

**HELLENIC REPUBLIC MINISTRY OF DEVELOPMENT  
AND INVESTMENTS  
General Secretariat for Public Investments & NSRF  
Special Service for EEA GRANTS  
National Focal Point**

**Interim evaluation of the Programmes:**

- i) Programme B - Roma Inclusion and Empowerment**
- ii) Programme F - Good Governance, Accountable Institutions,  
Transparency**

**EEA Grants - 2014-2021**

**DELIVERABLE 2:**

**FINAL REPORT OF THE INTERIM EVALUATION**

**VOLUME A**

**Programme B – Roma Inclusion and Empowerment**

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**JUNE 2023**

## Table of Contents

<b>Table of Abbreviations</b> .....	<b>1</b>
<b>Introduction</b> .....	<b>2</b>
<b>Executive Summary in English / Επιτελική Σύνοψη στα Αγγλικά</b> .....	<b>4</b>
<b>Executive Summary in Greek / Επιτελική Σύνοψη στα Ελληνικά</b> .....	<b>9</b>
<b>1. Context of the Programme</b> .....	<b>14</b>
1.1. The EEA Grants Financial Mechanism 2014–2021 .....	14
1.2. The EEA Grants Financial Mechanism 2014–2021 in Greece .....	15
1.3. Brief Presentation of the Programme "Roma Inclusion and Empowerment" .....	16
<b>2. Programme coherence and compatibility with National and European policies</b> .....	<b>20</b>
2.1. Evaluation of the continued relevance of the Programme strategy in meeting public sector needs in individual intervention areas .....	20
2.2. Examination of the complementarity of the Programme with other interventions with a similar objective .....	21
<b>3. Evaluation of the Effectiveness of the Programme</b> .....	<b>22</b>
3.1. Presentation of Projects .....	22
3.2. Implementation progress of the financial object of the Projects and the Programme .....	33
3.3. Implementation progress of the physical object of the Projects and the Programme .....	42
3.3.1. Task Force Units supporting Roma Inclusion and Empowerment .....	43
3.3.2. Integrated pilot social housing relocation scheme for Roma inclusion .....	50
3.3.3. Three Small Grant Schemes: Women and Youth Empowerment, Promotion and Support of Roma children in summer camps and community activities, Small Scale Interventions .....	53
3.3.4. Provision of Supporting Services to the Programme "Roma Inclusion and Empowerment" .....	59
3.4. Time schedule feasibility - Risk assessment and mitigation analysis of the Programme .....	63
3.5. Evaluation of the effectiveness of the Programme .....	67
3.6. Ability to achieve the objectives of the Programme .....	70
<b>4. Evaluation of the efficiency of the resources of the Projects and Programme</b> .....	<b>71</b>
<b>5. Expected impacts from the implementation of the Projects of the Programme</b> .....	<b>74</b>
5.1. Evaluation of impacts of the Programme in the existing conditions in Greece in the areas of Roma Inclusion and Empowerment .....	74
5.2. Evaluation of impacts of the Programme in the Project Promoters .....	75
5.3. Evaluation of indirect impacts of the Projects of the Programme .....	76
<b>6. Duration and viability of the Projects of the Programme</b> .....	<b>76</b>
<b>7. Examination of the Mechanism's administrative capacity and the effectiveness of the Programme implementation procedures</b> .....	<b>77</b>
7.1. Examination of the management and implementation framework of the Programme .....	77
7.2. Examination of the administrative capacity, quality and effectiveness of the Mechanisms .....	81
<b>8. Conclusions / Recommendations</b> .....	<b>83</b>
<b>9. References</b> .....	<b>86</b>

## Table of Abbreviations

EEA	European Economic Area
ENPE	Union of Regions of Greece
ERDF	European Regional Development Fund
ESF	European Social Fund
EU FRA	European Union Agency for Fundamental Rights
Executive Service ApKO	Executive Authority ("Special Service - Executive Structure NSRF"), Division of Employment and Social Economy of the Ministry of Labour and Social Affairs
FM	Financial Mechanism
FMO	Financial Mechanism Office
KEDE	Central Union of Municipalities of Greece
MIS	Monitoring Information System
MoU	Memorandum of Understanding
NFP	National Focal Point
NGO	Non-Governmental Organization
N.R.I.S	National Roma Integration Strategy
NSRF	National Strategic Reference Framework
OECD	Organisation for Economic Cooperation and Development
PDP	Pre-Defined Project
SP	Sub-Project

## Introduction

This Report is the **Volume A of the Deliverable 2: "Final Report of the Interim Evaluation of Programme B – Roma Inclusion and Empowerment"** in the context of the Project "Interim Evaluation of the Programmes: a) Social Inclusion and Empowerment of Roma - (Programme B - Roma Inclusion and Empowerment) and b) Good Governance, (Programme F - Good Governance, Accountable Institutions, Transparency)" of the of the EEA Financial Mechanism 2014-2021.

According to the EEA FM 2014-2021 Regulation (Article 10.1 "Obligations of the Beneficiary States", par. 1), Greece has the obligation to carry out an **independent evaluation** of all the EEA Financial Mechanism Programmes.

The evaluation process is part of the management framework of the EEA grants and it is focused on the examination of achievement of results, as well as, on the assessment of the effects of each Programme and not solely on the recording of quantitative data that is linked to the implementation of the Programmes and the absorption of funds.

An important part of the management framework involves the definition of baseline values, indicators and targets on the basis of which the progress of Programmes is monitored in terms of the intended results. In this context, the evaluation also aims to provide qualitative information on the results and impacts of the Programmes with the use of available data and quantitative information on the progress of the implementation.

The **purposes of the evaluation** of the EEA Financial Mechanism Programmes 2014-2021 are the following:

1. The evaluation of the degree of the implementation of the Programmes, according to their original design and the achievement of the expected results;
2. The assessment of the effects and degree of sustainability of the given aid;
3. The production of the necessary knowledge, up to the evaluation period, of the results of the interventions that can contribute to providing appropriate corrective measures in the immediate future;
4. The assessment of ways in which the financial support framework complements or overlaps with other sources of funding (particularly from the EU).

In accordance with the Evaluation Guidelines of the EEA Financial Mechanism Programmes 2014-2021, the main **criteria of this evaluation** are the following:

1. Compatibility and complementarity of Programmes and projects with national and European policies;
2. The effectiveness in achieving set goals at the Project and Programme level;
3. The efficiency and proportionality of the resources used towards the achieved results;
4. The expected positive or negative, direct or indirect effects that Programmes and Projects can have on their thematic areas over time;
5. The duration and sustainability of the interventions and their results.

The evaluations of EEA Financial Mechanism Programmes are based on OECD guidelines<sup>1</sup> and adhere to the principles of neutrality, independence and promotion of functional operational recommendations. The evaluation findings aim to feed into management processes and decisions, as well as, to meaningfully contribute to outcomes, to inform the planning, budgeting and implementation processes of Programmes, as well as, to positively contribute to the entire reporting system.

The current interim evaluation project was assigned to SPEED Development Consultants S.A., on the basis of the contract of 1 November 2022 between the Special Service for Planning, Coordination and Monitoring of the Implementation of Financial Mechanism of the Economic Area (EEA) - National Focal Point and the company.

This Deliverable was prepared in compliance with the approved structure and contents and in application of the methodology that was presented in detail in "Deliverable 1" of the current ongoing evaluation project.

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<sup>1</sup> 2014-2021: Evaluation Mandate and Policy for the EEA and Norway Grants (19/10/2021)  
(<https://eeagrants.org/sites/default/files/resources/FMO%20Evaluation%20Mandate%20and%20Policy.pdf>)

## Executive Summary in English / Επιτελική Σύνοψη στα Αγγλικά

### EXECUTIVE SUMMARY OF THE INTERIM EVALUATION OF THE PROGRAMME:

#### *Programme B "Roma Inclusion and Empowerment"*

#### *(Πρόγραμμα Β «Ένταξη και Ενδυνάμωση των Ρομά»)*

This Section sets out a summary and synthesis of the conclusions of the interim evaluation of the Programme as of 01/02/2023 (reference date of the report), on the basis of the findings of the analysis performed and the responses to the evaluation questions, and in particular the following criteria:

- ✚ Evaluation of the appropriateness and appropriate timing of the Programme strategy, as well as, the compatibility and complementarity of the interventions to national and European policies;
- ✚ Evaluation of the progress and the possibility of achieving the financial goals of the Programme;
- ✚ Evaluation of the system and assessment of the possibility of achieving the qualitative and quantitative goals of the Programme;
- ✚ Evaluation of the effectiveness of the Programme and the efficiency of its resources;
- ✚ Evaluation of the expected impacts and the sustainability of interventions;
- ✚ Evaluation of the administrative capacity of Mechanisms and of the Programme implementation procedures;
- ✚ Identification of critical issues and recommendations to address them;

The "Roma Inclusion and Empowerment" Programme co-funded by the EEA Grants 2014-2021, is considered as an important part of the N.R.I.S. (National Roma Integration Strategy), 2021-2030. To this date, the Programme continues to respond to the country's needs and priorities in relation to the social inclusion and empowerment of the Roma objectives and it is fully compatible with EU policies. In the context of the Programme, strategic partnerships are established at the regional and local levels to adopt integrated approaches with the scope to promote the social integration and active participation of the Roma, as well as, synergies with key stakeholders such as the Union of Regions of Greece (ENPE) and the Central Union of Municipalities of Greece (KEDE) which are members of the Intersectoral Committee, as well as, the National Advisory Committee.

From the perspective of the Beneficiary State strategic priorities, the Programme is complementary to the "Human Resources and Social Cohesion" Programme under the NSRF 2021-2027, and to Actions that are envisaged and promoted through other National Strategies and Action Plans, such as the National Strategy for Social Inclusion and Poverty Reduction 2021 – 2027, the National Action Plan for the Rights of Persons with Disabilities 2020–2023, the National Action Plan for Gender Equality 2021-2025 and the National Action Plan for the Rights of the Child 2021 – 2023.

The Programme promotes the objective to strengthen social inclusion, the empowerment of the Roma and the promotion of equal access to education, health and the labour market and it is implemented through the following actions:

- Pre-Defined Project PDP1: Task Force Units supporting Roma Inclusion and Empowerment
- Pre-Defined Project PDP2: Integrated pilot social housing relocation scheme for Roma inclusion

- Three Small Grant Schemes (Women and Youth Empowerment, Promotion and Support of Roma children in summer camps and community activities, Small Scale Interventions)
- Programme Management - Provision of Supporting Services.

From the implementation of the Programme the following conclusions are drawn:

- ✚ Although, the rate of approvals of the projects by the Programme Operator is high (commitment of 83.12% of the Programme's resources), the rate of contracting of Projects and their Sub-projects is at 46.33% of the Programme's budget and the expenditure is even lower (10.13% of the Programme budget).
- ✚ In the absence of measurable data on the physical progress and to the extent that the approved Projects do not currently yield significant output and results, there are no measurable values of the pre-selected indicators. Thus, evaluation of the effectiveness and the efficiency of the resources of the programme is not possible to be assessed quantitatively, at this time. Nevertheless, on the basis of the evidence and information provided to the evaluator, qualitative conclusions may be reached. More specifically, the effectiveness of the Programme most probably will be reduced by not absorbing its budget and not reaching its goals, taking in account the implementation issues in all Projects, mainly because of the high risk of PDP2 and lower, but existing risks in other Projects. Evaluator's recommendations have been submitted to mitigate the risks.
- ✚ The approved Project PDP2 is severely delayed and expected to be further delayed due to a low degree of maturity as a result of the lack of a suitable land plot to successfully implement the integrated pilot social housing relocation scheme for Roma inclusion, at the time of this evaluation. PDP2 is therefore not progressing in accordance with the set time schedule and objectives of the Programme and the physical object is not expected to be completed in compliance to the approved time schedule.
- ✚ Part of the delays in the progress of both the physical and financial objects is related to reasons that are considered to be externalities to the established legal and administrative framework of the Programme and the state laws for projects approval and implementation. The reasons for the delays that have occurred in the context of the required studies and preparatory work for the maturity of PDP2, may not automatically be considered as externalities, therefore it is not possible to assess accurately and in a fair manner the administrative capacity, quality and effectiveness of the Mechanisms used by the Municipality of Katerini.
- ✚ In addition to delays in open tender procedures, the implementation is challenged by the fact that the Management and Control System of the Programme is excessively complicated and "heavy" regarding the tendering procedures and the assignment of the contracts, especially for small sizes and low budget projects.
- ✚ At this stage it can be verified that the initial allocation of financial resources is confirmed on the basis of the planned budgets through the Calls for Proposals procedures, as well as, through the cost of the approved Projects to the extent that such Projects are activated.
- ✚ However, there is very limited availability of the measured current values of the pre-selected Indicators of the Projects. In the absence of the completion of this data and to the extent that the approved Projects do not currently yield measurable values of output indicators and results, it is not possible to evaluate the efficiency of the approved Projects or of the Programme as a whole.

Nevertheless, on the basis of the evidence and information provided to the evaluator, qualitative conclusions may be reached. More specifically, the efficiency of the resources of the Projects and the Programme as a whole may be reduced by the implicated risks in not absorbing the Programme budget and the Programme not reaching its goals, which are connected to implementation issues in all Projects.

- ✚ Medium - high risk regarding PDP1: The delay of the Call for recruitment for the Task Force, as well as, other procurement or tendering delays may lead to the non-absorption of parts of the foreseen budget, risks in fully reaching the project's objectives and reduction in the efficiency of available resources.
- ✚ High risk regarding PDP2 which is severely delayed due to low degree of project's maturity. The main part of the physical object is not expected to be completed causing high risks in reaching the project's objectives and reduction in the efficiency of available resources.
- ✚ Medium - high risk regarding SGSs: Procurement or tendering delays may lead to the non-absorption of parts of the foreseen budget, risks in fully reaching the project's objectives and reduction in the efficiency of available resources.
- ✚ Medium - high risk regarding Programme Management - Provision of Supporting Services: Probable delays as a result of risks incurred in the other Projects of the Programme may lead to the non-absorption of parts of the foreseen budget.
- ✚ Limited engagement / commitment of the programme stakeholders and administrative burden and related obstacles may delay operations with additional impacts on budget absorptions, on the Projects and the Programme as a whole reaching their objectives and on the efficiency of resources.
- ✚ The above risks can be mitigated with the incorporation of evidence - driven Recommendation 3 on the redesign and seeking alternative funding for PDP2 and evidence - driven Recommendations 1, 2, 4, 5, with respect to PDP1, the three Small Grant Scheme and the Programme Management - Provision of Supporting Services action.
- ✚ The Programme has a strong response connection to the country's needs and priorities that are related to the social inclusion and empowerment objectives of the Roma community and it is fully compatible with N.R.I.S 2021-2030 and EU policies. However, Outcome 1: "Enhanced inclusion and empowerment of Roma" is partly not expected to be reached and Output 1.1: "Pilot transitional housing infrastructure in Roma settlements upgraded" is fully not expected to be reached with the existing design of PDP2. In addition, the risks in time schedule delays identified in all other Projects may also be taken into account. On this basis, jointly with the lack of sufficient measured current values of the pre-selected Indicators of the Projects, it is not possible to evaluate the impacts of the Programme in the existing conditions in Greece in the areas of Roma Inclusion and Empowerment at this point.
- ✚ As far as indirect impacts are concerned, it is expected that the implementation of the Programme will directly positively impact the operations of the Programme Operator, the Project Partners and the Project Promoters with the exception of Municipality of Katerini, as under its current design, PDP2 is not progressing in accordance with the set time schedule and objectives of the Programme and the physical object is not expected to be completed in compliance to the approved time schedule.



- ✚ The central role of an authority, currently acted by the General Secretariat or Social Solidarity and Fight Against Poverty, as the main coordinating body of all social inclusion policies for the Roma is crucial in monitoring and evaluation of these policies, as well as, the better design and planning of perspective policies in the future. This role should be retained, as long as, such policies and programmes exist.
- ✚ On the basis of the assumption that the adopted measures and developed mechanisms will be materialized effectively, the sustainability and viability of the results of the Projects and the Programme as a whole may be assessed positively, with the exception of Outcome 1: “Enhanced inclusion and empowerment of Roma” which is partly not expected to be reached and Output 1.1: “Pilot transitional housing infrastructure in Roma settlements upgraded” which is fully not expected to be reached with the existing design of PDP2. In addition, the risks in time schedule delays identified in all other Projects may also be taken into account.
- ✚ The required communications and reporting, both English and Greek, are carried out not only under the established hierarchy of interactions among the relevant and implicated competent authorities, but also at a horizontal level, resulting in complex structures of communication and overlapping responsibilities with, consequently, significant management waste.
- ✚ All implicated bodies have reported an excellent collaboration between the Project Promoters, the Programme Operator, the NFP, the FMO and international partners, where applicable and as appropriate, and stress the importance to also strengthen the co-working links between the Beneficiary State and the Donor Countries.
- ✚ The administrative capacity, quality and effectiveness of the Mechanisms under the competent units of the Ministry of Labour and Social Affairs can be evaluated as satisfactory.

### **Recommendations for the competent authorities:**

The following recommendations are drawn from the evaluation of the Projects’ and the Programme’s effectiveness, efficiency of resources, estimated effects, duration and sustainability of interventions and review of the Mechanism’s administrative capacity and the efficiency of the Programme’s implementation procedures, including the evaluation of the physical and financial objects and the time schedules of the projects and sub-projects.

- **Recommendation 1:** The evaluator recommends the close monitoring of the approved time schedule in all WPs under Sub-Project<sup>2</sup> (hereinafter to referred to as “SP”) SP1 “Establishment and Functioning of Task Force Unit for the support of Roma Inclusion and Empowerment” of PDP1 and the speeding-up of the launching process of the WPs that have not been activated yet, in order to avoid further delays that could impact the objectives of SP1 and hence, of PDP1.
- **Recommendation 2:** The evaluator recommends the close monitoring of the approved time schedule and the speeding-up of the launching process of the Call for Proposals under SP5 “Development, installation and maintenance of information system and technical support for the

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<sup>2</sup> A Sub-Project constitutes a module within a project that corresponds to a certain identifiable individual activity and is expected to be implemented through a respective procurement/legal commitment.

members of the Central and Regional Units” of PDP1 in order to avoid further delays that could impact the objectives of SP5 and hence, of PDP1.

- **Recommendation 3:** It is estimated that, with its current design, the physical object of PDP2 is not expected to be completed in compliance to the approved time schedule. Thus, the evaluator recommends that PDP2 is redesigned. SP3 “Services of complementary actions for the social integration of Roma (PDP2\_EEA Grants)” could remain in the programme, due to its expected significant contribution to the sustainable integration of Roma youth who are members of the beneficiaries’ families into local society, as well as, their integration into the social and economic environment of Katerini.
- **Recommendation 4:** The evaluator recommends the close monitoring of the approved and planned for time schedules under the three Small Grant Schemes, the-speeding up of the process to publish the imminent Call for Proposals for SGS3, as well as, the speeding-up of all tendering, procurement and contract processes as a whole, in order to avoid further delays that could impact their objectives.
- **Recommendation 5:** The evaluator recommends the close monitoring of the progress of the physical object of PDP1, PDP2 and the projects under the three Small Grant Schemes and modify the physical object of the Programme Management activities under the Project “Provision of Supporting Services to the Programme “Roma Inclusion and Empowerment” accordingly.
- **Recommendation 6:** Upon completion of the approved Projects, measurable data should be appropriately selected and calculated for the purposes to enable the evaluation of the following parameters of the Projects and the Programme as a whole: (i) the effectiveness, (ii) the ability to achieve the set objectives, (iii) the efficiency, (iv) the impacts in the existing conditions in Greece in the areas of Roma Inclusion and Empowerment in the future.
- **Recommendation 7:** As the Management and Control System was reported to be excessively complicated and “heavy”, an increased degree of flexibility in cases of smaller budgeted projects should be considered.
- **Recommendation 8:** Simplifications in the adopted Management and Control System are recommended, especially for the decision-making processes during the implementation of Projects that have already been adopted in previous stages, such as in the Programme Concept note and resources allocation process or for Projects that are implemented by the Project Promoter’s own means. It is nevertheless important to reach an effective compromise between close collaboration and re-thinking the communication hierarchy of all relevant parties, in order to avoid undermining the excellent collaboration as unanimously reported to the evaluator by all implicated authorities from the part of the Beneficiary State.

## Executive Summary in Greek / Επιτελική Σύνοψη στα Ελληνικά

### ΕΠΙΤΕΛΙΚΗ ΣΥΝΟΨΗ ΤΗΣ ΕΝΔΙΑΜΕΣΗΣ ΑΞΙΟΛΟΓΗΣΗΣ ΤΟΥ ΠΡΟΓΡΑΜΜΑΤΟΣ

#### *Πρόγραμμα Β «Ένταξη και Ενδυνάμωση των Ρομά»*

#### *(Programme B "Roma Inclusion and Empowerment")*

Στην Ενότητα αυτή γίνεται συνοπτική και συνθετική αποτύπωση των συμπερασμάτων της ενδιάμεσης αξιολόγησης του Προγράμματος με ημερομηνία αναφοράς την 01/02/2023, με βάση τα πορίσματα της ανάλυσης και της απάντησης των αξιολογικών ερωτημάτων ως εξής:

- ✚ Αξιολόγηση της καταλληλότητας / επικαιρότητας της στρατηγικής και της συμβατότητας και συμπληρωματικότητας των έργων του Προγράμματος με τις εθνικές και ευρωπαϊκές πολιτικές,
- ✚ Αποτίμηση της προόδου και εκτίμηση της δυνατότητας επίτευξης των χρηματοδοτικών στόχων του Προγράμματος,
- ✚ Αξιολόγηση του συστήματος και εκτίμηση της δυνατότητας επίτευξης των ποιοτικών και ποσοτικών στόχων του Προγράμματος,
- ✚ Αξιολόγηση της αποτελεσματικότητας του Προγράμματος και της αποδοτικότητας των πόρων,
- ✚ Εκτίμηση των προβλεπόμενων επιπτώσεων και της βιωσιμότητας των παρεμβάσεων,
- ✚ Εξέταση της διοικητικής ικανότητας του Μηχανισμού και των διαδικασιών εφαρμογής του Προγράμματος,
- ✚ Εντοπισμός κρίσιμων ζητημάτων και προτάσεις αντιμετώπισής τους

Το Πρόγραμμα «Ένταξη και Ενδυνάμωση των Ρομά» που χρηματοδοτείται με πόρους του Χρηματοδοτικού Μηχανισμού Ευρωπαϊκού Οικονομικού Χώρου (ΧΜ ΕΟΧ 2014- 2021) θεωρείται σημαντικό μέρος της νέας Εθνικής Στρατηγικής για την Κοινωνική Ένταξη των Ρομά (ΕΣΚΕ) 2021-2030. Έως σήμερα, το Πρόγραμμα εξακολουθεί να ανταποκρίνεται στις ανάγκες και τις προτεραιότητες της χώρας ως προς τους στόχους της κοινωνικής ένταξης και της ενδυνάμωσης των Ρομά και είναι πλήρως συμβατό με τις πολιτικές της ΕΕ.

Στο πλαίσιο του Προγράμματος, αναπτύσσονται στρατηγικές συμμαχίες σε περιφερειακό και τοπικό επίπεδο για την υιοθέτηση ολοκληρωμένων προσεγγίσεων για την προώθηση της κοινωνικής ένταξης και της ενεργής συμμετοχής των Ρομά και συνέργειες με ενδιαφερόμενους εταίρους όπως η Ένωση Περιφερειών Ελλάδας (ΕΝΠΕ) και της Κεντρικής Ένωσης Δήμων Ελλάδας (ΚΕΔΕ) που είναι μέλη της Διατομεακής Επιτροπής καθώς και της Εθνικής Συμβουλευτικής Επιτροπής.

Από άποψη στρατηγικών προτεραιοτήτων του Δικαιούχου Κράτους, το Πρόγραμμα λειτουργεί συμπληρωματικά προς το Ε.Π. «Ανθρώπινο Δυναμικό και Κοινωνική Συνοχή» 2021-2027 και των Δράσεων άλλων Εθνικών Στρατηγικών και Σχεδίων Δράσης, όπως πχ της Εθνικής Στρατηγικής για την Κοινωνική Ένταξη και Μείωση της Φτώχειας 2021–2027, του Εθνικού Σχεδίου Δράσης για τα Δικαιώματα των Ατόμων με Αναπηρία 2020–2023, του Εθνικού Σχεδίου Δράσης για την Ισότητα των Φύλων 2021-2025 και του Εθνικού Σχεδίου Δράσης για τα Δικαιώματα του Παιδιού 2021–2023.

Το Πρόγραμμα προωθεί τους στόχους της ενίσχυσης της κοινωνικής ένταξης, της ενδυνάμωσης των Ρομά και της προώθησης της ίσης πρόσβασής τους στην εκπαίδευση, την υγεία και την αγορά εργασίας και υλοποιείται μέσω των ακόλουθων Πράξεων: ☒

- Προκαθορισμένη Πράξη PDP1: Ομάδα Δράσης για την υποστήριξη της Κοινωνικής Ένταξης και Ενδυνάμωσης των Ρομά.
- Προκαθορισμένη Πράξη PDP2: Ολοκληρωμένο πιλοτικό έργο κοινωνικής μεταστέγασης Ρομά με τίτλο «Προσωρινή Μετεγκατάσταση Ειδικών Κοινωνικών Ομάδων στην θέση «Πέλεκα» του Δήμου Κατερίνης».
- Τρία μικρά σχέδια επιχορήγησης (Small Grant Schemes) (Ενδυνάμωση νέων και γυναικών Ρομά, Προώθηση και υποστήριξη παιδιών Ρομά σε παιδικές κατασκηνώσεις, Μικρής κλίμακας παρεμβάσεις για την ενδυνάμωση και τη στήριξη των Ρομά σε τοπικό επίπεδο.
- Ενέργειες Υποστήριξης του Προγράμματος Κοινωνική Ένταξη και Ενδυνάμωση των Ρομά.

Από την υλοποίηση του Προγράμματος προκύπτουν τα ακόλουθα συμπεράσματα:

- ✚ Αν και το ποσοστό εγκρίσεων έργων του Προγράμματος είναι υψηλό (δέσμευση 83,12% των πόρων του Προγράμματος), το ποσοστό συμβάσεων των έργων/υποέργων είναι στο 46,33% του προϋπολογισμού, η δε απορρόφηση είναι ακόμη χαμηλότερη (10,13% του προϋπολογισμού).
- ✚ Στη φάση αυτή, η μικρή φυσική πρόοδος συνεπάγεται έλλειψη μετρήσιμων δεδομένων για τα πραγματικά αποτελέσματα του προγράμματος, με βάση τους ποσοτικούς στόχους των προεπιλεγμένων δεικτών. Επομένως, η αξιολόγηση της αποτελεσματικότητας και της αποδοτικότητας των πόρων του προγράμματος δεν είναι δυνατόν να αξιολογηθεί ποσοτικά. Ωστόσο, με βάση τα στοιχεία και τις πληροφορίες που παρασχέθηκαν στον αξιολογητή, μπορούν να εξαχθούν ποιοτικά συμπεράσματα. Πιο συγκεκριμένα, η αποτελεσματικότητα του Προγράμματος πιθανότατα θα μειωθεί (μη απορρόφηση του συνόλου του προϋπολογισμού του και μη επίτευξη του συνόλου των στόχων του), λαμβάνοντας υπόψη τα προβλήματα υλοποίησης και κυρίως λόγω του υψηλού κινδύνου του έργου PDP2, αλλά και των μέτριων προς υψηλών κινδύνων και στα υπόλοιπα έργα του προγράμματος. Έχουν υποβληθεί συστάσεις του αξιολογητή για τον μετριασμό των κινδύνων.
- ✚ Η προκαθορισμένη Πράξη PDP2 “Ολοκληρωμένο πιλοτικό έργο κοινωνικής μεταστέγασης Ρομά με τίτλο «Προσωρινή Μετεγκατάσταση Ειδικών Κοινωνικών Ομάδων στην θέση «Πέλεκα» του Δήμου Κατερίνης” εμφανίζει σημαντικές καθυστερήσεις και αναμένεται να καθυστερήσει περαιτέρω λόγω χαμηλού βαθμού ωριμότητας, ως αποτέλεσμα της απουσίας κατάλληλου οικοπέδου για την επιτυχή εφαρμογή του ολοκληρωμένου πιλοτικού προγράμματος μετεγκατάστασης κοινωνικής κατοικίας για την ένταξη των Ρομά κατά τον χρόνο της Αξιολόγησης. Ως εκ τούτου, το PDP2 δεν υλοποιείται σύμφωνα με το προκαθορισμένο χρονοδιάγραμμα και τους στόχους του Προγράμματος και το φυσικό αντικείμενο δεν αναμένεται να ολοκληρωθεί σύμφωνα με το εγκεκριμένο χρονοδιάγραμμα,
- ✚ Ένα μέρος των καθυστερήσεων στην πρόοδο τόσο του φυσικού όσο και του οικονομικού αντικείμενου σχετίζεται με εξωτερικούς παράγοντες ως προς το θεσμικό και διοικητικό πλαίσιο του Προγράμματος. Οι καθυστερήσεις στο πλαίσιο των απαιτούμενων μελετών και των προπαρασκευαστικών εργασιών για την ωρίμανση του PDP2, δεν θεωρούνται αυταπόδεικτα ως

- οφειλόμενες σε εξωτερικούς παράγοντες, επομένως δεν μπορεί να αξιολογηθεί με δίκαιο τρόπο και ακρίβεια η διοικητική ικανότητα και η ποιότητα και η αποτελεσματικότητα των Μηχανισμών του Δήμου Κατερίνης.
- ✚ Εκτός από τις καθυστερήσεις στις ανοικτές διαδικασίες διαγωνισμών, στη διαχείριση και την υλοποίηση των έργων επιδρά το ότι το Σύστημα Διαχείρισης και Ελέγχου του Προγράμματος είναι υπερβολικά περίπλοκο και «βαρύ» όσον αφορά τις διαδικασίες δημοπράτησης και ανάθεσης των συμβάσεων, ειδικά όσον αφορά έργα μικρού μεγέθους και χαμηλού προϋπολογισμού.
  - ✚ Μέτριος - υψηλός κίνδυνος για το PDP1: Οι καθυστερήσεις της πρόσκλησης πρόσληψης της Ομάδας Δράσης, καθώς και άλλες καθυστερήσεις διαδικασιών διαγωνισμών, ή συμβάσεων ή προμηθειών μπορεί να οδηγήσουν στη μη απορρόφηση τμημάτων του προβλεπόμενου προϋπολογισμού, στην μη πλήρη επίτευξη των στόχων του Έργου και στη μείωση της αποτελεσματικότητας των πόρων,
  - ✚ Υψηλός κίνδυνος για το PDP2: Καθυστερήσεις στις διαδικασίες διαγωνισμών ή συμβάσεων. Η χρονική μετατόπιση του εγκεκριμένου χρονοδιαγράμματος και ο κίνδυνος μη απορρόφησης του προϋπολογισμού, μη επίτευξης των στόχων του έργου και μη ικανοποιητικής αποτελεσματικότητας των πόρων είναι πολύ υψηλός,
  - ✚ Μέτριος - υψηλός κίνδυνος για τα SGSs: Οι καθυστερήσεις διαδικασιών διαγωνισμών, ή συμβάσεων ή προμηθειών μπορεί να οδηγήσουν στη μη απορρόφηση τμημάτων του προβλεπόμενου προϋπολογισμού, στην μη πλήρη επίτευξη των στόχων των Έργων και στη μείωση της αποτελεσματικότητας των πόρων,
  - ✚ Μέτριος - υψηλός κίνδυνος για τις Ενέργειες Υποστήριξη: Πιθανές καθυστερήσεις ως αποτέλεσμα των κινδύνων που προκύπτουν για τα άλλα Έργα του Προγράμματος μπορεί να οδηγήσουν στη μη απορρόφηση τμημάτων του προβλεπόμενου προϋπολογισμού, στην μη πλήρη επίτευξη των στόχων των Ενεργειών Υποστήριξης και στη μείωση της αποτελεσματικότητας των πόρων,
  - ✚ Η τυχόν περιορισμένη δέσμευση των ενδιαφερόμενων μερών του Προγράμματος και ο διοικητικός φόρτος με τα συναφή εμπόδια ενδέχεται να καθυστερήσουν τις εργασίες με πρόσθετες επιπτώσεις στην απορρόφηση του προϋπολογισμού, στην επίτευξη των στόχων των Έργων και του Προγράμματος και στην αποδοτικότητα των πόρων.
  - ✚ Οι ως άνω κίνδυνοι μπορούν να μετριαστούν με την ενσωμάτωση της τεκμηριωμένης Σύστασης 3 που αφορά τον επανασχεδιασμό και την αναζήτηση εναλλακτικής χρηματοδότησης για το PDP2 και των τεκμηριωμένων Συστάσεων 1, 2, 4, 5, αναφορικά με το PDP1, τα τρία Μικρά Σχέδια Επιχορηγήσεων και τη δράση Διαχείριση Προγράμματος - Παροχή Υπηρεσιών Υποστήριξης.
  - ✚ Το Πρόγραμμα ανταποκρίνεται άμεσα στις ανάγκες και τις προτεραιότητες της χώρας ως προς τους στόχους κοινωνικής ένταξης και ενδυνάμωσης των Ρομά και είναι πλήρως συμβατό με τις πολιτικές της ΕΣΚΕ 2021-2030 και της ΕΕ. Ωστόσο, το Outcome 1: “Enhanced inclusion and empowerment of Roma” αναμένεται να μην επιτευχθεί μερικώς και το “Output 1.1: Pilot transitional housing infrastructure in Roma settlements upgraded” δεν αναμένεται να επιτευχθεί συνολικά με τον υπάρχοντα σχεδιασμό του PDP2. Επιπλέον, οι κίνδυνοι που συνδέονται με καθυστερήσεις στα χρονοδιαγράμματα και εντοπίζονται σε όλα τα Έργα πρέπει επίσης να ληφθούν υπόψη. Τουτέστιν, δεδομένης και της έλλειψης επαρκών μετρήσιμων δεδομένων, δεν

είναι εφικτή η αξιολόγηση των αναμενόμενων επιπτώσεων του Προγράμματος στις υπάρχουσες συνθήκες στην Ελλάδα στους τομείς της ένταξης και της ενδυνάμωσης των Ρομά, επί του παρόντος,

- ✚ Σε ό,τι αφορά τις έμμεσες επιπτώσεις, η υλοποίηση του Προγράμματος αναμένεται να επηρεάσει άμεσα θετικά τις λειτουργίες του Διαχειριστή του Προγράμματος, των Εταίρων του Έργου και των Φορέων Υλοποίησης. Η αναφορά γίνεται με την εξαίρεση του Δήμου Κατερίνης, καθώς με τον τρέχοντα σχεδιασμό του, το PDP2 δεν προχωρά σύμφωνα με το προκαθορισμένο χρονοδιάγραμμα και τους στόχους του Προγράμματος και το φυσικό αντικείμενο δεν αναμένεται να ολοκληρωθεί σύμφωνα με το εγκεκριμένο χρονοδιάγραμμα,
- ✚ Ο κεντρικός ρόλος μιας αρχής, (ασκείται επί του παρόντος από τη Γενική Κοινωνικής Αλληλεγγύης και Καταπολέμησης της Φτώχειας), ως ο συντονιστικός φορέας όλων των πολιτικών και προγραμμάτων κοινωνικής ένταξης για τους Ρομά είναι κρίσιμος για την παρακολούθηση και αξιολόγηση αυτών των πολιτικών, καθώς και για τον καλύτερο σχεδιασμό αντίστοιχων πολιτικών στο μέλλον. Αυτός ο ρόλος θα πρέπει να διατηρηθεί, όσο υπάρχουν τέτοιες πολιτικές και προγράμματα.
- ✚ Υπό την προϋπόθεση της αποτελεσματικής υλοποίησης των εγκεκριμένων μέτρων και μηχανισμών, η βιωσιμότητα των αποτελεσμάτων των Έργων και του Προγράμματος συνολικά μπορεί να αξιολογηθεί θετικά, με εξαίρεση το Outcome 1: "Enhanced inclusion and empowerment of Roma" που αναμένεται να μην επιτευχθεί μερικώς και το "Output 1.1: Pilot transitional housing infrastructure in Roma settlements upgraded" που δεν αναμένεται να επιτευχθεί συνολικά με τον υπάρχοντα σχεδιασμό του PDP2. Οι κίνδυνοι που συνδέονται με καθυστερήσεις στα χρονοδιαγράμματα και εντοπίζονται σε όλα τα Έργα πρέπει επίσης να ληφθούν υπόψη.
- ✚ Οι απαιτούμενες επικοινωνίες πραγματοποιούνται όχι μόνο στο πλαίσιο μιας προσυμφωνημένης ιεραρχίας αλληλεπιδράσεων μεταξύ των εμπλεκόμενων αρμόδιων αρχών και μερών, αλλά και σε οριζόντιο επίπεδο, με αποτέλεσμα πολύπλοκες δομές επικοινωνίας και αλληλεπικαλυπτόμενες αρμοδιότητες με σημαντικό φόρτο διαχείρισης.<sup>2</sup>
- ✚ Η σύνταξη και υποβολή μεγάλου αριθμού Αναφορών και Εκθέσεων είναι σχετικά χρονοβόρα, λαμβανομένου υπόψη του μεγέθους των έργων και του ότι τα κείμενα συχνά υποβάλλονται στην ελληνική αλλά και την αγγλική γλώσσα.
- ✚ Όλοι οι εμπλεκόμενοι φορείς ανέφεραν στον Αξιολογητή την εξαιρετική συνεργασία μεταξύ των Φορέων Υλοποίησης, του Διαχειριστή του Προγράμματος, του ΕΣΕ, των εκπροσώπων του ΧΜ ΕΟΧ 2014 - 2021 και των διεθνών εταίρων κατά περίπτωση και τονίζουν τη σημασία της ενίσχυσης των δεσμών συνεργασίας μεταξύ του Δικαιούχου Κράτους και των Δοτριών Χωρών.
- ✚ Η διοικητική ικανότητα, η ποιότητα και η αποτελεσματικότητα των Μηχανισμών που υπάγονται στις αρμόδιες μονάδες του Υπουργείου Εργασίας και Κοινωνικών Υποθέσεων αξιολογείται ως επαρκής και ικανοποιητική.

#### **Συστάσεις προς τις αρμόδιες αρχές:**

Οι ακόλουθες συστάσεις προκύπτουν από την αξιολόγηση της αποτελεσματικότητας των Έργων και του Προγράμματος, της αποδοτικότητας των πόρων, τις εκτιμώμενες επιπτώσεις, την εκτιμώμενη διάρκεια και βιωσιμότητα των παρεμβάσεων και την αξιολόγηση της διοικητικής ικανότητας του

Μηχανισμού και της αποτελεσματικότητας των διαδικασιών υλοποίησης του Προγράμματος, συμπεριλαμβανομένης της αξιολόγησης του φυσικού αντικείμενου και του χρονοδιαγράμματος των έργων και των υπο-έργων.

- **Σύσταση 1:** Ο Αξιολογητής συνιστά τη στενή παρακολούθηση του εγκεκριμένου χρονοδιαγράμματος σε όλα τα ΠΕ στο πλαίσιο του ΥΕ1 του PDP1 και την επιτάχυνση της διαδικασίας εκκίνησης των ΠΕ που δεν έχουν ακόμη ενεργοποιηθεί, προκειμένου να αποφευχθούν περαιτέρω καθυστερήσεις που θα μπορούσαν να επηρεάσουν τους στόχους του ΥΕ1 και ως εκ τούτου του PDP1. ☒
- **Σύσταση 2:** Ο Αξιολογητής συνιστά τη στενή παρακολούθηση του εγκεκριμένου χρονοδιαγράμματος και την επιτάχυνση της διαδικασίας έναρξης της Πρόσκλησης Υποβολής Προτάσεων του ΥΕ5 του PDP1, προκειμένου να αποφευχθούν περαιτέρω καθυστερήσεις που θα μπορούσαν να επηρεάσουν τους στόχους του ΥΕ5 και ως εκ τούτου του PDP1. ☒
- **Σύσταση 3:** Καθώς εκτιμάται ότι, με τον τρέχοντα σχεδιασμό του, το φυσικό αντικείμενο του PDP2 δεν αναμένεται να ολοκληρωθεί σύμφωνα με το εγκεκριμένο χρονοδιάγραμμα, ο Αξιολογητής συνιστά να επανασχεδιαστεί το PDP2, με σκοπό την αναζήτηση εναλλακτικών πηγών χρηματοδότησης προκειμένου να διασφαλιστεί η υλοποίηση του έργου και να εκπληρωθούν οι αναμενόμενοι στόχοι του Προγράμματος. Το ενδεχόμενο διατήρησης ή μη του ΥΕ3 «Υπηρεσίες συμπληρωματικών ενεργειών για την κοινωνική ενσωμάτωση των Ρομά (PDP2\_EEA Grants)» στο πλαίσιο του Προγράμματος μπορεί να εξεταστεί χωριστά, λόγω της αναμενόμενης σημαντικής συμβολής του στη βιώσιμη ένταξη των νέων Ρομά που είναι μέλη των ωφελούμενων οικογενειών στην τοπική κοινωνία καθώς και στην ένταξή τους στο κοινωνικό και οικονομικό περιβάλλον της Κατερίνης. ☒
- **Σύσταση 4:** Ο Αξιολογητής συνιστά τη στενή παρακολούθηση των εγκεκριμένων και προγραμματισμένων χρονοδιαγραμμάτων στο πλαίσιο των Τριών Μικρών Σχεδίων Επιχορήγησης (Small Grant Schemes), την επιτάχυνση της διαδικασίας δημοσίευσης της επικείμενης Πρόσκλησης για το SGS3, καθώς και την επιτάχυνση όλων των διαδικασιών διαγωνισμών, προμηθειών και συμβάσεων, προκειμένου να αποφευχθούν περαιτέρω καθυστερήσεις που θα μπορούσαν να επηρεάσουν τους στόχους των Έργων,
- **Σύσταση 5:** Ο Αξιολογητής συνιστά τη στενή παρακολούθηση της προόδου του φυσικού αντικείμενου των PDP1, PDP2 και των έργων στο πλαίσιο των Τριών Μικρών Σχεδίων Επιχορήγησης (Small Grant Schemes) και την τροποποίηση του φυσικού αντικείμενου της Πράξης “Ενέργειες Υποστήριξης στο πλαίσιο του Προγράμματος Κοινωνική Ένταξη και Ενδυνάμωση των Ρομά”, ανάλογα με τις ανάγκες.
- **Σύσταση 6:** Με την ολοκλήρωση των εγκεκριμένων Έργων, συνιστάται η επιλογή και ο υπολογισμός κατάλληλων μετρήσιμων δεδομένων ώστε να καταστεί εφικτή η αξιολόγηση των ακόλουθων παραμέτρων των Έργων και του Προγράμματος συνολικά: (i) αποτελεσματικότητα, (ii) ικανότητα επίτευξης των τιθέμενων στόχων, (iii) αποδοτικότητα, (iv) αναμενόμενες επιπτώσεις στις υπάρχουσες συνθήκες στην Ελλάδα στους τομείς της ένταξης και της ενδυνάμωσης των Ρομά σε μελλοντικό χρόνο.

- **Σύσταση 7:** Καθώς αναφέρθηκε ότι το Σύστημα Διαχείρισης και Ελέγχου είναι υπερβολικά περίπλοκο και «βαρύ», ίσως υπάρχει περιθώριο να εισαχθεί αυξημένος βαθμός ευελιξίας σε περιπτώσεις έργων μικρότερου προϋπολογισμού,
- **Σύσταση 8:** Συνιστώνται απλοποιήσεις στο εγκεκριμένο Σύστημα Διαχείρισης και Ελέγχου, ειδικά για τις διαδικασίες λήψης αποφάσεων κατά την υλοποίηση Έργων που έχουν ήδη εγκριθεί σε προηγούμενα στάδια, όπως κατά την εξειδίκευση και την κατανομή των πόρων του Προγράμματος ή για Έργα που υλοποιούνται με ίδια μέσα του Φορέα Υλοποίησης. Ωστόσο, είναι σημαντικό να επιτευχθεί ένας αποτελεσματικός συμβιβασμός μεταξύ της στενής συνεργασίας και της επανεξέτασης της επικοινωνιακής ιεραρχίας όλων των σχετικών μερών, προκειμένου να αποφευχθεί η υποβάθμιση των άριστων όρων συνεργασίας, όπως ομόφωνα αναφέρθηκαν στον Αξιολογητή από όλα τα εμπλεκόμενα μέρη από πλευράς Δικαιούχου Κράτους.

## 1. Context of the Programme

### 1.1. The EEA Grants Financial Mechanism 2014–2021

The **Financial Mechanism 2014–2021 of the European Economic Area (EEA Grants)**, established under the Protocol 38C of the Agreement on the European Economic Area, represents the commitment of the **Donor Countries (Iceland, Liechtenstein, Norway)** to contribute to the reduction of economic and social inequalities within the European Economic Area for the period 2014-2021. The EEA Grants provision have a dual objective; to contribute to a more equal Europe, both socially and economically, as well as, to strengthen relations between the Donor Countries and the 15 Beneficiary States.

The total funding budget for the **2014-2021 Financial Mechanism** that is expected to be granted by the Donor Countries is €2,803,159,190, of which €56,324,324.00 pertains to the Bilateral Relations Fund. The budget concerns the support of 97 Programmes (5,684 projects) within the 15 Beneficiary States: Bulgaria, Croatia, Cyprus, Czech Republic, Estonia, Greece, Hungary, Latvia, Lithuania, Malta, Poland, Portugal, Romania, Slovakia, and Slovenia.

The Financial Mechanism emphasizes the following Priority Areas:

- ✚ Innovation, Research, Education and Competitiveness
- ✚ Social Inclusion, Youth Employment and Poverty Reduction
- ✚ Environment, Energy, Climate Change and low carbon economy
- ✚ Culture, Civil Society, Good Governance and Fundamental Rights and Freedoms
- ✚ Justice and Home Affairs
- ✚ Fund for Regional Cooperation
- ✚ Fund for Youth Employment.

The net allocations secured for the current EEA Grants Programming Period 2014-2021 per Priority Sector are as follows:

#### Table 1: Net Allocations by Priority Sector



Priority Sector	Net Allocations
Justice and Home Affairs	344,746,782.00 €
Innovation, Research, Education and Competitiveness	618,818,703.00 €
Social Inclusion, Youth Employment and Poverty Reduction	382,002,196.00 €
Environment, Energy, Climate Change and low carbon economy	419,964,000.00 €
Culture, Civil Society, Good Governance and Fundamental Rights and Freedoms	449,994,186.00 €
Fund for Regional Cooperation	31,889,375.00 €
Fund for Youth Employment	60,610,625.00 €
Allocation to Hungary	198,505,000.00 €
Other	86,391,385.00 €
<b>TOTAL</b>	<b>2,592,922,252.00 €</b>

## 1.2. The EEA Grants Financial Mechanism 2014–2021 in Greece

In terms of the Beneficiary State of Greece, on October 31, 2017, the Donor countries and Greece signed a **Memorandum of Understanding** (hereinafter referred to as **"MoU"**) for the Financial Mechanism 2014-2021, which concerns the financing of nine (9) new Programmes, based on the country's needs and priorities.

The amount committed to Greece for the Programming Period 2014-2021 is:

- 107,947,500 Euros: EEA Grands (71,43%)
- 10,980,393 Euros: national contribution (28,57%)

As provided in the MoU, these amounts are distributed to **priority areas for Greece**, which are shown in Table 1, together with their net allocations (as revised and reallocated by the second amendment of the MoU).

**Table 2: Net Allocations by Priority Sector for Greece**

A/A	EEA Programmes in Greece 2014-2021	EEA Grants (€)	National Contribution (€)
1	Innovation and entrepreneurship	21,500,000	
2	Roma Inclusion and Empowerment	5,500,000	2,200,000
3	Local development and Fight Against Poverty	7,000,000	
4	Water management	5,200,000	1,300,000
5	Renewable energy sources and energy conservation	10,000,000	3,333,333
6	Good governance, accountable institutions, transparency	7,000,000	1,235,295
7	Strengthening national asylum and immigration systems	16,500,000	2,911,765
8	Asylum and immigration (urgent needs for the reception and identification of new arrivals and accommodation of vulnerable groups)	16,500,000	
9	Citizens society	13,446,115	

A/A	EEA Programmes in Greece 2014-2021	EEA Grants (€)	National Contribution (€)
	<b>Other Allocations</b>		
	Technical assistance	1,750,500	
	Deposit (Article 1.11)		
	Deposit	1,216,885	
	Bilateral relations fund	2,334,000	
	<b>Net Total Allocations</b>	<b>107,947,500</b>	<b>10,980,393</b>

Under the Joint Ministerial Decision 13249/4-2-2020 (Official Gazette B' 526), which incorporates the Regulation for the implementation of the Financial Mechanism (FM) of the EEA 2014-2021 (Article 3.2), the **National Focal Point** ("NFP": National Focal Point) has the overall responsibility for the achievement of the objectives of the EEA 2014–2021 Framework, as well as, for the implementation of the MoU.

### 1.3. Brief Presentation of the Programme "Roma Inclusion and Empowerment"

The "**Roma Inclusion and Empowerment**" Programme of the is one of the previously-mentioned nine (9) Greek Programmes financed by the Financial Mechanism 2014–2021 of the European Economic Area (EEA Grants). The implementation of the Programme is governed by the:

**Official Gazette B/4027/21.9.2020/Ministerial Decision 91761**, entitled "*Co-financing of the Programme entitled: "Social Inclusion and Empowerment of Roma" (Programme B - Roma Inclusion and Empowerment), with acting Programme Operator the Special Service "Executive Structure NSRF - Division of Employment and Social Economy", General Secretariat of Employment, Ministry of Labour and Social Affairs, with co-funding resources from the Financial Mechanism of the European Economic Area (EEA) for the period 2014-2021 and national resources from the Public Investment Program - PDE*", as amended and as currently in force by the **Official Gazette/B/4742/8.9.2022/Ministerial Decision 83966**, entitled "*Amendment of the reference: 91761/21-09-2020 Ministerial Decision entitled "Co-financing of the Programme entitled: "Social Inclusion and Empowerment of Roma" (Programme B - Roma Inclusion and Empowerment), with acting Programme Operator the Special Service "Executive Structure NSRF - Division of Employment and Social Economy", General Secretariat of Employment, Ministry of Labour and Social Affairs, with co-funding resources from the Financial Mechanism of the European Economic Area (EEA) for the period 2014-2021 and national resources from the Public Investment Program - PDE (B'4027)*".

This Ministerial Decision determines the financing of the Programme, the description of the institutional framework for its implementation, its eligibility period, etc. At the same time, it includes as an Annex, the **Programme Agreement** between the following parties:

- the EEA 2014-2021 Financial Mechanism Committee (hereinafter referred to as "FMC"); under Article 2.10 of the Programme Agreement, all relevant communication to the FMC is to be directed to the **Financial Mechanism Office**, hereinafter referred to as the "**FMO**", which represents the FMC towards the National Focal Point and the Programme Operator in relation to the implementation of the Programme.

- the Hellenic Republic as it represented by the Ministry of Development & Investments / General Secretariat for Public Investments & the NSRF / Special Service EEA, , hereinafter referred to as the **“National Focal Point”**.

The **European Union Agency for Fundamental Rights** (hereinafter referred to as **“EU FRA”**) acts as international partner to the Programme.

The partner of the Programme on behalf of the Beneficiary State is the **General Secretariat for Social Solidarity and Fight against Poverty of the Ministry of Labour and Social Affairs**.

The **Programme Operator** under this Programme Agreement is the **Executive Authority (“Special Service - Executive Structure NSRF”), Division of Employment and Social Economy of the Ministry of Labour and Social Affairs**, hereinafter referred to as **“Executive Service ApKO”**.

The aim of the Programme is to manage the urgent housing issues of the Roma population in a holistic framework (creation of a model settlement / resettlement of Roma in the area of Katerini) to remove the conditions of social exclusion of the Roma and to promote conditions for their social integration. The integration of Roma communities touches also on the issues of unemployment, education and health, as well as, on the promotion of equal treatment and respect for the fundamental rights of Roma. The establishment of a Task Force unit in areas with a high concentration of Roma populations will ensure the effective implementation of the National Strategy for the integration of Roma communities with regard to all social integration policies (housing, education, health, etc.).

The Programme promotes projects - special interventions with the objective to strengthen social inclusion, the empowerment of this population and the promotion of equal access to education, health and the labour market. Hence, the main objectives of the Programme are supported by the following **Pre-Defined projects**, as well as, three **Small Grant Schemes**:

- ✚ **Pre-Defined Project 1 (PDP1): Task Force Units supporting Roma Inclusion and Empowerment**, with total maximum eligible costs of €3,100,000.
- ✚ **Pre-Defined Project 2 (PDP2): Integrated pilot social housing relocation scheme for Roma inclusion**, with total maximum eligible costs of €2,700,000.
- ✚ **Three Small Grant Schemes:**
  - Women and Youth Empowerment
  - Promotion and Support of Roma children in summer camps and community activities
  - Small Scale Interventions

as well as, the promotion of bilateral cooperation of the Beneficiary State with competent bodies of Norway and other beneficiary countries in the areas of social inclusion and human rights. The Pre-Defined Projects, additional allocations, as well as, the three Small Grant Schemes provided for in the context of the Programme are specified as follows:

**Table 3: Pre-Defined Projects, additional allocations and Small Grant Schemes of the Programme "Roma Inclusion and Empowerment"**

Pre-Defined Projects / Small Grant Schemes	Project Promoter	Other Partners	Total Max Eligible Costs	EEA Grants 2014- 2021	National funds
Pre-Defined Project 1 (PDP1): Task Force Units supporting Roma Inclusion and Empowerment	Ministry of Labour and Social Affairs - Executive Authority ("Special Service - Executive Structure NSRF"), Division of Social Solidarity (Special Service "NSRF Executive Structure", Division of Social Solidarity)	-	3,100,000,00€	2,214,228.00€	885,772.00€
Pre-Defined Project 2 (PDP2): Integrated pilot social housing relocation scheme for Roma inclusion.	Municipality of Katerini	Ministry of Labour and Social Affairs, General Secretariat for Social Solidarity and Fight Against Poverty (General Secretariat for Social Solidarity)	2,700,00,00€	1,928,610.00€	771,390.00€
Three Small Grant Schemes: <ul style="list-style-type: none"> <li>• Women and Youth Empowerment</li> <li>• Promotion and Support of Roma children in summer camps and community activities</li> <li>• Small Scale Interventions</li> </ul>	All entities according to Article 7.2.1 of the EEA Grants 2014 - 2021 Regulation <sup>3</sup> - Partnership with municipalities having Roma branches or with NGOs shall be mandatory.	-	1,300,000,00€	928,590.00€	371,410.00€

<sup>3</sup> **Regulation on the implementation of the European Economic Area (EEA) Financial Mechanism 2014 - 2021, Article 7.2.1.** Eligibility of Project Promoters and project partners: Any entity, public or private, commercial or noncommercial and non-governmental organisations, established as a legal person in the respective Beneficiary State are considered eligible project promoters. Where explicitly stipulated in the programme agreement, international organisations or bodies or agencies thereof, may be eligible project promoters.

Pre-Defined Projects / Small Grant Schemes	Project Promoter	Other Partners	Total Max Eligible Costs	EEA Grants 2014- 2021	National funds
Programme Management - Provision of Supporting Services	Ministry of Labour and Social Affairs - Executive Authority ("Special Service - Executive Structure NSRF"), Division of Employment and Social Economy (Special Service "NSRF Executive Structure", Division of Employment and Social Economy)	-	600,000,00€	428,572.00€	171,428.00€

**Note:** The above-mentioned amounts under "EEA Grants 2014-2021" and "National Funds" were calculated on the basis of the percentage rate (%) of the Programme eligible costs that are funded by EEA Grants 2014-2021 resources, while also ensuring that all nominal amounts as mentioned in the Programme Agreement are respected.

## **2. Programme coherence and compatibility with National and European policies**

### **2.1. Evaluation of the continued relevance of the Programme strategy in meeting public sector needs in individual intervention areas**

The “Roma Inclusion and Empowerment” Programme co-funded by the EEA Grants 2014-2021, is considered as an important part of the N.R.I.S. (National Roma Integration Strategy), 2021-2030.

The updated version of the N.R.I.S. (March 2022) confirms the vision of the national strategy for setting, organizing and monitoring initiatives to promote the equity, socio-economic integration and participation of the Roma community in Greek society, in order to ensure the respect of human rights and the commitment of the Greek state to actively promote the principle of equal treatment.

The new national targeting and the action plan for the social integration of the Roma are based on set directions, priorities and goals for the social integration of the Roma in the European strategic framework until 2030, as well as, in the Action Plan for the European Pillar of Social Rights.

The new N.R.I.S 2021-2030 is the result of a systematic mapping of Roma communities in Greece, the identification of their needs and an in-depth study and participatory process with the contribution of the relevant Ministries and competent agencies, as well as, the representatives of the Roma communities.

The strategy is based on four (4) pillars, which reflect national priorities and strategic goals, policy measures and institutional interventions for the promotion of equality, inclusion and the active participation of the Roma at the national, regional and local level. These pillars are the following:

- PILLAR I. "Prevention and fight against poverty and social exclusion of the Roma";
- PILLAR II. "Strengthening the equal access of Roma to basic services and goods (education, employment, health, social care and housing)";
- PILLAR III. "Preventing and combating stereotypes and discrimination against the Roma";
- PILLAR IV. "Promoting the active participation of Roma in social, economic and political life".

The new N.R.I.S 2021–2030 defines a network of 213 targeted actions/projects, based on the existing needs of the target group at the local level and the available resources for equal integration, empowerment, health, employment, housing, decent living conditions, upskilling of Roma children and gender issues.

The Task Force Units supporting Roma inclusion and empowerment under the Programme “Roma Inclusion and Empowerment” of the EEA Grants 2014-2021 is a significant step towards the implementation of the National Roma Integration Strategy.

In the context of the programme, strategic partnerships are established at the regional and local levels to adopt integrated approaches with the scope to promote the social integration and active participation of the Roma, as well as, synergies with key stakeholders such as the Union of Regions of Greece (ENPE) and the Central Union of Municipalities of Greece (KEDE) which are members of the Intersectoral Committee, as well as, the National Advisory Committee.

In conclusion, the “Roma Inclusion and Empowerment” Programme continues to this date to respond to the country's needs and priorities in relation to the social inclusion and empowerment of the Roma objectives and it is fully compatible with N.R.I.S and EU policies.

## **2.2. Examination of the complementarity of the Programme with other interventions with a similar objective**

The “Roma Inclusion and Empowerment” Programme includes a number of interventions that support the policies designed with the aim of social integration and empowerment of the Roma. At the same time, the needs covered by the Programme are the objective of other Programmes at a national and European level.

The elaboration of the current interim evaluation comprises, among other tasks, the examination of the external consistency of the Programme, both at the planning and implementation levels. This examination is methodologically extended to the complementarity between the actions carried out under this Programme with the actions that are promoted through other national and European financial tools and Programmes in the same areas of intervention for social inclusion and empowerment of the Roma. The measures taken and the mechanisms created to ensure the elimination of overlapping in the financial support from different financial instruments and the optimal utilization of available resources are also examined.

From the perspective of the Beneficiary State strategic priorities, the programme is complementary both to N.R.I.S 2021–2030 and to actions that are envisaged and promoted through other National Strategies and Action Plans, such as the following:

- National Strategy for Social Inclusion and Poverty Reduction 2021 – 2027 (*a part of this document involves the current situation and needs of the Roma population*).
- National Action Plan for the Rights of Persons with Disabilities 2020–2023.
- National Action Plan for Gender Equality 2021-2025.
- National Action Plan for the Rights of the Child 2021 – 2023.

It is noted that all social solidarity policies and Programmes, including those related to the Roma, fall under the responsibility of the General Secretariat for Social Solidarity and Fight Against Poverty of the Ministry of Labour and Social Affairs. Other competent national entities include the General Secretariat of Demographic and Family Policy and Gender Equality and the General Secretariat of Employment Promotion, all under the jurisdiction of the Ministry of Labour and Social Affairs.

In this context, the evaluation of the external consistency of the Programme at the implementation stage concerns the examination of the degree of complementarity in the functions between the actions of the Programme and other Programmes implemented in the same intervention areas.

The programme “Human Resources and Social Cohesion” is the biggest NSRF 2021-2027 programme with a budget of 4,161 billion Euros. It is co-financed by the European Social Fund and includes, among others, the following strategic objectives:

- dealing with deprivation of livelihood means
- promotion of social inclusion and access to quality health services
- promoting social innovation
- social inclusion and fight against child poverty
- institutional empowerment of social partners and the civil society organizations

A significant number of interventions in the framework of this Programme aim to:

- Upgrade the coordination, monitoring and evaluation mechanisms of social inclusion policies;
- Promote horizontal systemic actions for the equal access of citizens, especially vulnerable populations, to health care services with an emphasis on primary health care, long-term care, public health and prevention, as well as, mental health;
- Promote social and Labour Integration for socially vulnerable groups of the unemployed (people below the poverty line, people with low educational qualifications, the Roma, disabled people, people with cultural peculiarities and in religious minorities);
- Promote equal participation in the labour market;
- Strengthen the mechanisms of equal access to all levels of education with an emphasis on supporting people from vulnerable social groups - inclusive education;
- Strengthen the social integration of people from Vulnerable Social Groups (VSL).
- Promote the work and social integration of young people of 15-29 years of age who are outside employment, education and training.

It is of critical importance for these interventions to operate in a complementary way and to not function in opposition or an overlapping logic with each other during the implementation stage, in order for the maximum possible results to be reached.

It is also important that the selection of projects and mechanisms under the “Human Resources and Social Cohesion” Programme of NSRF 2021-2027 in applying specialization procedures are scheduled in a complementary way with the EEA FM 2014-2021 Programme.

In order to ensure complementarity and to prevent the overlapping of financial support instruments during the implementation period, appropriate coordination procedures have been established between the EEA FM and other competent entities. All mentioned interventions are under the responsibility of the Ministry of Labour and Social Affairs and hence the lack of requirement for the coordination between different bodies of central administration is a positive factor for the development of efficient coordination techniques and mechanisms.

### **3. Evaluation of the Effectiveness of the Programme**

#### **3.1. Presentation of Projects**

This section presents the main characteristics of the approved (as of now) projects of the Programme, such as the physical and financial progress of individual sub-projects, the output and outcome indicators progress as of the 1<sup>st</sup> of February 2023 and the expected results and benefits from the implementation of the individual projects and the Programme as a whole.

It should be noted that as this section presents the projects of the Programme that are currently approved under the provisions of the Programme Agreement, only the Predefined Projects and the additional allocations for Programme management - provision of supporting services will be covered under this section. This section does not refer to the three Small Grant Schemes for which there are no approved projects yet.



## 1 Task Force Units supporting Roma Inclusion and Empowerment

### General Information

#### Title of Project

Task Force Units supporting Roma Inclusion and Empowerment

#### MIS Code No

5075006

#### Project Promoter

Ministry of Labour and Social Affairs - Executive Authority ("Special Service - Executive Structure NSRF"),  
Division of Social Solidarity (Special Service "NSRF Executive Structure", Division of Social Solidarity)

#### Project Partners

-

#### Budget

- Total Public Expenditure: 3,099,860.00 €
- Co-funding from EEA Grants (71.43%): 2,214,185.43 €

### Physical Object

#### Technical Description

The purpose of the project is the establishment of a Task Force Unit which will function as a key tool for monitoring and coordinating the implementation of the National Strategy and the Action Plan for the Social Inclusion of Roma 2021-2030 together with the relevant policies and measures at the national, regional and local level. To achieve this goal, the Task Force Unit will develop collaborations, mechanisms and tools for coordination and communication with an emphasis on the active participation and empowerment of men and more importantly, women and Roma youth in the relevant processes with the aim to contribute to (a) strengthening, monitoring and evaluating the policies of the National Strategy and the Action Plan for the Social Inclusion of Roma and (b) empowering Roma to actively participate in the social integration process. In addition, the Task Force Unit will seek to empower Roma communities to actively participate in the design, monitoring and implementation processes of policies that affect them. In particular, the Task Force Unit will contribute to:

- coordinating and monitoring the activities of the National Strategy and the Action Plan for the Social Inclusion of Roma 2021-2030 at the local, regional and central administration level;
- the transfer of know-how and experience to the Roma communities and the residents of the selected areas, with the aim to strengthen their participation in the design and implementation processes of actions in the context of the National Strategy and the Action Plan for the Social Inclusion of Roma 2021-2030 (existing and new policies);
- the transfer of know-how to local authorities in order for them to design and to implement effective actions to activate local stakeholders and the Roma community so that they are actively involved in the design, monitoring and implementation processes of policies that affect them;
- the development and implementation of measures to effectively combat discrimination and stereotypes in the wider population.

The Task Force Unit will be led by the Programme Partner i.e. the General Secretariat for Social Solidarity and Combating Poverty, and will consist of a Central Unit / Steering Committee with the role of guiding and coordinating the four (4) Regional Units in the four (4) Regions with a relatively higher concentration of Roma populations (Attica, Central Macedonia, Eastern Macedonia and Thrace and Western Greece), in

compliance with data from the National Strategy for the Social Integration of Roma (December 2011). In the long term, this model will provide with useful experience for the design and implementation of social integration actions for other vulnerable groups, such as refugees, immigrants, etc. This will bring significant added value to national public administration and hence, this model may act as a pilot action for the implementation of programmes with other vulnerable social groups as well. During the implementation of the project, the European Union Agency for Fundamental Rights - FRA will provide with advisory support to both the Central and the Regional Units (as well as, to the competent local authorities, where necessary), in matters concerning the design, development and implementation of consultation and participation actions with the local Roma community.

The project is expected to contribute to the coordination of Roma integration activities among the local, regional and central levels of administration, to the transfer of know-how and experience to Roma communities and residents in these areas, to the transfer of know-how to local authorities, as well as, to the development and implementation of measures to combat discrimination and stereotypes in the wider population.

#### Deliverables

WP 1: Technical Consultant for Project Management

Deliverables: Periodic reports of technical and management support services

WP 2: Staffing of Task Force Unit

Deliverables: Quarterly Reports, Final Report

WP 3: Supply of equipment and consumables for the establishment and operation of the Central and Regional Units.

Deliverables: Electronic equipment, Graphic equipment, Consumables, Furniture

WP 4: Expenses for telecommunication services / Internet connection expenses

Deliverables: Mobile communications connections, Monthly statement of telecommunications charges

WP 5: Vehicle leasing expenses for the needs of the Task Force Unit members

Deliverables: Receipts of finance lease expenses for five (5) cars.

WP 6: Operational expenses of offices for the needs of the Regional Units

Deliverables: Receipts of operating expenses of four (4) offices (rents, utilities bills, cleaning, etc.).

WP 7: Travel expenses of the members of the Central and Regional Units

Deliverables: All documentation of participation, accommodation, travel, compensation of mobile executives and the movement journals.

WP 8: Development, installation and maintenance of an information system and technical support for the members of the Central and Regional Units

Deliverables: Information system in operation, relevant digital files, user manuals, periodic reports of technical support services

WP 9: Organization of meetings, events, publicity, promotion, information events

Deliverables: Event organization services. Audio-visual material in digital format where necessary and registering system. Promotion and publicity material in printed and digital formats.

WP 10: Movements of personnel of Special Service "NSRF Executive Structure", Division of Social Solidarity.

Deliverables: All documentation for participation, accommodation, travel, compensation of mobile executives and movement journals.

WP 11: Expenses of publications - announcements

Deliverables: Publications - announcements in print and digital media and relevant expenditure documents

WP 12: Training of the members of the Task Force Unit

Deliverables: Printed and digital material, presence journals

WP 13: Translation services

Deliverables: Translated pages

WP 14: Indirect costs

Deliverables: Service receipts, bill payment receipts, passbook statements, movement journals and receipts for fuel supply expenses.

### Financial Object

The finalized financial object of the project amounts to 3,099,860.00 € (EEA Grants co-financing: 12,214,185.43 €) and it is analyzed by Sub-Project in the following table. Payments to **Project Promoter** are as declared to the Programme Operator and as they stand at the time of the elaboration of the current evaluation report on the basis of the information provided to the Evaluator.

Sub-Projects (SP)	Budget (€)	Total Public Expenditure (€)	Final Eligible Public Expenditure (€)	Payments to Project Promoter
SP1. Establishment and Functioning of Task Force Unit for the support of Roma Inclusion and Empowerment	2,752,860.00	2,752,860.00	2.752.860,00	613,028.24
SP2. Technical Advisor for Project Management Support	80,000.00	80,000.00	80,000.00	10,974.00
SP3. Operational expenses of offices for the needs of the Regional Units	144,000.00	144,000.00	144,000.00	9,478.64
SP4. Vehicle leasing expenses for the needs of Task Force Unit members	63,000.00	63,000.00	63,000.00	5,010.63
SP5. Development, installation and maintenance of information system and technical support for the members of the Central and Regional Units	60,000.00	60,000.00	60,000.00	-
<b>SUMS</b>	<b>3,099,860.00</b>	<b>3,099,860.00</b>	<b>3,099,860.00</b>	<b>638,491.51</b>

### Benefits

#### Direct Benefits

- The beneficiaries of the project are primarily members of the vulnerable social group of Roma, as the project mainly aims to the development and support of mechanisms, procedures and tools for the implementation of public policies for this social group.
- On a second level, the project will also benefit the General Secretariat for Social Solidarity and Fight Against Poverty of the Ministry of Labour and Social Affairs, through the strengthening of its strategic role as competent body for the coordination, monitoring and evaluation of social inclusion policies for the Roma, as well as, the entire administration at a central, regional and local level, as the implementation of the project is expected to contribute to the coordination of Roma integration

activities among the above-mentioned levels of administration and in the transfer of know-how to local authorities.

Contribution to Programme Indicators

**OUTPUT INDICATORS**

Indicator	Unit of Measurement	Target Value	Value
Number of policy recommendations produced by the Task Force	Cumulative Number	3.00	-
Number of meetings and other activities with public/local administration and Roma communities carried out by the Task Force	Cumulative Number	3.00	-
Number of municipal staff trained in Roma inclusion by the Task Force	Cumulative Number	15.00	-
IT system for monitoring Roma inclusion policies developed	Cumulative Number	1.00	--
Number of Roma Community Services Offices participating in capacity building initiatives	Cumulative Number	30.00	
Number of Social Cooperative Enterprises of Roma supported	Cumulative Number	2.00	-
Number of awareness raising campaigns combating anti-Roma attitudes conducted	Cumulative Number	10.00	-
Number of awareness raising and training meetings	Cumulative Number	10.00	-
Number of municipalities in which social inclusion services are provided to Roma	Cumulative Number	4.00	-
Number of Roma inclusion Task Force staff trained (by gender, Roma)	Cumulative Number	20.00	-
Number of other public officials (e.g. teachers, police officers, medical staff, etc.) trained in Roma inclusion (by gender)	Cumulative Number	5.00	-
Number of Roma NGOs participating in learning initiatives on effective advocacy	Cumulative Number	5.00	-

**OUTCOME INDICATORS**

Indicator	Unit of Measurement	Target Value		
Number of jobs created (by gender, age)	Cumulative Number	Total: 25.00	Men:	Women:
Number of national policies and laws influenced	Cumulative Number	Total: 3.00	Men:	Women:
Number of Roma beneficiaries of social inclusion services	Cumulative Number	Total: 1,500.00	Men:	Women:

## 2 Integrated pilot social housing relocation scheme for Roma inclusion

### General Information

#### Title of Project

Integrated pilot social housing relocation scheme for Roma inclusion

#### MIS Code No

5087337

#### Project Promoter

Municipality of Katerini

#### Project Partners

- Ministry of Labour and Social Affairs, General Secretariat for Social Solidarity and Fight Against Poverty (General Secretariat for Social Solidarity)

#### Budget

- Total Public Expenditure: 2,700,000.00 €
- Co-funding from EEA Grants (71.43%): 1,928,610.00 €

### Physical Object

#### Technical Description

The objective of the project is the implementation of the following:

- Development of a local social housing complex consisting of 56 residential units, which will belong to the Municipality of Katerini, following the grant of land by the Municipality, precisely for the development of this housing complex.
- Installation of basic housing equipment, which will include the following (indicatively): household appliances, such as refrigerators, stoves, washing machines, air conditioners, electrical/solar thermal systems.
- Active participation of all involved citizens, especially the Roma, as well as, representatives of the local community and the public administration through the organization of four (4) information and consultation activities with the objective to successfully implement the relocation project and gain the acceptance of the public for it.
- Supporting activities for the physical relocation of 56 families to the newly built housing units.

The physical object of Pre-Defined Project 2 consists of the supply and placement of fifty-six (56) houses and one (1) building (hereinafter "Polykentro"), within the granted plot of land of the Municipality of Katerini (ownership documentation based on Official Gazette 728 /B/9-9-1991), fully equipped and ready for use. For this purpose, one hundred and thirty-six (136) heavy prefabricated huts will be connected, in compliance with the rules of science and art (132 huts for the 56 residences and 4 huts for the "Polykentro"). The dimensions of each hut will be 9.00 m x 3.60 m (32.4 sq m). Thus, on the allocated plot of land of the Municipality of Katerini, a total of 56 houses will be created for the relocation and housing of 56 Roma families, who live in unsuitable accommodation (on the basis of Article 159 of Law 4483/2017).

The residences are of five (5) basic types, of different capacity and/or layout; 3 ground floor and 2 two-storey residences (with or without independent entrance on the floor). In the two-story houses, the construction of a staircase (with a total of 23 stairs) is provided for the access to the floor. The distribution of residence types in the settlement takes into account the composition of the households to be relocated, as reflected in the census of the Municipality of Katerini. In particular, for the implementation of the Pre-

Defined Project 2 (PDP2), the supply of houses and the complete installation of its items will be carried out at once.

In addition, the physical object of PDP2 includes:

- the transfer-installation of the existing equipment of the beneficiaries in the new settlement;
- awareness raising actions for the beneficiaries - residents; through these actions, the active participation of all involved citizens (especially the Roma, as well as, representatives of the local society and public administration) in the implementation of PDP2 will be sought, with the ultimate goal of a successful outcome and the general acceptance of the relocation project by the public;
- technical support services for the activation and monitoring of the implementation of PDP2.

The physical object of PDP2 is complemented by soft actions, which will be implemented by the Project Promoter with the objective of: a) the successful transition of all the beneficiaries of Roma families to the new social housing complex; and b) the sustainable integration of Roma youth who are members of the beneficiaries families into local society as well as, their integration into the social and economic environment of Katerini.

#### Deliverables

A total of fifty-six houses, including basic functional equipment to make them habitable, as well as, a "multi-centre" are the Deliverables of the project. The residences are divided into five types of different capacities; 7 ground-floor houses with an area of 32.5 sq.m. (T1), 20 ground-floor houses with an area of 65 sq.m. (T2), 13 two-story houses with an area of 97.5 sq.m. (TD2), 6 ground-floor houses with an area of 65 sq.m. (T3), 10 two-story houses with an area of 97.5 sq.m. (TD3). All residential units will be equipped with household appliances such as refrigerators, stoves, washing machines, air conditioners, solar water heaters, etc., as well as, with basic furniture. The multi-center consists of a composition of four prefabricated houses. All of the above are delivered fully installed, as described in the general layout plan and the architectural design. Additional deliverables include advisory support services for the implementation of the act, awareness-raising services for the beneficiaries - settlers, as well as, relocation services for the beneficiary families in the new settlement.

The Deliverables of the complementary actions for a) the successful transition of all the beneficiaries of Roma families to the new social housing complex; and b) the sustainable integration of Roma youth who are members of the beneficiaries families into local society, as well as, their integration into the social and economic environment of Katerini are the following:

1. List of person-months of staff employment.
2. Signed staff attendance sheets.
3. Individual reports of executives for the provision of services and products to beneficiaries.
4. Printed and digital materials of meetings – networking collaborations with reference to the details of the participants, dates, agendas, agreement documents, etc., depending on the type of action.
5. Printed and digital material from actions (photos, invitations, brochures, lists of recipients, lists of participants, distributed material, etc depending on the type of action).
6. Material produced by executives.
7. Quarterly activity report.
8. Contracts, deliverables, etc. (in cases of projects with contracts for works / services / supplies).

### Financial Object

The finalized financial object of the project amounts to 2,700,000.00 € (EEA Grants co-financing: 1,928,610.00 €) and it is analyzed by Sub-Project in the following table. At this stage of the evaluation and on the basis of the quantitative and qualitative information provided to the evaluator by the Programme Operator and the Project Promoter, there are no declared costs per Sub-Project.

Sub-Projects (SP)	Budget (€)	Total Public Expenditure (€)	Final Eligible Public Expenditure (€)	Payments to Project Promoter
SP1. Support services for the implementation of PDP2 "Integrated pilot social housing relocation scheme for Roma inclusion" (PDP2_EEA Grants)	43,200.00	43,200.00	43,200.00	0,00
SP2. Supply, transportation and installation of prefabricated houses and equipment for the relocation and housing of 56 Roma families in the location "Peleka" of the Municipality of Katerini (PDP2_EEA Grants)	2,256,800.00	2,256,800.00	2,256,800.00	0,00
SP3. Services of complementary actions for the social integration of Roma (PDP2_EEA Grants)	400,000.00	400,000.00	400,000.00	0,00
<b>SUMS</b>	<b>2,700,000.00</b>	<b>2,700,000.00</b>	<b>2,700,000.00</b>	<b>0,00</b>

### Benefits

#### Direct Benefits

This project will provide a purpose-built settlement with communal areas, a multi-activity center and prefabricated houses, providing housing for the temporary relocation of 56 Roma families, with a total population of 270 people. The project, hence, lays the foundations for the elimination of social inequalities and exclusion of this special social group. The project is part of a broader action plan for the integration and empowerment of Roma communities.

#### Contribution to Programme Indicators

#### OUTPUT INDICATORS

Indicator	Unit of Measurement	Target Value	Value
Number of children and youth reached, at risk of early-school leaving	Cumulative Number	30	-
Number of young people aged 15-29 completing vocational education or work-based learning	Cumulative Number	30	-
Number of beneficiaries of education services provided	Cumulative Number	51	-
Number of quality housing structures installed in Roma settlements	Cumulative Number	56	-

#### OUTCOME INDICATORS

Indicator	Unit of Measurement	Target Value		
Number of Roma settlements supported with upgraded housing infrastructure	Cumulative Number	Total: 1	Men:	Women:
Number of Roma residing in the installed pre-fabricated dwelling structures	Cumulative Number	Total: 270	Men:	Women:

### 3 Provision of Supporting Services to the Programme "Roma Inclusion and Empowerment"

#### General Information

Title of Project

Provision of Supporting Services to the Programme "Roma Inclusion and Empowerment"

MIS Code No

5074511

Project Promoter

Ministry of Labour and Social Affairs - Executive Authority ("Special Service - Executive Structure NSRF"),  
Division of Employment and Social Economy (Special Service "NSRF Executive Structure", Division of  
Employment and Social Economy)

Project Partners

-

Budget

- Total Public Expenditure: 600,000.00 €
- Co-funding from EEA Grants (71.43%): 428,572.00 €

#### Physical Object

Technical Description

The project includes supporting actions to strengthen the effectiveness of the actions of the Executive Service ApKO, with the aim to contribute to the optimization of services provided and the maximization of their effectiveness, through the following Sub-Projects:

SUB-PROJECT 2: "SUPPORT COSTS WITH OWN MEANS"

SERVICES A:

Support from a Technical/Legal Advisor regarding:

I. The design and drafting of an individual management and monitoring system for the action under the EEA Grants 2014-2021 in accordance with Article 5.7 of the Joint Ministerial Decision 13249/04-02-2020, for the implementation of the Programme, which must cover

- a) the verification, control and monitoring systems;
- b) the system of prevention, mitigation, detection, reporting and restoration of irregularities;
- c) the system established to maintain the audit trail of all supported activities.

II. The preparation and design of the invitations to be issued within the framework of the program.

SERVICES B:

Programme Management support from External Consultants / experts in the process of evaluating and selecting submitted proposals for each of the 3 Small Grant Scheme projects.

Programme Management Support by an External Technical Consultant in the monitoring and implementation progress reviewing of the project, in the verification of the outputs of the project, as well as, the ongoing and ex-post evaluation, throughout the implementation of the Programme.

Programme Manager support in the appeals review processes.

Project Expenditure Eligibility Check in PDP1.

Project Expenditure Eligibility Check in PDP2, i.e. administrative and on-site verification of physical object implementation.

Preparation of Studies, Analyses Guidelines, Manuals, etc. for programme implementation support.

Programme Management support by External Communication Consultant for the design, specification, updating and organization of communication strategies for PDP1, PDP2 and the three Small Grant Scheme projects.

Programme Manager support by External Consultant for the preparation and organization of 3 information, publicity and information events.



Translation and interpretation services.

SERVICES C:

Provision of technical, legal and accounting support to the Project Promoters of PDP1, PDP2.

SERVICES D:

Cooperation and bilateral relations, including: a) expenses related to travel expenses, accommodation or other expenses related to the strengthening of bilateral relations; b) expenses of travel, accommodation and facilitation in the work of the Cooperation Committee; c) expenses of meetings for the exchange of good practices between the bodies involved of the programme and others involved either within the territory or with international organizations.

Conducting and organizing meetings and movements between the involved national bodies and parties of the Programme.

Costs of carrying out on-site checks and verifications by the Programme Manager.

SERVICES E:

Supply of equipment to carry out the work of the Programme Manager.

Overhead costs.

SUB-PROJECT 3: "PREPARATORY COSTS WITH OWN MEANS"

SERVICES A:

Provision of Organizational and Management Consulting Services in collaboration with other partners.

SERVICES B:

Provision of Consulting Services for urban and town planning.

SERVICES C:

Provision of Consulting Services for the preparation of the Communication Plan.

SERVICES D:

Provision of Consulting Services on educational and cultural issues of the Roma target group.

SERVICES E:

Provision of interpretation services at the technical meeting of 26/02/2020 in Katerini.

SERVICES F:

Provision of Services for creation, management, technical support and configuration of a new website.

SERVICES G:

Actions related to carrying out movements between the involved national bodies and parties of the programme.

SERVICES H:

Actions related to the provision of other consulting services.

#### Deliverables

SP2

- Reports of legal support actions, drafting report of the individual management and monitoring system for the action under the EEA Grants 2014-2021, preparation of tenders.
- Study of procedures for the evaluation and selection of submitted Proposals for each of the 3 Small Grant Scheme projects.
- Report of monitoring, review, progress report on the implementation of the physical object of project actions, verification of action outputs, ongoing and ex-post evaluation processes.
- Expenditure eligibility audit reports.
- Studies, analyses.
- Technical Report on the progress of implemented actions and their budgeting.
- Reports on the provision of technical, legal and accounting support to the Project Promoters of PDP1, PDP2.
- Advertising development, advertising plan, registrations in print and electronic press, copies of relevant legal documents for handling / purchasing materials, equipment, supply, etc. of respective suppliers, printed material, audio-visual material in digital format, translation / interpretation material.☒

- Travel approvals, Tickets, hotel vouchers, expense documents, attendance sheets / forms, agenda
- Audit File (Audit Results Evaluation Sheet, documents documenting the conclusions and findings of the audit team, audit methodology elaborated, potential problems, findings, conclusions and recommendations, as well as, proposals for financial corrections or recovery of amounts that were unduly or illegally paid in cases of irregularity)
- Decisions of awards of contracts, committee meetings minutes / certificates, invoices

SP 3

- Design, planning and maturing of Programme in collaboration with other partners, writing documents accompanying the Concept Note, supporting the drafting of a specialized Management and Control System for the Programme and the Programme Agreement, supporting Project Partners for compliance to Programme requirements. ☒
- Preparatory actions for the preparation of Action Teams at the local level and in particular the development of a network of Roma branches of Community Centres at the regional and national level.
- Development of methodology and tools for monitoring of the implementation and evaluation processes of Roma social integration interventions by local government agencies.
- Development of partnerships with civil society organizations with Roma communities networks.
- Participation in work meetings, conferences, presentations and other public events.
- Monitoring of developments in the areas of interest and recording needs.
- General layout of a NEW TEMPORARY SETTLEMENT FOR A SPECIAL SOCIAL GROUP (ROMA) IN THE MUNICIPALITY OF KATERINI - Layout of project social service areas (Multi-centre) and outdoor areas.
- Types of dwellings of NEW TEMPORARY SETTLEMENT FOR A SPECIAL SOCIAL GROUP (ROMA) IN THE MUNICIPALITY OF KATERINI.
- Technical Report and Specifications.
- Preparation of a Communication Plan, drafting and presentation of Programme for a special website.
- Preparatory actions to prepare an Action Team Support Mechanism at the local level for interventions related to education and culture.
- Contribution to the development of a network of Roma branches of Community Centres on subjects of education and culture.
- Development of cultural activities and empowerment of Roma youth and women.
- Monitor local developments.
- Support of agencies for the activation and participation of Roma students for the successful completion of compulsory education and a smooth transition to secondary and professional education.
- Development of partnerships in the field of education and culture with civil society organizations and Roma community networks.
- Promotion and support of Roma children in children's camps.
- Interpreting services to support the technical meeting of 26/02/2020 in Katerini
- Creation, management, technical support and configuration of a new website to display the Programme
- Transportation and accommodation of three (3) Roma representatives
- Providing travel services for the movement and accommodation of Executive Service ApKO executives
- External expert assessment report of PDP1.

### Financial Object

The finalized financial object of the project amounts to 600,000.00 € (EEA Grants co-financing: 428,572.00 €) and it is analyzed by Sub-Project in the following table. Payments to **Project Promoters** are as declared to the Programme Operator and as they stand at the time of the elaboration of the current evaluation report on the basis of the information provided to the Evaluator.

Sub-Projects (SP)	Budget (€)	Total Public Expenditure (€)	Final Eligible Public Expenditure (€)	Payments to Project Promoter
SP2: "Support costs with Own Means"	520,000.00	520,000.00	520,000.00	82,051.53
SP3: "Preparatory costs with Own Means"	80,000.00	80,000.00	80,000.00	79,581.26
<b>SUMS</b>	<b>600,000.00</b>	<b>600,000.00</b>	<b>600,000.00</b>	<b>161,632.79</b>

### Benefits

#### Direct Benefits

Through the project the empowerment and social integration of the Roma is sought. The beneficiary population of the project is the Roma communities in the selected regions (Athens, Attica, Western Greece, Central Macedonia, Eastern Macedonia and Thrace). The number of beneficiaries is estimated at around 3,000 people.

#### Contribution to Programme Indicators

This project is not connected to output or outcome indicators.





### 3.2. Implementation progress of the financial object of the Projects and the Programme

This section analyses the implementation progress of the financial object of the Projects and the Programme as a whole. This information is derived from **data from the Programme Operator and the Project Promoters' integrated Monitoring Information System (hereinafter referred to as "MIS")** that is shared with the evaluator and will be compared to the corresponding programmatic elements per Project, as reflected in the relevant Approval Decisions. The objective of this section is to use all available quantitative information provided to the evaluator by the competent authorities in order to answer the following questions in a fair and reliable manner:

- What is the absorption rate of the Projects and the Programme as a whole?
- What is the estimated rate of absorption of the Programme resources at the end of the programming period?

To date, the following five (5) Calls for Proposals addressed to the competent implementing bodies have been published in the context of the Programme. The listing includes the final versions of these Calls for Proposals, as amended and in force:

- ✚ **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Task Force Units supporting Roma Inclusion and Empowerment" (MIS No: 4622, Budget: €3,100,000.00)**

-  **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Integrated pilot social housing relocation scheme for Roma inclusion" (Reference No: 2.4714/3.10.2022, Budget: €2,700,000.00)**
-  **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Women and Youth Empowerment" (MIS No: 6136, Budget: €1,000,000.00)**
-  **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Promotion and Support of Roma children in summer camps and community activities" (MIS No: 6689, Budget: €250,000.00)**
-  **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Provision of Supporting Services to the Programme "Roma Inclusion and Empowerment" (MIS No: 4650, Version 3/0, Budget: €600.000,00)**

The Projects that have been activated under the "Roma Inclusion and Empowerment" Programme are the following:

**Table 4: Activated Projects of the Programme "Roma Inclusion and Empowerment"**

MIS	TITLE OF PROJECT	No of CALL FOR PROPOSAL	PROJECT PROMOTER	TOTAL BUDGET IN PIP*	EEA Grants 2014- 2021	National funds
5075006	Task Force Units supporting Roma Inclusion and Empowerment	4622	Ministry of Labour and Social Affairs - Executive Authority ("Special Service - Executive Structure NSRF"), Division of Social Solidarity (Special Service "NSRF Executive Structure", Division of Social Solidarity)	3,099,860.00€	2,214,230.00€	885,630.00€
5087337	Integrated pilot social housing relocation scheme for Roma inclusion	2.4714/3.10.2022	Municipality of Katerini	2,700,000.00€	1,928,610.00€	771,390.00€
5074511	Provision of Supporting Services to the Programme "Roma Inclusion and Empowerment"	4650	Ministry of Labour and Social Affairs - Executive Authority ("Special Service - Executive Structure NSRF"), Division of Employment and Social Economy (Special Service "NSRF Executive Structure", Division of Employment and Social Economy)	600.000,00€	428,572.00€	171,428.00€

\* PIP: Public Investments Programme.

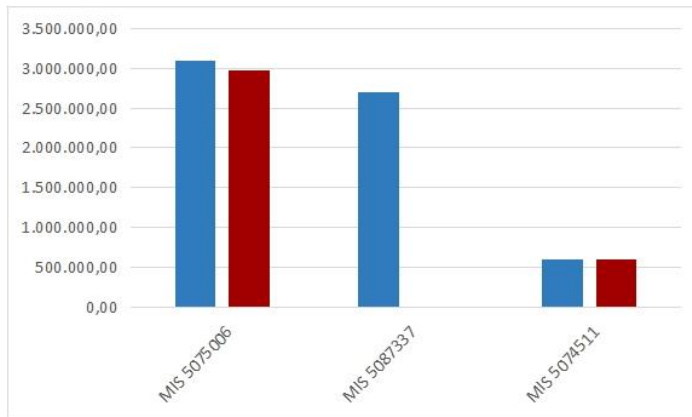
There is a high rate of Contracts in progress under the approved Projects: "Task Force Units supporting Roma Inclusion and Empowerment" (MIS: 5075006) and Provision of Supporting Services to the Programme "Roma Inclusion and Empowerment" (MIS: 5074511). However, there is no progress recorded under the approved Project "Integrated pilot social housing relocation scheme for Roma inclusion" (MIS: 5087337).

**Out of the total budgets of these Projects (€6,399,860.00), €3,567,771.25 are covered through existing contracts, an amount corresponding to approximately 55.75%.** The details of the contracts of the approved Projects are the following:

- ✚ PDP1: "Task Force Units supporting Roma Inclusion and Empowerment" (MIS: 5075006). The Contracts amount to 2,968,189.99 € out of a total budget of 3,099,860.00 € (95.75%).
  - ✓ SP1. Establishment and Functioning of Task Force Unit for the support of Roma Inclusion and Empowerment (Beneficiary: Special Service "NSRF Executive Structure", Division of Social Solidarity): First Contract on: 19/03/2021, subsequent Contracts on: 07/06/2022, 30/06/2022, June-July 2022.
  - ✓ SP2. Technical Advisor for Project Management Support) (Beneficiary: Special Service "NSRF Executive Structure", Division of Social Solidarity): Contracted on 28/01/2022.
  - ✓ SP3. Operational expenses of offices for the needs of the Regional Units (Beneficiary: Special Service "NSRF Executive Structure", Division of Social Solidarity): Contracted on June-July 2022.
  - ✓ SP4. Vehicle leasing expenses for the needs of Task Force Unit members (Beneficiary: Special Service "NSRF Executive Structure", Division of Social Solidarity): Contracted on: 29/04/2022.
- ✚ PDP2: "Integrated pilot social housing relocation scheme for Roma inclusion" (MIS: 5087337). No Contracts assigned to date, hence the Contracts amount to 0.00 € out of a total budget of 2,700,000.00 € (0.0%).
- ✚ "Provision of Supporting Services to the Programme "Roma Inclusion and Empowerment" (MIS: 5074511). The Contracts amount to 599,581.26 € out of a total budget of 600,00.00 € (99.93%).
  - ✓ SP2. "Support costs with Own Means" (Beneficiary: Special Service "NSRF Executive Structure", Division of Employment and Social Economy): Contracted on: 10/07/2020.
  - ✓ SP3. "Preparatory costs with Own Means" (Beneficiary: Special Service "NSRF Executive Structure", Division of Employment and Social Economy): Contracted on: 31/12/2017.

The figure below represents the overall status of contracts for all approved projects in the Programme in relation to the budgets of the approved Projects.

Figure 1: Contracts by Project



On the basis of the expenditures registered in the MIS as “declared funds”, hence payments claimed by the Project Promoters, the total Programme expenditures are at low levels.

- ✚ The more progressed status of expenditures is exhibited at the Project “Provision of Supporting Services to the Programme “Roma Inclusion and Empowerment” (MIS: 5074511), for which the Beneficiary's payments amount to 23.62% of the Contracts.
- ✚ For the Project “Task Force Units supporting Roma Inclusion and Empowerment” (MIS: 5075006), the Beneficiary's payments amount to 21.51% of Contracts.

The following Table demonstrates the expenditures of Project Promoters in relation to the total budget of the respective Projects as approved and registered in the PIP, as well as, the assigned Contracts.

**Table 5: Project Promoters expenditures in relation to the total budget of Projects as approved and registered in the PIP, as well as, assigned Contracts**

MIS	Project Title	Project Promoter	Total Budget in PIP	Contracts	Incurred expenditure
5087337	PDP1: Task Force Units supporting Roma Inclusion and Empowerment	Special Service "NSRF Executive Structure", Division of Social Solidarity	3,099,860.00 €	2,968,189.99 € <i>(95.75% of Total Budget)</i>	638,491.51 € <i>(21.51% of Contracts)</i>
5087337	PDP2: Integrated pilot social housing relocation scheme for Roma inclusion	Municipality of Katerini	2,700,000.00 €	0.00 €	0.00
5074511	Provision of Supporting Services to the Programme "Roma Inclusion and Empowerment	Special Service "NSRF Executive Structure", Division of Employment and Social Economy	600,000.00 €	599,581.26 € <i>(99.93% of Total Budget)</i>	141,608.79 € <i>(23.62% of Contracts)</i>



In terms of the evaluation of the progress of Technical Sheets submission by Project Promoters in relation to the deadlines set out in the Calls for Proposals and, accordingly, the degree of administrative flexibility on behalf of the Programme Operator in order to better support the Project Promoter in cases of delays for technical or administrative reasons, the following information is noted.

- ✚ **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Task Force Units supporting Roma Inclusion and Empowerment"** (MIS No: 4622, Budget: €3,100,000.00)

Deadline for the submission of proposals was the 07/12/2020.

Decision of Approval of Project issued on: 27/01/2021

Latest version of Technical Sheet submitted on: 22/6/2022.

- ✚ **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Integrated pilot social housing relocation scheme for Roma inclusion"** (Reference No: 2.4714/3.10.2022, Budget: €2,700,000.00)

Deadline for the submission of proposals: 30/12/2022.

Decision of Approval of Project issued on: 30/12/2022

Latest version of Technical Sheet submitted on: 7/12/2022.

- ✚ **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Women and Youth Empowerment"** (MIS No: 6136, Budget: €1,000,000.00).

Deadline for the submission of proposals: 31/10/2022.

Decision of Approval of Project issued on: N/A (*no proposals approved at the date of the elaboration of this evaluation*)

- ✚ **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Promotion and Support of Roma children in summer camps and community activities"** (MIS No: 6689, Budget: €250,000.00)

Deadline for the submission of proposals: 06/03/2023.

Decision of Approval of Project issued on: N/A (*no proposals submitted at the date of the elaboration of this evaluation*)

- ✚ **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Provision of Supporting Services to the Programme "Roma Inclusion and Empowerment"** (MIS No: 4650, Version 3/0, Budget: €600.000,00)

Deadline for the submission of proposals: 10/03/2021.

Decision of Approval of Project issued on: 22/07/2022 as an amendment to the initial Decision of Approval issued on 30/12/2020.

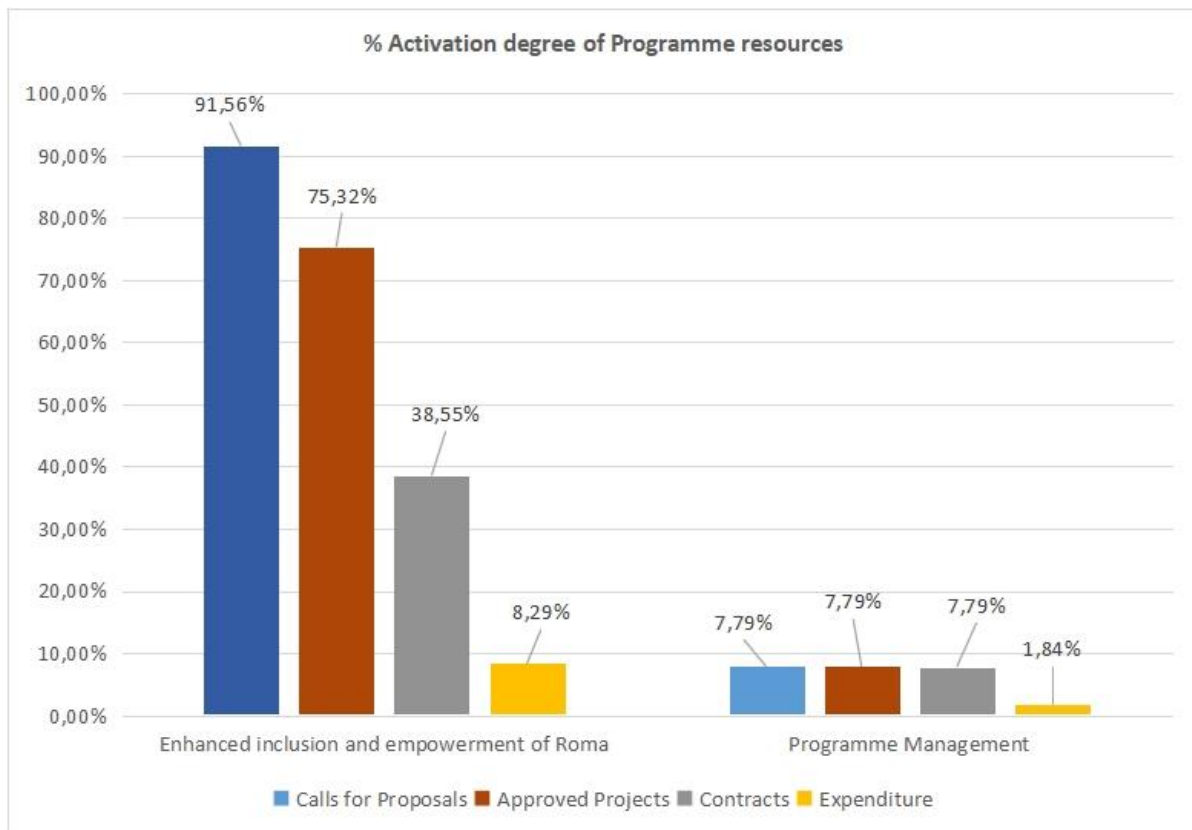
Latest version of Technical Sheet submitted on: 21/07/2022

The status of the implementation progress of the Programme as a whole, at the time of the elaboration of this evaluation is as follows:

- 99.35% of the available resources of the Programme is now activated with the publication of the five (5) Calls for Proposals in the context of the Pre-defined Projects, the three (3) Small Grant Scheme projects and the additional management allocations of the Programme (7,650,000.00 €).
- Three (3) Projects have been approved under the Programme, which commit 83.12% of the available resources of the Programme (6,399,860.00 €).
- The assigned Contracts of the Programme represent 46.33% of the available resources of the Programme (3,567,771.25 €).
- The degree of absorption of the Programme resources is at 10.13% of the available resources of the Programme (780,100.30 €)

The above evidence and conclusions are shown in the following Figure as well as, in the following Table.

**Figure 2: Activation degree of Programme resources**



**Table 6: Total status of implementation progress of Programme (as of 01/02/2023)**

PRIORITY AREA	Programme Budget	Calls for Proposals	Approved Projects	Contracts	Expenditure
PA07 - Outcome 1: Enhanced inclusion and empowerment of Roma	3,100,000.00 €	3,100,000.00 €	3.099.860,00 €	2,968.189.99 €	638,491.51 €
	2,700,000.00 €	2,700,000.00 €	2,700,000.00 €	0.00 €	0.00 €
	1,300,000.00 €	1,250,000.00 €	0.00 €	0.00 €	0.00 €
PA07 - Programme Management	600,000.00 €	600,000.00 €	600,000.00 €	599,581.26 €	141,608.79 €
<b>TOTAL</b>	<b>7,700,000.00 €</b>	<b>7,650,000.00 €</b>	<b>6,399,860.00 €</b>	<b>3,567,771.25 €</b>	<b>780,100.30 €</b>
<b>% of Budget of Programme</b>		<b>99.35%</b>	<b>83.12%</b>	<b>46.33%</b>	<b>10.13%</b>
		<b>% of Calls for Proposals</b>	<b>83.66%</b>	<b>46.64%</b>	<b>10.20%</b>
			<b>% of Approved Projects</b>	<b>55.75%</b>	<b>3.19%</b>
				<b>% of Contracts</b>	<b>21.87%</b>

The following conclusions can be drawn from the course of implementation of the financial object of the Programme's interventions:

- ❖ Although, the rate of approvals of the projects by the Programme Operator is high (commitment of 83.12% of the Programme's resources), the rate of contracting of Projects and their Sub-projects is at 46.33% of the Programme's budget. Some delays have been observed due to changes in the project implementation environment that led to delays in the announcement of the Calls for Proposals, the declaration of certain tender procedures as infertile, etc. All bodies involved in the implementation of the Programme have successfully dealt with the above difficulties and an improved rate of contracting is expected within the first half of 2023;
- ❖ The available data demonstrates that the rate of absorption of available resources remains very low (10.13% of the Programme budget). This is due to delays and difficulties in the contracting of Projects and their Sub-projects, as analysed above. This situation, after resolving issues of contracting difficulties and international partners' eligibility of expenses, is expected to improve significantly within the first half of 2023 and to gradually normalise in the remaining Programme implementation period.

### **3.3. Implementation progress of the physical object of the Projects and the Programme**

This section analyses the implementation progress of the physical object of the Projects and the Programme as a whole. This information is derived from **data from the Programme Operator and the Project Promoters' integrated MIS, as well as, Progress Reports and Reports on achievement of objectives** that are shared with the evaluator.

In the context of this report, **the evaluator has also performed interviews with representatives of the Programme Operator, as well as, the Project Promoters** with the aim to collect the views of the key partners, parties and stakeholders that are involved in the implementation process and hence, reach fair and accurate, as possible, conclusions in terms of the set evaluation criteria. The details of these interviews (dates, venues, participants) are included in Paragraph 9.

The result of the analysis performed on all the above-mentioned available evidence will reach a comparison of the available evidence to the corresponding programmatic elements per Project, as reflected in the relevant Approval Decisions. As a result of this process, the evaluator will also seek to estimate the level of achievement of the objectives of each Project and the Programme as a whole.

In consistency with the analysis elaborated in Paragraph 3.2 and the data used in Table 6, the analysis and assessment of the physical object of the Projects and the Programme herein will take into account any information that has been made available to the evaluator **as of 01/02/2023**.

The objective of this section is to use all available qualitative and quantitative information provided to the evaluator by the competent authorities in order to answer the following questions in a fair and reliable manner:

- What is the degree of achievement of the objectives of the Programme (output indicators, results, etc)?

- What is the estimated degree of achievement of the Programme objectives at the end of the programming period?

Through the process of the analysis of outputs and results of the approved Projects, the degree of contribution of each Project to the achievement of the set goals of the Programme will be determined.

Accordingly, to assess the degree of achievement of the overall objectives of the Programme, the current indicator values will be added and the degree of achievement of the intended result of the Programme will be determined, on the basis of the pre-selected indicators for the Main Objective of the Programme, under the Programme Agreement.

For each Project, the evaluator will also perform a **time schedule feasibility analysis** on the basis of the data that has been made available up to the reference date of the evaluation study, which is the 01/02/2023, and interlink this with a **risk assessment and mitigation analysis** and subsequently submit **Recommendations** whenever it is deemed find it necessary and appropriate.

For the purposes of the risk assessment and mitigation analysis in specific, the following tools and resources / information will be used:

- EEA Grants: Programme Operators - Risk assessment and mitigation analysis template, Publication Date: 20 Nov 2020<sup>4</sup>
- Strategic Report of the EEA Grants 2014-2021 (Reporting period: November 2021 to October 2022)
- Annual Programme Report FM 14-21, Greece, GR-ROMAINCLUSION Roma Inclusion and Empowerment 2022.

Subsequently, all information on the risk assessment and mitigation analysis performed will be collectively presented to address the Programme as a whole and to reach a conclusion on the overall time schedule feasibility and risk level of the Programme. This will be performed in Paragraph 3.4.

### **3.3.1. Task Force Units supporting Roma Inclusion and Empowerment**

The project entitled "Task Force Units supporting Roma Inclusion and Empowerment" (MIS: 5075006) is implemented with the Special Service "NSRF Executive Structure", Division of Social Solidarity as Project Promoter and has an approved budget of 3,099,860.00 €. The project seeks to contribute to the coordination of Roma integration activities between local, regional and central levels of administration, to the transfer of know-how and experience to Roma communities and the inhabitants of these areas, to the transfer of know-how to local authority staff, as well as, to the development and implementation of measures to combat discrimination and stereotypes in the wider population.

During the implementation of the Project, the European Union Agency for Fundamental Rights (FRA) is to provide advisory support to both the Central and Regional Task Force Units (as well as, to the

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<sup>4</sup> <https://eeagrants.org/resources/programme-operators-risk-assessment-and-mitigation-analysis-template> (last accessed: 03.04.2023)

competent local authorities, where necessary), in matters concerning the planning, development and implementation of consultation and participation actions with the local Roma community.

On the basis of the information shared with the evaluator by the Programme Operator and the Project Promoter, the implementation progress of the physical object of the Project is as follows:

### **SP1. Establishment and Functioning of Task Force Unit for the support of Roma Inclusion and Empowerment**

SP1 is now in implementation through the following activated Work Packages: WP2, WP3, WP9, WP13, WP14.

- **WP2: Staffing of Task Force Unit**

The Contracts with 25 special collaborators have been signed as of 21/12/2021 with additional Contracts signed up to November 2022 to cover additional needs and/or to replace members of staff where necessary. These Contracts are in progress and there are no delays and/or other implementation problems reported. The Task Force Units fully operates in the four regions of the country, as planned. However, it is noted that the delay of the contracts is expected to affect the absorption of the initially foreseen budget, as the physical object of this WP involves exclusively human employment measured in person-months and it is therefore not possible to cover this workload in the existing time frame of the project. The evaluator notes that as the financial object data has been provided by SP only (and a breakdown by WP was not made available), it is not possible to measure the existing shrinkage. Furthermore, due to the lack of measurable data on the Project's indicators it is not possible to measure the probability of a further potential shrinkage of budget. However, a quantified assessment of the risks incurred are presented in the table below (Risk Score: 3.0).

- **WP3: Supply of equipment and consumables for the establishment and operation of the Central and Regional Units.**

Following an invitation to interested parties for the submission of offers for the supply of furniture and office equipment, the Contractor has been selected as of April - May 2022 and the Contract is in progress with no delays and/or implementation problems reported.

- **WP9: Organization of meetings, events, publicity, promotion, information events.**

Following an invitation to interested parties for the submission of offers for the Organization of Events on 8/6/2022 and 9/6/2022 in Athens, the Contractor has been selected as of June 2022. The Contract is in progress with no delays and/or implementation problems reported.

- **WP13: Translation services**

Following an invitation to interested parties for the submission of offers for interpretation services (from and to Greek/English) at a work meeting to exchange good practices at the offices of the General Secretariat for Social Solidarity and Fight Against Poverty on 6/9/2022, as well as, at a visit to the Roma Day Center of Klimaka in Zephyri on the same day, the Contractor has been selected as of August-September 2022. The Contract is in progress with no delays and/or implementation problems reported.

- WP14: Indirect costs

Due to the technical nature of the WP, no details of the progress of the physical objective are mentioned herein. The evaluator notes that service and infrastructure / supply receipts are submitted as required, as also stated in the SP Technical Sheet (TDY\_193499\_id341853\_SUB\_81.pdf, submitted electronically on 21.02.2022) and that there are no delays and/or implementation problems reported.

The 25 member of the Task Force Unit, in compliance to their contractual obligations, have delivered four (4) reference reports each. In the first report, on the basis of each member's area of specialization, a short essay was included to outline the current situation, as well a draft report of recommendations at the central / regional level. In addition, three (3) Quarterly Reports have been submitted, in which the services provided during the reference period are described, including the planning of all types of services that are to be provided by each member in the following period.

The members of the Central and Regional Task Force Units carry out field visits / inspections in Roma settlements and camps with the aim to record the current situation and needs and to contribute to the empowering of Roma residents and to develop collaborations with Roma representatives and relevant non-governmental organizations. The movements of the members of the Central and Regional Task Force Units started in February 2022. So far various Roma settlements in the following regions have been visited: Region of Attica, Region of Central Macedonia, Region of Eastern Macedonia and Thrace, Region of Western Greece.

Furthermore, in the context of the movement of executives abroad for the purpose of obtaining information on the European experience, good practices at the European level and monitoring the relevant implemented European programmes for Roma empowerment, the General Secretariat for Social Solidarity and Combating Poverty accompanied by the Coordinator and another member of the Task Force Unit visited Slovakia in July 2022, in the context of developing cooperation in areas related to the new National Strategy for Roma Social Inclusion 2021-2030, as well as, exchanging experiences in the housing sector within the framework of the "Roma Inclusion and Empowerment" Programme.

In addition, as part of the training activities of the Task Force Units, an educational teleconference was organized, followed by a live two-day educational meeting on 8/6/2022 and 9/6/2022, in Athens, which was attended by all members of the Task Force Units.

At the same time, as part of the publicity and promotion activities of the Project, during the 86th Thessaloniki International Trade Fair- Exhibition in mid-September, a presentation was held on the subject of "Empowerment of Roma Women: Policies to strengthen their role and deal with incidents of gender-based violence" at the stand of the Ministry of Labour and of Social Affairs.

Under the Programme Management activities, the Technical Support Consultants supervise the implementation of the Project and provide with support to the Task Force Units and report on their activities in compliance with their contractual obligations.

There are already delays noted in the launching of the active WPs and a number of WPs have not been launched as of yet.

The WPS that have not been launched yet under SP1, together with the respective Deliverables for convenience of inspection, are the following:

- WP4: Expenses for telecommunication services / Internet connection expenses

Deliverables: Mobile communications connections, Monthly statement of telecommunications charges

- WP7: Travel expenses of the members of the Central and Regional Units

Deliverables: All documentation of participation, accommodation, travel, compensation of mobile executives and the movement journals.

- WP10: Movements of personnel of Special Service "NSRF Executive Structure", Division of Social Solidarity.

Deliverables: All documentation for participation, accommodation, travel, compensation of mobile executives and movement journals.

- WP11: Expenses of publications - announcements

Deliverables: Publications - announcements in print and digital media and relevant expenditure documents

- WP12: Training of the members of the Task Force Unit

Deliverables: Printed and digital material, presence journals.

#### **Time schedule feasibility - Risk assessment and mitigation analysis:**

On the basis of the information provided above, while also taking into account that:

- ✓ According to the Programme Operator and Project Promoter, the remaining Work Packages (WP4, WP7, WP10, WP11, WP12) are expected to be activated in the following months;
- ✓ The remaining WP4, WP7, WP10, WP11, WP12 were scheduled to commence<sup>5</sup> on 01/01/2022, 21/12/2021, 01/01/2022, 01/01/2022 and 21/12/2021 respectively (TDY\_193499\_id341853\_SUB\_81.pdf, submitted electronically on 21.02.2022). There is therefore already a delay of over 12 months in these WPs, as of the reference date which is 01/02/2023. Given the analysis above, there is an identified risk that further procurement or tendering delays could lead to the non-completion of these WPs on time and the non-absorption of the entirety of the foreseen budget. In the absence of measurable data on the physical progress and to the extent that the approved Projects do not currently yield significant output and results, there are no measurable values of the pre-selected Indicators. The nature of these WPs is such that their physical object may be covered within the remaining time frame of the Project, subject to the incorporation of the evaluator's Recommendation 1 (see also below). Due to the lack of measurable data on the Project's indicators it is not possible to measure the probability of a

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<sup>5</sup> "Commencement" of an Action (i.e. Work Package, Sub Project of Project) herein refers to the date of the award of the Contract



potential shrinkage of budget. However, a quantified assessment of the risks incurred are presented in the table below (Risk Score: 3.0).

- ✓ As far as the remaining WP4, WP7, WP10, WP11, WP12 are concerned: the nature, legal framework (procedure followed) and costs incurred of the physical object are such that these Work Packages may be fully implemented in accordance with the time schedule and the objectives of the Programme as a whole, however there are still significant risks incurred;
- ✓ The core object of SP1 is the staffing and activation of the Central and Regional Task Force Units which are already in operation with delays reported in WP2. It is also noted that WP2 is now progressing with no further delays or implementation issues reported;

It is the evaluator's view that **the implementation course of SP1 is now linked to delays and the subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows:**

Risk description	Likelihood	Consequence	Risk score	Description of response
PDP1: SP1: WP2: Delay of the Call for recruitment for the Task Force and non-absorption of the foreseen budget	<b>3</b>	<b>3</b>	<b>3.00</b>	The Task Force Units fully operate in the four regions of the country, as planned. The delay of the contracts will affect the non-absorption of the entirety of the initially foreseen budget.
PDP1: SP1: WP4, WP7, WP10, WP11, WP12: Existing Procurement or contract or tendering delays that could lead to the non- absorption of the foreseen budget	<b>3</b>	<b>3</b>	<b>3.00</b>	Full and accelerated operations as described in the Programme Agreement. Ensure sound preparatory work by all partners. Appoint external experts to support the PO & PPs with the drafting of open calls for proposals. Furthermore, a market search could be carried out to update the technical and financial terms of the public procurement specifications, where applicable.

**Recommendation 1:**

*The evaluator recommends the close monitoring of the approved time schedule in all WPs under SP1 of PDP1 and the speeding-up of the launching process of the WPs that have not been activated yet, in order to avoid further delays that could impact the objectives of SP1 and hence, of PDP1.*

## **SP2. Technical Advisor for Project Management Support**

The Contract with the selected Technical Advisor for Project Management Support was assigned on January 2022 and it is now in progress with no delays and/or implementation problems reported. Under the Programme Management activities, the Technical Support Consultants supervise the implementation of the Project and support Unit A and B with a physical presence 3 times a week, as part of their contractual obligations. The Technical Support Consultants have submitted their 1st Semi-annual report on 28/7/2022.

### **Time schedule feasibility - Risk assessment and mitigation analysis:**

**The Contract is in progress and there are no delays and/or other implementation problems reported. The physical object is expected to be completed in compliance to the approved time schedule and no subsequent risks are identified.**

## **SP3. Operational expenses of offices for the needs of the Regional Units**

There has been a time deviation from the approved time schedule of the Project due to an unsuccessful tender announced in August 2021.

Nevertheless, the competent authorities have managed to successfully complete a new tender procedure in January 2022, which led to the selection of three (3) Contractors for the provision of services for the use of three (3) respective furnished and fully functional office spaces. The results of this procedure are as follows, by part:

- Part 1. "Use of equipped and furnished offices in the city of Thessaloniki for the housing needs of the regional Task Force Unit of Central Macedonia": Contract assigned as of June - July 2022.
- Part 2. "Use of equipped and furnished offices in the city of Komotini for the housing needs of the regional Task Force Unit of Eastern Macedonia": Contract assigned as of June - July 2022.
- Part 3. "Use of equipped and furnished offices in the city of Patras for the housing needs of the regional Task Force Unit of Western Greece": Programming Agreement under Article 100 of Law 3852/2010 between the Special Service "NSRF Executive Structure", Division of Social Solidarity, the Municipal Property & Common Space Management & Utilization Societe Anonyme "Nestoras Tsanaklis" and the Municipality of Komotini in force as of June - July 2022.

### **Time schedule feasibility - Risk assessment and mitigation analysis:**

Despite the initial delay due to the above-mentioned unsuccessful tender, the Contracts under this SP are in progress and there are no further delays and/or other implementation problems reported. It is furthermore noted that the competent authorities have managed to speed up all included procedures and hence to award the above Contracts in compliance with the approved time schedules with minimal delays, as on the basis of PDP1 Technical Sheet (TDP\_5075006\_id327938\_SUB\_48, submitted electronically on 22.06.2022), the assignment of contracts for SP3 was due on 30.06.2022.

**There are therefore no delays and/or other implementation problems reported. The physical object is expected to be completed in compliance to the approved time schedule and no subsequent risks are identified.**

#### **SP4. Vehicle leasing expenses for the needs of Task Force Unit members**

There has been a time deviation from the approved time schedule of the Project due to an unsuccessful tender announced in June 2021.

Nevertheless, the competent authorities have managed to successfully complete a new tender procedure in January 2022, which led to the selection of a contractor for the provision of the service of using five (5) vehicles through financial leasing (LEASING) without purchase. The Contract was assigned as of April - May 2022.

#### **Time schedule feasibility - Risk assessment and mitigation analysis:**

Despite the initial delay due to the above-mentioned unsuccessful tender, the Contract under this SP is in progress and there are no further delays and/or other implementation problems reported. The physical object is expected to be completed in compliance to the approved time schedule. It is furthermore noted that the competent authorities have managed to speed up all included procedures and hence to award the above Contract in compliance with the approved time schedules with minimal delays, as on the basis of PDP1 Technical Sheet (TDP\_5075006\_id327938\_SUB\_48, submitted electronically on 22.06.2022), the assignment of contracts for SP3 was due on 29.04.2022.

**There are therefore no delays and/or other implementation problems reported. The physical object is expected to be completed in compliance to the approved time schedule and no subsequent risks are identified.**

#### **SP5. Development, installation and maintenance of information system and technical support for the members of the Central and Regional Units**

The technical specifications of the SP are complete and the Call for Proposals is expected to be completed by March 2023. It is the Programme Operator and the Project Promoter's view that despite the initial delay in launching the Call for Tenders, the physical object is expected to be completed in compliance to the approved time schedule.

#### **Time schedule feasibility - Risk assessment and mitigation analysis:**

On the basis of the information provided above, while also taking into account that:

- ✓ SP5 was scheduled to commence on 16/12/2022 (TDP\_5075006\_id327938\_SUB\_48, submitted electronically on 22.06.2022). There is therefore already a delay of 1 month in this SP;
- ✓ Due to the legal framework which governs the implementation of SP5, which is Law 4412/2016 (procedure below limits), if the Call for Proposals is indeed launched by March 2023, SP5 would commence no earlier than April - May 2023, therefore the existing 1-month delay is expected to extend to a total delay of at least 5 months;

- ✓ Due to the nature of SP5 and subject to no further delays other than the above-mentioned ones occurring, SP5 may be fully implemented in accordance with the time schedule and the objectives of the Programme, however there are still significant risks incurred;

It is the evaluator's view that **the implementation course of SP5 is now linked to delays and the subsequent risks of non-absorption of the entirety of the initially foreseen budget are as follows:**

Risk description	Likelihood	Consequence	Risk score	Description of response
PDP1: SP5: Existing Procurement or contract or tendering delays that could lead to the non-absorption of the foreseen budget	<b>3</b>	<b>3</b>	<b>3.00</b>	Full and accelerated operations as described in the Programme Agreement. Ensure sound preparatory work by all partners. Appoint external experts to support the PO & PPs with the drafting of open calls for proposals. Furthermore, a market search could be carried out to update the technical and financial terms of the public procurement specifications, where applicable.

**Recommendation 2:**

*The evaluator recommends the close monitoring of the approved time schedule and the speeding-up of the launching process of the Call for Proposals under SP5 of PDP1 in order to avoid further delays that could impact the objectives of SP5 and hence, of PDP1.*

### 3.3.2. Integrated pilot social housing relocation scheme for Roma inclusion

The project entitled "Integrated pilot social housing relocation scheme for Roma inclusion" (MIS: 5087337) is designed to be implemented with the Municipality of Katerini as Project Promoter and the Ministry of Labour and Social Affairs, General Secretariat for Social Solidarity and Fight Against Poverty (General Secretariat for Social Solidarity) as Project Partner. The project currently has an approved budget of 2,700,000.00 €.

The objective of the project is to develop a local social housing complex consisting of 56 residential units, which will belong to the Municipality of Katerini, following the grant of land by the Municipality, precisely for the development of this housing complex with installation of basic housing equipment in each residential unit. The project will also promote the active participation of all involved citizens, especially the Roma, as well as, representatives of the local community and the public administration through the organization of four (4) information and consultation activities with the objective to

successfully implement the relocation project and gain the acceptance of the public for it and provide supporting activities for the physical relocation of 56 families to the newly built housing units.

The physical object is also complemented by soft actions to be implemented by the Project Promoter with the objective of: a) the successful transition of all the beneficiaries of Roma families to the new social housing complex; and b) the sustainable integration of Roma youth who are members of the beneficiaries families into local society, as well as, their integration into the social and economic environment of Katerini.

To date the call for the submission of proposals has been published in October 2022 (Reference No: 2.4714/3.10.2022) and the Project was approved on 30/12/2022 (No of Decision by Special Service "NSRF Executive Structure", Division of Employment and Social Economy 2.7349/30.12.2022).

However, no further progress has been recorded on this Project, due to the following externality:

**The granted plot of land of the Municipality of Katerini** (ownership documentation based on Official Gazette 728 /B/9-9-1991) which was selected specifically for the purposes of this project, hence to host the relocated Roma population in a new housing scheme, **was shown to be unsuitable for such use under the national legislation.**

More specifically, with the Ref. No 238505, 238566/16.12.2022 letter of the Decentralized Administration of Macedonia and Thrace, Directorate for the Environment and Spatial Planning as a response to the submission of a Sanitation Study on behalf of the Municipality of Katerini, it was stated that the plot of land on which the creation of an Organized Temporary Relocation Area for Special Social Groups had been approved (Official Gazette 2887/Bx/05.07.2019) and technically specified (Official Gazette 3811/EG/15.10.2019) is situated within an already designated and restored landfill Area of Uncontrolled Waste Disposal of a total area of 120 sq. in the location "Pelekas".

Under the provisions of the existing legislation the following apply:

- Under the Joint Ministerial Decision 13588/725/06, Official Gazette 383B/28.06.2006 "Measures and conditions for the management of hazardous waste in compliance with the provisions of Directive 91/689/EEC "on hazardous waste", following an approval by the Decentralized Administration of Macedonia and Thrace, a technical study for the sanitation - restoration of hazardous waste may be submitted with regards solely to the management - decontamination and disposal of hazardous waste.
- Under the Joint Ministerial Decision 114218, Official Gazette 1016B/17.11.1997, Appendix II - General Solid Waste Management programmes Paragraph 5, the basic uses of a landfill Uncontrolled Waste Disposal site after rehabilitation, are the following: nature reintroduction (wildlife), public land, forest, pasture, recreation area.

**Hence, for public health reasons and on the basis of the above, the existing legislation does not allow for the selected plot of land of the Municipality of Katerini in "Pelekas" to be used to host the relocated Roma population in a new housing scheme.**

To this end, the Municipality of Katerini is already investigating possible alternatives of land for the relocation and housing of the Roma communities that are beneficiaries of this Project.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

On the basis of the above, there are already severe delays and further delays are to be expected due to the lack of suitable land and hence, due to the low degree of maturity of the Project. PDP2 is not progressing in accordance with the set time schedule and objectives of the Project and the physical object is not expected to be completed in compliance to the approved time schedule.

However, it should be noted that it is the view of the Municipality of Katerini that SP3 “Services of complementary actions for the social integration of Roma (PDP2\_EEA Grants)” may be completed within the time schedule of the Project and that it is important to retain SP3 because of its expected significant contribution to the sustainable integration of Roma youth who are members of the beneficiaries families into local society, as well as, their integration into the social and economic environment of Katerini.

**On the basis of the above, the evaluator estimates that, with its current design, the physical object of PDP2 is not expected to be completed in compliance to the approved time schedule. As far as SP3 in specific is concerned, the evaluator notes that SP3 was scheduled to commence on 01/01/2023 (TDP\_5075006\_id327938\_SUB\_48, submitted electronically on 22.06.2022). There is therefore already a 1-month delay in SP3 as of 01/02/2023. Considering the nature and legal framework (procedure followed) of SP3, it is possible to complete SP3 in compliance with the approved time schedule of PDP2, subject to no further delays occurring. However, the rationale to implement SP3 alone without the implementation of SP1, SP2 under the EEA Grants existing programming period should be considered separately.**

**Notwithstanding the distinction between SP1, SP2 and SP3, it is the evaluator’s view that the implementation course of PDP2 is now linked to delays and the subsequent risks of non absorption of the entirety of the initially foreseen budget are as follows:**

Risk description	Likelihood	Consequence	Risk score	Description of response
PDP2: Procurement or tendering delays; Time shift of the agreed timetable and risk of non absorption of the budget.	4	4	4.00	Full and accelerated operations as described in the Programme Agreement. Ensure sound preparatory work by all partners. Appoint external experts to support the PO & PPs with the drafting of open calls for proposals. Furthermore, a market search could be carried out to update the technical and financial terms of the public procurement specifications, where applicable.

**Recommendation 3:**

*The evaluator estimates that, with its current design, the physical object of PDP2 is not expected to be completed in compliance to the approved time schedule. The evaluator recommends that PDP2 is redesigned, with the view to seek alternative funding in order to ensure the implementation of the project and that the expected goals of the Programme are met.*

*The decision to retain, or not, SP3 "Services of complementary actions for the social integration of Roma (PDP2\_EEA Grants)" under the Programme could be considered separately, due to its expected significant contribution to the sustainable integration of Roma youth who are members of the beneficiaries families into local society, as well as, their integration into the social and economic environment of Katerini.*

### **3.3.3. Three Small Grant Schemes: Women and Youth Empowerment, Promotion and Support of Roma children in summer camps and community activities, Small Scale Interventions**

As also mentioned in Paragraph 3.1 and given the evidence provided to the evaluator, there are no approved projects as of 01/02/2023 for the three Small Grant Schemes which are predefined in the Programme Agreement. There are therefore no approved Technical Sheets of Projects / Sub-Projects to support the assessment. In this scope, the evaluator will depend upon the quantitative / qualitative available information in the published Calls for Proposals, as well as, the conducted interview with the Programme Operator.

The objective of the three (3) Small Grant Schemes under the Programme "Enhanced inclusion and empowerment of Roma" is to promote social inclusion activities for Roma communities at the local level through the following types of actions and/or objectives:

- Women and Youth Empowerment.
- Promotion and Support of Roma children in summer camps and community activities.
- Small Scale Interventions.

According to the Programme Operator, the preparation of the relevant Calls started in 2021. By November 2021 the consultation process with local groups was completed. The evaluation - processing of all received information and feedback along with legislation framework checks and the preparation of technical specifications was completed by June 2022.

To date, as also mentioned in Paragraph 3.2, the following Calls for Proposals addressed to the competent implementing bodies have been published. The listing below includes the final versions of these Calls for Proposals, as amended and in force. The progress of the physical call in each Call for Proposal is also mentioned below:

- ✚ **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Women and Youth Empowerment"** (MIS No: 6136, Budget: €1,000,000.00)

This Call for Proposals addresses all entities according to Article 7.2.1 of the Regulation on the implementation of the EEA Financial Mechanism 2014 - 2021. Partnership with municipalities having Roma branches or with NGOs shall be mandatory. The maximum budget of each individual proposal is set at 200,000.00 €.

The deadline for the submission of proposals was the 30/10/2022. Thirteen (13) funding project proposals have been submitted. Of these, five (5) have been initially approved in terms of completeness and are now, as of 01/02/2023, being evaluated at a second stage in terms of technical specifications, content, scope, objectives and time schedule. The remaining eight (8) proposals are re-examined under a submitted Appeals process. The Programme Operator estimates that the first Decisions of Approvals of projects will emerge within February 2023.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

On the basis of the information provided above, while also taking into account that:


- ✓ According to Paragraph 4.1 of the Programme Agreement, the indicative timing for the implementation of SGS1 was the second half of 2022, which leads to the remark that there is already an identified delay of over 1 month as of 01/02/2023. Should the estimation of the Programme Operator that the first Decisions of Approvals of projects will emerge within February 2023 be valid, the existing shift of the time schedule will lead to a total delay of at least 2-3 months before there are any signed contracts under SGS1;
- ✓ The physical object may still however be completed in compliance to the approved time schedule;
- ✓ Procurement or contract or tendering procedures may lead to further delays;
- ✓ The proposals already submitted under SGS1 demonstrate that a number of parties and partnerships are interested in receiving grants and in implementing the project. However, it is still possible that low participation and willingness of Roma to engage in the activities could lead to further delays;

It is the evaluator's view that **the implementation course of SGS1 is now linked to delays and the subsequent risks of non-absorption of the entirety of the initially foreseen budget are as follows:**

Risk description	Likelihood	Consequence	Risk score	Description of response
SGS1: Probable delay related to the low participation and willingness of Roma to engage in the activities	2	2	2.00	The low participation rate of the Roma communities may be mitigated through the actions of the Task Force and the mobilisation of the local Roma branch. The ongoing implementation of the National Strategy for the Roma Inclusion contributes to this goal. Moreover, the Roma communities themselves



				appear eager to receive more empowerment and the chance to improve their quality of life.
SGS1: Existing Procurement or contract or tendering delays that could lead to the non- absorption of the foreseen budget	<b>3</b>	<b>3</b>	<b>3.00</b>	Full and accelerated operations as described in the Programme Agreement. Ensure sound preparatory work by all partners. Appoint external experts to support the PO & PPs with the drafting of open calls for proposals. Furthermore, a market search could be carried out to update the technical and financial terms of the public procurement specifications, where applicable.

 **Call for the submission of proposals within the framework of the Financial Mechanism of the European Economic Area for the period 2014 - 2021 (EEA Grants 2014 - 2021) entitled "Promotion and Support of Roma children in summer camps and community activities" (MIS No: 6689, Budget: €250,000.00)**

This Call for Proposals addresses all entities according to Article 7.2.1 of the Regulation on the implementation of the EEA Financial Mechanism 2014 - 2021. Partnership with municipalities having Roma branches or with NGOs shall be mandatory. In addition, due to the nature of the objective of this invitation, the participation of an entity, public or private, commercial or non-commercial and non-governmental organization, which has been established as a legal entity in Greece and which is professionally active in maintaining a children's camp business in Greece, in accordance with the national legislation. The budget of each individual proposal cannot be under 50,000.00 €, nor over 200,000.00 €.

The deadline for the submission of proposals is 6/3/2023 and the submission of funding proposals and its evaluation is in progress. It is expected that all eligible projects will be approved by April 2023, in order for the summer camps and related activities to be implemented in compliance with the time schedule.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

On the basis of the information provided above, while also taking into account that:

- ✓ According to Paragraph 4.1 of the Programme Agreement, the indicative timing for the implementation of SGS2 was the second half of 2022, therefore there is already an identified delay of over 1 month as of 01/02/2023. Should the estimation of the Programme Operator that all eligible projects will be approved by April 2023 be valid, the existing shift of the time schedule will lead to a total delay of at least 5 months before there are any signed contracts under SGS2;

- ✓ The physical object may still however be completed in compliance to the approved time schedule;
- ✓ Procurement or contract or tendering procedures may lead to further delays;
- ✓ There is a risk of poor submission for project proposals under the Calls for Proposals. There is also an identified risk of low participation and willingness of Roma to engage in the activities. Both these risks could lead to further delays;

It is the evaluator's view that **the implementation course of SGS2 is now linked to delays and the subsequent risks of non-absorption of the entirety of the initially foreseen budget are as follows:**

Risk description	Likelihood	Consequence	Risk score	Description of response
SGS2: Poor submission for project proposals under the SGS calls.	<b>2</b>	<b>2</b>	<b>2.00</b>	Broad publication and dissemination of the Programme's goals and of the benefits of the three SGSs to the Roma populations. The actions of the Task Force have been planned to encourage the motivation and the participation of the beneficiaries. Moreover, the proposals already submitted under the SGS1 demonstrate that a number of parties and partnerships are interested in receiving grants and in implementing the project. The promotion of the already issued Call for the SGS2 will be kept until the expiration of the deadline.
SGS2: Probable delay related to the low participation and willingness of Roma to engage in the activities	<b>2</b>	<b>2</b>	<b>2.00</b>	The low participation rate of the Roma communities may be mitigated through the actions of the Task Force and the mobilisation of the local Roma branch. The ongoing implementation of the National Strategy for the Roma Inclusion contributes to this goal. Moreover, the Roma communities themselves appear eager to receive more empowerment and the chance to improve their quality of life.

SGS2: Existing Procurement or contract or tendering delays that could lead to the non-absorption of the foreseen budget	<b>3</b>	<b>3</b>	<b>3.00</b>	Full and accelerated operations as described in the Programme Agreement. Ensure sound preparatory work by all partners. Appoint external experts to support the PO & PPs with the drafting of open calls for proposals. Furthermore, a market search could be carried out to update the technical and financial terms of the public procurement specifications, where applicable.
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In terms of the implementation of the Small Scale Interventions, the draft Call for Proposals was prepared as of January 2023 and its publication is expected soon. These interventions shall involve coupling activities of Roma communities and the wider local communities.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

Similarly to the analysis performed above and on the limited availability of information for SGS3, while also taking into account that:

- ✓ According to Paragraph 4.1 of the Programme Agreement, the indicative timing for the implementation of SGS3 was the second half of 2022, therefore there is already an identified delay of over 1 month as of 01/02/2023. The Programme Operator has given no specific estimation as to when the publication of the Call for Proposals is due, therefore the existing delay is highly probable to extend further;
- ✓ However, the physical object may still be completed in compliance with the approved time schedule;
- ✓ Procurement or contract or tendering procedures may lead to further delays;
- ✓ There is a risk of poor submission for project proposals under the Calls for Proposals. There is also an identified risk of low participation and willingness of Roma to engage in the activities. Both these risks could lead to further delays;

It is the evaluator's view that **the implementation course of SGS3 is now linked to delays and the subsequent risks of non-absorption of the entirety of the initially foreseen budget are as follows:**

Risk description	Likelihood	Consequence	Risk score	Description of response
SGS3: Poor submission for project proposals under the SGS calls.	<b>2</b>	<b>2</b>	<b>2.00</b>	Broad publication and dissemination of the Programme's goals and of the benefits of the three SGSs to the Roma populations. The actions of the Task Force have been planned to

				encourage the motivation and the participation of the beneficiaries. Moreover, the proposals already submitted under the SGS1 demonstrate that a number of parties and partnerships are interested in receiving grants and in implementing the project. The promotion of the already issued Call for the SGS2 will be kept until the expiration of the deadline.
SGS3: Probable delay related to the low participation and willingness of Roma to engage in the activities	<b>2</b>	<b>2</b>	<b>2.00</b>	The low participation rate of the Roma communities may be mitigated through the actions of the Task Force and the mobilisation of the local Roma branch. The ongoing implementation of the National Strategy for the Roma Inclusion contributes to this goal. Moreover, the Roma communities themselves appear eager to receive more empowerment and the chance to improve their quality of life.
SGS3: Existing Procurement or contract or tendering delays that could lead to the non-absorption of the foreseen budget	<b>3</b>	<b>3</b>	<b>3.00</b>	Full and accelerated operations as described in the Programme Agreement. Ensure sound preparatory work by all partners. Appoint external experts to support the PO & PPs with the drafting of open calls for proposals. Furthermore, a market search could be carried out to update the technical and financial terms of the public procurement specifications, where applicable.

**The physical object is expected to be completed in compliance to the approved time schedule.**

**Recommendation 4:**

*The evaluator recommends the close monitoring of the approved and planned for time schedules under the three Small Grant Schemes, the-speeding up of the process to publish the imminent Call for Proposals for SGS3, as well as, the speeding-up of all tendering, procurement and contract processes as a whole, in order to avoid further delays that could impact their objectives.*

**3.3.4. Provision of Supporting Services to the Programme “Roma Inclusion and Empowerment”**

The project entitled “Provision of Supporting Services to the Programme “Roma Inclusion and Empowerment” (MIS: 5074511) is implemented with the Special Service “NSRF Executive Structure”, Division of Employment and Social Economy as Project Promoter and has an approved budget of 600,000.00 €. The project includes supporting actions to strengthen the effectiveness of the actions of the Executive Service ApKO, with the aim to contribute to the optimization of services provided and the maximization of their effectiveness.

On the basis of the information shared with the evaluator by the Programme Operator and the Project Promoter, the implementation progress of the physical object of the Project is as follows:

**SP2. Support costs with Own Means**

The Decision of the Approval of the Project was issued on 22/07/2022 as an amendment to the initial Decision of Approval issued on 30/12/2020. SP2 is in progress with the latest version of the Technical Sheet having been issued on 26/07/2022.

**Time schedule feasibility - Risk assessment and mitigation analysis:**

The evaluator notes that:

- ✓ SP2 was scheduled to commence on 15/03/2021 (TDP\_5074511\_id336798\_SUB\_16, submitted electronically on 21/07/2022) and according to the Programme Operator, it is implemented with no reported delays and/or other implementation problems;
- ✓ However, the physical object of SP2 is interlinked to the implementation progress of all other projects, therefore the aforementioned identified risks for other projects to be delayed can negatively impact the time schedule and the full absorption of the foreseen budget of SP2

Therefore, it is the evaluator’s view that **although the implementation course of SP2 is not linked to delays, there is still an identified risk of non-absorption of the entirety of the initially foreseen budget, as follows:**

Risk description	Likelihood	Consequence	Risk score	Description of response
Programme Management - Provision of	<b>3</b>	<b>3</b>	<b>3.00</b>	The delay in the tendering, procurement and contract processes of other projects is likely to affect the

Supporting Services: SP2: Probable delays and non-absorption of the foreseen budget, as a result of risks incurred in the other Projects of the Programme				non-absorption of the entirety of the initially foreseen budget. Full and accelerated operations as described in the Programme Agreement. Ensure sound preparatory work by all partners. Close monitoring of progress of other projects and prompt application of modifications wherever necessary.
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### SP3. Preparatory costs with Own Means

The Decision of the Approval of the Project was issued on 22/07/2022 as an amendment to the initial Decision of Approval issued on 30/12/2020. SP3 is in **progress with the latest version of the Technical Sheet having been issued on 18/3/2021.**

#### Time schedule feasibility - Risk assessment and mitigation analysis:

The evaluator notes that:

- ✓ SP3 was scheduled to commence on 31/12/2017 (TDP\_5074511\_id336798\_SUB\_16, submitted electronically on 21/07/2022) and according to the Programme Operator, it is implemented with no reported delays and/or other implementation problems;
- ✓ However, the physical object of SP3 is interlinked to the implementation progress of all other projects, therefore the aforementioned identified risks for other projects to be delayed can negatively impact the time schedule and the full absorption of the foreseen budget of SP3.

Therefore, it is the evaluator's view that **although the implementation course of SP3 is not linked to delays, there is still an identified risk of non-absorption of the entirety of the initially foreseen budget, as follows:**

Risk description	Likelihood	Consequence	Risk score	Description of response
Programme Management -Provision of Supporting Services: SP3: Probable delays and non-absorption of the foreseen budget, as a result of risks incurred in the other Projects of the Programme	<b>3</b>	<b>3</b>	<b>3.00</b>	The delay in the tendering, procurement and contract processes of other projects is likely to affect the non-absorption of the entirety of the initially foreseen budget. Full and accelerated operations as described in the Programme Agreement. Ensure sound preparatory work by all partners. Close monitoring of progress of other projects and prompt application of modifications wherever necessary.

**Recommendation 5:**

*The evaluator recommends the close monitoring of the progress of the physical object of PDP1, PDP2 and the projects under the three Small Grant Schemes and modify the physical object of the Programme Management activities under the Project "Provision of Supporting Services to the Programme "Roma Inclusion and Empowerment" accordingly.*

In terms of the current Indicator values of the Programme in relation to the Target Values of the pre-selected indicators for the Main Objective of the Programme under the Programme Agreement, these can be shown in the following Table:

**Table 7: Indicators – Programme Objective: Enhanced inclusion and empowerment of Roma**

Outcome / Output – Expected Programme Results	Indicator	Unit of Measurement	Current Value	Target Value
Outcome 1: Enhanced inclusion and empowerment of Roma	Number of Roma residing in the newly installed housing facilities	Cumulative Number	N/A	270
	Number of jobs created	Cumulative Number	25	25
	Number of national policies and laws influenced	Cumulative Number	N/A	3
	Number of Roma reached by empowerment measures	Cumulative Number	N/A	1,000
	Number of Roma beneficiaries of social inclusion services	Cumulative Number	N/A	1,500
Output 1.1: Pilot transitional housing infrastructure in Roma settlements upgraded	Number of equipped housing structures installed	Cumulative Number	N/A	56
	Number of consultation sessions with Roma families carried out on the status of the housing and infrastructure development	Cumulative Number	N/A	12
Output 1.2: Social inclusion services provided to Roma	Number of prefectures in which social inclusion services are provided to Roma	Cumulative Number	N/A	4
Output 1.3: Task Force on Roma inclusion strengthened	Number of Roma inclusion Task Force staff trained	Cumulative Number	20	20
	<i>Female</i>		15	-
	<i>Male</i>		5	-
	<i>Roma</i>		4	-
	Number of policy recommendations produced by the Task Force	Cumulative Number	N/A	3
	Number of meetings of the Task Force units held with other public authorities	Cumulative Number	42	3
	Number of municipal staff trained in Roma inclusion by the Task Force	Cumulative Number	N/A	15

Outcome / Output – Expected Programme Results	Indicator	Unit of Measurement	Current Value	Target Value
	Number of other public officials (e.g. teachers, police officers, medical staff, etc.) trained in Roma inclusion (by gender)	Cumulative Number	N/A	5
	IT system for monitoring Roma inclusion policies developed	Binary	N/A	Yes
Output 1.4: Capacity of Roma Community Services reinforced	Number of staff of Community Services Offices participating in capacity building initiatives	Cumulative Number	N/A	30
Output 1.5: Social cooperative enterprises of Roma supported	Number of Social Cooperative Enterprises of Roma supported	Cumulative Number	N/A	2
Output 1.6: Awareness raising campaigns combating anti-Roma attitudes conducted	Number of awareness raising campaigns combating anti-Roma attitudes conducted	Cumulative Number	N/A	10
Output 1.7: Advocacy capacity of Roma NGOs reinforced	Number of Roma NGOs participating in learning initiatives on effective advocacy	Cumulative Number	N/A	5
Output 1.8: Roma children supported to attend summer camps	Number of Roma children attending summer camps	Cumulative Number	N/A	50
Output 1.9: Roma women’s empowerment groups created	Number of Roma women’s empowerment groups active	Cumulative Number	N/A	3
Output 1.10: Roma children in Katerini supported	Number of Roma children in Katerini supported in educational activities	Cumulative Number	N/A	51
Output 1.11: Roma children in Katerini supported to participate in educational & athletic activities	Number of Roma children in Katerini supported to participate in recreational & athletic activities	Cumulative Number	N/A	30
Output 1.2: Roma young unemployed in Katerini supported to participate in Vocational Training Programmes	Number of Roma young unemployed in Katerini supported to participate in Vocational Training Programmes	Cumulative Number	N/A	30

As shown above, there is very limited availability of the measured current values of the pre-selected Indicators of the Project. On the basis of the information provided to the evaluator by the Programme



Operator and the Project Promoter, it is expected that the values of these Indicators are to be measured at the end of the Programme, as due to the specifications of the physical object it is not possible to provide with interim values.

As a result of this, it is not possible to draw measurable conclusions about the course and the effectiveness of the implementation of the Programme and its impact on the Programme at this stage. Therefore, there is not enough evidence to assess the degree of achievement of the overall objectives of the Programme at this stage.

However, qualitative observations / conclusions may be drawn from the use of the evidence and information provided to the evaluator by the Programme Operator and Project Promoters. These observations are laid out in the subsequent Paragraphs 3.5, 3.6 and also draw conclusions from the Time schedule feasibility - Risk assessment and mitigation analysis that is already performed for each Project and is elaborated for the Programme as a whole in the next Paragraph 3.4.

### 3.4. Time schedule feasibility - Risk assessment and mitigation analysis of the Programme

On the basis of the work performed in Paragraphs 3.2 and 3.3, the evaluator has already identified a number of risks that emerge from the existing and/or further expected delays and time constraints under the approved technical specifications and time schedule of each Project.

In this paragraph, the evaluator will combine the above mentioned information with a number of additional risks of horizontal nature that may incur to all approved Projects as a result of the complexity, the administrative challenges and resources limits that are an integral part of these types of projects. The evaluator will then estimate the level of risk of the Programme as a whole. The results of this analysis are presented in the Table below:

**Table 8: Time schedule feasibility - Risk assessment and mitigation analysis of the Programme**

	Risk description	Likelihood	Consequence	Risk score	Description of response
1	PDP1 (SP1: WP2): Delay of the Call for recruitment for the Task Force and non-absorption of the foreseen budget	3	3	3.00	The Task Force Units fully operate in the four regions of the country, as planned. The delay of the contracts will affect the non-absorption of the entirety of the initially foreseen budget.
2	PDP1: Delays and obstacles in the completion of the project due to issues that might be faced by the Task Force Units on the ground.	2	2	2.00	Monitoring the Task Force Units' needs for assistance in order to resolve issues on the ground. Constant liaison

					<p>and cooperation with the General Secretariat and PP of PDP1.</p> <p>Furthermore, the central TFU will provide support and inputs to the regional Units, when required. The PP of PDP1 has the personnel and the jurisdiction to deliver monitoring and steering to the TFU altogether. Ensure sound preparatory work that results in common understanding of the tasks, a clear project strategy and focus agreed with PO and Programme Implementation partners.</p>
3	PDP2: Procurement or tendering delays; Time shift of the agreed timetable and risk of non absorption of the budget.	4	4	<b>4.00</b>	<p>Due to legislative constraints, the selected plot of land of the Municipality of Katerini in "Pelekas" may not be used to host the relocated Roma population in a new housing scheme. There are already severe delays and further delays are expected due to the lack of suitable land. PDP2 has a low maturity degree, it is not progressing in accordance with the set time schedule and objectives of the Project</p>

					and the physical object is not expected to be completed in compliance with the approved time schedule. The non-absorption of the budget is highly probable.
4	SGSs (SGS2, SGS3): Poor submission for project proposals under the SGS calls.	<b>2</b>	<b>2</b>	<b>2.00</b>	Broad publication and dissemination of the Programme's goals and of the benefits of the three SGSs to the Roma populations. The actions of the Task Force have been planned to encourage the motivation and the participation of the beneficiaries. Moreover, the proposals already submitted under the SGS1 demonstrate that a number of parties and partnerships are interested in receiving grants and in implementing the project. The promotion of the already issued Call for the SGS2 will be kept until the expiration of the deadline.
5	SGSs: Probable delay related to the low participation and willingness of Roma to engage in the activities	<b>2</b>	<b>2</b>	<b>2.00</b>	The low participation rate of the Roma communities may be mitigated through the actions of the Task Force and the mobilisation of the local Roma branch. The ongoing implementation of the

					National Strategy for the Roma Inclusion contributes to this goal. Moreover, the Roma communities themselves appear eager to receive more empowerment and the chance to improve their quality of life.
6	PDP1 (SP1, SP5), SGSs: Procurement or contract or tendering delays that could lead to the non- absorption of the foreseen budget	<b>3</b>	<b>3</b>	<b>3.00</b>	Full and accelerated operations as described in the Programme Agreement. Ensure sound preparatory work by all partners. Appoint external experts to support the PO & PPs with the drafting of open calls for proposals. Furthermore, a market search could be carried out to update the technical and financial terms of the public procurement specifications, where applicable.
7	Programme Management - Provision of Supporting Services: Probable delays and non-absorption of the foreseen budget, as a result of risks incurred in the other Projects of the Programme	<b>3</b>	<b>3</b>	<b>3.00</b>	
8	All Actions: Limited engagement / commitment of the programme stakeholders	<b>2</b>	<b>3</b>	<b>2.45</b>	Holding regular meetings with municipal services involving local Roma and other residents. Informing regularly local authorities, Roma and other stakeholders of

					programme progress – monthly newsletter. Progress of NSRF Programmes implementation may also assist in the further mitigation of this risk.
9	All Actions: Administrative burden and related obstacles delay operations	<b>3</b>	<b>3</b>	<b>3.00</b>	Acceleration of procedures. Ensure sound preparatory work by the PO. Appoint external experts to support the PO & PPs with the drafting of open calls for proposals, the selection procedures, the monitoring and verification of outputs and incurred costs and in general, wherever required.
<b>OVERALL RISK OF THE PROGRAMME</b> <i>(not an average of the above - manually scored)</i>		<b>Likelihood</b>	<b>Consequence</b>	<b>Risk score</b>	
		<b>3</b>	<b>3</b>	<b>3.00</b>	

### 3.5. Evaluation of the effectiveness of the Programme

To evaluate the effectiveness of the Programme on the basis of the methodology submitted together with the Draft Evaluation Report of Programme B (Deliverable 1), the application of a bottom-up reduction approach from the Project level to the Programme level is recommended.

The methodology involves measuring the physical object (outputs) of each Project and reducing it with weighting to the upper level of the Programme, hence through the **effectiveness indicator** which expresses the progress of the physical implementation of the Project at each of its individual levels and is calculated from the quotient of the realized physical object at the stage of completion of the Project, in relation to the originally planned physical object, based on the following formula:

$$\text{In.Effect} = \text{Physical Implementation} / \text{Physical Target}$$

The evaluation of the effectiveness of the Programme is achieved by the method of financial weighting, that is, using the financial weight of each Project in the Programme, with the following formula:

$$(\text{In.Effect})\text{Prog} = \sum (\text{In.Effect})\text{Proj} (\text{GF})\text{Proj}$$

where:

In.Effect = Physical Implementation Effectiveness Index

GF = Gravity Factor

Proj = Project

Prog = Programme

As also shown in Table 7 and mentioned in Paragraph 3.3, there is very limited availability of the measured current values of the pre-selected Indicators of the Projects. In the absence of the completion of this data it is not possible to evaluate the effectiveness of the approved Projects or of the Programme as a whole.

Through the provision of qualitative data and detailed information on the course of the tender procedures per Project / Sub-Project, the Sub-Projects that have been activated and in progress, as well as, any administrative or other issues / difficulties faced, **the Programme Operator and Project Promoters certify the course of implementation for the interventions that directly contribute to all Outcomes / Outputs and the expected results of the Programme, although not fully.**

In specific, considering the time schedule feasibility and risk assessment and mitigation analysis performed above, the evaluator notes that Outcome 1: "Enhanced inclusion and empowerment of Roma" is partly not expected to be reached and Output 1.1: "Pilot transitional housing infrastructure in Roma settlements upgraded" is fully not expected to be reached with the existing design of PDP2. In addition, the risks in time schedule delays identified in all other Projects may also negatively partly impact the fulfillment of the remaining Outputs and expected results of the Programme.

Nevertheless, the type of data provided to the evaluator by the Programme Operator and Project Promoters cannot be translated to measurable indicators to evaluate the course of the implementation on the basis of the specifications and procedures set by the Programme. Such specifications and procedures constitute the result and output indicators of each Project, the course of implementation of the activities and the budget, any deviations during the course of their implementation, etc.

It is only with the reports through MIS that a measurable verification of the course of implementation of the foreseen activities by the competent authorities based on the inclusion criteria, can be achieved.

It is important to stress that the information and estimates provided by the competent authorities are not disputed, but they can only be taken into account as a robust indication of the implementation progress of the Projects and the Programme as a whole, without further certification of the required means (results, indicators) and steps for their successful completion.

Given that the effectiveness of the Programme in terms of achieving the goals that were set is based on a series of criteria, such as the following:

- Absorption rate of the evaluated Projects and the Programme as a whole,
- Degree of achievement of the objectives of the Programme (output indicators, results produced, etc.),
- Estimated degree of absorption of Programme resources at the end of the Programming Period,
- Estimated degree of financial integration and prospects of achieving the objectives of the Programme, at the end of the Programming Period,

**the above information should be certified with measurable data in order for the evaluation of the effectiveness of the Projects and Programme as a whole to be made possible.**

Despite the lack of the availability of measurable data, qualitative observations / conclusions may be drawn from the use of the evidence and information provided to the evaluator by the Programme Operator and Project Promoters, as analytically laid out in Paragraphs 3.2, 3.3, 3.4.

More specifically, it has been shown that the effectiveness of the Programme may be reduced by the implicated risks in not absorbing the Programme budget and the Programme not reaching its goals which are connected to implementation issues in all Projects. At this point, the evaluator notes that due to the lack of measurable data on the Project's indicators it is not possible to measure the probability of a potential shrinkage of budget or of the Programme not reaching its goals. However, a quantified assessment of the risks incurred has already been elaborated in Paragraph 3.4 and the evaluator shall make use of the information and calculations performed in that part of the report and in particular in Table 8 to reflect the level of risks that could impact the effectiveness of the Projects and the Programme as a whole.

In particular, on the basis of the evidence and data provided, the evaluator estimates that the following risks of Table 8 with a score of "Medium - Low", "Medium - High", or "High" (thus ignoring risks with a score of "Low"), herein organized and presented by Project, might negatively impact partly the effectiveness of the Programme. :

- PDP1: The project is in implementation and the budget is progressively being absorbed. However, the delay of the Call for recruitment for the Task Force, as well as, other procurement or contract or tendering delays may lead to the non-absorption of parts of the foreseen budget; Risk Score: 3.0;
- PDP2: Procurement or tendering delays; Time shift of the agreed timetable and risk of non absorption of the budget is very high with the existing design of the project; Risk Score: 4.0;
- SGSs: Procurement or contract or tendering delays may lead to the non-absorption of parts of the foreseen budget; Risk Score: 3.0;
- Programme Management - Provision of Supporting Services: The project is in implementation and the budget is progressively being absorbed. However, probable delays as a result of risks incurred

in the other Projects of the Programme may lead to the non-absorption of parts of the foreseen budget; Risk Score: 3.0;

- All Actions: Limited engagement / commitment of the programme stakeholders and administrative burden and related obstacles may delay operations with additional impacts on budget absorptions; Risk Score: 2.45;

**Therefore, to avoid further reductions in the effectiveness of the Programme, the evaluator recommends:**

- ❖ **the incorporation of evidence - driven Recommendation 3 on the redesign and seeking alternative funding for PDP2;**
- ❖ **the incorporation of evidence - driven Recommendations 1, 2, 4, 5, with respect to PDP1, the three Small Grant Scheme and the Programme Management - Provision of Supporting Services action.**

### **3.6. Ability to achieve the objectives of the Programme**

The assessment of the degree of achievement of the Programme goals at the end of the Programme implementation period per approved Project is based on the following parameters and assumptions:

- the target value of the output and result indicators of the Projects and their contribution to the achievement of the Programme objectives
- the ability of individual Sub-Projects and their contracts to deliver Programme objective values (outputs and outcomes)
- the assessment of the possibility of timely contracting and implementation of the Sub-Projects (timing of contracts and possibility of implementing the Sub-Projects within the Programme implementation period)
- reasonable assumptions such as those expressed by the Project Promoters regarding the course of implementation of the Projects and the achievement of their objectives.

As also shown in Table 7 and mentioned in Paragraph 3.3, there is very limited availability of the measured current values of the pre-selected Indicators of the Projects. In the absence of the completion of this data and to the extent that the approved Projects do not currently yield measurable values of output indicators and results, the progress in achieving the objectives is not possible to assess at the time.

The implementation progress of the Projects and the Programme as a whole should be certified with measurable data in order for the evaluation of the ability to achieve the objectives of the Programme to be made possible.

Similarly to what is stated in Paragraph 3.5, despite the lack of the availability of measurable data, qualitative observations / conclusions may be drawn from the use of the evidence and information provided to the evaluator by the Programme Operator and Project Promoters, as analytically laid out in Paragraphs 3.2, 3.3, 3.4.



More specifically, it has been shown that the ability to achieve the objectives may be reduced by the implicated risks in not absorbing the Programme budget and the Programme not reaching its goals, which are connected to implementation issues in all Projects. In particular, on the basis of the evidence and data provided, the evaluator estimates that the following risks of Table 8 with a score of "Medium - Low", "Medium - High", or "High" (thus ignoring risks with a score of "Low"), herein organized and presented by Project, might partly undermine the ability to achieve the Programme objectives:

- PDP1: The project is in implementation and the budget is progressively being absorbed. However, the delay of the Call for recruitment for the Task Force, as well as, other procurement or contract or tendering delays may lead to the non-absorption of parts of the foreseen budget and hence the project not fully reaching its objectives;
- PDP2: Procurement or tendering delays; Time shift of the agreed timetable and risk of non absorption of the budget is very high with the existing design of the project. Hence PDP2 is not expected to achieve its objectives;
- SGSs: Procurement or contract or tendering delays may lead to the non-absorption of parts of the foreseen budget and hence the project not fully reaching its objectives;
- Programme Management - Provision of Supporting Services: The project is in implementation and the budget is progressively being absorbed. However, probable delays as a result of risks incurred in the other Projects of the Programme may lead to the non-absorption of parts of the foreseen budget and hence the project not fully reaching its objectives;
- All Actions: Limited engagement / commitment of the programme stakeholders and administrative burden and related obstacles may delay operations with additional impacts on the Projects and the Programme as a whole reaching its objectives.

**Therefore, to avoid further reductions in the ability to achieve the objectives of the Programme, the evaluator recommends:**

- ❖ **the incorporation of evidence - driven Recommendation 3 on the redesign and seeking alternative funding for PDP2;**
- ❖ **the incorporation of evidence - driven Recommendations 1, 2, 4, 5, with respect to PDP1, the three Small Grant Scheme and the Programme Management - Provision of Supporting Services action.**

#### **4. Evaluation of the efficiency of the resources of the Projects and Programme**

To evaluate the efficiency of resources of the Projects and the Programme as a whole, on the basis of the methodology submitted together with the Draft Evaluation Report of Programme B (Deliverable 1), the application of a bottom-up reduction approach from the Project level to the Programme level is recommended.

The evaluation of the efficiency of a Project is hence done through the joint consideration of elements of the physical and financial integration of the projects and then of the Programme as a whole. It consists of the process of monitoring the evolution of the unit cost of the physical object of the projects at the time of their completion, in relation to the unit cost that was initially planned. This analysis may lead to useful conclusions regarding the "economics" of the implementation of the approved interventions in the context of the Programme.

The measurement of project efficiency is expressed by the ratio of the physical in relation to the financial integration and therefore the efficiency indicator of a project is calculated from the following formula:

$$\text{In.Effic} = \text{In.Effect} / \text{Absorption (Financial Integration Index)}$$

The evaluation of the efficiency of the Programme is achieved by a similar procedure to the one that was described in the context of calculating the effectiveness indicators. More specifically, the efficiency index of each Project is multiplied by its weighting factor in the total expenditure of the Programme. The Programme efficiency index is a result of the sum of the weighted indices of each individual Project with the use of the following formula:

$$(\text{In. Effic})_{\text{Prog}} = \sum (\text{In. Effic})_{\text{Proj}} (\text{GF})_{\text{Proj}}$$

where:

In. Effic = Efficiency Index

GF = Gravity Factor

Proj = Project

Prog = Programme

In terms of the procedure of producing weighted data, the following criteria should be taken into account:

- Weighting based on the Weight of the projects in the Achieved Outputs of the Program
- Weighting based on the Financial Weight of each Project
- Comparison of Programme Efficiency Index by Weighting Approach

**At this stage it can be verified that the initial allocation of financial resources is confirmed on the basis of the planned budgets through the Calls for Proposals procedures, as well as, through the cost of the approved Projects to the extent that such Projects are activated.**

However, as also shown in Table 7 and mentioned in Paragraph 3.3, there is very limited availability of the measured current values of the pre-selected Indicators of the Projects. In the absence of the completion of this data and to the extent that the approved Projects do not currently yield measurable values of output indicators and results, it is not possible to evaluate the efficiency of the approved Projects or of the Programme as a whole.

Upon completion of the approved Projects, measurable data should be appropriately selected and calculated for the purposes to enable the evaluation of the efficiency of the Projects and Programme as a whole.

Similarly to what is stated in Paragraphs 3.4, 3.5, 3.6, despite the lack of the availability of measurable data, qualitative observations / conclusions may be drawn from the use of the evidence and information provided to the evaluator by the Programme Operator and Project Promoters, as analytically laid out in Paragraphs 3.2, 3.3, 3.4.

More specifically, it has been shown that the efficiency of the resources of the Projects and the Programme as a whole may be reduced by the implicated risks in not absorbing the Programme budget and the Programme not reaching its goals, which are connected to implementation issues in all Projects. In particular, on the basis of the evidence and data provided, the evaluator estimates that the following risks of Table 8 with a score of "Medium - Low", "Medium - High", or "High" (thus ignoring risks with a score of "Low"), herein organized and presented by Project, might negatively impact partly the efficiency of resources of the Programme:

- PDP1: The project is in implementation and the budget is progressively being absorbed. However, the delay of the Call for recruitment for the Task Force, as well as, other procurement or contract or tendering delays may lead to the non-absorption of parts of the foreseen budget and hence the efficiency of resources might only be partly satisfactory;
- PDP2: Procurement or tendering delays; Time shift of the agreed timetable and risk of non absorption of the budget is very high with the existing design of the project. Hence the efficiency of resources is not satisfactory;
- SGSs: Procurement or contract or tendering delays may lead to the non-absorption of parts of the foreseen budget and hence the efficiency of resources might only be partly satisfactory;
- Programme Management - Provision of Supporting Services: The project is in implementation and the budget is progressively being absorbed. However, probable delays as a result of risks incurred in the other Projects of the Programme may lead to the non-absorption of parts of the foreseen budget and hence the efficiency of resources might only be partly satisfactory;
- All Actions: Limited engagement / commitment of the programme stakeholders and administrative burden and related obstacles may delay operations with additional impacts on the efficiency of resources of the Projects and the Programme as a whole.

**Therefore, to avoid further reductions in the efficiency of the resources of the Projects and the Programme as a whole, the evaluator recommends:**

- ❖ **the incorporation of evidence - driven Recommendation 3 on the redesign and seeking alternative funding for PDP2;**
- ❖ **the incorporation of evidence - driven Recommendations 1, 2, 4, 5, with respect to PDP1, the three Small Grant Scheme and the Programme Management - Provision of Supporting Services action.**

## **5. Expected impacts from the implementation of the Projects of the Programme**

### **5.1. Evaluation of impacts of the Programme in the existing conditions in Greece in the areas of Roma Inclusion and Empowerment**

As also mentioned in Paragraph 2.1 the Programme "Roma Inclusion and Empowerment" has a strong response connection to the country's needs and priorities that are related to the social inclusion and empowerment objectives of the Roma community and it is fully compatible with N.R.I.S 2021-2030 and EU policies.

The N.R.I.S 2021-2030 policy sets out the national objectives for the removal of the existing conditions of social exclusion of the Roma community and for the development of suitable conditions for their social integration.

In this respect, PDP1 directly contributes to the coordination of Roma integration activities among the local, regional and central levels of administration, to the transfer of know-how and experience to Roma communities and the inhabitants of these areas, to the transfer of know-how to local authority staff, as well as, to the development and implementation of measures to combat discrimination and stereotypes in the wider population. Through the establishment of national and regional Task Force Units, PDP1 is deemed to function as a basic monitoring, coordination and implementation tool of the N.R.I.S 2021-2030 and the relevant policies and measures.

In addition, the implementation of the three Small Grant Schemes is in direct correlation and complementarity with Pillars II, III, IV of the N.R.I.S 2021-2030 as it is expected to

- empower Roma women and youth through promoting the active participation of these population groups in social events and the promotion of their equal access to education, health and the labour market; these actions are in direct correlation and complementarity with Pillars II, III, IV of the N.R.I.S 2021-2030
- strengthen the social integration of the Roma community through the development of social abilities and skills (teamwork, socialization, creating bonds) addressed to Roma children and primary school students, aged 6-12, as well as, to the parents of these children, through the provision of counseling services/workshops, with the aim of informing them about the value of camping, the attraction, introduction and finally the smooth integration of children in the camps; these actions are in direct correlation and complementarity with Pillars II, III, IV of the N.R.I.S 2021-2030
- implement coupling activities of Roma communities and the wider local communities.

At this point it should be noted that there is also a strong compatibility between the implementation of PDP2 and the N.R.I.S 2021-2030 and EU policies, but for the purposes of the evaluation of impacts of the Programme in the existing conditions in Greece in the areas of Roma Inclusion and Empowerment, these are not mentioned in this section as it has already been shown that Outcome 1: "Enhanced inclusion and empowerment of Roma" is partly not expected to be reached and Output 1.1: "Pilot transitional housing infrastructure in Roma settlements upgraded" is fully not expected to

be reached with the existing design of PDP2. In addition, the risks in time schedule delays identified in all other Projects may also be taken into account.

However, on the basis of all the above mentioned information jointly with the fact that, as also shown in Table 7 and mentioned in Paragraph 3.3, there is very limited availability of the measured current values of the pre-selected Indicators of the Projects, it is not possible to evaluate in a more specific manner the final results and impacts of the Programme in the existing conditions in Greece in the areas of Roma Inclusion and Empowerment at this point.

Upon completion of the approved Projects, measurable data should be appropriately selected and calculated for the purposes to enable the evaluation of the impacts of the Programme in the existing conditions in Greece in the areas of Roma Inclusion and Empowerment in the future.

## **5.2. Evaluation of impacts of the Programme in the Project Promoters**

The implementation of the Programme is expected to assist in developing a sustainable framework of synergy actions and coordination of Roma integration activities between the local, regional and central levels of administration. This Programme seeks to promote the transfer of know-how and experience not only to the Roma communities and the residents of these areas, but also to local authority staff and also, through this process, to the regional and central administration competent authorities in the development of mechanisms and the implementation of measures to combat discrimination and stereotypes within the wider population.

Through the implementation of the Programme, the efficiency and productivity of the competent authorities for the design, planning and implementation of inclusion and empowerment policies for the Roma community are also enhanced.

It is therefore expected that the Programme will directly impact the operations of the following Project Promoters:

- The Ministry of Labour and Social Affairs - Executive Authority ("Special Service - Executive Structure NSRF"), Division of Social Solidarity (Special Service "NSRF Executive Structure", Division of Social Solidarity)
- The Ministry of Labour and Social Affairs - Executive Authority ("Special Service - Executive Structure NSRF"), Division of Employment and Social Economy (Special Service "NSRF Executive Structure", Division of Employment and Social Economy)
- Ministry of Labour and Social Affairs, General Secretariat for Social Solidarity and Fight Against Poverty (General Secretariat for Social Solidarity)
- All entities according to Article 7.2.1 of the EEA Grants 2014 - 2021 Regulation
- Municipalities having Roma branches
- NGOs that are active in Roma inclusion and empowerment activities

It should be noted at this point that even though the efficiency and operational mechanisms of the Municipality of Katerini would also be greatly and positively impacted by the implementation of PDP2,

the Municipality of Katerini is not listed among the Project Promoters and more generally the public sector authorities that are expected to be positively impacted by the Programme, as PDP2 is not progressing in accordance with the set time schedule and objectives of the Programme and the physical object is not expected to be completed in compliance to the approved time schedule.

In terms of all other approved Projects that are expected to be completed in accordance with the approved time schedules and goals of the Programme, through the expected increased knowledge, know-how and experience, the competent authorities are expected to obtain improved mechanisms to perform their duties which can also lead to reduced operational costs.

Furthermore, all parties involved in the Programme must comply with the rules of information and communication as defined in the EEA Grants 2014 - 2021 Regulation and are therefore expected to obtain enhanced mechanisms of sharing and disseminating information and hence an improved culture in transparency issues.

### **5.3. Evaluation of indirect impacts of the Projects of the Programme**

In terms of the expected indirect effects from the implementation of the projects in the areas of efficiency, transparency and integrity of the public administration, it is noted that the role of the General Secretariat or Social Solidarity and Fight Against Poverty as main coordinating body of the social inclusion policies of the Roma is expected to be strengthened, thus allowing the improved monitoring and evaluation of these policies, as well as, the better design and planning for perspective policies in the future.

## **6. Duration and viability of the Projects of the Programme**

For the evaluation of the measures and mechanisms in relation to the sustainability and viability of the results from the approved projects under the Programme "Integration and Empowerment of Roma", the evaluator identifies the following prerequisite factors:

- the ensuring of the necessary institutional framework
- the development of the necessary operational capacity including administrative operations and mechanisms.

On the basis of the assumption that the adopted measures and developed mechanisms will be materialized effectively, the sustainability and viability of the results of the Projects and the Programme as a whole may be assessed positively.

This assessment is based on the following achievements:

- Upgrading of coordination, monitoring and evaluation mechanisms in competent authorities by improving their effectiveness in supporting social inclusion policies and the new relevant programmes financed by various financial schemes (eg. NSRF 2014-2021).

- With the establishment of regulatory actions, the Task Force Units, operations and procedures within their structural organization, the competent authorities will be better equipped to undertake the design and implementation of similar programmes of Roma inclusion and empowerment more effectively.
- The implementation of the Programme is expected to foster institutional empowerment and enhanced participation procedures for social partners and civil society organizations.
- As a result of the design, planning and implementation of the Programme, a number of studies, methodologies, toolkits, coordination practices and promotion materials have been developed and can constitute useful assets in the context of future similar Project and Programmes.

## **7. Examination of the Mechanism's administrative capacity and the effectiveness of the Programme implementation procedures**

### **7.1. Examination of the management and implementation framework of the Programme**

Each beneficiary State has agreed to follow and comply with the specific regulatory framework of EEA 2014-2021 for the management and control of the implementation which is depicted in the document: "Regulation on the implementation of the European Economic Area Financial Mechanism 2014-2021". This Regulation is related to the "Protocol 38c of the EEA Agreement for the EEA Agreement" 2014-2021 the "EEA FM Financial Guidance" and the "Memorandum of Understanding (MoU)" which refers to the general framework of the cooperation between the Donor Countries and the Hellenic Republic for the implementation of the EEA Agreement of this period.

This framework also includes management and control rules for the implementation of the Bilateral Relations Fund, in connection with the Implementation Agreement for the Bilateral Fund, the Action Plan for the Bilateral Relations and the relevant Fund Financing Memorandum.

From the national perspective, the following Ministerial Decrees have been issued:

- "*Management and Control System for the implementation of the Financial Mechanism of the European Economic Area (EEA) for the period 2014-2021 - Allocation of Resources*" which transposes the Regulation for the EEA FM 2014-2021;
- "*Composition, role and operation of the Joint Committee for Bilateral Funds - JCBF - between of the Donor countries and Greece, which was adopted by the Joint Committee for the Bilateral Relations Fund*".

In compliance with the EEA Grants 2014-2021 Regulation, the first stage of undertaking a legal commitment to materialize an action is the selection of a potential implementing body/ contractor. The initial step, as foreseen in the approved Management and Control Manual, is the issuing of an Open Call for Proposals by the Project Promoter.

Prior to the publication of the Call, the Project Promoter must have completed a series of preparatory actions, which concern the following:

-  Specialization of the categories of actions, according to the Programme Agreement.

- ✚ Determination of the amount of the co-financed public expenditure available for the scope of work in the context of the invitation.
- ✚ Definition of the methodology and selection criteria of the actions, while taking into account the special requirements of the announced actions.
- ✚ Communication with the European Union Agency for Fundamental Rights ("EU FRA") which acts as international partner to the Programme providing advisory support and consultation to the national competent authorities.
- ✚ Approval of the open call document by the competent authority.
- ✚ Sending the draft Invitation to the NFP in order for the latter to verify that it fully complies with the institutional framework of the EEA Grants 2014-2021, as defined in Article 1.5 of the EEA Grants 2014-2021 Regulation, as well as, in the relevant national legal and administrative documentation.
- ✚ Notifying the EEA FM Committee of the Call by sending an English translation of the Call at least two weeks prior to the publication of each Call.
- ✚ Publishing the Call as widely as possible, in Greek and English, in order to ensure that all potential contractors are given sufficiently early knowledge of its existence and content.

The Project Promoter provides all the necessary translation support both to the Programme Partner from Donor countries and to the international organizations that participate in the implementation of the Programme.

During Stage B, all applications that have been found to be successful under Stage A are assessed/evaluated by at least two evaluators, one of which at minimum should be independent in order to ensure transparency in the selection process. The FMO and FRA partners are invited to participate, if they desire, in the selection committee meetings, as observers.

The invitation, selection, integration and implementation processes of the small grant Projects are carried out by the Project Promoter in accordance with the above mentioned Regulations, but in the context of the implementation of the Programme, parts of them may be assigned to other public or private bodies.

In any case, the specialization of the organization and procedures for the implementation of the Small Grant Schemes, within the framework of the common Management and Control System, is done in accordance with the procedures provided for in the management and control system at the Programme level, on the basis of the existing Regulations.

Technical Assistance projects are implemented in accordance with the provisions of the Management and Control - Procedures Manual. The National Focal Point proceeds to the publishing of the Invitation, which concerns the entire Technical Assistance, as specified in the technical assistance agreement for the entire eligible implementation period.

It should be noted that the establishment of the Management and Control System resulted in noticeable difficulties and delays as reported to the evaluator mainly by the Programme Operator and, in some cases, by the Project Promoters, as well. More specifically, it has been mentioned to the evaluator that the Management and Control System is excessively complicated and "heavy", even for tenders and the assignment of Contracts of modest sizes and low budget outsourcing services and



works, in terms of the followed procedures and administrative burden. There is perhaps scope to introduce an increased degree of flexibility in cases of smaller budgeted projects.

Furthermore, the required communications are carried out not only under the established hierarchy of interactions among the relevant and implicated competent authorities, but also at a horizontal level, resulting in complex structures of communication and overlapping responsibilities with, consequently, significant management waste. A notable example of this is the necessity for the Programme Operator to interact not only with the NFP, but also directly with the FMO and in many cases this is on the same subject matter and notwithstanding the required communications between the NFP and the FMO. It is also observed that communications with the NFP and, more rarely, even directly with the FMO are requested by the Project Promoters, notwithstanding their close collaboration with the Programme Operator.

Reporting needs also appear to be excessive and relatively time consuming considering the sizes of projects and the fact that a number of reports need to be produced in both English and Greek.

Therefore, simplifications in the adopted Management and Control System are needed, especially for the decision-making processes during the implementation of Projects that have already been adopted in previous stages, such as in the Programme specialization and resources allocation process or for Projects that are implemented by the Project Promoter's own means.

On the other hand, all implicated bodies have reported an excellent collaboration between the Project Promoters, the Programme Operator, the NFP, the FMO and international partners, where applicable and as appropriate, and stress the importance to also strengthen the co-working links between the Beneficiary State and the Donor Countries.

An effective compromise between close collaboration and re-thinking the communication hierarchy of all relevant parties could be sought.

For the purposes of better demonstrating the legal, regulatory, implementation and administrative framework governing the Programme "Roma Inclusion and Empowerment", it is important to stress the Strengths, Weaknesses, Opportunities and Threats of the Programme.

For this purpose, the evaluator will also take into account the Time schedule feasibility - Risk assessment and mitigation analysis of the Programme performed in Paragraph 3.4. The SWOT analysis incorporates all identified risks with a Risk Score of "Medium - Low", "Medium - High", or "High". Thus, any identified risks with a Risk Score of "Low" are not included in the analysis.

These are all presented in the **SWOT Analysis** below:

### **Strengths**

- Strong political support to the implementation of Roma inclusion and empowerment strategies.
- Good cooperation, as well as, constant liaison among the involved entities in the Beneficiary State and the Donor Countries.
- Satisfactory administrative capacity, quality and effectiveness of the Mechanisms under the competent units of the Ministry of Labour and Social Affairs that are also are adequately

organized and staffed with experienced personnel also in the operation of larger Programmes, financed by the European Social Fund.

- Involvement in the Programme of proactive national and international partners.
- Operational capacity of the Project Promoters to complete the entire physical and financial object of the Programme, with the incorporation of the recommendations of the evaluator.

#### **Weaknesses**

- Complex and bureaucratic Management and Control System.
- Too many interconnections and overlapping responsibilities among competent authorities and excessive reporting needs in both Greek and English.
- Heavy dependence of required preparatory work and approvals from other entities and external parties.
- Complex funding nature of the Programme, due to the involvement of three sources of funding; the EEA Grants 2014-2021, national resources and ESF resources.
- All projects are linked to delays and identified risks in not fully absorbing the foreseen budgets
- With its current design, the physical object of PDP2 is not expected to be completed in compliance to the approved time schedule.

#### **Opportunities**

- Updated National Roma Integration Strategy 2021-2030.
- Development of partnerships, networking and direct benefits to national, regional and local authorities from international enriched know-how and experience.
- Development of synergies with the new social inclusion programmes under the NSRF.

#### **Threats**

- External and also potentially internal delays in promoting appropriate preparatory actions, approvals and state permits to reach in the required maturity of the projects.
- Expected deadlock in the implementation process of PDP2 project under its current design.
- Changes in public procurement procedures affecting the time schedules.
- Shortened eligibility duration due to existing delays in the approved time schedules.
- Medium - high risk regarding PDP1: The delay of the Call for recruitment for the Task Force, as well as, other procurement or contract or tendering delays may lead to the non-absorption of parts of the foreseen budget, the project not fully reaching its objectives and reductions in the efficiency of resources;
- High risk regarding PDP2: Procurement or tendering delays; Time shift of the agreed timetable and risk of non absorption of the budget, of the project not reaching its objectives and of the efficiency of resources not being satisfactory is very high;

- Medium - high risk regarding SGSs: Procurement or contract or tendering delays may lead to the non-absorption of parts of the foreseen budget, the actions not fully reaching their objectives and reductions in the efficiency of resources;
- Medium - high risk regarding Programme Management - Provision of Supporting Services: Probable delays as a result of risks incurred in the other Projects of the Programme may lead to the non-absorption of parts of the foreseen budget, the project not fully reaching its objectives and reductions in the efficiency of resources;
- Limited engagement / commitment of the programme stakeholders and administrative burden and related obstacles may delay operations with additional impacts on budget absorptions, on the Projects and the Programme as a whole reaching their objectives and on the efficiency of resources;

## **7.2. Examination of the administrative capacity, quality and effectiveness of the Mechanisms**

The main bodies involved in the implementation of the Programme are:

- ✚ Programme Operator (PO): Executive Authority (“Special Service - Executive Structure NSRF”), Division of Employment and Social Economy of the Ministry of Labour and Social Affairs. Sub-Directorate I. Transnational Programmes and Programmes of other Financial Mechanisms of the EU, EGF and EEA Grants”.
- ✚ National Focal Point (NFP): Special Service EEA, General Secretariat for Public Investments & the NSRF Ministry of Development & Investments.
- ✚ Financial Mechanism Office (FMO): Funds and Horizontal Concerns Unit, Programme Management for the Programme “Roma Inclusion and Empowerment”.
- ✚ International Partner Organization (FRA): European Union Agency for Fundamental Rights.
- ✚ Programme Partner (PP): General Secretariat for Social Solidarity and Fight Against Poverty of the Ministry of Labour and Social Affairs.
- ✚ Project Promoter of the PDP1: Ministry of Labour and Social Affairs - Executive Authority (“Special Service - Executive Structure NSRF”), Division of Social Solidarity (Special Service “NSRF Executive Structure”, Division of Social Solidarity).
- ✚ Project Promoter of the PDP2: Municipality of Katerini.

At this stage of implementation, that is 14 months before the completion of the programming period (April 2024), there are conditions of “good cooperation, as well as, the constant liaison with the General Secretary for Social Solidarity and Fight Against Poverty for the political support to the current pilot Programme”, as stated by Ms. Rania Economou, Head of the Special Service “Executive Structure NSRF” in the 2nd Cooperation Committee Convention of the Cooperation Committee which was held on 9<sup>th</sup> February 2022. The representative of the Task Force Unit, spoke about the excellent cooperation with the representatives of FRA and FMO.

Ms. Fola, representative of the Embassy of Norway in Athens, added in the same convention that “she was impressed by the progress reported and praised the high level of the administrative and political

commitment to the implementation of the Programme". Additionally, the representative of FRA. Mr. Dimitrakopoulos, commented, positively, on the hitherto progress for both PDPs and reaffirmed that the Programme on the whole has been contributing and will, further, continue reinforcing the National Roma Integration Strategy". He mentioned that progress in the implementation of the National Roma Inclusion Strategy will be facilitated by PDP1 and in this way also more generally support ESF and other EU funding which has to comply with the enabling conditions concerning Roma inclusion.

It should be noted that on the basis of the data and information presented, as well as, conclusions drawn in the previous chapters, there are delays in the progress of both the physical and financial objects of the Programme. Part of the delays is related to reasons that are considered to be externalities to the established legal and administrative framework of the Programme, namely:

- ✚ The complexity of the required preparatory actions, approvals and permits to reach the required maturity of the projects;
- ✚ Difficulties mainly concerning PDP2 reported by the Project Promoter, hence the Municipality of Katerini, to finalize the required studies and to obtain the required approvals for the selected land plot; and all attempted actions by the Municipality of Katerini have been without success so far;
- ✚ Difficulties stemming from the complex funding nature of the Programme, as there are three sources of funding involved; the EEA Grants 2014-2021, national resources and ESF resources;
- ✚ The complex required procedures that were entailed in the recruitment of personnel for the staffing of the Task Force Unit which have caused delays in launching a fully operational Task Force Unit;
- ✚ The complexity of the statutorily required public procurement procedures.

Additional difficulties that have caused delays in relation to the approved time schedules are already mentioned in Paragraph 7.1.

Nevertheless, the reasons for the delays that have occurred in the context of the required studies and preparatory work for the maturity of PDP2, may not automatically be considered as externalities.

On the one hand, the evaluator must take into account the factual data and observations made in Paragraph 3.3.2, according to which both the statutory designations and legal restrictions concerning the land that was specifically selected by the Municipality of Katerini to host the relocation housing complex for the Roma community are clear and well established under the national legislation. On the other hand, the complexity of national legislation, as well as, of the relevant Regulatory Framework in the field of spatial planning also needs to be taken into account.

In this regard, it is not possible to assess accurately and in a fair manner the administrative capacity, quality and effectiveness of the Mechanisms used by the Municipality of Katerini.






It is also important to note that the administration units of the Ministry of Labour and Social Affairs that are involved in the Programme for the management, the operation and the promotion activities are adequately organized and staffed with experienced personnel, and are already operating much bigger programmes, financed by the European Social Fund. Therefore, the administrative capacity,

quality and effectiveness of the Mechanisms under the competent units of the Ministry of Labour and Social Affairs can be evaluated as satisfactory.

## **8. Conclusions / Recommendations**

As a result of the findings of the evaluation of the Programme which were presented in detail in this Report, this section includes the conclusions drawn from the analysis, as well as, recommendations regarding the main aspects of the implementation of the Programme that can also be used in the context of the design and planning of the forthcoming Programming Period and a potential new Programme.

From the implementation of the Programme the following conclusions are drawn:

-  Although, the rate of approvals of the projects by the Programme Operator is high (commitment of 83.12% of the Programme's resources), the rate of contracting of Projects and their Sub-projects is at 46.33% of the Programme's budget and the expenditure is even lower (10.13% of the Programme budget).
-  In the absence of measurable data on the physical progress and to the extent that the approved Projects do not currently yield significant output and results, there are no measurable values of the pre-selected indicators. Thus, evaluation of the effectiveness and the efficiency of the resources of the programme is not possible to be assessed quantitatively, at this time. Nevertheless, on the basis of the evidence and information provided to the evaluator, qualitative conclusions may be reached. More specifically, the effectiveness of the Programme most probably will be reduced by not absorbing its budget and not reaching its goals, taking in account the implementation issues in all Projects, mainly because of the high risk of PDP2 and lower, but existing risks in other Projects. Evaluator's recommendations have been submitted to mitigate the risks.
-  The approved Project PDP2 is severely delayed and expected to be further delayed due to a low degree of maturity as a result of the lack of a suitable land plot to successfully implement the integrated pilot social housing relocation scheme for Roma inclusion, at the time of this evaluation. PDP2 is therefore not progressing in accordance with the set time schedule and objectives of the Programme and the physical object is not expected to be completed in compliance to the approved time schedule.
-  Part of the delays in the progress of both the physical and financial objects is related to reasons that are considered to be externalities to the established legal and administrative framework of the Programme and the state laws for projects approval and implementation. The reasons for the delays that have occurred in the context of the required studies and preparatory work for the maturity of PDP2, may not automatically be considered as externalities, therefore it is not possible to assess accurately and in a fair manner the administrative capacity, quality and effectiveness of the Mechanisms used by the Municipality of Katerini.
-  In addition to delays in open tender procedures, the implementation is challenged by the fact that the Management and Control System of the Programme is excessively complicated and

“heavy” regarding the tendering procedures and the assignment of the contracts, especially for small sizes and low budget projects.

- ✚ At this stage it can be verified that the initial allocation of financial resources is confirmed on the basis of the planned budgets through the Calls for Proposals procedures, as well as, through the cost of the approved Projects to the extent that such Projects are activated.
- ✚ However, there is very limited availability of the measured current values of the pre-selected Indicators of the Projects. In the absence of the completion of this data and to the extent that the approved Projects do not currently yield measurable values of output indicators and results, it is not possible to evaluate the efficiency of the approved Projects or of the Programme as a whole. Nevertheless, on the basis of the evidence and information provided to the evaluator, qualitative conclusions may be reached. More specifically, the efficiency of the resources of the Projects and the Programme as a whole may be reduced by the implicated risks in not absorbing the Programme budget and the Programme not reaching its goals, which are connected to implementation issues in all Projects.
- ✚ Medium - high risk regarding PDP1: The delay of the Call for recruitment for the Task Force, as well as, other procurement or tendering delays may lead to the non-absorption of parts of the foreseen budget, risks in fully reaching the project’s objectives and reduction in the efficiency of available resources.
- ✚ High risk regarding PDP2 which is severely delayed due to low degree of project’s maturity. The main part of the physical object is not expected to be completed causing high risks in reaching the project’s objectives and reduction in the efficiency of available resources.
- ✚ Medium - high risk regarding SGSs: Procurement or tendering delays may lead to the non-absorption of parts of the foreseen budget, risks in fully reaching the project’s objectives and reduction in the efficiency of available resources.
- ✚ Medium - high risk regarding Programme Management - Provision of Supporting Services: Probable delays as a result of risks incurred in the other Projects of the Programme may lead to the non-absorption of parts of the foreseen budget.
- ✚ Limited engagement / commitment of the programme stakeholders and administrative burden and related obstacles may delay operations with additional impacts on budget absorptions, on the Projects and the Programme as a whole reaching their objectives and on the efficiency of resources.
- ✚ The above risks can be mitigated with the incorporation of evidence - driven Recommendation 3 on the redesign and seeking alternative funding for PDP2 and evidence - driven Recommendations 1, 2, 4, 5, with respect to PDP1, the three Small Grant Scheme and the Programme Management - Provision of Supporting Services action.
- ✚ The Programme has a strong response connection to the country's needs and priorities that are related to the social inclusion and empowerment objectives of the Roma community and it is fully compatible with N.R.I.S 2021-2030 and EU policies. However, Outcome 1: “Enhanced inclusion and empowerment of Roma” is partly not expected to be reached and Output 1.1: “Pilot transitional housing infrastructure in Roma settlements upgraded” is fully not expected to be reached with the existing design of PDP2. In addition, the risks in time schedule delays identified in all other Projects may also be taken into account. On this basis, jointly with the lack of sufficient

measured current values of the pre-selected Indicators of the Projects, it is not possible to evaluate the impacts of the Programme in the existing conditions in Greece in the areas of Roma Inclusion and Empowerment at this point.

- ✚ As far as indirect impacts are concerned, it is expected that the implementation of the Programme will directly positively impact the operations of the Programme Operator, the Project Partners and the Project Promoters with the exception of Municipality of Katerini, as under its current design, PDP2 is not progressing in accordance with the set time schedule and objectives of the Programme and the physical object is not expected to be completed in compliance to the approved time schedule.
- ✚ The central role of an authority, currently acted by the General Secretariat or Social Solidarity and Fight Against Poverty, as the main coordinating body of all social inclusion policies for the Roma is crucial in monitoring and evaluation of these policies, as well as, the better design and planning of perspective policies in the future. This role should be retained, as long as, such policies and programmes exist.
- ✚ On the basis of the assumption that the adopted measures and developed mechanisms will be materialized effectively, the sustainability and viability of the results of the Projects and the Programme as a whole may be assessed positively, with the exception of Outcome 1: "Enhanced inclusion and empowerment of Roma" which is partly not expected to be reached and Output 1.1: "Pilot transitional housing infrastructure in Roma settlements upgraded" which is fully not expected to be reached with the existing design of PDP2. In addition, the risks in time schedule delays identified in all other Projects may also be taken into account.
- ✚ The required communications and reporting, both English and Greek, are carried out not only under the established hierarchy of interactions among the relevant and implicated competent authorities, but also at a horizontal level, resulting in complex structures of communication and overlapping responsibilities with, consequently, significant management waste.
- ✚ All implicated bodies have reported an excellent collaboration between the Project Promoters, the Programme Operator, the NFP, the FMO and international partners, where applicable and as appropriate, and stress the importance to also strengthen the co-working links between the Beneficiary State and the Donor Countries.
- ✚ The administrative capacity, quality and effectiveness of the Mechanisms under the competent units of the Ministry of Labour and Social Affairs can be evaluated as satisfactory.

#### **Recommendations for the competent authorities:**

The following recommendations are drawn from the evaluation of the Projects' and the Programme's effectiveness, efficiency of resources, estimated effects, duration and sustainability of interventions and review of the Mechanism's administrative capacity and the efficiency of the Programme's implementation procedures, including the evaluation of the physical and financial objects and the time schedules of the projects and sub-projects.

- **Recommendation 1:** The evaluator recommends the close monitoring of the approved time schedule in all WPs under SP1 of PDP1 and the speeding-up of the launching process of the WPs that have not been activated yet, in order to avoid further delays that could impact the objectives of SP1 and hence, of PDP1.

- **Recommendation 2:** The evaluator recommends the close monitoring of the approved time schedule and the speeding-up of the launching process of the Call for Proposals under SP5 of PDP1 in order to avoid further delays that could impact the objectives of SP5 and hence, of PDP1.
- **Recommendation 3:** It is estimated that, with its current design, the physical object of PDP2 is not expected to be completed in compliance to the approved time schedule. Thus, the evaluator recommends that PDP2 must be redesigned. Sub-project SP3: “Services of complementary actions for the social integration of Roma (PDP2\_EEA Grants)” could remain in the programme, due to its significant contribution to the sustainable integration of Roma youth who are members of the beneficiaries’ families into local society, as well as, their integration into the social and economic environment of Katerini.
- **Recommendation 4:** The evaluator recommends the close monitoring of the approved and planned for time schedules under the three Small Grant Schemes, the-speeding up of the process to publish the imminent Call for Proposals for SGS3, as well as, the speeding-up of all tendering, procurement and contract processes as a whole, in order to avoid further delays that could impact their objectives.
- **Recommendation 5:** The evaluator recommends the close monitoring of the progress of the physical object of PDP1, PDP2 and the projects under the three Small Grant Schemes and modify the physical object of the Programme Management activities under the Project “Provision of Supporting Services to the Programme “Roma Inclusion and Empowerment” accordingly.
- **Recommendation 6:** Upon completion of the approved Projects, measurable data should be appropriately selected and calculated for the purposes to enable the evaluation of the following parameters of the Projects and the Programme as a whole: (i) the effectiveness, (ii) the ability to achieve the set objectives, (iii) the efficiency, (iv) the impacts in the existing conditions in Greece in the areas of Roma Inclusion and Empowerment in the future.
- **Recommendation 7:** As the Management and Control System was reported to be excessively complicated and “heavy”, there is perhaps scope to introduce an increased degree of flexibility in cases of smaller budgeted projects.
- **Recommendation 8:** Simplifications in the adopted Management and Control System are recommended, especially for the decision-making processes during the implementation of Projects that have already been adopted in previous stages, such as in the Programme specialization and resources allocation process or for Projects that are implemented by the Project Promoter’s own means. It is nevertheless important to reach an effective compromise between close collaboration and re-thinking the communication hierarchy of all relevant parties, in order to avoid compromising the excellent collaboration terms as unanimously reported to the evaluator by all implicated authorities from the part of the Beneficiary State.

## 9. References



The sources of information and data which were used by the evaluator in the context of the present evaluation report are the following:

- ✓ Strategic, legal and regulatory documents in the context of the Programme such as: Memorandum of Understanding, Program Agreement, Regulation for the implementation of the EEA FM 2014-2021, Ministerial Decision on Co-financing of the Programme, Management and Control System.
- ✓ Bibliographic review of key institutional and regulatory texts, provisions and other related sources through desk research.
- ✓ Detailed information about the actions and schedules for the course of maturation and implementation of the Sub-Projects (progress of maturity, tendering, contracting and implementation, as well as, payments/financial progress).
- ✓ Technical sheets and specifications of the Projects/Sub-Projects.
- ✓ Decisions of Approval of the Projects for inclusion and funding by the Programme.
- ✓ Analysis of the accounting elements of the implementation, as these had been inserted in the official Integrated Information System.
- ✓ Monitoring and Control reports and Annual reports.
- ✓ Primary data and views collected by the Programme Operator and Project Promoters through direct communication and personal interviews with executives. The details of interviews are presented below:

- ❖ **Meeting with the Executive Authority ("Special Service - Executive Structure NSRF"), Division of Employment and Social Economy of the Ministry of Labour and Social Affairs ("Executive Service ApKO")**

Date / time: 11 January 2023, 12:00pm

Venue: Executive Service ApKO offices, Korai 4, 10564 Athens, Greece

Interviewees: Vassiliki Staikou, Marina Platanaki, Angeliki Christopoulou, Georgia Kokkini

- ❖ **Video Conference with the Municipality of Katerini**

Date / time: 25 January 2023, 2:30pm

Venue: - [virtual meeting]

Interviewees: Iraklis Fotiou, Thomas Karpouzas, Petros Diamantis

- ❖ **Video Conference with the Executive Authority ("Special Service - Executive Structure NSRF"), Division of Social Solidarity (Special Service "NSRF Executive Structure", Division of Social Solidarity) of the Ministry of Labour and Social Affairs**

Date / time: 1 February 2023, 13:00pm

Venue: - [virtual meeting]

Interviewees: Georgia Vikatou

The main official documents that the evaluator has taken into account are the following:

- ✚ "Protocol 38C" of the Agreement on the European Economic Area, according to which the Financial Mechanism of EEA 2014-2021 is established, through which Donor Countries will contribute to the reduction of economic and social inequalities within the European Economic Area: <https://www.eeagrants.gr/download-file/50840>.

- ✚ The “Memorandum of Understanding” dated 31.10.2017 for the implementation of the Financial Mechanism of the European Economic Area for the period 2014-2021 between the Republic of Iceland, the Principality of Liechtenstein, the Kingdom of Norway and the Hellenic Republic, as amended by the No. 78434/19-07-2021 Official Gazette (Government Gazette 3141/B/2021) and as applicable: <https://www.eeagrants.gr/download-file/53993>
- ✚ The “Regulation for the implementation of the Financial Mechanism of the European Economic Area (EEA) 2014-2021” and specifically Articles 7.3, 1.3 and 7.4: <https://www.eeagrants.gr/download-file/54382>.
- ✚ Other Guidelines established and adopted by the FM EEA Committee for the period 2014-2021, as applicable.
- ✚ Joint Ministerial Decision No. 85335 (B' 1706/2015) on the Re-determination of the operation of the central account 23/200850 for the national co-financing of the Structural Funds, Cohesion Fund and EEA, as applicable.
- ✚ Joint Ministerial Decision No. 46317/2022 Official Gazette 2447/B/18-5-2022 Management and Control System for the implementation of the Financial Mechanism of the European Economic Area (EC - EEA) for the period 2014-2021 - Allocation of Resources and replacement of No. 13249/4-2-2020 (B' 526) Joint Ministerial Decision.
- ✚ Document No. 2.606/31-03-2022: Specializing Procedures of the Programme Operator.
- ✚ No. 91761/03-09-2020 (Government Gazette 4027/B'/21-09-2020) Decision of the Deputy Minister of Development and Investments for the Financing of the Programme, as it incorporates the “Programme Agreement”, between 2014-2021 EEA Economic and Social Committee and the Ministry of Development and Investments and has the status of a Programme Implementation Agreement according to the provisions of the Regulation), as applicable.
- ✚ The EU Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation (2021/C93/01).
- ✚ No. 4483 Law (Government Gazette 107/A'/31-07-2017) on the Temporary Relocation of Special Social Groups and specifically Article 159 thereof.
- ✚ Official Gazette 64 (Government Gazette 412/B'/12-02-2018) Decision on the Determination of the terms, conditions, technical issues, necessary details and procedures for the temporary relocation of special social groups - Improvement of Living Conditions, of the Ministers of Interior - Economy and Development - Labour, Social Security and Social Solidarity.
- ✚ No 30151/ΕΓ434/03-07-2019 (Government Gazette 2887/B'/05-07-2019) Approval Decision for the creation of an Organized Space for the Temporary Relocation of Special Social Groups in the Municipality of Katerini, of the Ministers of Interior - Economy and Development - Labour, of Social Security and Social Solidarity - Health - Environment and Energy, as well as, the Correction of this error (Government Gazette 3811/B'/15-10-2019).
- ✚ No. 0.5287/16-12-2020 Invitation to the Municipality of Katerini for the submission of a proposal within the framework of the EEA 2014-2021 period entitled "Social Integration and Empowerment of the Roma" and Code PDP2.
- ✚ No. 1.2516/28-05-2021 Decision Integration of the Act "Integrated Pilot Pilot Programme for Roma Integration" with MIS Code 5087337 in the Operational Programme "Social Integration and Empowerment of Roma 2014-2020".

- ✚ The decision numbered 83966/01-09-2022 (Government Gazette 4742/B/2022) of the Deputy Minister of Development and Investments entitled Amendment of the under data: 91761/21-09-2020 Ministerial Decision "Co-financing of the Program entitled: " Social Inclusion and Empowerment of the Roma" (Programme B - Roma Inclusion and Empowerment), with Programme Operator: the Executive Authority ("Special Service - Executive Structure NSRF"), Division of Employment and Social Economy of the Ministry of Labour and Social Affairs, with resources of the Financial Mechanism European Economic Area (EEA) period 2014-2021 and National resources of the PIP "Public Investment Program" (B/4027).
- ✚ N. 2.4714/03-10-2022 Supplementary Invitation of the General Secretary for the Promotion of Employment (ADA: 64ΣΥ46MTLK-LDA) to the Municipality of Katerini for the submission of a proposal for the implementation of the Action "Integrated pilot programme of relocation and social housing for the integration of the Roma" (Integrated pilot social housing relocation scheme for Roma inclusion) in order to join and be financed within the framework of the "Roma Inclusion and Empowerment" Programme.
- ✚ The Funding Application from 02/12/2022 and the accompanying Decision on Implementation by Own Means of the Pre-Determined Act PDP2 "Integrated pilot social housing relocation scheme for Roma inclusion" (Integrated pilot social housing relocation scheme for Roma inclusion) within the framework of the "Social Integration and Empowerment of the Roma" Programme with EEA MIS code: PDP2 (MIS: 5087337).
- ✚ Minutes of meeting of the 2<sup>nd</sup> Cooperation Committee Convention, February 9<sup>th</sup> of 2022.
- ✚ EEA Grants: Programme Operators - Risk assessment and mitigation analysis template, Publication Date: 20 Nov 2020<sup>6</sup>
- ✚ Strategic Report of the EEA Grants 2014-2021 (Reporting period: November 2021 to October 2022)
- ✚ Annual Programme Report FM 14-21, Greece, GR-ROMAINCLUSION Roma Inclusion and Empowerment 2022

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<sup>6</sup> <https://eeagrants.org/resources/programme-operators-risk-assessment-and-mitigation-analysis-template> (last accessed: 03.04.2023)