



External Evaluation on the Thematic Fund Security of the Bulgarian-Swiss Cooperation Programme BSCP

MANAGEMENT RESPONSE

1. Background

This is the management response to the final report (December 2018) on the Thematic Security Fund (TFS) in Bulgaria (Module 2), which is part of the External Review of the Swiss Contribution in the security sector. This wider evaluation consists in 3 modules, one referring to Romania, one to Bulgaria and a third covering a broad review of the Swiss Contribution in security and justice related themes. The main objectives of this External Review are:

- Assess the impact and results achieved by the TFS thus contributing to the **accountability** towards stakeholders both in Bulgaria and in Switzerland;
- Identify good/poor practices and innovative approaches, generate lessons to be retained and draw **recommendations**, both at country level and in the theme security for a possible extended Swiss support in reducing economic and social disparities in the Enlarged EU.

The final report is the result of a mandate commissioned by the Swiss Agency for Development and Cooperation (SDC) to a team of three independent experts (two internationals and one Bulgarian national), who conducted the external evaluation in the period September 2018 – December 2018. The module 2 is based on a review of 5 case study projects selected by SDC. It has involved a desk review of TFS framework and individual project documentation, meetings with executing agencies and other stakeholders in Bulgaria as well as meetings with Swiss project partners. Mission in Bulgaria took place from 15 September to 22 of October 2018.

The purpose of this management response is to present a consolidated appraisal of the Division New EU Member States in Bern and the Swiss Contribution Office in Bulgaria on the findings and recommendations shared in the report. Its main addressees are: SDC and NCU (to build on lessons learnt for similar projects or for a possible next Swiss Contribution), Bulgarian and Swiss Institutions involved in the projects (to capitalise on lessons learned and assure, where relevant the sustainability of the results achieved) and the review team.

Since the launch of the Swiss-Bulgarian Cooperation Program in 2010, a total number of 12 security projects have been elaborated in Bulgaria. 9 of them are implemented while 2 were discontinued. At the time of the evaluation, the portfolio of the TFS consisted of 8 projects still under implementation. 37% of the TFS funding in Bulgaria has been allocated to policing, 24% to the protection of victims of trafficking, 20% to combating organised crime and corruption, and 17% to juvenile justice.

2. General Appreciation of the Evaluation Report and Evaluation Process

SDC acknowledges the receipt and approves the final report(s) prepared by the evaluation team. Overall, the report on Module 2 and its annexes are good, concise and correspond to

the ToRs and main evaluation questions defined in the frame of the inception report. The level of details, comments and recommendations is strategic, what is compliant with SDC expectations. SDC acknowledges that the assessment is based on good knowledge of the projects and procedures and that the evaluation team managed, within the restricted time of the mandate, to comprehend the complexity of the TFS and the changing context in which the projects have been implemented. The good structure of the report written in an easy to comprehend language and complemented with illustrative figures is also appreciated.

3. Position towards main findings

Relevance

SDC agrees to a great extent with the evaluation findings as regards “Relevance”. Lack of strategic orientation of TFS is obvious while looking at “project” level. However the relevance needs to be considered while having in mind that complementarity and subsidiarity were dominant principles for the selection of the projects¹. SDC is of the opinion that niche approach and perseverance in pursuing initially agreed objectives are additional ingredients for the relevance of the Swiss Contribution. This is particularly valid for the projects Organised Crime (PORB) and Trafficking in Human Beings in which sub-sectors the Swiss Contribution is among the few to dare to engage beyond just punctual or sporadic interventions.

Effectiveness

SDC agrees to a great extent with the evaluation team’s findings as regards “Effectiveness”, particularly the limited information about outcomes. Important changes at project level were achieved, but the general overview on how to embed them into the domestic system is missing.

In the case of the Juvenile Justice project a more effective risk management would have resulted in an earlier response to the frequent shifts in Government priorities along with the lack of management capacity. An appropriate mitigation measure would have been to expand the involved stakeholders while seeking for broader policy support. Focusing the project entirely on the priorities of and with a set up solely within a state institution (Ministry of Justice) increased dependence of this project on political changes and shifts in political agenda, while overall the topic remains high in public space².

SDC agrees with the evaluation conclusion that Swiss partners made important contributions to most of the projects but that their role in the projects need to be further clarified for better mutual benefits. As regards involvement of Swiss partners and prospects for the future partnerships, SDC is of the opinion that there should be better understanding and delineation between the two main roles of Swiss counterparts - the one of a “service or know-how provider” or the one of “reciprocal institutional exchange in a partnership dynamic”.

Efficiency

As mentioned above, SDC agrees with the conclusion that the lack of systematic outcome monitoring at project and at TFS levels made it sometimes difficult to identify specific changes resulting from the project(s). The recommendation of the evaluation in this respect is valuable. Lack of a systematic monitoring at activities level and its triangulation within the dynamic context was maybe a deficiency of the SIB due to the lack of local counterpart.

The SIB and TFS modalities allowed for implementing simultaneously projects with multitude of actors – state institutions (Police/Ministry of Interior, Ministry of Justice), judicial authorities (PORB), para state authorities (NCCTHB) and NGOs while maintaining sufficient level of congruence. SDC recognises the important role of the SIB as an independent operator outside of constraints intrinsic to the Bulgarian administrative system. This needs to be duly considered in the search of an optimal management mechanism for possible consequent support in this domain, in light also of the limited expertise at SDC on security domain and approaches.

¹ Main TFS Activities were defined in the period 2009 – 2010 based on the prevailing national priorities back then.

² See reactions and debates on recently unveiled National Strategy for Children

SDC takes note of the opinion that remuneration to operational staff/civil servant for their involvement in project activities may be considered as a factor of motivation. Nevertheless ineligibility of “topping up” on salaries of involved civil servants was a principle adhered throughout the entire BSCP since its very beginning. It would be however advisable in case of an extended support in this domain to understand better how time and task attribution in relation with project’s activities are articulated in the respective institutions.

SDC agrees to a great extent with the findings and recommendations of the evaluation on the role of the TFS Steering Committee. In fact, this stakeholder platform was designed to provide strategic opinions and advice, but it focused mostly on operational aspects.

As regards cumbersome procurement process contributing to significant delay of the projects, SDC agrees only partially with this finding. In most of the cases, the lack of anticipation, planning and discipline in systematic follow up on the process are key causes for such delay. However, involvement of Swiss expertise on important elements (technical specifications in the case of “Stolen Vehicles” project) and supervision by SIB improve the efficiency in procurement process. In case of a future support in this domain where combination of soft and hard measures is foreseen, a good procurement plan and capacity building allocation are part of the measures to mitigate risks of inefficiency.

Intermediate review/assessment was not planned in the TFS. It is recognized that this measure can help to address efficiency aspects.

Sustainability

SDC agrees with the evaluation team that the sustainability prospects are generally good on short term and that in the longer term the prospects for institutionalizing and further development of projects benefits are less positive, due to often changing political priorities and considerable rates of staff turnover in state institutions and agencies.

As regards sustainability in the legal and policy framework, SDC is of the opinion that earlier political analysis and consideration of ongoing support activities by other donors can contribute a lot in understanding the policy making in Bulgaria and in securing complementarity to better aims towards systemic changes.

“Face-to-face” contacts and personal exchange between Swiss and Bulgarian authorities were important ingredients for establishing the partnership and for its continuation beyond projects.

As regards THB programme where a “programmatic” approach was chosen, sustainability considerations prevail through empowering NCCTHB as central authority coordinating the efforts of multiple players at National level.

Swiss added value and benefits to Swiss partner institutions

We find the conclusion of the evaluation with regards to Swiss added value and the benefits to Swiss partner institutions as very relevant. SDC believe that the level of satisfaction of partners is mainly due to the SIB constant support to the Swiss and Bulgarian parties.

Peer reviews performed by respective Swiss counterparts/homologs that were endeavoured under few of the projects (Stolen vehicles, Forensic, Polygon) proved to be instrumental in understanding how the Bulgarian systems function and where the Swiss expertise can be targeted best. To streamline mutual benefits in project implementation, it would be beneficial to consider “early matching exchanges” between Swiss and Bulgarian homologs active in different sub-sectors of the security and justice sectors, as recommended by the evaluation.