where applicable) in helping the project promoters deliver results?

It is still too early to assess the effectiveness of mandatory partnerships. With the exception of Romania, the countries requiring such partnerships have not yet finalised selection or contracting of projects. Multi-stakeholder partnerships in Romania show promising results, but here, too, most projects are at an early stage of implementation, or have only recently been contracted. Partnerships between local authorities and civil society have great potential to generate structural change at the local level by stimulating a new culture of collaborative problem solving, which is needed to address the complex problems of poverty and social exclusion affecting Roma and other vulnerable groups.

Only five local development programmes require partnerships as a condition of eligibility to participate in the open calls (BG, RO, SK, HR and LV). In Bulgaria, Romania and Slovakia, partnership is a consistent element of the approach used to address social inclusion of vulnerable groups. This requires collaboration between different local institutions, local authorities and civil society, as well as between different levels of government (communes and counties, or across communes) especially in Romania.³² In Croatia the partnership requirement relates to a specific component of an open call³³ and in Latvia the requirement relates to a specific type of PP under the PA14 open call.³⁴

In other countries with open calls, partnership is encouraged by extra points in the assessment. For example, in Poland, the qualitative criteria for the two stage call award up to 10 points depending on the evidence for the added value of proposed partnerships between different sectors during the design and future implementation the projects. It was reported that most cities applying for grants did include partnerships with different levels of local government such as *poviats* and *voivodships*, and citizens were engaged in the development strategies. However, the OECD suggests that in some municipalities, there needs to be a more

³¹ The mainstream approaches address development challenges related to health, and education and youth, with a special focus on accessibility of services to the most vulnerable, including Roma.

³² In Romania call under PA10 (social services) such partnerships include different level of territorial units – at micro and regional level (in disadvantaged communes, rural localities, municipalities and counties with high percentage of Roma and other vulnerable groups) and respectively representatives of local authorities and/or of public institutions providing services to the relevant vulnerable groups targeted by the project.

³³ In Croatia Component B (Regional Science Centers) of the open call require partnerships between primary schools that will host the RSCs and the county. Additional points are awarded if the partnership is wider and includes more local government units.

³⁴ In Latvia, if local governments apply as PP under the call (PA14) they have to include a cultural organization as mandatory partners.

structured approach to stakeholder engagement. OECD recommendations about engaging with minorities were accepted by some municipalities but not by all.

It is still too early to assess the effectiveness of mandatory local partnerships, as in all the countries except Romania, projects are still under selection or have only just been contracted. The majority of the sample of 30 projects reviewed in Romania provide promising examples of partnership between at least one to five non-governmental organisations (NGO) and one to six public institutions/ administrations (depending on the call and the project). The majority of the projects work in more than one disadvantaged location, and have multiple partners to ensure that projects reach the target groups in the different locations. However, these projects are also at an early stage of implementation or are just starting.

The local multi stakeholder partnerships in Romania demonstrate much potential to:

- **Bring new skills and practices**, transfer experience, and mutual learning for innovation;
- **Assist with practical problem solving.** Several PPs (NGOs) noted that partnerships with local public institutions and authorities have already helped to resolve emerging bottlenecks related to procurement, infrastructure etc., and this has helped to keep projects on track;
- **Ensure the sustainability of results.** The political commitment and capacity of local authorities and institutions are vital for sustainability, so too is the level of trust of local communities in these institutions and their capacity to participate in decisions affecting their lives. Partnership between NGOs (the majority of PPs are NGOs) and local public institutions promotes engagement of these institutions, orientates service provision to better meet the needs of vulnerable groups, and promotes a culture of openness to the participation of these groups in decision making.

Nevertheless, there are some challenges around the development of effective partnerships:

- Developing quality partnerships has been a challenge in Romania, Bulgaria, and Slovakia due to negative experiences with previous, predominantly formal, project partnerships, especially in the context of the Structural Funds.;
- Marginalised communities often have very little trust in local authorities and it takes time to overcome this;
- The long gap between reaching the agreement to work together (the application) and actual start of this work (the approval and contract of the project. PPs reported that, due to the long time that elapsed between agreeing to work together and the contracting of projects, they had to re-establish the commitment of partners to cooperate effectively. This was made harder by the emergence of the COVID pandemic;
- New ways of collaborative working had to be established in view of the emergence of the COVID pandemic;
- In some cases, local authorities lack experience of project implementation and this constrains progress and other partners with more experience (NGOs or local authority) have had to assist to keep projects on track.

Partnerships provide a strong foundation for the development of a collaborative culture addressing the multiple disadvantages faced by vulnerable communities and regions. However, making partnerships mandatory, or encouraging them with additional points during the evaluation of proposals, does not mean that partnerships will necessarily be effective. Partnerships should mobilise diverse expertise and experience, and capacity building is often required to solve problems in a collaborative way. It also takes time to build trust between project partners, especially between local authorities and disadvantaged communities.

2.2.5. In Bulgaria, Romania, and Slovakia, to what extent is Roma inclusion sufficiently and effectively addressed through the local development programmes?

The investment of approximately EUR 34 million in measures for Roma inclusion in Bulgaria, Romania, and Slovakia through the local development programmes is far too little to make a direct difference to the delivery of services to users, which is the main focus of the programmes in these countries. Nevertheless, the programmes do include three important socially innovative approaches to Roma inclusion which are missing from EU-funded programmes: (a) the emphasis on empowerment of Roma; (b) partnerships bring local governments and other public institutions together with Roma civil society; and (c) incorporation of mandatory antidiscrimination measures in Roma inclusion interventions. The three programmes show much promise in this direction, but there are also serious gaps: local authorities lack capacity and willingness to apply social innovation; Roma communities lack capacity to engage effectively in such innovations; and smaller Roma NGOs and municipalities lack capacity to access available funding. Sustained structural change requires that these gaps are effectively addressed.

Due to the scope and complexity of this question, a more detailed analysis and lessons for future programming are presented in a **case study in Error! Reference source not found.**

The strategic framework for advancing Roma inclusion and empowerment (PA7) entails three main interlinked aspects: **empowering Roma, inclusive institutions** and policies, and targeting the majority to improve their **attitudes towards Roma**. Each of these areas has multiple dimensions that require capacities and processes to facilitate effective interactions.

The PA7, Roma Inclusion and Empowerment, is integrated within the three programmes' overall focus on **social inclusion of vulnerable groups and combating poverty in disadvantaged areas and regions**. This includes prioritisation of improved quality and accessibility of services to Roma through a combination of targeted measures **under PA7** (with a total allocation of approximately EUR 34 million in the three countries) and mainstream measures, under PA10 'Local Development' and PA8 'Children and Youth at Risk' where Roma are usually part of broader vulnerable groups.

The resources invested by the Grants in Roma inclusion through the local development programmes are too limited to make a direct difference to service provision through projects themselves. Rather, the effectiveness of the programmes in this area depends on the **socially innovative approaches** used by projects to address the **complex issues limiting Roma inclusion**. These approaches can **promote systemic change** in the way local systems address these issues.

Effectiveness depends also on other factors, such as:

- The availability of data on the situation of Roma and the territorial distribution of challenges;
- Approaches adapted to the specific needs of Roma groups in different localities;
- An institution at central level that is empowered to coordinate the Roma-related efforts of individual line ministries, and has the capacity to do this.

The three countries with a Roma-specific focus in their local development programmes meet these requirements to different degrees.

POs and national focal points in the three countries view '**integrated approach**' as a combination of interventions in at least two of four thematic areas (education, health, employment and housing). In Bulgaria and Slovakia the Grants-funded projects are the first to implement this understanding of integrated approach under one programme and this is a significant innovation compared with Structural Funds. In Romania, the programme brings new services to communes which have no capacities to access available EU funding.

Another key social innovation of EEA funding compared with Structural Funds is the **emphasis on empowerment of Roma at individual and community level, as well as on partnership and networking**, which bring together local governments, local institutions and Roma and pro-Roma NGOs. Some of the projects supported by the open call in Romania are applying an innovative approach to Roma empowerment at community level by creating community initiative groups thus increasing the capacity of Roma communities to interact with local authorities and institutions (see **Error! Reference source not found.** for examples). The SGS in Slovakia supports small grassroots Roma organisations to promote self-reliance and involvement of community members in solving community problems identified by the community itself.

Finally, all programmes envisage **mandatory antidiscrimination measures as part of the Roma inclusion interventions** (and in the case of Romania and Slovakia of all interventions).

The implementation of Roma inclusion measures by the local development programmes so far revealed both successes and serious capacity gaps at the local level:

- **Municipalities and local institutions have limited capacities to work in real partnership with stakeholders are low.** In practice, partnerships still exist primarily to meet funding eligibility requirements, rather than for effective collaboration with Roma stakeholders;
- A number of municipalities (especially in Bulgaria and in Romania) are reluctant to submit proposals for Roma related projects even if they have large Roma communities, because mayors tend to perceive Roma inclusion as unpopular or even 'controversial' among constituents more generally;
- There is a major **need to facilitate effective Roma community in decision making, which is currently lacking.**

A more consistent focus on several important elements in future programming would increase the effectiveness of investments in Roma inclusion and empowerment. Some of these elements are already present in the current programmes but will need continuing support to generate visible effects. Other desirable elements were less evident in the design of the calls and in project proposals, but should be addressed as they are of critical importance for Roma inclusion and empowerment:

- In the long-term, the focus should **shift from supporting social services to promoting structural change** as a means of improving service provision, promoting equitable treatment, and addressing Roma inclusion in a systematic manner.
- Local development programmes should continue **prioritise territorial vulnerability** with a focus on disadvantaged areas (urban or rural) with a high share of Roma population. They should also continue to **combine mainstream and targeted measures** to give Roma access to horizontal social inclusion interventions to which they are nominally entitled.
- **Partnerships** between local authorities and Roma NGOs are critical. They are important for mutual understanding and make projects more effective in generating structural change.
- **A dedicated capacity building facility** (preferably a PDP) could be instrumental in addressing the limited capacity of **Roma communities to participate in decision making**, and of local authorities to work with Roma. This is needed especially in the most disadvantaged municipalities.
- Small or medium sized **grants could be awarded to solve concrete issues identified as priority by the community**. This would also develop community capacity to identify a problem, propose a solution, secure resources and get things done. Such practical problem-solving skills are critical building blocks of empowerment.
- **Access to incomes and employment** merits special attention. While the calls generally include this this, it is less covered by projects. This may be because problems in education, health or other social services are very acute. Also, potential PPs have less experience in applying innovative approaches to job creation and income generation. Future efforts could focus more on increasing employability of Roma through vocational and/ or apprenticeship schemes with social or municipal enterprises. Future support could also focus on developing management capacity amongst Roma entrepreneurs and family

businesses to grow and thus support job creation. Partnerships with organisations such as Innovation Norway, could stimulate social innovation to promote income generation in disadvantaged areas. In parallel, it is essential to address discrimination against Roma in the labour market.

- **Housing** also merits special attention in all three countries, especially in Bulgaria, where there are crowded neighbourhoods with illegal housing, often referred to as the Roma ‘ghettoes’. The Grants do not have the resources to resolve these issues but they could provide incentives for local actors to start the process by identifying measures to improve the situation. The first step towards legalisation of Roma settlements is formalisation of ownership of land plots, and including the settlements in the municipal zoning plans, which will allow for the construction and improvement basic infrastructure. This approach is being developed in Slovakia by the Plenipotentiary for Roma communities. This is a long and difficult process but starting it is a key priority. In Bulgaria, pilot projects supported by private funders in some municipalities are also working in this direction.³⁵ In future memoranda of understanding, the beneficiary states could be requested to start similar processes in localities with crowded Roma neighbourhoods as a pre-condition for access to other Grants’ resources related to Roma inclusion.
- **Fighting antigypsism** is critical. There will be no progress on Roma inclusion unless the majority changes its perception of Roma.

2.3. Efficiency

2.3.1. To what extent do the current institutional and administrative capacities of the Programme/Fund Operators support good programme management?

The POs and fund operators in the 10 beneficiary states have strong institutional and administrative capacities for management of the local development programmes. This is based on their extensive experience in fund management and good knowledge of the EEA regulation and management for results systems. Their capacity to collaborate with other institutional actors is very important. Some POs have been very successful in this (e.g. Estonia and Slovakia), while others faced serious challenges in the first half of programme implementation, but the situation has improved (e.g. Bulgaria). Challenges have been posed by high rates of staff turnover in Estonia and Croatia, and exceptionally frequent audits in Romania due to over-interpretation of the Grants Regulation by the National Audit Authority.

In all beneficiary states, except Greece (where the PO is the FMO, and the fund operator is contracted through a partnership intermediary agreement),³⁶ the POs were proposed by national authorities based on their proven capacity to manage funds efficiently, their competences, and previous experience of the management of EEA & Norway Grants programmes.

The nine POs are central public entities – ministries, public agencies, or a public fund. In five beneficiary states, the POs are ministries responsible for regional development, or departments within these ministries (SK, HR, CY, LV, and PL). In others, the POs are ministries with competences in some of the programme areas covered by the programme (the Ministry of Social Affairs in Estonia, and the Ministry of Education and Science in Bulgaria) or ministries with responsible for the management of EU funds (the Ministry for European

³⁵ Housing and zoning programme of the Trust for Social Achievements is piloting new model for regulation of Roma neighbourhoods in Bulgaria.

<http://socialachievement.org/en/what-we-do/program-areas/family-economic-success-program/housing-and-zoning/>

³⁶ Crowe SOL Management Consulting Services SA, in partnership with Human Rights 360.

Affairs and Equality in Malta). In Romania, the PO is the Romanian Social Development Fund (RSDF), a public fund registered by Law 129/1998 approved by the Romanian Parliament.³⁷

All nine POs have a good track record of managing the previous EEA and Norway Grants programmes, some of which were consolidated under the current local development programmes. Some POs have extensive experience in the management of European or national funds in relevant areas. Interview feedback from POs indicate that they all have well developed systems, ensuring management in line with the Grants' regulations.

POs have the necessary competences to address the multidimensional aspects of the local development programmes. In some cases, the regional and local development expertise of the PO is complemented by the involvement of bodies with expertise in other specific areas covered by the programme. For example, in Slovakia, the regional development expertise of the PO is complemented by the involvement of office of the Plenipotentiary for Roma Communities both in the programme committee, and the selection committee for the calls under PA8 and PA7.³⁸

In Romania and Slovakia, the current local development programmes continue the work of the previous financial mechanisms in the areas of social inclusion and local development.³⁹ The POs in these two countries continued from the previous period.⁴⁰ There is **good institutional memory and they have incorporated strategic lessons from the previous financial mechanisms**. This has contributed to effective programme design and strong implementation capacity. This is confirmed by interviews and desk research undertaken for this evaluation, and the findings of a previous in-depth monitoring mission in Romania commissioned by the FMO in late 2020 which concluded that the PO has strong strategic, operational and administrative capacities for management towards planned outcomes.

Ideally, POs with specialised thematic competences, such as ministries in different sectors, should have ensured collaboration with other institutional actors. This has been achieved to varying degrees. For example:

- In Estonia the PO coordinates efforts under the different PAs with contact points in all four relevant ministries. Despite the multiple modalities (PDPs and calls) and a relatively small staff, the PO has been highly efficient in launching the programme in a timely and meaningful way.
- In Bulgaria, the PO failed to apply a more collaborative approach needed to address the complexity of the local development programme during the first half of its implementation. However, the management was changed in early 2021, and with the support of the national focal point, the programme was effectively 'restarted' and is back on track. The PO is now much more open to collaboration with other institutional actors and civil society.
- In Latvia, the memorandum of understanding explicitly required institutional collaboration. The Ministry of Culture is a partner of the PO and is responsible for operating the culture open calls under PA14. However, there are no synergies between PA14 and the other two PAs (PA10 and PA16), and this seems to be reflected in Cooperation Committee meetings, which, according to interview feedback, generally allow insufficient time for the discussion of matters relating to the planning and implementation of calls under PA14.

³⁷ The RSDF was created by the Romanian Government as a specialised body to manage public funds in the area of social inclusion of vulnerable groups, with a strong focus on Roma at the local level. Its board includes representatives of seven line ministries, the Roma National Agency and representatives of civil society nominated by the President's office.

³⁸ This involvement was defined as a condition in the programme agreement.

³⁹ The previous 'Children and Youth at Risk' programme and the 'Local and Regional Initiatives to Reduce National Inequalities and to Promote Social Inclusion' programme.

⁴⁰ On 01 October 2020 the competencies of the PO in Slovakia were transferred from the Government Office of the Slovak Republic to the Ministry of Investments, Regional Development and Informatization. The transformation was so smooth that one interviewee had not realised that this change had taken place.

- In Croatia, the DPP notes that despite extensive experience of the management of European funds, the PO lacks subject expertise and institutional capacities to address the educational sector focus of the programme in sufficient depth. This may result in a more technical, rather than outcome based approach. However, both the PO and CARNET⁴¹ note that the Ministry of Education, CARNET, and other education stakeholders were consulted about the design of the programme and the calls.

Overall, the POs have the necessary capacities to management of the local development programmes efficiently. This was confirmed by feedback from national stakeholders and most of the donor partners and IPOs. Nevertheless, some challenges were reported:

- In all countries **the late start of the programmes was delayed** by the long time taken to agree on the concept notes and programme agreements and valuable implementation time was lost.
- The COVID-19 pandemic forced POs to adapt calls and they had to help with the modification of supported projects. In Bulgaria, Estonia, and Romania (although not in Greece) **PPs provided very positive feedback on the flexibility of POs** in this regard.
- **Staff turnover** was mentioned as an issue in some countries. In Estonia, some contact points within other ministries changed. In Croatia the rate of management and staff turnover at the PO could become problematic, especially since the programme is at a critical phase of implementation in view of the selection of proposals under programme's two main actions.⁴²
- In Romania, over-interpretation of the Grants' Regulation by the National Audit Authority has led to excessively frequent audits. This is consuming a lot of the PO's staff time and has shifted the focus of the PO's work to administration, at the expense of content management. The PO has been audited four times, with at least two audits per year. Although all four audits have confirmed good procedures and financial management, it is expected that this will continue, as it is in the National Audit Authority's plan.

2.3.2. To what extent are the project promoter entities proving to be appropriate to deliver programme outputs and contribute to the achievement of the programme outcome(s)?

It is not possible at this stage to provide an informed assessment of the extent to which PPs are *'proving to be appropriate...'*, as the majority of projects are still at an early stage of implementation or have only just been contracted. Nevertheless, the sampled projects indicate that the selected PPs have the capacity to make a solid contribution to programme outcomes. Interviewed PPs have a clear vision of desired changes, they have relevant subject expertise, they are open to collaboration with other stakeholders, and they provided meaningful insights into their projects' potential for sustainability and contribution to systemic change.

Interviews with a sample 64 PPs in the 10 beneficiary states suggest **strong implementation capacities that are likely to deliver the planned results**. However, this is a **preliminary assessment**. As of mid-December 2021, fewer than one third of the 161 contracted projects have been under implementation for more than a year, and progress to date has been significantly constrained by COVID-related restrictions. The suitability of the selected PPs can be better assessed a later stage, based on actual project results.

⁴¹ CARNET is an Agency under the Ministry of Education and is PP of one of the PDPs.

⁴² Only four of 10 positions at the PO are currently filled for various reasons (e.g. staff rotation and maternity leave). The vacant positions are not expected to be filled until the beginning of 2022 at the earliest.

The majority of project that have been under implementation for a longer time are PDPs. The PPs were also predefined. Interviews with PPs of various PDPs and other stakeholders confirms the appropriateness of this choice.

PDPs aiming to enhance capacities to address challenges at the local level in different thematic areas are **led by PPs that are the leading central public institutions in these areas.** They are well positioned to improve policy design and implementation, develop competences at the local level, and promote collaboration to foster systemic change. For example the Estonian National Institute for Health Development is expanding the public health competence of newly reformed local governments, through capacity building on evidence-based planning and interventions.

PDPs piloting new models and mainstreaming them into the relevant policy areas, are led by PPs that have a good record for innovation. For example, the Bulgarian Red Cross is introducing a new model of home care service combined with telecare. Several PPs are introducing innovative models for inclusive education, such as CARNET (Croatia PDP1), the National Institute for Education (Slovakia PDP1), and the European Wergeland Centre (Greece PDP#). All have extensive expertise in the relevant area, and have a track record of mainstreaming applied models into policies that are subsequently funded from national or EU sources. They work effectively with relevant line ministries, especially in the area of inclusive education, to promote collaboration between educational institutions at different levels and civil society to foster the integration of vulnerable into the education system (Roma in Slovakia, refugees in Greece).

National local government associations (cities, municipalities and/ or communes depending on the country) are clearly appropriate PPs for the five PDPs aiming to improve work of local administrations. They unite and represent local governments at different levels, which enables them to introduce and disseminate new knowledge, skills, and tools to improve governance, accountability, and participatory decision-making. A good example is provided by the Association of Polish Cities which is the promoter of the only PDP in Poland. The project is a critical component for the overall achievement of programme outcomes. The association is a highly experienced and well-resourced organisation, and it has delivered technical assistance and training to 53 vulnerable small and medium sized cities selected in the first stage of the open call, and will continue to support 29 of these cities that have subsequently been awarded grants to start implementing their local development action plans. The Association of Polish cities also assisted the implementation of the OECD Local Public Governance Review and the development of a methodology for carrying-out self-assessments to measure good governance and institutional capacity

Of the 161 contracted projects, 115 were selected through restricted calls, open calls for proposals and SGSs. The appropriateness of these PPs was defined by the priorities of the open calls and the requirements for proven capacities in the subject of the call. Evidence from Estonia and Romania (the programmes with the highest number of contracted projects through open calls) confirms that the **PPs have the capacity to deliver the expected outputs and results.** More specifically, these PPs have extensive previous experience in relevant areas and have experience of collaborative partnerships with other local stakeholders.

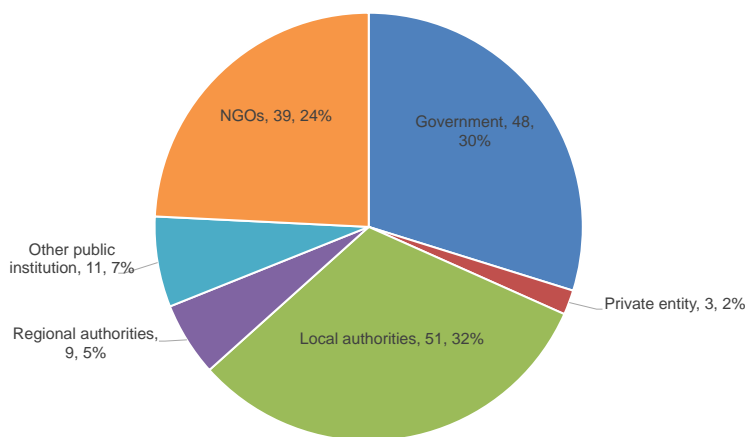
In the context of the Romanian programme, the appropriateness of PPs needs to be assessed together with the appropriateness of project partners, as project outputs and outcomes depend on the combined skills, knowledge, and experience of all project partners. Partnership was mandatory in all calls, and partners were required to have both subject and administrative experience. From this perspective, the implementation capacity to achieve programme outputs and contribute to programme outcomes is fostered by.

2.3.3. What are the strengths and weaknesses of each type of project promoter entity (private, public, non-governmental, intergovernmental)? Which types of entities are best suited for different themes?

74% of PPs currently supported by the local development programmes are public sector entities. It is not possible to provide an in-depth, performance-based analysis of the strengths and weaknesses of the different types of PP, as most projects are in the early stages of implementation (especially those supported by calls for proposals). At this stage it is possible to provide a general overview of their potential strengths and limitations. Complex local development challenges cannot be solved by any single institution or organisation working alone. Thus, it is important to focus on the potential of different types of PP to contribute to structural change at the local level across themes, rather than on the suitability of different types of entity to work on specific themes. Therefore, the types of PP best suited to address the complexity of local development are those that work effectively in partnership with local authorities, public institutions at different levels and civil society, including those representing the interests of vulnerable groups. The development of these partnerships requires investment, and they should prioritise real structural change, not the absorption of funds.

Based on analysis of GrACE data,⁴³ central government institutions and local authorities currently each account for approximately 30% of PPs. NGOs account for 24%, other public institutions 11%, regional authorities 5% and private sector entities 2%. This is summarised in Figure 4 below, which shows the number of each type of entity and the number as percentage of all 161 PPs.

Figure 4: Types of project promoter contracted by local development programmes



Source: Author based on GrACE data

With few exceptions, the PPs of PDPs are public sector institutions, largely public institutions at central level. Only four PDPs are led by NGO PPs (in Greece, Bulgaria, and Cyprus). The other 35 NGOs are PPs of projects selected by open and restricted calls and SGSs in Romania, Estonia and Slovakia. Thus, there are **currently no NGO PPs in four beneficiary states**.

The requested analysis of the strengths and weaknesses of different types of PPs and their suitability for different 'themes' is constrained by the following issues:

⁴³ Data extracted from GrACE on 14 December 2021

- This evaluation question should be addressed based on the performance of the various PPs, but this was not feasible, as most projects are at an early stage of implementation.
- It is difficult to provide a clear-cut answer on the strengths and weaknesses of different types of PP generalised across the 10 countries. Their performance depends on various factors such as the context, the focus of the programmes and the geographical scope of supported projects.
- The second part of the question asks which type of entities are better suited for the different 'themes'. This too depends on local contexts. It is also unclear exactly what is meant here by 'themes'. Some 'themes' suggested in the terms of reference are effectively sectors (e.g. education, business development), while others are cross cutting (e.g. local governance), and some are more specific and technical (e.g. infrastructure development).

In view of these constraints, it is only possible to provide a general overview of potential strengths and weaknesses (or constraints) based on the potential contribution of different types of PP to structural change at the local level.

The analysis below is structured as follows:

- Public sector entities
 - Central public authorities
 - Local authorities and local public institutions
 - Associations of cities, municipalities, local communes
- NGOs
- Private entities

Public sector entities

The following analysis suggest that **in some cases, central and local public institutions need to change to develop their capacities as agents of change.**

Central public authorities

Strengths

The main strengths of central public authorities (Ministries or other central public institutions) are their institutional positioning and linkage with the relevant national policies. National level institutions are generally considered to have better administrative capacities, human resources, and financial capacities than other type of body, such as NGOs and local institutions.

When considering structural change at the local level, central public authorities (as PPs) can support local authorities by increasing their capacities to implement relevant policy reforms. They can also improve the enabling environment for addressing diverse developmental challenges at the local level. However, these potential benefits depend heavily on the capacities of the relevant central institutions to work collaboratively with local authorities.

Weaknesses/ constraints

Central public institutions may prioritise change at national level over structural change at the local level. Approximately one third of the PDPs are national level initiatives that do not relate directly to local development. It is debatable to what extent such projects fit in the local development programmes.

In some cases, capacity gaps led to serious delays in the development of the relevant PDP. For example, PDP5 in Bulgaria, led by the Ministry of Health, was delayed due to lack of a clear vision (the project concept changed several after the start of the programme) and staff turnover at the relevant unit constrained project

management capacity. PDP4 in Romania⁴⁴ was considerably delayed by bureaucracy and lack of flexibility, as well as staff turnover.

The predominant culture of working in sectoral silos, with limited inter-institutional collaboration, has been reinforced by the sectorial approach of the Structural Funds in some of the countries, such as Bulgaria.

The overall political context can facilitate or constrain the effectiveness of central public institutions as project promoters. For example in Slovakia, the active involvement of the Plenipotentiary office ensured that the overall programme and supported projects follow the main principles of Roma inclusion and empowerment. In Bulgaria, the lack of a functional Roma contact point, and avoidance at political level of systematic approaches to Roma inclusion meant that the programme initially lacked the required Roma focus.

Local authorities and local public institutions

Strengths

Local governments are close to citizens. Their performance in meeting local needs and resolving problems impacts their re-elections prospects. They have the mandate and resources to adopt new service models and can allocate budgets for their continuation (while local budgets are limited, they can mobilise national funding and/ or apply for Structural Funds funding). They are also better suited for public procurement, infrastructure development, and local and regional policy planning in most 'themes' and sectors. This potential is reinforced when local governments partner effectively with other local actors, especially civil society, to address service delivery gaps and development challenges affecting local vulnerable groups.

Weaknesses/ constraints

Some aspects of governance are not well developed, especially participatory decision making involving citizens. There is little experience of involving disadvantaged communities in participatory decision making, and this undermines the trust of these communities in local authorities. There may be prejudice and discriminatory attitudes and policies, which respond to existing negative attitudes amongst the wider electorate, and this may reinforce exclusion rather than promote the inclusion of certain groups.

Local authorities' performance is also highly dependent on the extent of decentralisation. In some cases there is a tendency re-centralise. Smaller municipalities in disadvantaged regions lack experience in project management and lack vision and knowledge for social innovation.

Local government associations

Strengths

Local government associations provide a platform for the exchange of experience, learning, development of skills, and promoting a culture of good governance. These associations have been the main vehicle for introducing new approaches and skills, supported by national or international funding over time. Of course, the realisation of this potential depends on the experience and strength of the association. For example, the Association of Polish Cities is a strong, highly experience association and is implementing the only PDP in the Polish programme. This large PDP is an essential, integral element of the programme. Less experienced associations such as ACoR in Romania, have developed rapidly and are able to deliver significant results (e.g. supporting the establishment of ethics councils amongst their members).

⁴⁴ PDP4 "Capacity building in the field of public governance – a coordinated approach of the Centre of the Government of Romania"

Weaknesses/ constraints

The ability of local government associations to act as PPs may be constrained politicization and a tendency towards centralisation in some countries. There may be asymmetric power relations between smaller and bigger local government units. There may be significant differences within an association's membership, for example their knowledge and readiness to try innovative approaches and work collaboratively with other local actors. For example, in Bulgaria, the PDP 'GALOP' led by the National Association of Municipalities, aimed at innovative 'bottom up' approaches to developing local strategies to unlock unused local potential for economic development. The PP noted that there was a prevailing culture of top-down planning within local governments and little capacity for bottom-up participatory development for job creation and economic development projects.

NGOs

Strengths

NGOs bring knowledge, skills and experience in rights-based approaches to local development, inclusive education, service provision and empowerment of vulnerable groups. NGOs are more flexible. Through their networks, they have access to much more knowledge about social innovation.

According to some respondents, NGOs are better placed to lead projects addressing issues that are perceived as controversial, NGOs are less politically dependent. For example, one of the Greek PDPs on inclusion of refugees might have been cancelled after the government changed. NGOs are much better suited than other types of entity to fighting discrimination against Roma and enhancing the focus on empowerment of Roma communities. They are more able to build trust and develop the necessary civic infrastructure in target communities to enable Roma participation in local decision making processes.

Weaknesses/ constraints

However, NGO funding is unpredictable, as they have no endowments, and private giving is very limited. Most NGOs struggle to provide the required 10% co-financing (as they are viewed as private entities). Some experience high rates staff turnover. NGOs generally have less experience of, and authority to lead on, infrastructure and other hard measures. On their own, they do not have the power to ensure the sustainability of results, which depend on local and/ or central authorities. Effective collaboration with local authorities is therefore essential for the sustainability of new approaches.

Private entities

There are currently only three private sector PPs across the 10 programmes. It is therefore not possible at this stage to generalise about their strengths and weaknesses as PPs. This analysis will be more feasible at a later stage of implementation, as some programmes plan to support private entities.⁴⁵

⁴⁵ In Estonia, the three PPs which are such entities may face some issues related to state aid (see previous section effectiveness). A planned small grant scheme in Latvia under PA10 is open to small and micro enterprises registered in Latvia and conducting business in the Latgale Region, including registered self-employed persons, sole proprietors, and legal persons.

2.3.4. To what extent are the project promoters able to make use of the available funding (absorption capacity)?

The currently supported PPs are capable of utilising available funding effectively and efficiently. Selection criteria required that PPs have sound experience in managing similar levels of funding, and knowledge and experience to manage procurement and to adapt projects to emerging COVID challenges and price increases.

In the present context, 'absorption capacity' should be understood as the capability to utilise available funding to deliver meaningful outcomes in a timely and cost-efficient manner.

All interviewed PPs in the 10 beneficiary states have experience in managing similar levels of funding which was a requirement of all the open calls. This ensured financial management capacities and experience in managing procurement and adjusting financial planning to address changes in the operating environment. This suggests that they are able to utilise funding effectively and efficiently.

PPs in most countries generally consider that national procurement regulations are cumbersome and time consuming. However, PPs and POs do not consider this to be a significant risk as they are highly experienced in procurement. This is supported by the fact that all reported procurement challenges have been resolved, even if they have caused some delays.

For example:

- In Romania, one NGO PP partnered with a local authority to overcome procurement issues;
- In Bulgaria and Estonia, it was reported that there have been delays with procurement of specialised health equipment, but the issues have been resolved;
- In Romania, approval of municipal budgets by the state budget was delayed in early 2021. This has complicated the start of the projects and ensuring the co-financing commitments, but this will not delay utilisation of funds;
- In all countries, the COVID pandemic has seriously delayed the planned bilateral activities, and they have been done online. Some of the budgets for exchanges and study trips, training, and other bilateral activities are underspent and will be utilised when the situation improves;
- In some beneficiary states, the price of constructions materials has increased, and thus affected the cost of the cost planned infrastructure improvements (e.g. Bulgaria Cyprus, Romania). PPs will have to mobilise additional funding. The cost of social housing has also increased for a project in Cluj (Romania), funded under the call 'Poverty Alleviation'.

2.3.5. What sort of bottlenecks can be identified as regards the efficient implementation of the projects?

The effects of the COVID pandemic have been, and continue to be, the main cause of bottlenecks affecting the efficient implementation of the projects. Procurement has been complicated, prices have increased, and delivery of equipment has been delayed. Education and health projects have been seriously affected. The pandemic has constrained the effectiveness of work in marginalised communities, and it has exacerbated existing problems affecting these communities.

The main bottlenecks affecting the efficient implementation of projects relate to the COVID-19 pandemic, which led to a series of lockdowns in 2020 and 2021. There is a continuing threat of unpredictable repeat waves of infection.

As noted above (2.3.4), the pandemic has slowed procurement, increased the price of construction materials, slowed work on construction sites, and has delayed approval of municipal budgets. These issues have delayed some of the infrastructure components and the supply of important equipment.

COVID has seriously affected education projects, especially those addressing isolated and disadvantaged groups, which lack equipment and skills to transfer to online education (e.g. the PDP working with refugees in Greece, and a number of projects for inclusive education in Romania, had to be implemented in a fragmented way in the context of lockdowns and school closures)

The pandemic has complicated projects in Romania working in marginalised communities that require face to face interaction for community mobilisation, door to door awareness raising, and meetings with community groups to ensure their involvement. It has also put a lot of stress on some of the health service projects in Bulgaria.

Recent research confirms that the pandemic has increased inequality and exclusion and disproportionately impacted vulnerable and marginalised groups. It has undermined trust in institutions (or exposed existing low levels of trust) and has exposed the extreme information technology divide between rural and urban areas, especially amongst vulnerable groups such as Roma.⁴⁶ In Romania and Bulgaria it is reported that social exclusion and poverty have increased during the pandemic. This is likely to increase the need for social services far beyond what was planned with the current local development programmes. Another tendency, reported especially in Romania, is increasingly high levels of discrimination towards Roma. This is complicating project implementation and requires additional efforts by PPs and partners.⁴⁷

The majority of the PPs (especially in Romania and Estonia) report good flexibility of their POs in addressing emerging challenges, including approval of necessary changes in budget lines. However, PPs of PDPs in Greece note that the Fund Operator, has not permitted targets to be modified to reflect changing circumstances, such as the pandemic. In addition, the requirement for continuous reporting is considered to be excessively burdensome and is reducing the time available for substantive project work.

2.4. Coherence

2.4.1. To what extent are the programmes' planned outcomes and approach coherent with local (subnational) development strategies? How does this influence the achievement of results?

Programme agreements for the local development programmes make many references to strategic documents. Detailed analysis of these documents and country by country analysis of their influence on the achievement of results is not feasible within the time and budget constraints of the present evaluation. The following text provides a general overview (with some examples) of how local development plans are

⁴⁶ Overview of The Impact of Coronavirus Measures on The Marginalised Roma Communities in The EU https://ec.europa.eu/info/sites/default/files/overview_of_covid19_and_roma_-_impact_-_measures_-_priorities_for_funding_-_23_04_2020.docx.pdf

World Bank Group Romania, 'On the Pulse: Social impact of COVID 19 on vulnerable populations in Romania', <https://thedocs.worldbank.org/en/doc/828371614691372504-0080022021/original/WorldBankPresentationonSocialImpactofCOVID19inRomania.pdf>

⁴⁷ For example in the case of PP 3007, three of the apartment owners withdrew their offers in the organized auction for buying the social houses after they found out that the beneficiaries of these houses will be Roma. The PP is planning facilitation of pre- and post-relocation activities to support acceptance by the majority population of the 35 families which will be reallocated from the segregated Pata Rat neighbourhood.

framed and developed, and aspects that may facilitate or constrain achievement of results (structural change).

Coherence with local (subnational) development strategies

'Local development strategies' can be understood in two ways:

- National strategies for local development
- Local governments' own strategies for development of the locality

Stakeholder feedback and document analysis indicates that the local development programmes are aligned with national strategies. Local strategies are aligned with national strategies, but there are important differences in how local strategies are developed and whose needs and priorities they address.

National strategies may provide a guiding framework for local strategies. Here the emphasis is on local actors identifying development priorities and actions, with the active involvement of different local stakeholders in decision-making, including minorities and other vulnerable groups. In some cases, elements of the top-down approach may be helpful, for example to facilitate change in local planning and decision-making processes to better address local challenges.

In Poland, for example, the local development programme is comprised of an open call for 255 small and medium cities that are classified as vulnerable by the Polish Academy of Sciences based on objective criteria. There is a single, tightly integrated, centrally managed PDP that has supported eligible cities to develop multi-sectoral development plans and action plans in a participatory way.⁴⁸ In order to receive a grant, development and action plans must address key national priorities, but there is flexibility in how priorities are addressed in local plans (according to the locally determined needs of each city) and how they are addressed. Interview feedback indicates that this facilitated process has helped cities to 'discover for themselves' the key challenges and how they can best be addressed. One stakeholder noted a high level of motivation in the local administration to start implementing the grant-funded action plan that emerged from this process.

Local plans are also a vehicle for operationalising central strategies and plans. Doubts have been expressed in some countries about the scope for prioritising local concerns or implementing 'solutions' designed specifically to address those concerns. There is local engagement in decision-making, but there is limited scope for local innovation. Some doubts have been expressed about the depth and quality of local engagement. By constraining local decision-making, this approach may unintentionally or intentionally prioritise the needs and concerns of specific groups over others and this may further disadvantage vulnerable groups.

Programme documents mainly refer to national strategies and policies and there are few references to local strategies. Interviewed stakeholders tend to discuss relevance to strategy in national terms. Local strategies do exist but feedback suggests they in some countries they may serve the purpose of operationalising national priorities at local level, rather than addressing locally identified priorities with locally determined approaches.

In Latvia, for example, the five planning regions are each implementing a local/ regional economic development PDP, which between them account for 38% of total programme eligible expenditure. All five PDPs (1-5) are comprised of the same for elements, and regional differences appear to be reflected only in the different levels of grant funding allocated to each planning region. This suggests a centralised, top-down approach and stakeholder feedback suggests that local actors may not be the real 'owners' of these PDPs. In contrast, PDP7 in Latvia addresses a clearly identified need specific to a particular locality.

⁴⁸ Feedback from one stakeholder suggests that, in practice, the depth of public consultation may have varied.

In Croatia, the local development programme is supporting the implementation of a national programme to introduce STEM into schools. This may be highly desirable, but it is unclear how, or to what extent programme activities are based on specific, locally determined needs and priorities. Moreover, it is unclear if there are local budgets for sustaining investments in STEM equipment that has been procured in the context of a national programme.

An exception is Romania, where all calls for proposals require that applicants clearly state the coherence of the proposed projects with local and regional strategies, local strategies resulting from community led local development (CLLD) (where available), and national sector or issue-based strategies.

Influence of strategic alignment with achievement of results

Alignment of local development programme activities with local and regional strategies (and national strategies) implies local commitment (political commitment, allocation of resources, etc.). It also implies that programme activities are part of a wider array of coherently linked, mutually reinforcing activities all contributing to the achievement of common goals. Thus alignment with subnational strategies should enhance the achievement of programme results and promote sustainability. However, this is true only if such strategies:

- Are widely perceived as feasible and desirable;
- Reflect current realities (are up to date);
- Envisage the most effective approaches;
- Address appropriate leverage points.⁴⁹

In Latvia, for example, the local government set-up has changed significantly since the concept note was initially approved in early 2018. Doubts have been expressed about the preparedness of recently amalgamated local government units to engage effectively in programme activities, and it is possible that local strategies do not fully reflect these developments, although PDP6 does include the updating of city strategies. In view of the reportedly contentious nature of the territorial administrative reform in Latvia,⁵⁰ it is also possible that significant differences may exist around local and regional development plans. Thus, alignment with local development plans may, in some cases, not ensure the effectiveness of EEA & Norway Grants-funded activities.

In Bulgaria, the local development programme addresses (and is coherent with) national and international strategic documents. However, this does not necessarily promote the effectiveness or sustainability of local development programme results, as many strategies have not been implemented, for example because they were developed only to satisfy national and European funding requirements.

Furthermore, in several countries, there is a lack of systematic critical assessment or impact assessment of national and EU funding and this implies that strategies may not be sufficiently evidence based. Coherence with relevant strategies thus may not always promote the effectiveness and sustainability of local development programme initiatives. For example, the results of significant investment in Roma inclusion actions are not clearly understood.

⁴⁹ For example, see Donella Meadows (Sustainability Institute) (1999), http://www.donellameadows.org/wp-content/userfiles/Leverage_Points.pdf

⁵⁰ See Congress of Local and Regional Authorities of the Council of Europe (07/12/2020), <https://rm.coe.int/fact-finding-report-on-territorial-reform-in-latvia-monitoring-committ/1680a05b6f>

2.4.2. To what extent are the programmes likely to benefit (or are benefitting) from any complementarities with the initiatives funded by the EU and national funding?

EEA & Norway Grants-funded local development activities generally complement other funding sources by piloting new approaches, further developing existing initiatives, and improving access to, and supporting more effective utilisation of, other funding.

The analysis here considers not only benefits to the EEA & Norway Grants, but also benefits of the Grants to EU and national funding. We understand 'benefit' here to refer to the extent that (a) one funding source can leverage what has been done with funding from other sources or (b) one funding source is used to test or launch an approach (which would not otherwise have been possible) enabling it to be subsequently mainstreamed using funds from other sources.

Analysis of programme documents and stakeholder feedback suggest that EEA & Norway Grants-funded local development activities generally complement other funding sources in the following ways (which are not necessarily mutually exclusive):

- Launching or piloting initiatives or approaches that are subsequently expanded with other funding;
- Adding to, deepening, or improving services developed with, or usually delivered with, other funding. This includes improved targeting of vulnerable groups;
- Supporting more effective utilisation of EU-funded infrastructure, improving the benefits of EU-funded infrastructure;
- Supporting improved access to, and improved strategic utilisation of, EU funding.

Examples are provided in the following paragraphs.

There are also two ways in which some EEA & Norway Grants funding does not clearly complement other funding:

- Maintenance of activities (explained below)
- Duplication of activities

Launching activities that are subsequently mainstreamed

Examples of this include, in Bulgaria, the **piloting of telecare services targeting the poor and those living in remote areas of northwest Bulgaria**. This adds to a community-based care approach piloted by the Bulgarian Red Cross with Swiss funding and subsequently mainstreamed with EU funding. Depending on the outcome of the pilot telecare service, this too may eventually be mainstreamed with EU funding. In Latvia, a **small grant scheme for small and micro-businesses** is being piloted in one of the planning regions. In Malta, the EEA & Norway Grants supported the launching of a new strategic plan for a museum, and the government subsequently approved much larger funding to continue implementation of the strategy.

Adding to, or deepening activities funded from other sources

In Croatia, the local development programme **extends support in areas already addressed by EU funding**. It adds support for STEM education, entrepreneurship, and active citizenship to an existing large scale digitalization and ICT initiative in schools.

In Greece, the government launched classes for refugees but teachers lacked the necessary expertise and were not always aware of how to access educational materials. The **local development programme fills this gap with teacher training**. Moreover, it is **working jointly with refugee families and local families to foster community spirit**.

In Romania, there was an emphasis on evidence-based new and innovative approaches that were not prioritised by the Structural funds, for example in the areas of:

- Roma self-esteem and empowerment;
- Fight against discrimination, racism and anti-Gypsism;
- Using multi-dimensional integrated approaches to improve the accessibility and quality of services for vulnerable groups, especially in smaller and less developed communities;
- Use of small grant schemes to prioritise municipalities in disadvantaged areas and with a higher percentage of Roma population.

Also in Romania, some projects funded through open calls have upgraded and added to services for target groups that were previously supported with EU funding.

The local development programme in Estonia focuses particularly on the northeast with its large Russian-speaking minority, and on the southeast where socioeconomic development is lagging. It thus partly **addresses regional disparities that have increased despite EU funding** (which has targeted mainly two specific regions).

Also in Estonia, EU funding supports improved access to youth work services and the local development programme includes an open call to **enhance local government capacities to use smart youth work solutions**. While EU funds support employment and entry into the labour market, there is little support for school leavers who are hesitant to continue their studies, or may need more support with their studies. SGS2 works as a measure to prevent unemployment amongst this group.

Supporting more effective utilisation of EU-funded infrastructure, improving the benefits of EU-funded infrastructure

In Cyprus, the EU funded infrastructure for blood oncology but this did not cover support for patients. This is now being addressed by the local development programme.

In recent years, Latvia has invested heavily in business infrastructure. PA10 activities are intended to **complement this by promoting the use of these investments through capacity building** of regional and local business support services and direct support to entrepreneurs. Similarly, the PA14 open call in Latvia supports the **development of new cultural products that can make use of EU-funded infrastructure**. In Malta it is also noted that the local development programme **supports activities that make use of EU-funded infrastructure**.

Supporting improved access to, and improved strategic utilisation of, EU funding

The local development programme in Poland supports vulnerable small and medium cities with the **development of coherent, multi-stakeholder, multi-sectoral local development plans** aligned with national priorities. The programme supports increased access to, and utilisation of, EU funding in two ways. Firstly, at **strategic level, the local development strategies include investment plans that can be funded with EU and/ or national funding**. Secondly, participation in the programme has **helped to develop capacity to work within EU funding administrative requirements** – for example, one municipality was able to develop the necessary documentation to participate in a large EU-funded photovoltaic energy programme.

In Latvia the programme includes the **updating of city strategies, which will provide a basis for utilising future Structural Funds**.

In Romania, the local development programme includes a small 'access to finance' grant scheme (which is not available from Structural Funds) to **increase the capacities of disadvantaged communities in less developed rural and urban municipalities to access EU and national funding**.

Maintenance and duplication

Local development programmes are well-aligned with EU-funded support. However, while important, this alone does not confirm mutual benefit. For example, EEA & Norway Grants funding that continues an activity or service previously funded from another source may well be important for the target group but there may be no mutual benefit between the two sources of funding. In this case the EEA & Norway Grants may be seen only as an alternative source of funding – the actual source of the funding is not important. This can be described as **‘maintenance’**, or long-term financing of public services. Given the relatively limited scale of EEA & Norway Grants funding compared with EU and national funding, **‘maintenance’ of services is not an effective use**, except in special circumstances.

Duplication refers to the implementation of the same activities in parallel through different projects or the repetition of already implemented activities or delivered outputs. Duplication differs from maintenance in that the latter relates more to longer-term service provision, whereas duplication refers to the repetition of specific activities or outputs. No examples of duplication were reported or observed.

In some cases, stakeholder feedback suggests that there has been **emphasis on avoiding duplication rather than on identifying and leveraging potential synergies** between funding sources to achieve more. Avoiding duplication is important, but this alone does not ensure effective complementarity.

There are few clear-cut examples of maintenance or duplication, as defined above. However, this does not mean they do not exist. Much of the documentation and stakeholder feedback emphasises alignment with activities funded by EU and national funds but it is **often unclear specifically how the local development programmes add to or further develop** those activities, or why EEA & Norway Grants funding is needed (i.e. why activities cannot be funded from other sources). Moreover, these concepts are open to wide interpretation and it may be debatable whether or not funding of these activities could and should already be covered by national budgets, but are not for political and other reasons.

Feedback from some stakeholders in different beneficiary states, when asked about future funding priorities, suggests that they **partly view the EEA & Norway Grants as a source of maintenance funding** – for example they are critical of the gap between programmes because it makes it hard for them to continue their activities.

2.4.3. To what extent do EEA and Norway Grants’ programmes fill funding gaps within local development and poverty reduction? Which funding gaps do the Grants fill? What could the potential niche thematic area(s) be future EEA and Norway Grants’ local development programmes?

Local public administration capacity building, and Roma inclusion and empowerment, are two important areas where the EEA & Norway Grants local development programmes are filling funding gaps. The way the Grants function is important in building capacity at local level (and thus achieving structural change) even where capacity building is not an explicit objective. However, it is difficult to draw general conclusions about funding gaps and potential niches across the 10 beneficiary states. Relatively few examples were provided of themes for which the local development programmes are the only source of available funding. These are likely to vary between countries depending, for example, on how EU funding is translated into national programmes. The issue is also complicated by the fact that local development programmes in each beneficiary state cover different programme areas, and gaps being filled in one beneficiary state may not have been identified as gaps by key actors in other beneficiary states if they are already covered by other EEA & Norway Grants programmes.

When considering gaps it is important to understand why they exist. Focusing on specific gaps may only address symptoms rather than underlying causes. This could be problematic if the EEA & Norway Grants are

perceived as an alternative source of funding to meet the cost of ongoing service provision (i.e. does not involve transformational change), or where gaps are the result of political decisions (implies lack of commitment or intention address the issue). This does not mean that such issues should not be addressed, but that they need to be addressed in a systemic way, which may not always point to what some consider the most obvious gaps, or points of intervention.

The answer to the question is provided under the following three headings below:

- Thematic gaps addressed by the EEA & Norway Grants local development programmes;
- Cross-cutting gaps (addressed by the way in which the Grants function);
- Potential future niches for EEA & Norway Grants local development programmes.

2.4.4. Thematic gaps addressed by the EEA & Norway Grants local development programmes

Based on feedback from stakeholders, specific funding gaps addressed by the current local development programmes include:

- Local public administration capacity building for improved strategic planning and operational performance (discussed further below under 'cross-cutting gaps');
- Roma inclusion and empowerment;
- Domestic and gender-based violence and victim support;
- Cultural heritage, including soft measures and renovation/ restoration of cultural objects;
- Children and youth at risk – inclusive education, inclusive youth policies, juvenile justice, etc.;
- Integration of migrants and asylum seekers.

2.4.5. Cross-cutting gaps addressed by the EEA & Norway Grants

The Grants address systemic capacity gaps at the local level. How the Grants function is an important factor in achieving structural change at local level because the process of implementation itself builds the capacities of local systems to define problems and develop solutions in a participatory way, even where capacity building is not an explicit objective. EU funding generally does not do this.

Analysis of stakeholder feedback identifies the following general following aspects of Grants implementation as being particularly important:

- Better targeting of specific vulnerable regions or groups, specific themes;
- More emphasis on capacity building of local stakeholders, empowerment of vulnerable groups, cross sector and multi stakeholder partnership and networking;
- Integrated, multi-sectoral, multi-modal approach;
- More flexible, diverse, and innovative;
- Easier to Access;
- Bilateral partnership;
- More outcome-focused.

The emphasis on **capacity building, empowerment of vulnerable communities and socially excluded groups, partnership building and networking** is considered very important, as there are limited opportunities for this with EU funding. Feedback from DG REGIO notes that networking is difficult to achieve in practice with CLLD and that EEA & Norway Grants do this better.

This is closely linked to the Grants' **integrated, multi-sectoral, multi-modal and rights-based approach to local development**. In contrast, EU funding is considered to address local development issues in a more mono-dimensional, linear way that does not always correspond to the complex systemic issues underlying regional disparities and exclusion of specific groups and localities. This is supported by feedback from DG

REGIO, which identified a complex project on the impact of cultural heritage on local development. It involved a pilot to test a community-based method, with a level of detail and complexity, combining research and pilots, that is rarely seen in Structural Funds.

Multi-modal refers to **combinations of hard and soft measures, PDPs, open calls, and small grant schemes**. Empowerment of disadvantaged groups to engage in local decision making and fighting discrimination is mentioned in relation to Structural Funds, but in practice is not a core funding priority for them.

2.4.6. Potential future niches for EEA & Norway Grants local development programmes

Key actors generally consider that the local development programmes are **already targeting the most important thematic areas and would like support for these to be continued in future**.

The following are cross-cutting issues related to the effective functioning of local systems that would benefit from increased attention in future:

- Local government capacity building to:
 - Enhance strategic planning and operational performance (including the quality of services);
 - Improve access to, and utilisation of, EU funding to further address local development needs;
- Cooperation between local governments to enhance the quality, efficiency, and sustainability of local service provision;
- More systematic, inclusive participatory decision-making, especially involving Roma and other marginalised and vulnerable groups (depending on the country context).

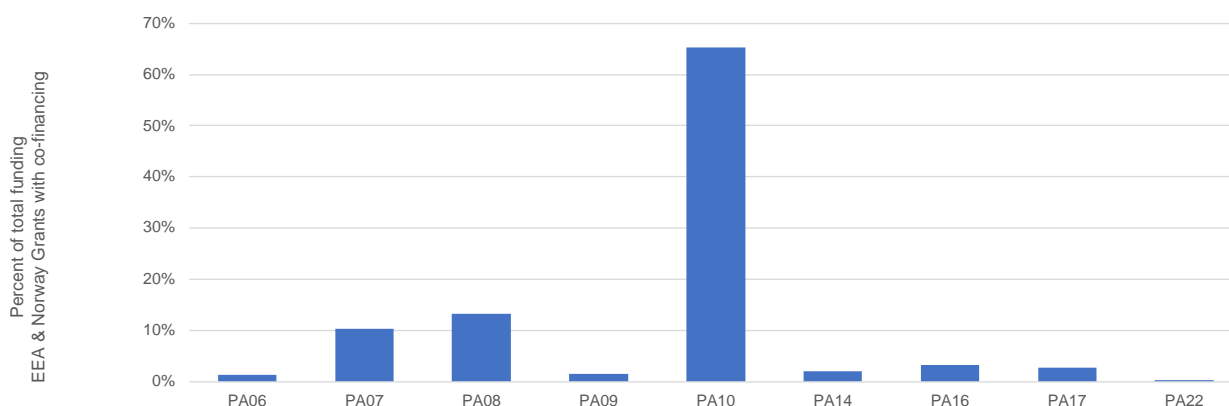
2.5. To what extent are the local development programmes contributing to the achievement of the European Union's strategy for smart, sustainable, and inclusive growth as operationalised in the EU 2020 strategy

Based on analysis of the Blue Book, five programme areas can be directly mapped to EUROPE 2020's Inclusive Growth Priority. It is difficult to map the other five programme areas to specific EUROPE 2020 priorities, either because they potentially cover multiple priorities, or because they do not fit well with any of them. Nevertheless, almost 90% of all local development programme funding (including co-financing but excluding programme management) is clearly addressing the EUROPE 2020 'Inclusive Growth' priority.

The local development programmes cover 10 programme areas⁵¹ in three priority sectors. Approximately 65% of all funding (EEA & Norway Grants and co-financing, but excluding programme management costs) is allocated to PA10 (see Figure 5 below). The next highest amounts are allocated to PA08 (13%), PA07 (10%), and PA16 (3%). Poland accounts for 53% of the EUR 215,716,248 allocated to PA10. In Estonia and Romania, funding is distributed across multiple programme areas.

⁵¹ PA6. European Public Health Challenges, PA7. Roma Inclusion and Empowerment, PA8. Children and Youth at Risk, PA9. Youth Participation in the Labour Market, PA10. Local Development and Poverty Reduction, PA14. Cultural Entrepreneurship, Cultural Heritage and Cultural Cooperation, PA16. Good Governance, Accountable Institutions, Transparency, PA17. Human Rights – National Implementation, PA22. Domestic and Gender-based Violence.

Figure 5: Distribution of funding between programme areas



Source: Author based on GrACE data

EUROPE 2020 has 3 priorities: Smart Growth, Sustainable Growth, and Inclusive Growth and these are further sub-divided into 7 more specific areas.⁵² These are summarised in Table 4 below.

Table 4: EUROPE 2020 priorities

Smart Growth	Sustainable Growth	Inclusive Growth
Innovation	Climate, Energy, & Mobility	Employment & Skills
Education	Competitiveness	Fighting Poverty
Digital Society		

Based on analysis of the Blue Book,⁵³ five of these programme areas can be directly mapped to EUROPE 2020’s Inclusive Growth Priority. It is difficult to map the other five programme areas to specific EUROPE 2020 priorities, either because they potentially cover multiple priorities, or because they do not fit well with any of them. For example, PA16 covers among other things local government capacity building and strategy development which will likely influence local developments across all three EUROPE 2020 priorities. PA14 does not appear to fit well with any of the EUROPE 2020 priorities but it could potentially address elements of all three main priorities, depending on the specific activities. Similarly, PAs 17, and 22 do not appear to directly address any of the three EUROPE 2020 priorities, but could address Inclusive Growth through inclusion of vulnerable and marginalised groups. A further complication is that individual programme areas include some activities that may fit better with other programme areas, or have a strong link to other programme areas.

Based on the above analysis, almost 90% of all local development programme funding (including co-financing but excluding programme management) is clearly addressing the EUROPE 2020 ‘Inclusive Growth’ priority – approximately 87% is allocated to ‘Fighting Poverty’ and 3% to ‘Employment and Skills’. However, for 11% of the funding, it is not immediately obvious which of the three main EUROPE 2020 priorities the funding is

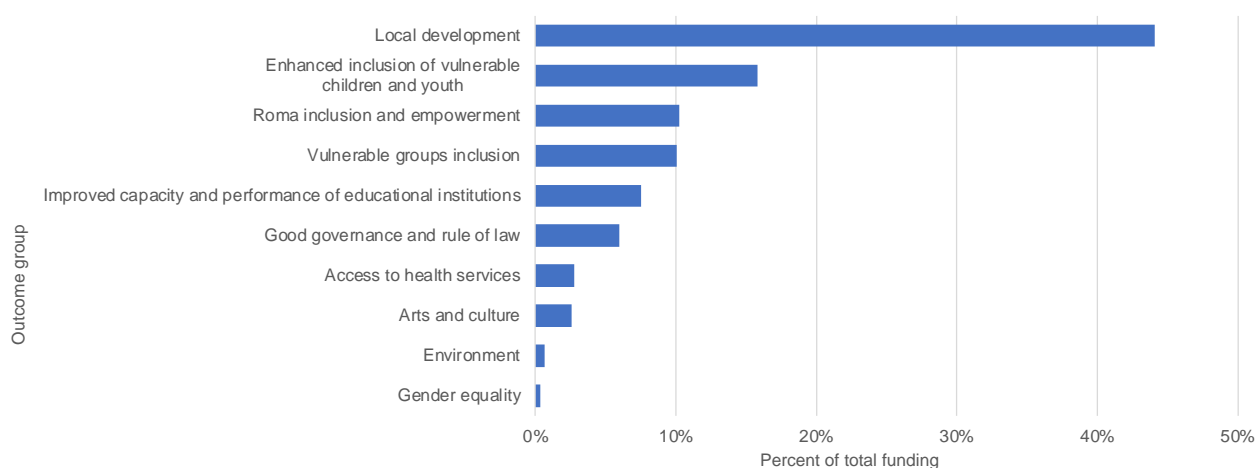
⁵² European Commission (03/03/2010), 'EUROPE 2020 A strategy for smart, sustainable and inclusive growth', p32, <https://op.europa.eu/en/publication-detail/-/publication/6a915e39-0aab-491c-8881-147ec91fe88a/language-en>

⁵³ EEA & Norway Grants (undated), 'Priority sectors and programme areas 2014-2021', https://eeagrants.org/sites/default/files/resources/FMO_170774%2BBlue%2BBook%2BFinal%2BUpdate_2017_FIN.pdf

addressing. Poland accounts for almost 36% of all funding, and almost 50% of PA10 funding. Excluding Poland from the calculation has only a marginal effect on the above analysis.

Analysis of the funding allocated to planned outcomes suggests that all EEA & Norway Grants local development programme funding is aligned with the EUROPE 2020 ‘Inclusive Growth’ priority, although in some cases indirectly (e.g. PAs 06, 16, 17 and 22). The outcome groups and funding allocated to them are summarised in Figure 6 below.

Figure 6: Percent of total funding allocated to EEA & Norway Grants outcome groups



Source: Table 2 (above)

2.6. Bilateral partnership

2.6.1. To what extent are bilateral partnerships (at programme and project level) adding value to the implementation of the local development programmes and in which ways?

Bilateral partnerships at **programme level** bring expertise and knowledge in specific subject areas, and they highly facilitate identification of donor project partners. DPPs often play an important role in preparing the concept note, in the work of the cooperation committees, and in the design of the calls. DPPs with specific expertise and networks in the programmes’ core subject areas enable successful matchmaking at project level. At **project level**, the evaluation suggests that partnerships add value to the implementation of the projects, mainly by sharing of experience and good practices.

Added value of bilateral partnerships at programme level

Analysis of feedback from POs and national focal points indicates that cooperation with the DPPs adds value in several significant ways.

One of the main benefits they bring is their **expertise and knowledge in specific subject areas**. However, as the programmes each combine several programme areas, DPPs could not always cover the entire thematic scope of the programmes. This issue was addressed both by the involvement of IPOs, and additional DPPs in the same country. For example, in Romania and Bulgaria, as the DPP (KS) has no experience in addressing issues of Roma empowerment and inclusion or inclusive education, the Council of Europe, as an IPO, has provided important expertise and feedback in these areas. In Estonia, four DPPs were involved in order to cover different the programmes different programme areas.

National stakeholders value the fact that the knowledge and experience that DPPs bring is based on existing **well-functioning systems in the donor countries**. DPPs frequently played an important role in **developing the concept note** (e.g. in Latvia) as well as **in the design of the calls and selection criteria especially in terms of the bilateral objective**. For example, in Croatia, at the suggestion of the DPP, 10 points were added for project proposals involving donor partners. DPPs have been very active in cooperation committees, have offered many ideas, and have commented on project proposals.

Feedback from interviews clearly indicates that the **length of the bilateral partnership** is a significant factor in the success of the cooperation. Indeed, it appears that working with the same DPP over successive programming period helps to promote a logical evolution of programme activities from programme to programme. Interviewees frequently pointed out that, at the start of the 2014-2021 programming period, it was very helpful that the key players were already well-known to each other and there was more mutual trust from the beginning, and this facilitated good cooperation.

DPPs provide valuable assistance in meeting the bilateral objective through the calls for proposals and the small grant schemes. Many DPPs regularly update the list of potential project partners. In this way, the POs can publish the updated lists on their websites, and applicants can contact potential donor project partners. In some countries, DPPs play a crucial role in **matchmaking** (finding donor project partners). For example

- In Latvia, both KS and Arts Council of Norway have been very active in this, with Arts Council of Norway organising a matchmaking event for PA14 PPs (grant applicants);
- In Croatia, the DPP supported the organisation of a matchmaking event. Although it took place online due to the COVID pandemic, it was assessed by the PO and the national focal point as very successful.⁵⁴ There were more than 120 participants, of which approximately 30 were from donor countries. It was organised in groups discussions where potential applicants from Croatia could present their ideas, and potential partners from the donor countries expressed their interest in partnership based on concrete project ideas. Of the 171 project proposal (for both open call and the SGS), 70 involved partners from the donor countries.⁵⁵ This indicates that the participants in the matchmaking event were well selected. Some of these entities from the donor states agreed to participate as partners in more than one project proposal. The PO notes that, due to the number of proposals that were submitted, the involvement of a donor partner will be a significant factor in the selection of projects, as 10 additional points are awarded to proposals involving a donor state partner. This means that the majority of the projects in Croatia will involve a donor project partner.

The identification of donor project partners was more complicated for the programmes that did not have a DPP. In Malta and in Slovakia the POs noted that they made joint efforts with the respective Royal Norwegian Embassies to involve suitable partners, but they were not successful.

- In Slovakia, the absence of a DPP meant that the PO was unable to attract a sufficient number of organisations to matchmaking events.
- Similarly, in Malta, national stakeholders struggled to identify relevant donor partners for their projects, and they noted that this process was very time-consuming. Stakeholders in Malta pointed out several times during interviews that there is no easy way to find bilateral partners. When asked about possible causes of these difficulties, they suggested noted that the donor might need to promote the programme more in the donor states, especially regarding the potential added value of partnerships for potential

⁵⁴ However, the DPP noted that the timing of the event (prior to the summer vacation when schools in Norway are closed) was not ideal, as this reduced the possibility to involve school staff with the project applications.

⁵⁵ Schools, universities, research institutions, NGOs, and private entities.

donor state partners (programme and project). When Maltese stakeholders approached possible bilateral partners, the latter often were not aware of the existence of the EEA & Norway Grants.

- National stakeholders in Cyprus faced similar difficulties. Programme and project stakeholders tried, but were unsuccessful in finding the right partners in donor states. Interviewees noted that it was not easy to find the right contacts and suggest that identification of donor state partners would be greatly facilitated if the FMO were to circulate a list of contacts potentially interested in bilateral cooperation.

Added value of bilateral partnership at project level

The establishment of partnerships at project level was encouraged by POs and DPPs. At project level, partnerships add value to the implementation of the projects, mainly by **sharing experience and good practices**.

Stakeholder feedback indicates that donor project partners:

- Help to ensure the viability of project designs;
- Bring knowledge, experience, and new, innovative methods;
- Help to solve specific problems.

In Poland, the cooperation with KS as donor project partner is important for the Association of Polish Cities. Beyond providing Norwegian experience, KS acts as a sounding board and is consulted and provides feedback at all stages. KS also provides advisers who are solving similar problems in Norway. Additionally, it supported the training of the Association's city advisers.

In Romania, there was a **good transfer of experience** between Bergen City Hall (Norway) and the Intercommunity Development Association Cluj Metropolitan Area (PN 3007) **in adapting approaches to social housing in Norway when addressing the issues of housing in the Pata Cluj** segregated neighbourhood in Romania. The PP notes that workshops involving more than 20 of its working together with experts from Bergen City Hall were very helpful in designing the local model and approach. The two sets of experts learned together what to adapt from the Norwegian model to meet the high level of poverty and segregation in Pata Cluj, which is different from the situation in Norway.

Longer term bilateral partnerships are highly valued, as cooperation is already well established, enabling much better use of mutual expertise. The partners are more familiar with each other's work and beneficiary state partners seem more ready to learn about and implement new methodologies, approaches and know-how. It also means that donor partners are already familiar with the local contexts. Partners that already worked together in the previous programming period are much more aware of the goals that need to be achieved, and cooperation in the planning phase of the present programme was stronger than at the same stage in the previous programming period.

PPs cooperating for the first time with a donor project partner need more time to develop relations to make the best use of their partner's expertise.

Feedback from donor project partners suggests that **PPs have made good use of the knowledge transferred during project planning and implementation**. Again, the process is easier where long-term partnerships are involved, and donor partners have more possibilities to influence projects, as local partners already trust their experience and capabilities.

Partnerships tend to work better when donor partners have a more substantive role in projects. If donor partners have a very limited role, partnerships tend to be less effective, for example if their involvement is limited to a small component of the project, or to ad hoc knowledge transfer.

Some DPPs and donor project partners noted that bilateral partnerships are frequently perceived by beneficiary state stakeholders as an add-on, rather than something that could be useful, and are thus not

considered important by the local actors. The same donor state partners consider that their involvement is too limited, and that local actors often do not take their views into account enough. During interviews it was noted that the fact that the FMO presents the bilateral outcome as a separate outcome in the results framework does not help to change this situation (*“if you really want to integrate the bilateral objective, it should be integrated”*). Some donor programme and project partners consider that should be more substantively and continuously involved.

Interview feedback suggests that some PPs' **interest in partnership may be motivated primarily by the extra points awarded during project selection, and this tends to lead to unsuccessful partnerships**. Partnerships tend to be successful where they are established to add value to the project implementation.

Donor project partners note that PPs' aims are often very clear to them from the first contacts they have with the national stakeholders. However, a donor project partner involved simultaneously in different projects suggests that POs could make it clearer in calls for proposals what the contribution of the donor project partners should be (*“we would avoid requests from project promoters simply because we would look good on their proposals”*). For example, the EEA & Norway Grants Active Citizens Funds clearly indicate the specific expertise that donor partners should bring, and this facilitates matchmaking.

The **COVID-19 pandemic has had a significant impact on bilateral partnerships**. The pandemic has limited travel and face to face meetings and many planned activities could not be held. Many partnership activities have therefore taken place online, and this has constrained the effectiveness of experience and expertise sharing and networking. Study trips have not taken place, and this has limited:

- The capacity of the donor partners to fully understand the local contexts and therefore to provide the best advice;
- The possibility for the different national stakeholders to learn from their peers in donor states.

The pandemic has had a greater impact on the programme in countries where it was not possible to organise matchmaking events before the outbreak of the pandemic.

Stakeholders note several other issues that have limited the added value of the bilateral partnerships:

- Language barriers (e.g. in Romania);
- Cultural and contextual differences (e.g. in Malta and Romania). One interviewed donor project partner notes that *“Romania is very difficult, possibly because of cultural differences. We are not partners or consultants, we are just requested to perform tasks. This would never happen in Norway”*. This view is shared by various national stakeholders. Indeed, a number of Romanian PPs consider that donor project partners can not contribute much to project objectives, as the contexts are quite different. Partnerships tend to be smoother when the contexts are more similar (e.g. in Estonia);
- Some donor project partners note that too many administrative documents are required for partnerships considering the relatively limited role of the donor project partners. This has contributed to delays in the early stages.

Some Bulgarian PPs suggest that it would be better if funding for the donor project partner is separated from the national allocation in the next programming period, as this would be more acceptable for project beneficiaries.

2.6.2. To what extent are bilateral partnerships (at programme and project level) adding value to the respective donor programme and project partners?

DPPs and donor project partners benefit from the opportunity to expand their networks both at national and international levels, including alliances within the Council of Europe. Donor project partners also consider that bilateral partnerships generate new knowledge and experience that is useful for them in their own local contexts. Thus, bilateral partnership is a two-way process, rather than a one-way transfer of knowledge from the donor states to the beneficiary states.

There are two main components to the added value of the bilateral partnerships to donor programme and project partners:

- New knowledge;
- Expanded networks and visibility at national and international levels.

Interview and survey feedback indicates that bilateral partnerships are beneficial for donor programme and project partners. According to the survey results, approximately 37% of respondents consider bilateral partnership to be 'very beneficial' for their organisation, while 50% consider the partnership to be 'beneficial', and approximately 12% 'somewhat beneficial'. As mentioned above, benefits are more tangible for donor programme and project partners that are more substantively involved in programme and project design and implementation. DPPs and donor project partners that are involved more superficially reported fewer tangible benefits for their organisations.

The evaluation confirms that bilateral partnership is not a one-way transfer of knowledge from the donor states to beneficiary states. Instead, it is a **two-way process that also benefits donor partners**.

DPPs benefit from their involvement as they are often members of various international bodies alongside counterparts from beneficiary states. EEA & Norway Grants partnerships enable them to **build and maintain relationships** and alliances that are important in international arenas (such as the Council of Europe). Partnerships enable DPPs to **promote good practices** in a practical way and to support their views and positions in these international forums. Additionally, for many DPPs their participation in the Grants represents an additional instrument that can contribute to their national strategies and policies.

While projects incorporate donor project partner methods, experience and expertise, they are not 'carbon copies' of what is done locally in the donor country. Thus, projects **generate new knowledge and experience** that is useful for donor project partners in their own local contexts. For some donor project partners, international networking and cooperation is in itself an important goal.

2.6.3. How would the programmes and projects have been developed or implemented if bilateral partnerships had not existed (counterfactual effect)?

Without bilateral partnerships programmes and projects would be implemented without the social innovation, external perspectives, and expertise that donor partners bring. The lack of DPPs at programme level constrains the identification and involvement of suitable donor partners at project level. Language barriers make it harder for PPs from smaller locations and rural areas to identify donor partners for their projects.

Analysis of stakeholder feedback suggests that programmes and **projects that are already well advanced would have been less effective without donor programme and project partners**, because they would be missing the external knowledge, experience, and different perspectives that lead to innovation in the implementation of the projects.

Additionally, consultations with stakeholders confirm that:

- Without a DPP, it would be much harder to find suitable donor project partners and there would be much less exchange of knowledge and experience;
- Without a DPP, the PDPs would have missed out on innovative methods and relevant Norwegian experience in addressing similar development challenges at the local level;
- Without donor project partners, PDPs would not have been so well adapted to the different regional contexts (e.g. PDPs1-5 in Latvia).

However, for many PPs, it is still too early to assess the practical benefits of bilateral partnership as many bilateral activities have not yet taken place due to the pandemic.

PPs without a bilateral partner were asked why they did not have a partner. Many were simply **not able to identify a donor project partner with relevant experience**. Some considered that they could manage the project as effectively only with national partners. For a few PPs, the **language barrier** was the reason.

In many **smaller locations in Romania and other beneficiary states**, both the **public administration and smaller NGOs may not be proficient in English**. This can be a serious barrier to effective bilateral relations, and may prevent the most disadvantaged groups and areas from benefiting from innovations that bilateral partnerships bring. One possibility to mitigate this problem would be for some of the calls for proposals to have a panel of donor partners at 'cluster' level instead of having donor partners at individual project level – study visits and exchanges could be organised for groups of projects, rather than individual projects.

Two other issues raised during interviews on donor project partnerships in Bulgaria and Romania. Firstly, entities in Norway are generally less interested to engage in partnerships in these countries, due to their 'negative image', as countries affected by corruption. The PO and national focal point in Bulgaria indicate that lack of interest amongst potential donor partners contributed to KS's decision not to organise a matchmaking event for the two calls under PA7 and PA8. This suggests that there may be limited awareness amongst potential donor partners about the challenges of social exclusion of vulnerable groups in these two beneficiary states. It is possible that increased awareness might raise their interest in helping to address these challenges.

Secondly, some of the selected donor project partners are reportedly 'unknown to anyone', and it is unclear if they are subject to any screening process to ensure that they can contribute expertise and innovation relevant to local contexts in the beneficiary states.

3. Conclusions and recommendations

Conclusions		Recommendations
Effectiveness		
1	<p>The extent to which the EEA & Norway Grants local development programmes contribute to structural change at the local level depends on the extent to which their design explicitly focuses on this. Programme strategy and design do not always prioritise this. This is confirmed by programme results frameworks, which often lack any linkage to structural change. Approximately half of the programmes are guided by a strategic focus on generating systemic change at the local level (PL, RO, BG, and SK). Other programmes have been designed to accommodate diverse themes continued from previous programming periods and are thus more fragmented and resources are spread too thinly across multiple themes.</p>	<p>For the local development programmes in the next financial mechanism, the FMO and the national focal points should ensure a clear strategic focus on generating systemic change at the local level. This expectation should be clearly expressed by the donors and reflected in programme documents and results frameworks. This may require revision of the FMO's guidance on the core indicators, which at present does not include many indicators to track structural change at the local level.</p>
2	<p>The programme development and approval process is complicated and slow and has delayed the start of programmes. This has limited the time available to achieve the planned outcomes, and generate structural change at local level.</p>	<p>Rather than developing a separate concept note, the FMO and the national focal points should consider the development of a detailed programme strategy/proposal, which is annexed to the programme agreement, as was the practice of the previous financial mechanism.</p>

Conclusions	Recommendations
<p>3 The ambitious outcomes of the 10 programmes must now be achieved in the 28 months remaining for project implementation and this may undermine the quality of activities and the impact of the programmes. Programme implementation has been significantly affected by COVID-19 restrictions for the past two years. More than two-thirds of the 161 contracted projects are at an early stage of implementation or have been delayed by the pandemic. This is reflected in the low rate of payments to projects. Some open calls for proposals are still in the process of selecting and/ or contracting projects. Given the limited time remaining, many project activities are likely to be rushed. There is a possibility of further COVID-related disruption and delays. The quality of activities may be affected and achievement of planned outcomes may be constrained.</p>	<p>The FMO should consider extending the deadline for project implementation by at least six months. This will help to ensure that projects can deliver results of the expected quality and support achievement of programme outcomes as envisaged. This would also mitigate risk of new COVID-related delays and would give projects time to catch up on bilateral activities, which have been significantly delayed.</p>
<p>4 The extent of synergies between programme areas within programmes depends on the reasoning behind combining programme areas in a single programme and the clarity of programme strategic focus. Programmes with a clear focus on specific challenges (territorial vulnerability, priority vulnerable groups, and/or priority aspects of poverty reduction) invest resources in a more focused way and synergies between programme areas are more evident. Combining of programme areas in a single programme, primarily to reduce the number of programmes and streamline programme management, is less effective, as such programmes tend to lack a clear priority focus and there are fewer synergies.</p>	<p>Rather than using the local development programmes as an umbrella to facilitate the continuation of previous programmes or projects, it is recommended that the FMO and the national focal points place greater emphasis on ensuring a clear strategic focus on structural change at the local level when considering combining multiple programme areas in a single programme. If there is a plan to continue predefined or other projects, they should be evaluated before their inclusion in a future programme, to validate their potential to generate structural change at the local level.</p>

Conclusions	Recommendations
<p>5 A specific focus on territorial vulnerability and prioritisation of work with vulnerable groups is the main factor that ensures the inclusiveness of programme results for diverse groups of the population. Bottom-up modalities (open calls for proposals and SGSs) offer the best potential for ensuring that diverse vulnerable groups benefit equitably from programme results. Bottom-up modalities are more flexible and better address the needs of vulnerable groups, especially if projects are designed and implemented with their active involvement. In this regard, soft measures are instrumental in reaching the most vulnerable groups effectively.</p>	<p>To promote the fair distribution of results to diverse vulnerable groups, the FMO, POs, and fund operators should consider increasing the use of open calls for proposals and SGSs for local initiatives. There should be greater emphasis on soft measures. The amount of grant funding allocated to infrastructure could potentially be reduced and more could be allocated to SGSs to support local stakeholders in applying for other funding (national or European) available for infrastructure.</p>
<p>6 It is still too early to assess the effectiveness of mandatory partnerships as the selection and contracting of projects has not been completed. However, evidence from projects that have started in Romania shows that multi-stakeholder partnerships, especially between local authorities and civil society, have great potential to generate structural change at the local level by stimulating a new culture of collaborative problem solving, which is needed to address the complexity of poverty and social exclusion of Roma and other vulnerable groups.</p>	<p>The POs should continue or expand the practice of requiring multi-stakeholder partnerships at the project level, especially between local authorities and civil society, as this is an important element of structural change at the local level. To ensure that partnerships are meaningful, and not simply established to absorb funds, the process of building and sustaining such partnerships would be assisted by capacity development support, including mentoring and peer exchange.</p>

Conclusions		Recommendations	
7	<p>The investment of approximately EUR 34 million in targeted measures for Roma inclusion in Bulgaria, Romania, and Slovakia through the local development programmes is far too little to make a real difference to direct individual service provision, which is currently the primary focus of the programmes in these countries. The potential effectiveness of the programmes towards structural change depends on the introduction of new approaches to Roma inclusion with emphasis on: empowerment of Roma; implementation partnerships that bring local governments and Roma civil society together; and incorporation of mandatory anti-discrimination measures in Roma inclusion interventions. The programmes in Bulgaria, Romania and Slovakia show promise in this direction, but serious capacity gaps are evident: local authorities are reluctant to apply social innovation and lack the necessary capacity; Roma communities are unable to engage effectively in such innovations; and smaller Roma NGOs and municipalities are unable to access available funding. Sustained structural change requires that these gaps are effectively addressed.</p>	<p>It is recommended that the FMO and the POs consider shifting the prevailing focus on providing social services to a clear focus on creating capacities and practices to systematically address services delivery, equal treatment, and Roma inclusion. A capacity-building facility (a pre-defined project) would fill the need for focused investment to empower marginalised communities to identify problems and express their interests and needs to local institutions. This should be complemented by small or medium-sized grants to solve concrete issues identified as priorities by the communities themselves. This would build practical problem-solving capacities at the local level and empower communities.</p>	
Efficiency			
8	<p>The programme/ fund operators in the 10 beneficiary states have the capacity to manage the local development programmes. They have extensive experience in fund management, including the previous EEA & Norway Grants programmes. Some POs have been very successful in collaborating with other institutions to address the multi-dimensional aspects of the local development programmes. Others faced serious challenges in the first half of programme implementation, but the situation has improved.</p>	<p>The FMO and the national focal points should ensure that the POs have not only technical expertise but also relevant subject matter expertise. The expected inter-institutional collaboration should be clearly specified in programme agreements and strategy proposals. This will help to ensure the effective and efficient implementation of programmes.</p>	

Conclusions		Recommendations
9	<p>Although projects are at an early stage of implementation, the evidence indicates that project promoters contracted to date will be able to deliver the expected results. All interviewed project promoters demonstrate strong implementation capacities. They have subject matter expertise and are capable of using funding effectively and efficiently. The COVID-19 pandemic has been the primary cause of implementation bottlenecks. It has affected procurement, and other activities, especially in the areas of education and community-based work.</p>	See recommendation 3
10	<p>The majority of project promoters at this stage are public sector entities (74%). NGOs account for only 24% of project promoters and are eligible only in some countries. There are very few private sector project promoters. Each of these types of project promoters has potential strengths and weaknesses, but it is too early to assess them based on their performance. The types of project promoters best suited to addressing the complexity of local development are those that are capable of collaborating effectively with other actors. It is unhelpful to think in terms of which types of project promoters are best suited to specific themes.</p>	See recommendation 6

Conclusions		Recommendations
Coherence		
11	<p>Local development programmes are aligned with national and EU-funded support. However, concept notes and programme agreements do not always provide a clear picture of expected complementarities and synergies with other funding. This may limit the mutual benefit of different funding sources. In some cases, the EEA and Norway Grants may be providing ‘maintenance’, or long-term financing of public services, which is not an effective use of its limited funding. Interventions are more effective when they leverage synergies between different funding sources to increase impact in priority areas and target groups. Identified good practices include launching/ piloting initiatives or approaches that are subsequently expanded using other funding; adding to or improving services developed with, or usually delivered with, other funding; supporting improved access to, and improved strategic utilisation of, EU funding; or supporting more effective utilisation or improving the benefits of EU-funded infrastructure.</p>	<p>The FMO should require, and the national focal points and POs should ensure, that the complementarity and added value of proposed EEA & Norway Grants interventions, and the justification for the funding, are always explicitly identified and clearly explained in programme proposals and programme agreements. Information on complementarity with EU and national funding should also be included in programme reports.</p>
12	<p>There appears to be limited engagement and information sharing between the EEA & Norway Grants and DG REGIO once Protocol 38C negotiations have been concluded.</p>	<p>The FMO should engage more systematically with DG REGIO after negotiations have been concluded. This would enable identification and better use of complementarities, especially in the application of policies such as community-led local development in marginalised urban and rural areas. This can also involve analysis, policy briefs and exchange of existing research or evaluations to increase the optimisation of complementarities.</p>

Conclusions		Recommendations	
13	<p>The EEA & Norway Grants are investing in diverse thematic areas of importance to local development. However, stakeholder feedback indicates that their main added value is not in filling thematic gaps, but in addressing gaps in the way local decision-making systems function, which EU funding addresses only to a limited extent. The local development programmes support structural change through better targeting of specific vulnerable regions or groups, or specific themes; greater emphasis on capacity building of local stakeholders and empowerment of vulnerable groups; and cross-sectoral multi-stakeholder partnership and networking. The programmes' integrated, multi-sectoral and multi-modal approach is considered very important for generating structural change at the local level.</p>		<p>The FMO and the POs should consider systematically adopting the principles of inclusive and integrated community-led local development (CLLD) in future local development programmes, including multi-sectoral and multi-stakeholder partnerships, participatory approaches ensuring the involvement of vulnerable groups in local decision making, targeted capacity building, and seed funds to support initiatives jointly developed by local stakeholders. This would ensure that programmes respond better to the focus on structural change at the local level. It would increase complementarity with EU funding, especially in disadvantaged areas or regions with a high percentage of vulnerable population, where the application of EU funded CLLD has been much less effective.</p>
Bilateral relations			
14	<p>The potential of bilateral partnerships is constrained by the low awareness in the donor states about the local development programmes, and the EEA & Norway Grants in general. This has made it difficult to find donor partners, especially for countries with no DPPs, or countries perceived in the donor states as contextually too different. It is also questionable whether matchmaking events are sufficient on their own to create substantive partnerships.</p>		<p>Rather than relying only on matchmaking events to establish new project partnerships, the FMO, DPPs and POs should consider a more strategic and systematic approach to raising awareness in the donor countries about the context and priorities of the local development programmes. This will help to expand the networks of stakeholders with an interest in bilateral partnership.</p>
15	<p>Language barriers make it harder for PPs in disadvantaged areas to identify and work with donor partners.</p>		<p>To ensure that PPs in disadvantaged areas can benefit from bilateral cooperation, POs and DPPs could consider the use of panels of donor partners at cluster level for some calls for proposals. These could organise study visits and exchanges for groups of projects.</p>

ANNEXES

Annex 1. List of interviewed stakeholders

National Stakeholders

Bulgaria

Stakeholder	Modality	Organisation	Type of entity	Interviewee
NFP	Programme	Central Coordination Unit; Council of Ministers	Public institution	Dobrinka Krasteva, Daniela Tsoneva, Gergana Mitreva
PO	Programme	Ministry of Education and Science	Public institution	Maria Valova, Maria Teodorova; Milena Minceva; Elena Miloshova; Borjana Bozanova
PP	PDP	Bulgarian Red Cross Association	NGO	Nadezhda Todorovska, Siana Metodieva
PP	PDP	National Association of the Municipalities in Republic of Bulgaria	Municipal association	Teodora Dacheva, Simeon Petkov
PP	PDP	Municipality Kostinbrod	Municipality	Tereza Vlasajkova, Tanja Kirilova – Ivanova
PP	PDP	Association 'Children with oncoheamatologic diseases'	NGO	Plamen Belchev Petja Aleksandrova, project coordinator
PP	Restricted call	Municipality Stara Zagora	Municipality	Ivanka Sotirova, project manager Vessela Mareva, manager Youth center; Boyana Radeva, youth worker Monika Todorova, education mediator; Neli Mineva, youth worker; Zdravko Tenev, psychologist; Mircho Hristov, youth worker; Georgi Simeonov, project coordinator
PP	Restricted call	Municipality Plovdiv	Municipality	Georgy Tityukov, Dimitria Todorova, project coordinator Kalina Damjanova, youth worker; Donka Kyosseva, education mediator
PP	Restricted call	Municipality Dobrich	Municipality	Emilia Baeva, Daniela Sivkova, project manager; Nikolay Nikolov, youth worker; Mimi Ivanova, youth work coordinator; Erham Sali, education mediator
PP	Restricted call Youth Centres	Municipality Vratsa	Municipality	Tcvetelina Teofilova, project coordinator; Michaela Mitcheva, youth worker; Kalin Angelov, youth worker; Tihomit Mashov, youth work coordinator; Rossen Dekov, education mediator; Nikola Zhivkov, youth worker; Galina Snechanov, Dessislava Petrova
Other		Foundation Roma - Lom	Roma NGO	Nikolaj Kirilov

Midterm evaluation of local development programmes (2014-2021 Financial Mechanisms)

Stakeholder	Modality	Organisation	Type of entity	Interviewee
Other		Public Policies Watchdog Forum Foundation	NGO	Pavlina Petrova
FMO		FMO		Matko Marton
International project partner	PDP6	European Fundamental Rights Agency	International organization	Andrey Ivanov
IPO		Council of Europe	International organization	Margareta Platon

Croatia

Stakeholder	Modality	Organisation	Type of entity	Interviewee
FMO				Sarlota Vernaj
NFP	Programme	Ministry for Regional Development and EU Funds	Central public institution	Natalija Laštro
PO	Programme	Ministry for Regional Development and EU Funds	Central public institution	Luka Kevešević
PP	PDP1	Croatian Academic and Research Network (CARNET)	Central public institution	Renata Šimunko Vlatka Marčan

Cyprus

Stakeholder	Modality	Organisation	Type of entity	Interviewee
NFP and PO	Programme	Directorate general for European programmes, coordination and development	Public	Leda Skordelli, Senior Coordination Officer, representing both the NFP and PO
PP	PDP 2	Community Council of Moniatis	NGO	Savvas Maliotis
PP	PDP 4	St Loucas Community	NGO	Ms Thekla Kallika and Ms Egli
PP	PDP 5	Social Welfare Services of the Ministry of labour and social insurance	Public	Panayiota Trifilli
PP	PDP 6	Ministry of the Environment	Public	Christalla Nisiotou
PP	PDP 9	Nicosia Municipality Multifunctional foundation	NGO	Stavroula (Roula) Georgopoulou
PP	PDP 10	Karaiskakio Foundation	NGO	Julie Kitromelidou; Pavlos Costeas

Greece

Stakeholder	Modality	Organisation	Type of entity	Interviewee
PP	PDP1	The European Wergeland Centre	NGO	Kjersti Klette, Project Coordinator in Norway

Midterm evaluation of local development programmes (2014-2021 Financial Mechanisms)

				Dora Katsamori; Coordinator in the Greece office
PP	PDP2	Solidarity Now Greece	NGO	Marilyn Polena, Director of Programmes
NFP	NFP	MOU	Public	Herakles Alexopoulos
fund operator	programme	Human rights 360	NGO	Epaminondas Farmakis ; Anastasia Georgiou ; Stavroula Palaiologou; Rania Papadopoulou

Estonia

Stakeholder	Modality	Organisation	Type of entity	Interviewee
PO	Programme	Ministry of Social Affairs	Public institution	Ülar Vaadumäe
NFP	Programme	Ministry of Finance	Public institution	Laura Pikkoja, Miryam Vahtra, Marek Kübarsepp
PP	PDP1	Ministry of Justice	Public institution	Laidi Surva, Terje Smitt
PP	PDP3	Social Insurance Board	Public institution	Liis Sild
PP	PDP5	National Heritage Board	Public institution	Kaija-Luisa Kurik
PP	PDP6	University of Tartu	Public institution	Riina Järvela, Merike Kull, Maret Pihu, Priit Kaasik
PP	PDP7	National Institute for Health Development	Public institution	Agne Kivisaar
PP	Open Call 5	Valga municipality	Public institution	Lea Vutt
PP	SGS 1	Police and Border Guard Board	Public institution	Margarita Ingel
PP	SGS 2	Tartu Art School	Public institution	Juta Vallikivi
PP	SGS 2	Pärnumaa Vocational Education and Training Centre	Public institution	Anu Kukk, Helke Heinmets, Terje Jürivete
PP	Open Call 3	Lifeline (Eluliin)	NGO	Eda Mölder
PP	Open Call 5	Paide Unit of Information Centre for Sustainable Renovation	NGO	Rainer Eidemiller
PP	SGS 3	NGO Pärnu Women Support Centre	NGO	Margo Orupõld
PP	SGS 1	NGO Prevention Centre	NGO	Elo Lättemägi

Latvia

Stakeholder	Modality	Organisation	Type of entity	Interviewee
FMO				Gudrun Dogg Gudmundsdottir
PO	Programme	Ministry of Environmental Protection and Regional	Public institution	Janis Gorbunovs Ilze Krieva

Midterm evaluation of local development programmes (2014-2021 Financial Mechanisms)

Stakeholder	Modality	Organisation	Type of entity	Interviewee
		Development of the Republic of Latvia		
NFP	Programme	Ministry of Finance of the Republic of Latvia	Public institution	Diāna Āboliņa Aija Paleja
PP	PDP6	Latvian Association of Local and Regional Governments	Local government association	Ligita Pudža
PP	PDP1	Latgale Planning Region	Public institution	Sarmīte Teivāne
PO	Culture open calls	Ministry of Culture of the Republic of Latvia	Public institution	Zanda Saulīte
Project Partner	PDP1	Ministry of Environmental Protection and Regional Development of Latvia	Public institution	Raivis Bremšmits
PP	PDP7	Ropazi local municipality	Local authority	Diāna Viļčuka

Malta

Stakeholder	Modality	Organisation	Type of entity	Interviewee
PO and NFP	Programme	Ministry for Foreign and European Affairs - Funds and Programmes Division	Public institution	Carmen Dalli, Anthony Camilleri, Alison Grech, Angele Azzopardi
PP	PDP2	Foundation for Social Welfare Standards (FSWS)	Public institution	Remenda Grech, Eliane Aquilina
PP	PDP3	Ministry for the National Heritage, the Arts and Local Government	Public institution	Roberto Tabone, Fabian Galea

Poland

Stakeholder	Modality	Organisation	Type of entity	Interviewee
FMO		Financial Mechanism Office		Gudrun Dogg Gudmundsdottir
DPP	Programme, PDP	Norwegian Association of Local and Regional Authorities (KS)	Local government association	Elita Cakule Christian Larsen
NFP	Programme	Ministry of Development Funds and Regional Policy	Public institution	Tomasz Kolodziej; Maciej Aulak
PO	Programme	Ministry of Development Funds and Regional Policy	Public institution	Kamil Wieder
IPO	PDP	Organisation for Economic Cooperation and Development (OECD)	Intergovernmental organisation	Johannes Klein
PP	Open call	City of Rydułtowy	Local authority	Mariola Bolisęga
PP	PDP	Association of Polish Cities	Local government association	Tomasz Potkański; Anna Wiktorczyk-Nadolna

Romania

Stakeholder	Modality	Organisation	Type of entity	Interviewee
NFP	Programme	General Directorate within the Ministry of Regional Development, Public Administration and European Funds	Central public institution	Mihaela Terchila; Diana Duma
PO	Programme (management)	Romanian Social Development Fund	Public fund	Mihaela Peter, Director Gabriela Popescu, Deputy Director
PO	Programme coordinators/ experts)	Romanian Social Development Fund	Public fund	Cristian Chiriac (open calls 1 and 2); Radu Raileanu (open call 1) Cristina Paraipan (SGS 'Access to financing') ; Adrian Szelmenczi (open call 4);
PP	PDP 3 - PNP002	AcOR: Association of Communes in Romania	Public entity	Adrian Miroiu-Lamba
PP	Call 1-PN1003	Territorial Administrative Unit Sacueni	Public entity	Fűzesi Mónica
PP	Call 1 -PN1005	Territorial Administrative Unit SĂSCIORI Commune	Public entity	Daniela Draghici
PP	Call 1– PN1008	SASTIPEN - Association "Roma Centre for Health Policies"	NGO	Radu Anuți
PP	Call 1-PN1012	Association Centre for Education and Human Rights	NGO	Melania Coman
PP	Call 1-PN1014	UAT Municipality of Alba Iulia	Public entity	Crina Dumitrescu
PP	Call 1-PN1016	'Caritas-Social Assistance' Association Branch, Alba Iulia	NGO	Kerezsi Hajnalka
PP	Call 1-PN1018	Romanita Humanitarian Association (RO)	NGO	Naina Popa
PP	Call 1-PN1019	Save the Children Organization România	NGO	Stefania Mircea
PP	Call 1-PN1020	General Directorate of Social Assistance and Child Protection, Ialomita	Public entity	Raluca Romaniuc
PP	Call 1-PN1022	"Amfiteatru" Foundation	NGO	Borsan Aurel
PP	Call 1-PN1023	Foundation "Together" Community Development Agency	NGO	Andrei Constantin
PP	Call 2 - PN2019	'Stefan cel Mare' University	Public institution	Ioana Cozianu

Midterm evaluation of local development programmes (2014-2021 Financial Mechanisms)

Stakeholder	Modality	Organisation	Type of entity	Interviewee
PP	Call 2 - PN2022	Prahova County School Inspectorate	Public institution	Aurel Graur
PP	Call 2 - PN2025	Alba Iulia Orthodox Philanthropy Association	NGO	Daniela Truță
PP	Call 2 - PN2041	"Alaturi de Voi" Foundation	NGO	Diana Vasiliu
PP	Call 2 - PN2078	YANA Foundation-You Are Not-Along, Charitable Foundation	NGO	Gabriela Mateiu
PP	Call 2 - PN2114	ZAN ART Arts and Spirituality Association	NGO	Zâna Barău
PP	Restricted Call Call 3 - PN3006	Salvation Army Christian Mission in Romania	NGO	Eugen Lucan
PP	Restricted Call Call 3 - PN3007	Intercommunity Development Association Cluj Metropolitan Area	Association of public entities	Alexandrina Kiss
PP	Call 4 - PN4010	Medical Forensic Institute Iasi	Public Institution	Diana Bulgaru Iliescu
PP	Call 4 - PN4038	General Directorate for Social Assistance and Child Protection Buzau	Public Institution	Mihaela Neagu
PP	Call 4 - PN4049	National Institute of Public Health	Public Institution	Anda Curtă
PP	Call 4 - PN4039	SOS Children's Villages Romania	NGO	Mihail Carp
PP	Call 4 - PN4077	HOSPICE House of Hope Foundation	NGO	Petruța Anania
SGS 'Access to financing'				
PP	PND001	Territorial administrative unit Moldova Noua town	Public entity	Dabiel Jian Gheorghe
PP	PND002	Territorial administrative unit Ciortesti commune	Public entity	Apostol Alina
PP	PND007	Territorial administrative unit Ogra commune	Public entity	(name), Local councillor
PP	PND009	Territorial administrative unit Balcesti town	Public entity	Aleca Constantin
PP	PND010	Territorial administrative unit Putineiu commune	Public entity	Duma Adrian

Slovakia

Stakeholder	Modality	Organisation	Type of entity	Interviewee
NFP	Programme	Government body	Public institution	Martina Szaboova
NFP	Programme	Government body	Public institution	Matus Lukacin
PO	Programme	Ministry of Investments, Regional Development and Informatization	Public institution	Jana Dackova
PO	Programme	Ministry of Investments, Regional Development and Informatization	Public institution	Vlasta Milanova
PP PDP	PDP	National Institute for Education	Public institution	Miroslava Hapalova
PP PDP	PDP	National Institute for Education	Public institution	Jozef Facuna
PO	Selection Committee	IUVENTA - Slovak Youth Institute	NGO	Peter Lenco
PO	Selection Committee	Office of the Plenipotentiary of the Government of the Slovak Republic for Roma Communities	Public institution	Tibor Skrabsky
DPP/IPO		Council of Europe	International organization	Margareta Platon
Other stakeholders		Fundamental rights agency	International organization	Jaroslav Kling
FMO				Matko Marton Sheena Keller

Donor partners, international partner organizations and other international stakeholders

Type of stakeholders	Organisation	Type on entity	Name of person (s) interviewed
Donor programme and project partner (BG, LV, MT, PL, RO)	Norwegian Association of Local and Regional Authorities (KS)	Public Authority	Elita Cakule; Christian Larsen (PI. LV) Bjørn Rongevær, Christian Larsen (BG,RO, MT)
Donor programme partner (EE)	Norwegian Institute of Public Health (NIPH NO)	Public Authority	Solfrid Johansen
Donor programme partner (EE)	Norwegian Directorate of Health (HDIR NO)	Public Authority	Freja Ulvestad Karki
Donor programme partner (HR)	Norwegian Agency for International Cooperation and Quality Enhancement in Higher Education	Public Authority	Margunn Instefjord

Midterm evaluation of local development programmes (2014-2021 Financial Mechanisms)

Type of stakeholders	Organisation	Type on entity	Name of person (s) interviewed
Donor programme partner (EE)	Norwegian Directorate for Cultural Heritage (RA NO)	Public Authority	Noelle Dahl-Poppe
Donor Partner (LV)	Arts Council of Norway		Tora Toreng
Donor project partner (RO)	Terram Pacis	NGO	Joseph Hategekimana
Donor project partner (BG)	Glemmen Videregående Skole	School	Christiane Sofie Skahjem
Donor project partner (RO)	SOS Children's Villages	NGO	Kjersti Movold
Donor project partner (RO)	Migrasjonssenteret Rusomsorgen Frelsesarmeen	NGO	Christian Ariton
Donor project partner (SK)	European Wergeland Venter	Resource centre on education	Valentina Papeikiene.
Donor project partner (RO)	New Schools AS	Private company	Mihaela Tăbăcaru
Donor project partner	Agder County	Local authority	Lars Holmer Hoven
Donor project partner	Elverum Municipality	Local authority	Alf Kristian Enger
International partner organisation (BG, SK, RO)	Council of Europe	International organization	Margareta Platon
Other stakeholders	European Commission DG REGIO	Public Authority	Péter Takacs
Other stakeholders	European Commission DG REGIO	Public Authority	Ann-Kerstin Myleus

Annex 2. List of documents reviewed

General

EEA and Norway Grants Financial Mechanism Office

- EEA and Norway Grants 2014-2021 (2019), Blue Book: An overview of supported programme areas <https://eeagrants.org/resources/eea-and-norway-grants-2014-2021-blue-book-overview-supported-programme-areas>
- Core Indicators 2014-2021. Guidance document for programmes financed under the EEA and Norway Grants 2014-2021. (2020) <https://eeagrants.org/resources/eea-and-norway-grants-2014-2021-core-indicator-guidance>
- EEA and Norway Grants 2014-2021: Results guideline. (2021) <https://eeagrants.org/resources/2014-2021-results-guideline>
- EEA and Norway Grants 2014-2021: Results reporting guide. (2021) <https://eeagrants.org/resources/eea-and-norway-grants-2014-2021-results-reporting-guide>
- Centre for Strategy & Evaluation Services. Assessment of the Programme Development Approach: Final Report (December, 2020) <https://eeagrants.org/resources/assessment-programme-development-approach>

EU level policy documents and evaluative research

- European Commission (03/03/2010), 'EUROPE 2020 A strategy for smart, sustainable and inclusive growth', <https://op.europa.eu/en/publication-detail/-/publication/6a915e39-0aab-491c-8881-147ec91fe88a/language-en>
- European Commission (March, 2014), 'Community Led Local Development'. Cohesion policy 2014-2020 https://ec.europa.eu/regional_policy/sources/docgener/informat/2014/community_en.pdf
- European Commission (undated), 'Priorities for 2021-2027' https://ec.europa.eu/regional_policy/en/policy/how/priorities
- European Commission (undated), 'The 2021-2027 EU budget – What's new?', https://ec.europa.eu/info/strategy/eu-budget/long-term-eu-budget/2021-2027/whats-new_en
- European Commission (undated), 'Recovery and Resilience Facility' [key instrument at the heart of NextGenerationEU], https://ec.europa.eu/info/business-economy-euro/recovery-coronavirus/recovery-and-resilience-facility_en
- European Commission (27/05/2020), 'Europe's moment: Repair and Prepare for the Next Generation' [NextGenerationEU recovery instrument], <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1590732521013&uri=COM:2020:456:FIN>
- European Commission (01/09/2021), 'DG Regio' [institutional diagram], https://ec.europa.eu/regional_policy/sources/dgs/organigramme_en.pdf
- European Commission (undated), 'Asylum, Migration and Integration Fund', https://ec.europa.eu/info/funding-tenders/find-funding/eu-funding-programmes/asylum-migration-and-integration-fund_en

- Green European Foundation & The Greens | European Free Alliance (09/2016), 'Guide to EU Funding on Migration and Asylum',
https://gef.eu/wp-content/uploads/2017/01/The_Guide_to_EU_Funding_on_Migration_and_Asylum.pdf
- Council of Europe (2012), Estimates of Roma population in Europe,
<http://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=0900001680088ea9>
- Council of the European Union (2009), Council Conclusions on Inclusion of the Roma, Common Basic Principles on Roma Inclusion,
https://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lsa/108377.pdf
- European Commission (2021), EU Roma Strategic Framework for Equality, Inclusion and Participation,
https://ec.europa.eu/info/sites/default/files/union_of_equality_eu_roma_strategic_framework_for_equality_inclusion_and_participation_en.pdf
- European Fundamental Rights Agency FRA (2018), A persisting concern: anti-Gypsyism as a barrier to Roma inclusion,
<https://fra.europa.eu/en/publication/2018/persisting-concern-anti-gypsyism-barrier-roma-inclusion>
- European Commission (undated), 'Creative Europe',
<https://ec.europa.eu/culture/creative-europe>
- European Union (20/12/2013), 'Regulation (EU) No 1295/2013 Of The European Parliament And Of The Council of 11 December 2013 establishing the Creative Europe Programme (2014 to 2020) and repealing Decisions No 1718/2006/EC, No 1855/2006/EC and No 1041/2009/EC',
<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:347:0221:0237:EN:PDF>
- ERGO Network. 'Community-Led Local Development for Roma inclusion. Evaluation Report 2014-2020'
<https://ergonetnetwork.org/wp-content/uploads/2021/03/ERGO-Network-evaluation-of-the-2014-2020-CLLD-cycle-designed.pdf>
- ERGO Network. (December 2020). 'Ineffectiveness or Misuse of European Funds. Synthesis report from ERGO Network members in four countries (Bulgaria, Hungary, Slovakia and Romania)
<https://ergonetnetwork.org/wp-content/uploads/2021/03/Misuse-of-EU-funds-in-4-Member-States-synthesis-report.pdf>
- INTERACT (2021), 'About Interreg',
<https://interreg.eu/about-interreg/>
- Péter Takács, DG Regional and Urban Policy Unit 03 Inclusive growth, territorial and urban development (28/02/2018), 'Europe closer to citizens: the new policy objective 5 – Strategies and tools for integrated territorial development in 2021-2027',
https://ec.europa.eu/regional_policy/sources/informing/dialog/2019/2019_02_28_urban_territorial.pdf
- Neda Korunovska, Zeljko Jovanovic. Open Society Roma Initiatives Office. Open society Foundations. 'Roma in the COVID-19 crises. An early warning from six EU Member States'
<https://www.opensocietyfoundations.org/publications/roma-in-the-covid-19-crisis>
- Katarzyna Szumielewicz, DG REGIO F.3 Poland (undated), 'Europe closer to citizens: the new priority objective 5',
http://bof.org.pl/images/2019/Prezentacje_konferencja/13_Cel_polityki_PO5_-_K._Szumielewicz.pdf

Other

- Donella Meadows (Sustainability Institute) (1999), 'Leverage Points – Places to Intervene in a System', http://www.donellameadows.org/wp-content/userfiles/Leverage_Points.pdf

Programme documents reviewed for each of the 10 countries (as published in GrACE, or provided by the FMO)

- Memoranda of Understanding
- Concept notes as approved
- Programme Agreements
- Results frameworks
- Annual programme reports
- Internal monitoring and risk assessments
- Programme progress overviews

Country specific documents

Bulgaria

Other programme level documents

- Blomeyers and Sanz/CREDA consulting. (March, 2021) BG-LOCALDEV External Monitoring report. (commissioned by the FMO)
- Blomeyers and Sanz/CREDA consulting (2019) BG- LOCALDEV External Monitoring Report. (commissioned by the FMO)

Project calls and small grants schemes (texts and guidelines):

- Call 1 Restricted call for proposals: "Youth centres: A Powerful Factor for Local Development" <https://www.eeagrants.bg/en/programs/local-development/news/oqranichena-pokana-za-podbor-na-proekti%E2%80%9Emladezhkite-czentrove-moshhen-faktor-za-mestno-razvitie-%E2%80%9C>
- **Open call 2** for proposals “**Establishing youth centres**” <https://www.eeagrants.bg/en/programs/local-development/news/pokana-za-podbor-na-proektni-predlozheniya-%E2%80%9Eizgrazhdane-na-mladezhki-czentrove%E2%80%9C>
- Open call 3 for proposals “**Education and care in early childhood**” <https://eumis2020.government.bg/bg/s/Procedure/Info/7ae1575e-a627-447d-9941-c7dedb6c7b22>
- Open call 4 for proposals "Integrated measures for Roma inclusion and empowerment" [https://www.eeagrants.bg/programi/mestno-razvitie/novini-1/izpolzvane-na-sredstva-otdvustranniya-fond-na-programata-\(predi-sklyuchvaneto-na-dogovori\)](https://www.eeagrants.bg/programi/mestno-razvitie/novini-1/izpolzvane-na-sredstva-otdvustranniya-fond-na-programata-(predi-sklyuchvaneto-na-dogovori))

Project level documents (proposals and reports as available) for 10 projects:

- [PDP BG-LOCALDEV-0001](#) Grow through Activating Local Potential (GALOP), Guidelines for assessing the submitted LD concepts; Public tender for developing municipal strategies; drafts of municipal strategies;

- [PDP BG-LOCALDEV-0002](#) Innovative Community Care Models in Favour of People with Chronic Diseases and Permanent Disabilities
- [PDP BG-LOCALDEV-0003](#) Recovery Centre for Children with Oncohematological Diseases
- [PDP BG-LOCALDEV-0004](#) Healthcare for everyone
- [PDP BG-LOCALDEV-0005](#) Building capacity for educational and social inclusion
- [PDP BG-LOCALDEV-0006](#) Novel Approaches to Generating Data on Hard-to-reach Populations at Risk of Violation of their Rights
- Call 1 – 4 projects: [BG-LOCALDEV-0007](#) Youth Centre Dobrich; [BG-LOCALDEV-0008](#) Youth Center Plovdiv; [BG-LOCALDEV-0009](#) Youth Centre Stara Zagora; [BG-LOCALDEV-0010](#) Vratsa Youth Center

Other policy and research documents

- Council of Ministers, portal for public consultations. Draft of the National Strategy for equality, inclusion and participation of Roma 2021-2030 (In Bulgarian). Проект на Национална стратегия на Република България за равенство, приобщаване и участие на ромите 2021-2030
<https://strategy.bg/PublicConsultations/View.aspx?lang=bg-BG&id=5708>
- Ilieva, N., Kazakov, B. (2014), Projection of the Roma population in Bulgaria (2020-2050). In: International Scientific Conference GEOBALCANICA 2019, p. 278,
https://www.researchgate.net/publication/335576198_PROJECTION_OF_THE_ROMA_POPULATION_IN_BULGARIA_2020-2050
- OSF, REF, UNICEF (2020). Roma Early Childhood Inclusion+
<https://www.unicef.org/bulgaria/media/9126/file>

Croatia

Calls for proposals and SGSs (texts, guidelines)

- Ministry for Regional Development and EU Funds. (2021) Open call for proposals. Strengthening STEM skills in primary schools and development of Regional Science Centres for STEM education in primary schools
<https://eeagrants.hr/en/strengthening-stem-skills-in-primary-schools-and-development-of-regional-science-centres-for-stem-education-in-primary-schools/>
- Ministry for Regional Development and EU Funds. (2021) Improved Skills and Competencies of Teachers and Other Educational Workers in Primary Education
<https://eeagrants.hr/en/improved-skills-and-competencies-of-teachers-and-other-educational-workers-in-primary-education/>

Other documents

- Preparation, monitoring and evaluation of the comprehensive curricular reform experimental programme „School for Life“
<https://mzo.gov.hr/en>
- European Commission. e-Schools project to increase ICT use in Croatia's education system (2016)
https://ec.europa.eu/regional_policy/en/projects/croatia/e-schools-project-to-increase-ict-use-in-croatia-s-education-system

- CARNET. (Aug.2020). CARNET awarded 1.3 billion in grants for the second phase of the e-schools programme. <https://www.carnet.hr/en/carnet-awarded-hrk-1-3-billion-in-grants-for-the-second-phase-of-e-schools-programme/>

Cyprus

Project level documents

- Project documents (contract and reports as available) for the selected project sample of six predefined projects: PDP2, PDP4, PDP6, PDP9 and PDP10
- Other policy documents:
- National Strategic Policy for the Reduction of Poverty and Social Exclusion (2014 - 2024)
- Cyprus Anti-Poverty Network, Cyprus Poverty Watch (9 July 2020), https://www.eapn.eu/wp-content/uploads/2020/09/EAPN-EAPN-Cyprus-Poverty-Watch-2020_ENG-4676.pdf

Estonia

Project level documents (calls and documents of selected sample of projects)

- Financed projects. Website of Ministry of Social Affairs, <https://www.sm.ee/en/norway-grants-financed-projects>
- Open call for proposals: 'Integrated services provision to prevent early school leaving'. Rules and Regulations for Applicants, https://www.sm.ee/sites/default/files/outcome_1_rules_and_regulations_lq_support_services.pdf
- Open Calls and SGS. Website of Ministry of Social Affairs. <https://www.sm.ee/en/open-calls>

Reviewed project level information for a sample of 13 projects including:

- PDPs (PDP1 'Specialised juvenile justice approach established'; PDP3 'Strengthening the Victim Support System'; PDP5 'Increasing physical activity of schoolchildren'; PDP6 'Increasing public health competence and capacity of local governments' PDP8. 'Historic town centres revitalised through heritage-based local development')
- Projects supported by open calls or small grants schemes (EE-LOCALDEV-0010, EE-LOCALDEV-0012; EE-LOCALDEV-0018; EE-LOCALDEV-0017; EE-LOCALDEV-0022; EE-LOCALDEV0023; EE-LOCALDEV-0024; EE-LOCALDEV-0027; EE-LOCALDEV-0032)

Other documents (policy documents and evaluations)

- Estonia's regional development strategy for 2014-2020 <https://slidetodoc.com/the-regional-development-strategy-of-estonia-2014-2020/>
- Ministry of Social Affairs, Estonia (2012). National Health Plan 2009–2020 (2012 amended version) https://www.emcdda.europa.eu/drugs-library/ministry-social-affairs-estonia-2012-national-health-plan-2009%E2%80%932020-2012-amended-version_en
- Technopolis Group Eesti OÜ. (2019). Mid-term evaluation of the Operational Programme for Cohesion Policy Funds 2014-2020 https://www.ibs.ee/wp-content/uploads/ESIF_final_report.pdf

- Strategy for Preventing Violence 2015-2020. (2015)
https://www.kriminaalpoliitika.ee/sites/krimipoliitika/files/elfinder/dokumendid/strategy_for_preventing_violence_for_2015-2020.pdf
- Ministry of Education and Research. The Estonian Lifelong Learning Strategy 2020
https://www.hm.ee/sites/default/files/estonian_lifelong_strategy.pdf
- The State Shared Service Center, EU structural and investment funds' subsidies to Estonia in the budget period 2014–2020, Finance by period and measure in domain,
<https://rtk.ee/en/toetatavad-valdkonnad>
- Webpage of SSSC,
<https://www.rtk.ee/en/funds-and-programs/other-programs/eea-and-norway-grants-estonia#programs>
- Ministry of Social Affairs, Estonia. Welfare Development Plan 2016–2023
https://www.sm.ee/sites/default/files/content-editors/eesmargid_ja_tegevused/welfare_development_plan_2016-2023.pdf

Greece

Project level documents:

- Project contracts, PDP 1 and PDP2

Other documents

- Anti-Poverty Network, Greece Poverty Watch (2019),
<https://www.eapn.eu/wp-content/uploads/2020/06/EAPN-PW2019-Greece-EN-EAPN-4494.pdf>

Latvia

Project level documents (calls and documents of selected sample of projects):

- eeagrants.lv (undated), 'EEA Grants_accepted_projects-2014-2021' [spreadsheet],
<https://eeagrants.lv/excel-export->
- eeagrants.lv (17/06/2021), 'Call for Project Proposals for the Small Grant Scheme 'Support for Business Ideas in Latgale'',
<https://eeagrants.lv/en/2021/06/17/call-for-project-proposals-for-the-small-grant-scheme-support-for-business-ideas-in-latgale/>
- KUN (undated), 'Welcome to KUN Centre for Equality and Diversity',
<https://www.kun.no/english.html>
- Latgale Planning Region (17/06/2021), 'Call for Project Proposals for the Small Grant Scheme 'Support for Business Ideas in Latgale'',
<https://eeagrants.lv/en/2021/06/17/call-for-project-proposals-for-the-small-grant-scheme-support-for-business-ideas-in-latgale/>
- Ministry of Culture of the Republic of Latvia (31/03/2021), 'Announcement – Programme 'Local Development, Poverty Reduction And Cultural Cooperation' – Call For Proposals 'Support For The Creation Of Professional Art And Cultural Products For Children And Youth' – EEA Grants 2014 – 2021 – Latvia'
- Ministry of Culture, Republic of Latvia (08/01/2021), 'Local Development and Culture Programme',
<https://www.km.gov.lv/en/local-development-and-culture-programme>

- Arts Council Norway (2015), 'The Cultural Rucksack – A National Programme for Arts and Culture in Norwegian Schools'.

Other policy documents and research

- Cabinet of Ministers, Republic of Latvia (29/07/2014), 'Cultural Policy Guidelines 2014-2020 "Creative Latvia"',
<https://likumi.lv/ta/en/en/id/267970>
- Congress of Local and Regional Authorities of the Council of Europe (12/2020), 'Fact-finding report on territorial reform in Latvia' [Resolution 457 (2020)],
<https://rm.coe.int/fact-finding-report-on-territorial-reform-in-latvia-co-rapporteurs-xav/1680a0bfbcd>
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<https://www.oecd.org/regional/regionaldevelopment/national-urban-policy-Latvia.pdf>
- Official Statistics Portal (undated), 'Official statistics of Latvia',
https://data.stat.gov.lv/pxweb/lv/OSP_PUB/START_POP_IR_IRS/IRD060/
- Official Statistics Portal (undated), 'Added value of regions and cities',
<https://stat.gov.lv/lv/statistikas-temas/valsts-ekonomika/ikp-gada/2352-regionu-un-pilsetu-pievienota-vertiba?themeCode=IK>
- Péter Takács, DG Regional and Urban Policy Unit 03 Inclusive growth, territorial and urban development (28/02/2018), 'Europe closer to citizens: the new policy objective 5 – Strategies and tools for integrated territorial development in 2021-2027',
https://ec.europa.eu/regional_policy/sources/informing/dialog/2019/2019_02_28_urban_territorial.pdf
- Riga Planning Region (11/12/2014), 'Riga Planning Region Sustainable Development Strategy 2014-2030 and Development Programme 2014-2020',
https://www.varam.gov.lv/sites/varam/files/4_rpr_planning-documents_rudolfs_cimdins.pdf
- UNESCO (undated), 'Latvian Rucksack initiative',
<https://en.unesco.org/creativity/policy-monitoring-platform/latvian-rucksack-initiative>

Malta

- Reviewed project information for 2 predefined projects
- National Strategic Policy for the Reduction of Poverty and Social Exclusion (2014-2024)

Poland

Project related information and project calls:

- Association of Polish Cities (undated), 'About the Association of Polish Cities' [translation],
<https://www.miasta.pl/strony/o-zwiazku-miast-polskich>
- Association of Polish Cities (undated), 'Database on cities - Local Government Analysis System (SAS)' [translation],
<https://www.miasta.pl/strony/baza-danych-o-miastach-system-analiz-samorzadowych-sas>
- Ministry of Development Funds and Regional Policy (undated), 'Guide for applicants' [Poland],
<https://www.eog.gov.pl/en/site/guide-for-applicants/>

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<https://dezvoltare-locala.frds.ro/en/inclusive-education-for-children-and-youth-at-risk-call-for-proposals/>
- Call 3 Poverty reduction restricted call for proposals
<https://dezvoltare-locala.frds.ro/en/poverty-reduction-restricted-call-for-proposals/>
- Call 4 “ Local Development call for proposals”
<https://dezvoltare-locala.frds.ro/en/local-development-call-for-proposals/>
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<https://dezvoltare-locala.frds.ro/en/>
- Small grants scheme Access to financing, 2019, 2020, 2021
<https://dezvoltare-locala.frds.ro/en/>

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- PDP 3 Project Proposal (PNP002)

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- Call 2 : 6 projects (PN2019, PN2022, PN2025, PN2041, PN2078, PN2114)
- Call 3: 2 projects (PN3006, PN3007)
- Call 4 : 4 projects (PN4010, PN4038, PN4039, PN4049, PN4077)
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Annex 3. Sufficiency and effectiveness of addressing Roma inclusion through the local development programmes in Bulgaria, Romania and Slovakia: a case study

Introduction

The purpose of the Roma case study is to reflect deeper on the evaluative question “To what extent is Roma inclusion sufficiently and effectively addressed through the local development programmes in Bulgaria, Romania, and Slovakia?” and to extract strategic learning that can serve the Grants’ approach to Roma inclusion through these programmes for the next financial mechanism.

The question has multidimensional aspects.

- “Sufficiency” has both quantitative and qualitative aspects. It relates to the **quantitative** characteristic of the measures planned by these programmes vis-à-vis the magnitude of the disadvantage cycle of exclusion of Roma communities within local development. But it also has **qualitative aspects**: on one hand, to what extent the applied approach, modalities and results respond to the theory of change for Roma inclusion and empowerment as defined in the ‘Blue Book’, and on the other – the extent to which applied measures would contribute to change in the way local and national systems are addressing Roma inclusion.
- Effectiveness relates to **qualitative** characteristic of the measures: Do the approaches chosen by the programmes and respectively the Project Promoters have the potential to yield the maximum results for the resources invested? And what is the added value of these results as compared to other public investments including the Structural funds?
- Last, but not least, an additional demand to the sufficiency and effectiveness aspects of the question comes from the fact that **the main investment** of the Grants in addressing PA7 Roma inclusion and empowerment in the three countries is channelled through the Local development programmes. In Bulgaria and Romania, additional investments in addressing Roma are done through some other sectorial programmes, as well as through the Active Citizens Fund.

1. Why Roma inclusion within the local development and poverty reduction programmes?

According to CoE the average estimates the Roma population in the three countries accounts to 2,961,122 people in the three countries (691,065 in Bulgaria, 1,749,192 in Romania and 520,864 in Slovakia) ⁵⁶. The latest available data published by the European Fundamental Rights Agency⁵⁷ suggest that poverty rate among Roma in 2016 was 86% in Bulgaria, 70% in Romania and 87% in Slovakia. It also shows that there is little improvement towards breaking the vicious circle of exclusion combining a low educational level, structural unemployment, reduced access to health services resulting in poor health and short life expectancy, poor living conditions especially in compact settlements in rural or urban areas, where a number of households are missing access to basic sanitation, running water and houses and neighbourhoods are not regulated.

Especially alarming is that in average 60% of young Roma (16-24) in the three countries are not in employment, education or training. The share of students among Roma who leave education early was 67% in Bulgaria, 77% in Romania and 58% in Slovakia. This may lead to the reproduction of a poverty and exclusion cycle in the next generations.

⁵⁶ Council of Europe (2012), [Estimates of Roma population in Europe](#).

⁵⁷ FRA (2018), [A persisting concern: anti-Gypsyism as a barrier to Roma inclusion](#).

At the same time, demographically, the Roma population is younger than the general population. Based on various research of the World Bank⁵⁸ the share of children aged 0-14 years (the future generation of new labour market entrants) is between 20 and 40% (depending on the baseline estimation of the Roma population used for the modelling) and the estimate is that Roma will constitute roughly one third of the labour force in the next decades – and a quarter of these future employees have been born already.

Despite established institutional infrastructure for Roma inclusion the governments across Europe (and in the three countries covered in this case),⁵⁹ and huge resources devoted from the EU Structural funds, not much has changed.⁶⁰ Among the main reasons is the way these resources are invested, which often does not address the root causes of the problems, as well as serious barriers related to systemic discrimination. Interventions are fragmented by sectors and services, funds are designed in a way that makes them less accessible to municipalities with Roma populations.

As noted in one of the interviews with a DPP, it is questionable whether Roma inclusion is about local development or it is more a national governance and policy issue, as it is unclear who has the authority and tools to respond to the magnitude of this disadvantaged cycle.

Actually, it is a multilevel governance issue. It does depend on the extent to which central governments recognize Roma inclusion as an important national development priority, but it also depends on the extent to which local governments have the capacity for development and implementation of policies which are inclusive to their Roma constituents. The local level is where Roma and non-Roma directly interact. Such interaction may result in acceptance or rejection, in harmonious co-habitation or exclusion and marginalization.

A local development-based approach to Roma inclusion can contribute to new ways of addressing the barriers faced by these disadvantaged communities, also by involving them as active participants and not just as passive recipients of assistance, thus putting in practice Roma participation. If applied well, it can demonstrate the benefits of inclusion vs. exclusion for the overall local development, not just for Roma, and contribute to overcoming existing prejudice and anti-gypsy sentiments among the majority of the population.

2. Approach to Roma inclusion of the three Local Development Programmes

According to the 'Blue Book' the strategic framework of advancing Roma inclusion entails three main interlinked aspects: empowering Roma, rendering institutions and policies more inclusive, and targeting the majority to positively influence attitudes towards Roma. It also underlines the importance of Roma participation as a driver for inclusion and the partnerships among all stakeholders as essential for implementing integrated measures at the local level and for inducing the necessary systemic reforms.

Each of these areas has multiple dimensions that require capacities and facilitative processes of effective interactions. The sustainability of the Roma inclusion process depends on the strategic fit among the three areas and the extent to which this framework is recognized and adopted as part of

⁵⁸ World Bank (2014), [Diagnostics and policy advice for supporting Roma inclusion in Romania](#); Nestorova Dická, J. (2021), [Demographic Changes in Slovak Roma Communities in the New Millennium](#); Ilieva, N., Kazakov, B. (2014), [Projection of the Roma population in Bulgaria \(2020-2050\)](#).

⁵⁹ The former EU Framework for National Roma Integration Strategies coordinated by National Roma Contact Points. Its successor is the new EU Roma Strategic Framework for Equality, Inclusion and Participation.

⁶⁰ FRA (2018), [A persisting concern: anti-Gypsyism as a barrier to Roma inclusion](#).

the functioning of local governance systems.

PA7 “Roma inclusion and empowerment” is integrated within the overall focus of the three programmes on social inclusion of vulnerable groups and combating poverty in disadvantaged areas and regions. This includes priority attention to improving the quality and accessibility of services to Roma through targeted measures under PA7 (also aimed at Roma empowerment) and mainstream measures, under PA10 “Local Development” and PA8 “Children and Youth at risk” where Roma are part of broader vulnerable groups.

2.1 Targeted measures (PA7)

In total, the three countries allocate € 33,894,118 for targeted measures for Roma inclusion and empowerment under PA7 (€ 9,000,000 or 24% of the entire Programme in Bulgaria, € 17,647,059 or 23% of the programme in Romania and € 7,247,059 or 45% of the programme in Slovakia).

The greatest share of the targeted measures has the provision of integrated services in education, health, employment, housing and education in all countries, as well as help with the issuing of ID documents and other social services in Romania. Housing is missing only in Bulgaria. An integrated approach is defined as providing at least two combined services in the different thematic areas at the individual, family or community level (depending on the country). By combined services it is meant that the projects will involve at least two types of sectoral services to the same target group as defined in the calls for proposals.

The integrated services are also combined with the aim of stimulating capacity for collaboration among different local stakeholders – local government units, local public institutions, NGOs working on service provision, also including Roma NGOs, as well as local initiative groups within Roma communities (specifically in Romania). This is enforced by encouraging (in Slovakia) and requiring mandatory (in Romania and Bulgaria) partnerships among these stakeholders as eligibility of the projects.

From this perspective, the **main focus of the PA7 component is on improved service provision which can help with the individual empowerment of Roma**. In theory by improving accessibility to services it is assisting people to practice their basic rights and **in the long term** to expand their capacity (educational, qualification, etc.). This way it is increasing their self-esteem and decreasing individual vulnerability risks of social exclusion and dependency on social transfers.

However, direct service provision by itself does not always lead to individual empowerment. Firstly, it **depends on how the service is provided**. There are many cases when the provided social assistance can reconfirm the status quo of targeted disadvantaged communities, rather than help them get out of the vicious circle of exclusion and discrimination. Secondly, it is really important to what extent those vulnerable groups who receive services have a say in shaping the way these services are provided. From this perspective, **actual empowerment at the individual level depends on the ability of Roma communities to participate in decisions on improvement of their lives** (including quality and accessibility of services).

The Romanian programme is the only one that provides a definition of empowerment (on an individual and community level) and has a specific objective for the PA7 call specifically targeted at empowerment of Roma. It is aimed at supporting **diverse measures aimed to contribute to empowerment of Roma** - empowerment of Roma women and youth; of Roma leaders and civil society to defend Roma rights; increasing awareness on Roma culture and intercultural approaches; increasing the capacity of public entities to be more inclusive (including innovative approaches and

improving the quality of existent services) and combating all forms of discrimination and stereotypes. In addition, empowerment measures were encouraged as part of the service provision components of the relevant open calls. As a result, a number of projects have included activities for creating community initiative groups to interact with relevant institutions and/or participate in decision making.

The programme in Slovakia does not specifically define empowerment. However, the small grants scheme is aimed at growing the capacities of small grassroots NGOs to work with people in the communities and involve them in initiatives for community problem solving.

It is still early to see how empowerment and integrated service provision will be approached in Bulgaria, as applications under the relevant call is at a very early stage of appraisal. The application guidelines have included some definition of empowerment (strongly influenced by the example of the Romanian programme).

Required partnership with NGOs and especially Roma NGOs can also contribute to empowerment through Roma participation, as well as to increasing the inclusiveness of institutions. It contributes to practical capacity building of local governments and institutions for better targeted policies designed according to the needs of local communities, as well as to creating a culture of collaboration among local stakeholders aimed at improvement of the situation of disadvantaged communities as part of the development of the locality.

In addition, both programmes in Slovakia and Romania have planned **two small grants schemes under PA7 aimed at building participatory capacities at the grassroots level of both Roma communities and of public institutions** to interact, work together on community problem solving and increase their skills for accessing existing public funding.

Last but not least, all programmes envisage **mandatory antidiscrimination measures as part of the interventions for Roma inclusion** (and in the case of Romania and Slovakia of all interventions). Including specific activities to fight discrimination within institutions or bringing together Roma and non-Roma can contribute to the third important aspect of the framework of Roma inclusion and empowerment – non-discriminatory society.

2.2 Mainstream measures (under PA10 and PA8)

In addition to a targeted approach under PA7, **Roma inclusion is also present as part of the mainstream components under the other two areas (PA10 and PA8) in the programmes in Romania and Slovakia.**

In Romania, the PDP “*Sustainable social and education integration through sport activities*” with DPP the Norwegian School of Sport Sciences aims at modelling a new approach for reducing the early leaving of school and increasing the educational outcomes of disadvantaged students. The call “*Inclusive education*” (PA8) has supported diverse initiatives for reducing the share of students who are leaving the school early by focusing on the transition between the different levels of the educational system (primary, secondary and vocational/high school). *Call 4 aimed at improved social services of diverse disadvantaged groups* is supporting initiatives in localities with a high percentage of Roma population and has the requirement of including Roma beneficiaries as part of the target groups.

In Slovakia, ten multifunctional centres will be established in selected municipalities under an open call. Its main ambition is to support the access of vulnerable children and youth in disadvantaged areas to a broader range of extra-curricular activities to improve their personal development, provide them with skills and thus increase their chances to succeed in society.

The PDP *“Innovative education of teachers to increase their intercultural competences in the education process of Roma pupils”* in Slovakia is aimed at empowerment of Roma children through teaching Romani language, as well as increasing the competences of teachers for inclusive education. One of the important parts of the project is the visit to the European Wergeland Center in Oslo, where teachers learn about alternative teaching and communication practices at school.

In Bulgaria, this synergy was evolving over time.

Though present as intent, the initial design of the modalities under the PA10 outcome was not linked with the priority Roma inclusion focus of the programme.

- PA10 consists of diverse health related PDPs (also due to the absence of a specific Health Programme in the country). Out of them only the PDP led by the Bulgarian Red Cross has some link with Roma. Organising seven local home-care centres in Northwest Bulgaria with a considerable share of Roma population, Roma are part of both the employees of the centres and are among their clients.
- Another component under PA10 - the PDP “Galop” together with the SGS for job creation, is aimed at increasing the capacities of municipalities for bottom-up planning and implementation of initiatives for local development based on unutilized local resources and stimulating job creation. But it has no link with Roma inclusion.

These specifics of the design, together with the overall policy environment in the country of avoiding Roma inclusion as part of the national development priorities and respectively - avoiding naming directly Roma, but hiding it under “vulnerable groups”⁶¹, enabled the reluctance of the previous manager of the Programme Operator to address the core programme focus on Roma inclusion. This led to narrowing the initial focus of elements of PA8 (youth centres and hubs for pre-school education) intended to be very inclusive of Roma children and youth during the first half of the programme. In addition, the initial design of PA7 was linked with addressing the issue of lack of data by a PDP *“Novel approaches to gathering data on hard-to-reach populations at risk of violations of their rights”*. Due to delay of this project (also linked with the delay of the Census in the context of Covid-19), the call for integrated Roma inclusion measures was left on the waiting list with the argument that with no data it cannot be well targeted to Roma communities.

In practice the Programme in Bulgaria was ‘restarted’ back to its original focus only at the beginning of 2021, after the change of management of the PO. For a very short time, the new PO management, which came with high commitment to change and with the intensive support of the national focal point at both strategic and operational levels, succeeded in finalizing the design and open delayed open calls, as well PDPs under PA10 and PA8 to relate closer to the original programme’s focus on Roma inclusion:

- The new PDP of the Ministry of Health and in partnership with the National Network of Health Mediators will work to improve the system of implementation of policies for healthcare services provision to vulnerable groups at the local level – including Roma. The inclusion of this PDP is also very important in view of the impact of the three preceding waves of Covid-19, which affected disproportionately vulnerable populations and Roma in particular, as well as the response to the unfolding fourth wave of the pandemic, which appears to be particularly severe.

⁶¹ The Bulgarian programme is also the only one which does not specifically note in its name Roma inclusion. Instead, it is “Local Development and Social Inclusion of Vulnerable Groups”.

- The eight Youth centres increased their focus on including in their activities representatives of the most vulnerable groups of young people - those living in small towns and villages and the Roma.
- The open calls under PA8 and PA7 were designed based on intensive consultation with stakeholders, including municipalities and Roma and pro-Roma NGOs. The PA8 open call for setting up hubs to educate children (0-6) and their parents in disadvantaged and rural areas in Bulgaria regained its clear focus on including children from vulnerable Roma families. The design of the PA7 open call on integrated measures for Roma, proved that it can address the most marginalized communities with setting up clear criteria for selecting the target groups, based on different aspects of vulnerability. The majority of the applications came from such localities with considerable share of vulnerable population, including Roma.
- A new PDP “Capacity building for educational and social inclusion” which came in place of the previous “Include” project, was finally designed and approved. It will be assisting the inclusiveness of institutions, also including a strong component on antidiscrimination.

Though these changes came late in the process, they give a chance that the programme in Bulgaria will be able to contribute to its outcomes as initially intended. However, the risk, especially with the open calls for proposals, will be if the quality of applications is low, as there will be no time for reopening second rounds for proposal in the time left for programme implementation.

Overall, the mainstream measures applied by the three programmes have potential to **increasing the “inclusiveness” and “sensitivity” of institutions**. They involve additional training and education of teaching staff, local government officials, and youth workers on how to apply “inclusiveness” and “sensitivity” in practice boosting awareness of others’ specific needs and overcoming prejudice and discrimination. They also contribute to more inclusive service provision to Roma as part of broader vulnerable groups. Some projects for inclusive education supported in Romania (“IMPACT”) plan innovative public awareness and fighting discrimination initiatives, based on art, documentaries and campaigns.

3. Sufficiency and effectiveness of applied approaches to Roma inclusion

The resources invested by the Grants in Roma inclusion through the Local Development programmes are too limited to make a difference only as a direct service provision. The extent of their sufficiency depends on: whether they model social innovation in approaching the complexity of the issues of Roma inclusion; how this innovation will be linked with local structural change in approaching these issues and whether and who would scale up emerging innovation nationwide through different mechanisms and funding.

Three interrelated aspects of the approaches applied by the programmes have a lot of potential for modelling social innovation.

The first one is the application of an **integrated approach to service provision**. Until now, especially in Bulgaria and Slovakia, existing programmes of the European Structural Funds approach this from a sectorial angle and the application of an integrated approach is done for the first time under one programme. This can contribute to overcoming the predominant work in ‘silos’ and open the opportunity for developing a more collaborative culture both at the local and at national levels. In Slovakia the application of an integrated approach is already considered as a model that is planned to be mainstreamed through the new Operational Programme. In Bulgaria, if the model works well, it will also serve as example for the SFs.

In Romania, where the structural funds apply an integrated approach (under POCU and other mechanisms), the programme adds value by introducing services missing in smaller locations and disadvantaged regions, which could not access funding from the operational programmes.

Integrated approach by itself is not sufficient to improve the way services are provided. It needs to be accompanied by **partnerships and collaborative work among local stakeholders** – different institutions providing services, local communities, civil society and local governments.

By “forcing” partnerships as mandatory for eligibility of projects the programmes have a lot of potential to assist in a *new type of capacity building in collaborative approaches to local development by learning through doing*. This involves practical learning among different stakeholders (local institutions, local authorities, Roma NGOs and other civil society), as well as peer linkage and learning among stakeholders from different locations (such partnerships are also stimulated, especially under call 4 in Romania).

The stakeholder feedback suggests that the main social innovation and respectively added value of EEA and Norway Grants’ funding compared to the Structural Funds is **the emphasis on the Roma empowerment objective**. Roma empowerment and building community capacity for participation is out of the attention of other funding.

Romania is the only one of the three countries which has already contracted projects with targeted measures for Roma inclusion and empowerment, as well as projects addressing Roma inclusion under the mainstream measures of PA8 and PA10 in implementation since beginning of 2021. The interviews with all PPs of Roma projects and a sample of projects from the other two calls shows a number of positive findings on their potential for effectiveness both in terms of Roma empowerment and of better interaction among institutions and with Roma organizations and communities.

A prime example for a new approach to Roma empowerment at the community level in Romania is the project “We can do it together” of Impreuna Agency – a Roma led NGO with over 20 years of experience in development of Roma communities. This is the only project funded under the component “empowerment” of the first round of call 1 “Roma inclusion and empowerment”.

The project’s approach is innovative, changing the social perspective commonly used in public policy and media ethnic perspectives of Roma as “problematic” to **a new image of Roma as a resource for Romania’s development:**

- **It applies a bottom-up approach through community development facilitation** implemented by a broad partnership of Impreuna Agency with one national Roma NGO promoting Roma culture and identity, 5 local Roma NGOs and the National Centre for Roma Culture.
- It is focused on community building through systematic community facilitation and formation of local initiative groups within the community, participatory identification of needs and their prioritization, developing plans of how to address identified problems testing new initiatives with seed budget support from the local partner organization.
- **It builds new leadership at the grassroots level.** In the long term, the project is expected to set up a local level network of 75 Roma resource experts and leaders who will become voices of the Roma community in relation to local authorities and institutions. The project aims to support the empowerment of 2,200 Roma nationwide, using a "bottom-up" approach in 20 communities of five counties in which Roma citizens are at the centre, by learning how to actively contribute to solving community problems and make their voices heard by local institutions and advocate that community priorities are included into the local plans for development.

Other projects supported by Call1 “Roma Inclusion and empowerment” in Romania, under the priority of social services also report various activities for mobilizing the participation of Roma communities, including creating initiative groups.

At the same time, feedback of stakeholders from the three countries outlines several serious capacity gaps that can hinder the effectiveness of any Roma inclusion measures.

In all countries, there is a concern about the capacities of municipalities and/or local institutions to work in real partnership with Roma stakeholders. There is still a predominant formal approach to partnerships for projects, rather than real inclusive collaboration with Roma stakeholders. According to a number of respondents this is a negative effect that has shaped the field through the Structural funds where projects are developed by consultants, rather than by genuine participation of the targeted communities. This was among the challenges in finalizing the selection of projects in Slovakia, as the selection committee put a lot of effort to ensure that projects are real and not “fake” partnerships and will really contribute to Roma inclusion and empowerment.

A number of municipalities (especially in Bulgaria and in Romania) are reluctant to apply for Roma related projects even if they have large sized Roma communities. This may be due to the magnitude of the problems, but it is related to the unpopularity of a “controversial” issue like Roma among the majority population. For example, in Romania, less municipalities applied during the first round of Call 1 ‘Roma inclusion and empowerment’ (about 35), as compared to over 100 applicants to call 4 - supporting social services of broader vulnerable groups.

This is further confirmed by some stakeholder feedback in Bulgaria. The process of beginning developing territorial integrated plans rarely includes the relevant compact segregated Roma

neighbourhoods. If these marginalized areas are not included as a priority in these plans any measures for improvement of the situation might not be eligible for funding from the EU funds. This also puts the broader issue of municipal capacities for inclusive local development and the extent to which marginalized Roma communities are on their political agenda, except of the time of elections.

Partnership can be also blocked by the mistrust of both Roma organizations and Roma communities to other NGOs which are more general service providers. In some cases, this is due to a lot of experience when they felt “used” by large projects, which practically did not address their needs.

A serious gap is the capacity of Roma communities to participate in decision making. There is very low trust in institutions and a low belief that community voices will be heard. Evidence comes from the application of the EU cohesion Community Led Local Development (CLLD) instrument in Romania aimed at generating bottom-up local development strategies and projects to support measures for overcoming poverty and social exclusion. Based on a recent evaluation, the CLLD as applied failed to address adequately the needs of the Marginalized Urban Areas. A major challenge identified was the lack of adequate facilitation of community involvement and representation of Roma in the Local Action Groups and respectively - failing to integrate adequate measures to resolve their issues⁶².

In practice, there is very limited if any funding that is aimed at developing the capacity of Roma community to voice their interests. Enabling real participatory community facilitation to identify priority needs and possible solutions increases the capacity of vulnerable groups to interact with local councils to consider their proposals in the official local development strategies.

Last but not least, the experience with the Grants’ first call on Roma inclusion in Romania surfaced the **low capacity of both disadvantaged smaller communes and of smaller Roma NGOs to meet the requirements of the call**. While part of the reason was the complexity of the call (with three predefined priorities and the mandatory requirement for relevant experience of managing similar size funding), the underlying reason is **that with its larger sized projects of the open calls, the Grants start repeating the pattern of the Structural funds which fund the strongest**, not the ones that need to develop capacities.

The results of the second call on Roma inclusion provide evidence about the “absorption” capacity of Roma NGOs. Even though the mandatory 10% financial contribution required from NGOs was waived due to COVID, this did not increase the number of Roma NGO applicants for this second round. One explanation from the project promoters interviewed was that most of the Roma NGOs capable of managing such size of funding applied in the first round. In the second call, from 31 Project Promoters, only 8 NGOs applied as project promoters, comparing with the first call where 12 out of the 22 applicants, were NGOs as project promoters.

To counteract this gap in absorption capacity the Romanian programme, as well as the Slovak one have **small grants schemes aimed at supporting smaller grassroots Roma organizations**. Both of them are still in the process of calls or selection.

In terms of addressing the low capacity of the smaller municipalities and communes to access national and European funding, a successful experience comes from the practice of the **small grants scheme “Access to financing”** of the Romanian programme (under PA10). It provides small funding support

⁶² https://www.inforegio.ro/images/documente/implementare/evaluare-program/Evaluarea_interventiilor_POR_2014-2020_-_Etapa_I_-_EN/Evaluation_report_of_ROM_2014-2020_AP_9_DLRC.pdf

to such localities to develop technical documentation for application to different funding opportunities for infrastructure improvement. The two rounds of the SGS (in 2020 and in 2021) have supported about 50 such projects. A great number of them are in smaller municipalities/communes with a significant share of Roma population, as the evaluation was providing more points for such municipalities.

Based on interviews with a sample of five of these projects they all are applying to different funding for infrastructural projects. Two of the local administrations were successful in obtaining further finance - for construction of a kindergarten in one of the localities and for building a Socio Medical centre within the community in the second one. This experience needs to be further studied, and might provide **a different approach to the current EEA Grants investment in infrastructure, which can be stimulated by smaller financial instruments like this small grants scheme**, thus utilizing better existing programmes supporting infrastructure through national or Structural funds. This will help increase the soft measures of the local development programmes which are so desperately needed to overcome the capacity gaps in the area of Roma inclusion.

4. Lessons for the future programming

The effectiveness of applying Roma inclusion measures by the local development programmes surfaced successes, but also serious capacity gaps at the local level.

While no doubt, supported projects and initiatives as designed in the current programmes will be valuable and will bring benefits both for direct beneficiaries, as well as for starting some elements for structural change locally, the next programmes may consider several of the needs coming from stakeholders' feedback:

- It is important that the local development programmes **keep the focus on social inclusion and a priority on territorial vulnerability** diversified by countries due to the different distribution of Roma population: on disadvantaged areas (urban or rural) and/or disadvantaged regions (in Slovakia).
- It will be important that they **combine both mainstream but also targeted measures reaching the Roma in marginalized communities**. This is in line with the emerging approach of the European Commission encouraging the Member States to take targeted measures for opening the access of Roma to horizontal social inclusion interventions to which they nominally are entitled, but implicit barriers prevent them from exercising their rights.
- **There is a need to consider a shift from support to social services to support of local structural change** which will contribute to improvement of service provision, equal treatment and systematic addressing of Roma inclusion in the long-term. Service provision can be only an instrument to contribute to systemic change, not an objective by itself.
- Partnerships between local authorities and Roma NGOs are very important, because without them, very few projects including the most vulnerable can be implemented. But this should be addressed not for project purposes only but as an instrument for local structural change. A more targeted approach to partnership building and consistent interaction between these two key stakeholders, but also expanding networks with other entities – public institutions, active groups, businesses and social enterprises, can contribute to creating new ecosystems of support to Roma inclusion locally.
- **The design of the new programmes needs to address better the gaps in the capacities for Roma inclusion and empowerment** of both local Roma NGOs and local authorities in more disadvantaged municipalities. We would recommend integrating into the new programmes a specifically designed capacity building facility that can assist addressing this gap, by working with the communities and local authorities and facilitating identification of priorities, linking them

with the local policies and developing good and meaningful ideas and proposals. This capacity building facility can be included as a predefined project with good timing to assist the calls and later on – the qualitative monitoring of their impact on communities, or as a block grant (if relevant).

- **A critical challenge is the low capacity of Roma communities to get involved in local decision making.** This is beyond just developing proposals in a participatory way. It is about capacity for participation in local development. **There is a gap in funding for community building and developing community-based Roma leadership** that is capable of voicing the interests of the different groups in the community to the decision makers. The ‘Impreuna’ Agency project is a good example of such an approach. Such approaches need to be enhanced and can be integral part of the suggested above capacity building facility.
- There is a gap in support for a critical part of the disadvantaged cycle of Roma exclusion – access to incomes and employment

The ‘Blue book” suggests under PA7 piloting new elements like small micro financing schemes, or social enterprises, or if such sources from other funding are existing to increase their accessibility to potential entrepreneurs, family businesses among Roma who are currently unemployed or in the gray economy to grow and support the creation of job places.

In practice such new elements and overall measures for increasing access to income and employment are almost missing as a systematic element of supported projects in the current programmes. Among the reasons may be that issues in education, health or other social services are very acute, but also potential project promoters may have less experience in applying innovation for jobs and income generation.

It is important that the future programmes also address the issue of economic empowerment of Roma communities. This may involve increasing employability of Roma through vocational and/or apprenticeship schemes with social or municipal enterprises. Another area of support can focus on potential entrepreneurs or family businesses among Roma helping them gain necessary managerial skills and grow to support job creation. In parallel, discrimination of Roma in the labour market is critical to address.

There had been a number of pilots and experiences in the past that can be explored and learned from, as well as collaboration with regional initiatives like REDI can contribute to learning of what works for income generation for Roma inclusion. Potential partnerships with organizations like Innovation Norway, may stimulate social innovation for income generation in disadvantaged areas.

- Another serious gap is in the area of housing for Roma in all three countries

Housing is another area deserving a special focus in all three countries but particularly in Bulgaria, where it relates to the existing compact neighbourhoods with illegal housing, often referred to as the Roma “ghettoes”. According to unofficial data there are more than 26 large urban marginalized areas, and numerous others in smaller towns or rural municipalities.

The Grants do not have the resources to resolve these issues but can set the incentives for local level actors to start identifying measures which can contribute to unlocking the process of developing and implementing relevant policies at the local level.

The first step towards legalization of Roma settlements is formalization of the ownership of the land plots and including the settlements in the municipal zoning plans, which will allow building and improving basic infrastructure. In Slovakia, such an approach is currently developed by the Plenipotentiary for Roma communities. They are aware that the process is long and difficult but starting it is a key priority. In Bulgaria, pilot projects supported by private funders in some

municipalities are also working in this direction. The “*Housing and Zoning Programme*” of the Trust for Social Achievement is piloting a new model for regulation of Roma neighborhoods in Bulgaria⁶³. There is a need to collect learning from diverse practices and pilots that have made attempts in the area of housing.

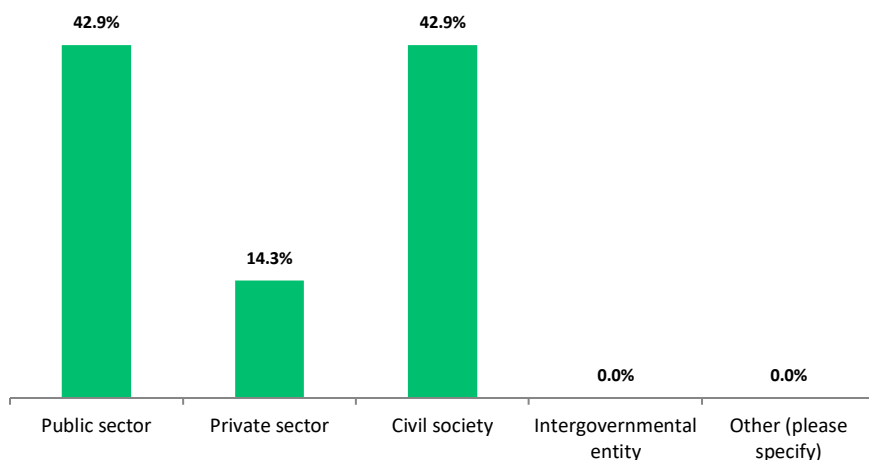
Including marginalized urban or rural areas in the local development planning is critical for making the first step towards their improvement. It requires capacities of municipalities that need to be developed, as well as introduction of knowledge on innovative approaches. In the future memoranda of understanding the countries can be requested to start similar processes in localities with compact Roma neighbourhoods as a pre-condition for access to other Grants’ resources related to Roma inclusion. Instruments similar to the small grants scheme “access to financing” in Romania can be used to assist developing technical documentation for improving infrastructure.

- **There is a clear lack of projects aimed at fighting antigypsyism** – within institutions but also within the society at large, bringing Roma and non-Roma together, working with the media and building broader support for Roma inclusion. This emerges as another niche in which the Grants can invest in the future programming period. Any progress on Roma inclusion would be possible only if and when the majority starts **perceiving Roma as a resource for development and an opportunity** – and not a burden and source of threat.
- **More flexibility in financial instruments** (as size of the calls and diverse small grants schemes) proves to have potential for more effective and efficient addressing the need for capacity development in different aspects – of smaller grassroots organizations based in communities and/or of smaller local administrations to access funding. It will be important to allocate more resources to small or medium size grants aimed at solving tangible, concrete issues identified as priorities by the local people. This approach would yield several benefits. It would address practical problems, would build the capacity of the local people to cover the entire path from identifying a problem, coming up with a solution, securing the resources and organizing to solve the problem. Such practical problem-solving skills are important building blocks of empowerment.
- The experience of the SGS “Access to funding” needs to be further studied and can serve as a new approach to address the need of infrastructure investments. By supporting municipalities to develop the needed documentation and plans required by existing funding sources for such infrastructural improvements, the Grants can “free” some of its money for more developmental soft measures.
- Disadvantaged Roma communities face a variety of issues, and interventions must be locally customized to best address each community’s specific priority needs. Calls for proposal should be structured around specific objectives, rather than prescribed interventions, and be open enough to fund a range of suitable actions that best fit the circumstances of local communities. A range of project activities or investment options can still be presented as ideas (instead of prescribed as requirements) to inspire suitable actions that best fit the needs of local communities. Various interventions could be integrated to best address a community’s needs and impediments, depending on their nature.
- **Accepting the SGS applications in local languages would be an important boost for local people’s empowerment.** This was the experience of the Romanian programme, where the application is in Romanian language and has only one text box with description in English.

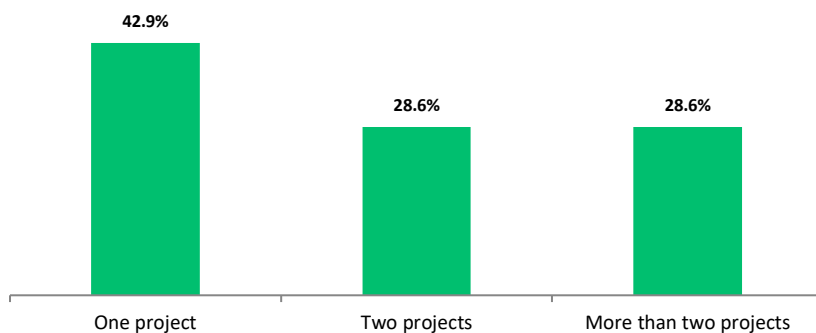
⁶³. <http://socialachievement.org/en/what-we-do/program-areas/family-economic-success-program/housing-and-zoning/>

Annex 4. Summary of survey results

1. Which sector does your institution represent?



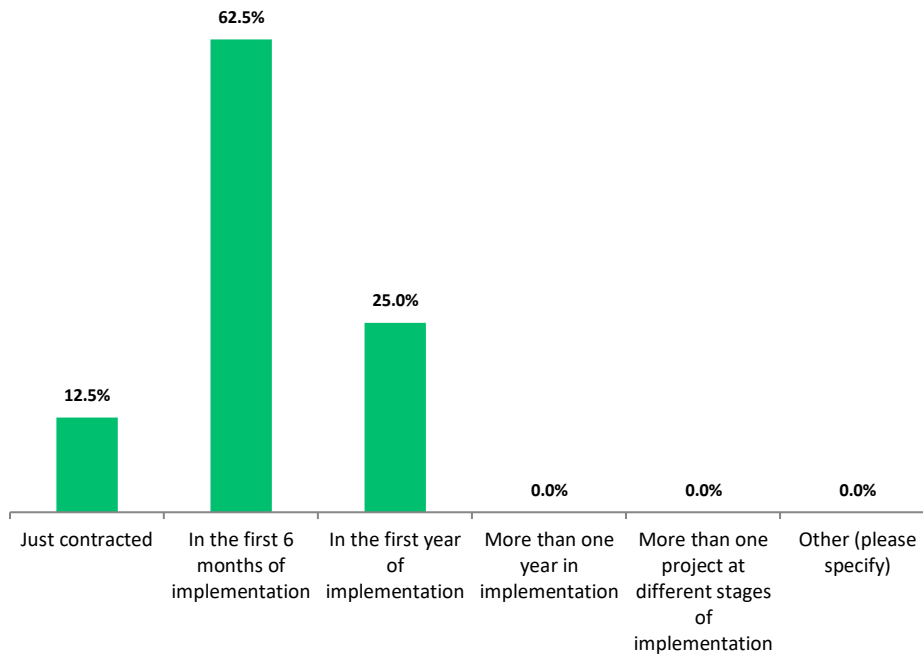
2. In how many projects supported by the current Local Development programme is your organisation currently involved?



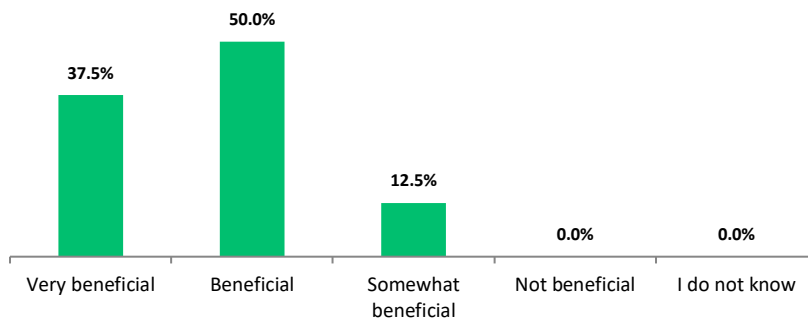
3. In which country (ies)?

- Romania
- Estonia
- Bulgaria, Slovakia
- Lithuania and Latvia
- Estonia
- Croatia and Bulgaria
- Romania

4. At what stage is the project (s)?



5. How beneficial is the bilateral partnership for your organisation, or how beneficial do you expect it to be?



Comments

'It brings benefits to both sides of the collaboration'

'We already see new markets and great opportunities for learning'

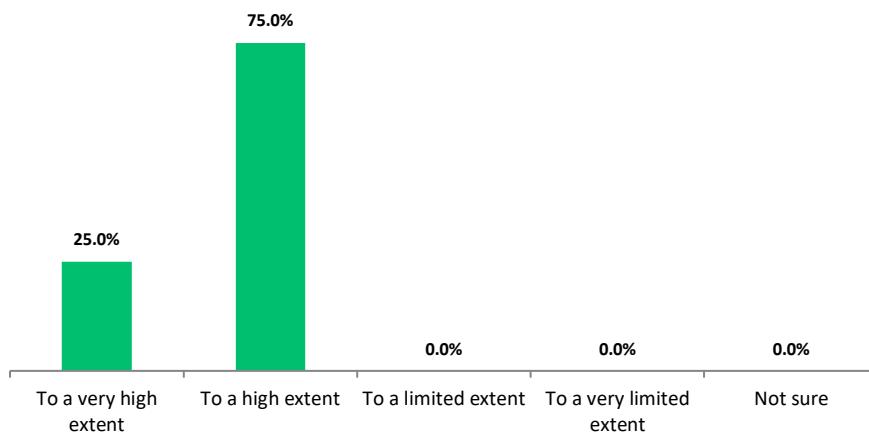
'We value international relations and partnership and will have the opportunity to share our knowledge for the benefit of people in Estonia.'

'The focus of both projects is to provide expert input on the subject matter of the projects and focusing on the benefit of the partners from the beneficiary countries.'

6. How do you expect the bilateral partnership to benefit your organisation? Please select the 3 most important



7. In your view, to what extent are your knowledge and resources being effectively and efficiently used in the preparation and the implementation of the project (s)?

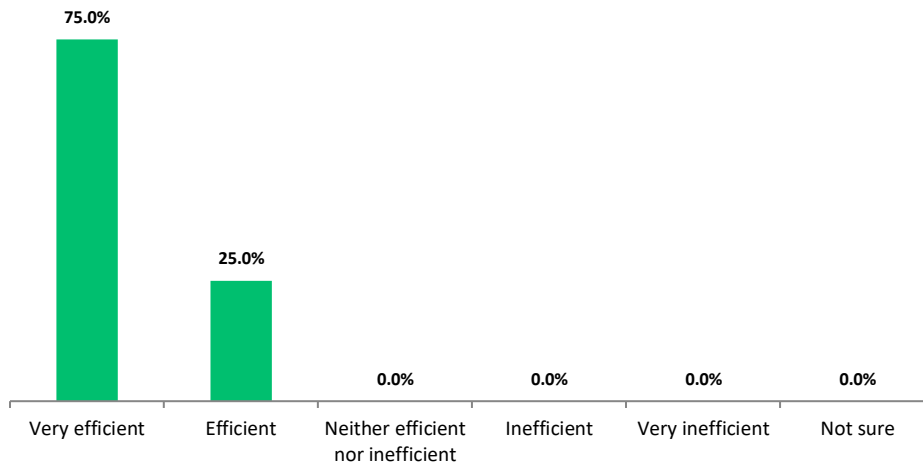


Comments

'Our organization is an innovative organization that has knowledge that can be useful in other countries.'

'Covid a challenge, and complicated reporting system'

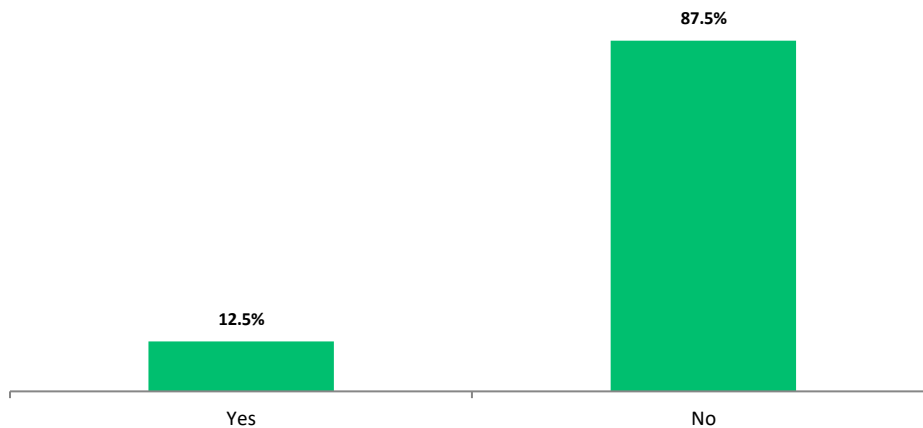
8. How would you rate the overall coordination/communication with the Project Promoter (s) from the partner country (ies) so far?



Comments

'all info concerning the projects is shared and received effortlessly'

9. Did you face any challenges or bottlenecks in the process of preparation and contracting of the project (s) you are involved in as donor project partner?



Comments

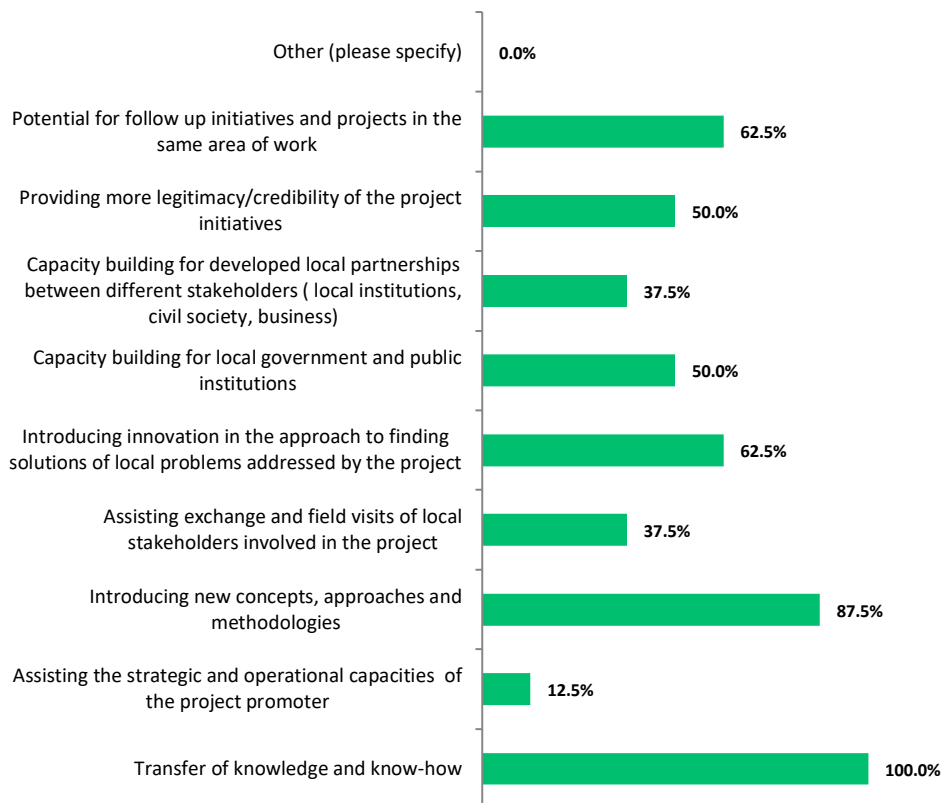
'There have been significant delays in the start of both projects due to administrative complications in the partner countries. However due to Covid many activities would have been postponed non the less'.

'Not really, but challenge is reporting format and complex format'

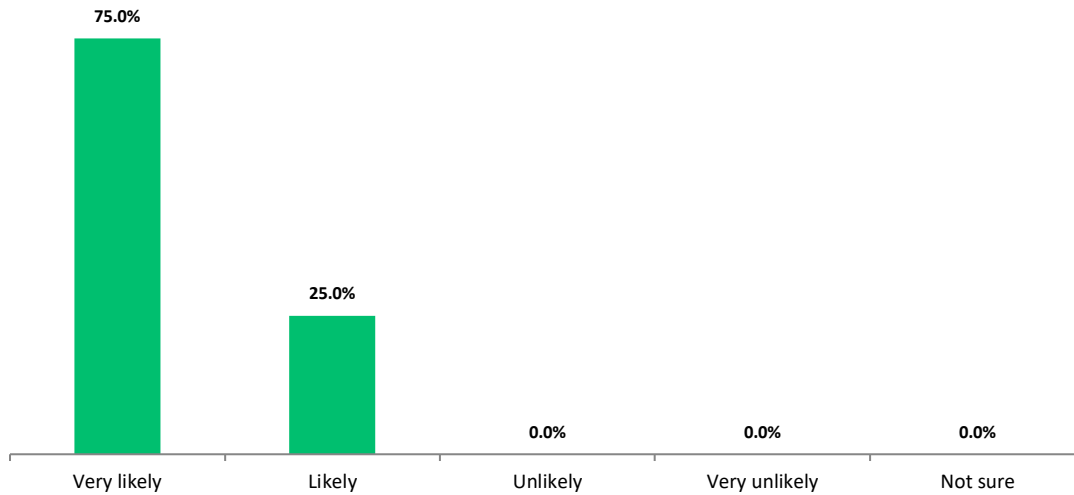
10. Overall, do you think that the Project Promoter (s) has (have) sufficient capacities to provide for effective and efficient implementation of the project (s)?



11. What in your view will be the added value of your organisation's involvement to the effectiveness of the project (s)? Please select the 4 most important statements.



12. On the basis of the experience you have had until now, would your organisation be willing to get involved again in future similar partnerships?



Comments

'It has been very beneficial'

'We need to get better at reporting systems'

'What would you recommend for more optimal usage of bilateral partnership in the local development programmes of the next Financial Mechanism of the EEA and Norway Grants.'

'Finding young pioneers'

'More focus on common challenges, output and outcome for both partners (eg. from Norway and the project promotor). The donor partner should be more involved in the application phase. Both form and content of the application should be available in English.'

'A more streamlined application process and provision of information on different programmes in different countries would be preferable. Delays due to local administration (up to 12 or 18 months) can also complicate participation as a donor programme partner.'

'Maybe a training on procedures, and org. With tech knowledge should focus on this and not reporting'

Annex 5. Combinations of programme areas in the local development programmes

Table 5: Combinations of programme areas in the local development programmes – eligible costs (EUR) excluding programme management

Country	Host area		Additional programme areas combined						Total eligible costs excluding programme management	
	PA10	PA6	PA7	PA8	PA9	PA14	PA16	PA17		PA22 +PA4
BG	13,935,540		9,000,000	15,419,694						38,355,234
HR	27,064,480						1,082,579			28,147,059
CY	7,429,353						300,000			7,729,353
EE	crosscutting	4,529,000		11,094,235		3,317,647	crosscutting		1,114,676	20,055,558
GR	5,968,000									5,968,000
LV	5,448,824					3,192,353	2,000,000			10,641,177
MT	6,563,765									6,563,765
PL	114,397,059						1,250,000			115,647,059
RO	27,209,227		17,647,059	21,272,214			6,297,088	8,868,529		81,294,117
SK	7,700,000		7,247,059	1,300,000						16,247,059
Total	215,716,248	4,529,000	33,894,118	49,086,143		6,510,000	10,929,667	8,868,529	1,114,676	330,648,381