EUROPEAN
COMMISSION

Brussels, 29.6.2017
SWD(2017) 249 final

COMMISSION STAFF WORKING DOCUMENT

eu-LISA EVALUATION

Accompanying the document

Report from the Commission to the European Parliament and the Council

on the functioning of the European Agency for the large-scale IT systems in the area of Freedom, Security and Justice (eu-LISA)

{COM(2017) 346 final}
{SWD(2017) 250 final}

CONTENTS

1. INTRODUCTION

The European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (eu-LISA) was set up to provide a long-term solution for the operational management of large-scale IT systems in this area. The Agency is currently responsible for the operational management of the following IT systems: second generation Schengen Information System (SIS II), the Visa Information System (VIS) and Eurodac.[1]

This Staff Working Document is based on the final evaluation report issued by an external contractor (Ernst and Young — EY)[2] and summarises the findings of the external evaluation of the action of eu-LISA since it took up its core tasks in December 2012. It also outlines the possible impact of the evaluation on the applicable legal framework, in particular on the eu-LISA establishing Regulation.

1.1. Purpose and scope of the evaluation

The purpose of the evaluation is laid down in Article 31 of Regulation (EU) 1077/2011 of the European Parliament and of the Council of 25 October 2011 establishing the European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice[3] (hereinafter referred to as the establishing Regulation). The Regulation stipulates that, 'within 3 years from 1 December 2012, and every 4 years thereafter, the Commission, in close consultation with the Management Board, shall perform an evaluation of the action of the Agency'.[4]

In accordance with Article 31(1), the evaluation must:

i) examine the way and the extent to which the Agency effectively contributes to the operational management of large-scale IT systems in the area of freedom, security and justice and fulfils its statutory tasks; and
ii) assess the role of the Agency in the context of a Union strategy aimed at a coordinated, cost-effective and coherent IT environment at Union level.

---

1 The system for comparing fingerprints of asylum seekers and some categories of illegal immigrants, which facilitates the application of the Dublin Regulation.

2 Independent external evaluation of the European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice - eu-LISA, Final evaluation report, March 2016; http://bookshop.europa.eu/is-bin/INTERSHOP.enfinity/WFS/EU-Bookshop-Site/en_GB/-EUR/ViewPublication-Start?PublicationKey=DR0 116464.

3 OJ L 286, 1.11.2011 p. 1.

4 Article 31 of Regulation (EU) No 1077/2011 of the European Parliament and the Council of 25 October 2011 provides in paragraph 1 that 'W*ithin 3 years from 1 December 2012, and every 4 years thereafter, the Commission, in close consultation with the Management Board, shall perform an evaluation of the action of the Agency. The evaluation shall examine the way and extent to which the Agency effectively contributes to the operational management of large-scale IT systems in the area of freedom, security and justice and fulfils its tasks laid down in this Regulation. The evaluation shall also assess the role of the Agency in the context of a Union strategy aimed at a coordinated, cost- effective and coherent IT environment at Union level that is to be established in the coming years*'. Paragraph 2 provides that 'O*n the basis of the evaluation referred to in paragraph 1, the Commission, after consulting the Management Board, shall issue recommendations regarding changes to this Regulation, also in order to bring it further in line with the Union strategy referred to in paragraph 1. The Commission shall forward those recommendations, together with the opinion of the Management Board, as well as appropriate proposals to the European Parliament, the Council and the European Data Protection Supervisor'.*

Paragraph (2) of Article 31 further states that, on the basis of the present evaluation, the Commission, after consulting the Management Board, will issue recommendations regarding possible changes to the Regulation.

The evaluation examined the implementation of eu-LISA's tasks, taking into account the relevant legal and policy framework, i.e. the eu-LISA establishing Regulation and the legislative instruments that govern the IT systems the Agency operates at central level. Given that no formal Union strategy has been put in place, the evaluation focused on the Agency's contribution to the establishment of a coordinated, effective and coherent IT environment for managing large-scale IT systems that support the implementation of Justice and Home Affairs (JHA) policies.

In addition to assessing whether the Agency has fulfilled its current statutory tasks, the evaluation also assessed the extent to which eu-LISA has efficiently implemented the new tasks that it assumed in 2013 and 2014. This includes VISION[5] and DubliNet[6], which are the communication tools that allow central visa authorities to consult on visa applications (VISION) and ensure the exchange of information for the effective application of the Dublin Regulation by the Member States (DubliNet).

The evaluation also looked into the way in which eu-LISA has organised and implemented ad hoc projects such as the 2015 pilot on the Smart Borders proposals, which was entrusted to it by way of a delegation agreement.[7] It also looked into major evolutions of existing systems under its management, e.g. the Biometric Matching System (BMS) or the Eurodac Recast.[8]

The evaluation also examined how eu-LISA's role, work and/or organisation could be adapted and improved, with the possible need for revision of or extension of the tasks entrusted to it in the Regulation.

In line with the Commission's Guidelines on Better Regulation[9] the evaluation was conducted by assessing eu-LISA's action against the following criteria: effectiveness, efficiency, coherence, relevance and EU-added value.

2. BACKGROUND TO THE INITIATIVE

2.1. Objective of the initiative — eu-LISA

As stated in the impact assessment that accompanies the Regulation, eu-LISA was set up to achieve synergies by ensuring the operational management of large-scale IT systems in a

[5] Service level agreement on the temporary modalities of cooperation between the Member States and Iceland, Liechtenstein and Norway using VISION, represented by the Presidency of the Council of the European Union and the European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice, signed on 27 May 2013.

[6] Service level agreement between the European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice and the services of the European Commission (DG HOME) for the transfer of the technical support for the operational management of DubliNet to eu-LISA, signed on 31 July 2014.

[7] Delegation agreement between the European Union represented by the European Commission, represented for the purposes of signing this delegation agreement by Matthias Ruete, Director General, DG Migration and Home Affairs and the European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice represented by Krum Garkov, signed on 14 January 2015.

[8] Regulation (EU) No 603/2013 of the European Parliament and of the Council of 26 June 2013, L18 0, 29.6.2013, p. 1.

[9] COM(2015) 111 final.

single entity, benefitting from economies of scale, creating critical mass and ensuring the highest utilisation rate of capital and human resources.

The Agency began operations on 1 December 2012. The Agency's seat is Tallinn, Estonia, whilst its operational data centre is in Strasbourg, France. There is also a backup site in Sankt Johann im Pongau, Austria.

Apart from the three systems it currently manages, its establishing Regulation specifies that eu-LISA may also be made responsible for the preparation, development and operational management of other large-scale IT systems in the area of freedom, security and justice, only if so provided by relevant legislative instruments based on Articles 67 to 89 TFEU.[10]

Since it was established, eu-LISA has taken on tasks other than those envisaged in the legislative instruments on the systems or in the establishing Regulation, such as DubliNet and VISION. It also carried out a Smart Borders pilot project in 2015 in order to help the Commission prepare for the revised Smart Borders initiative. This resulted in particular in the new proposal for a Regulation for an Entry/Exit System (EES).[11] In accordance with Article 1(3) of the establishing Regulation, the EES proposal envisages eu-LISA taking on the development and operational management of the EES.

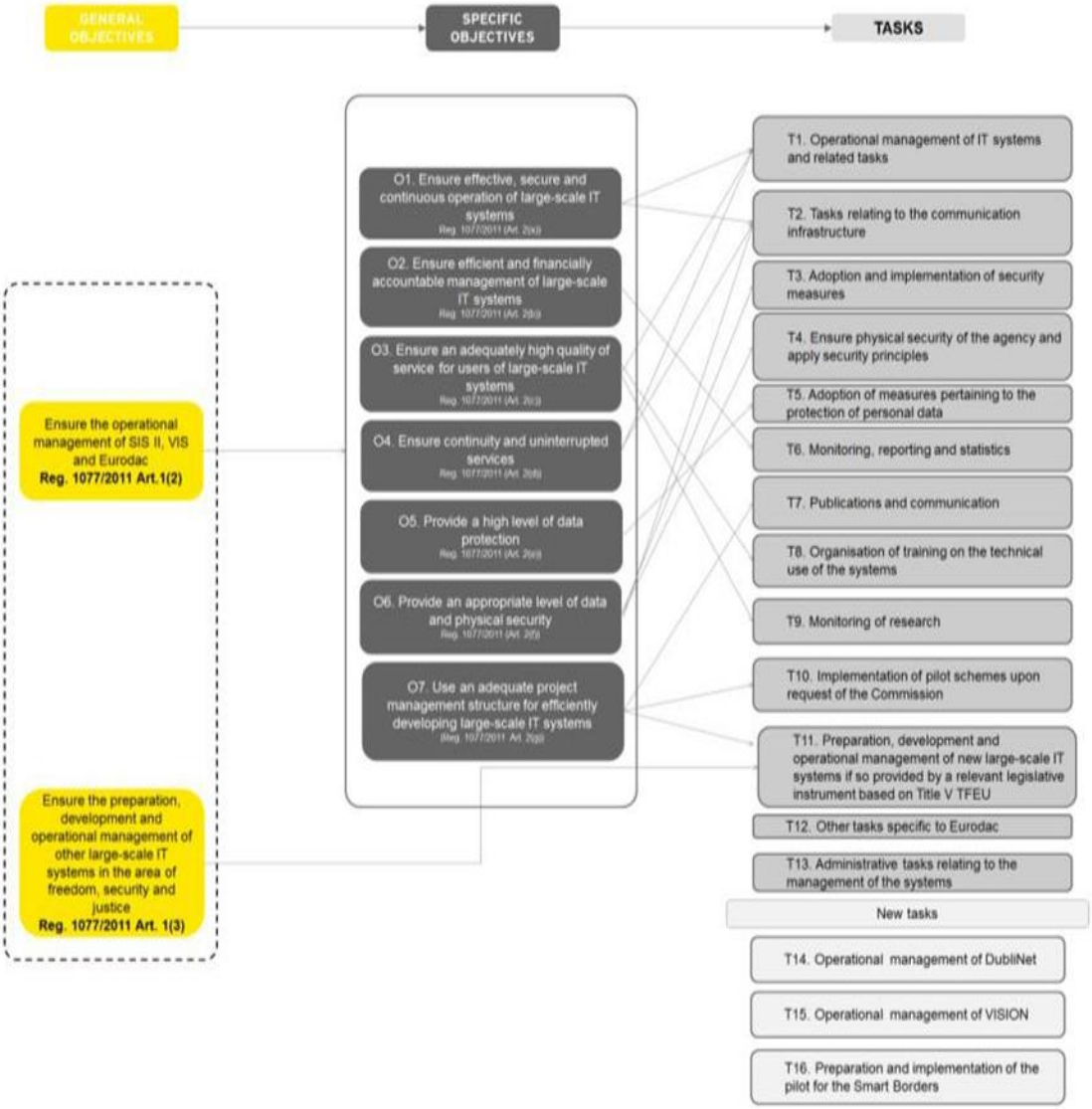
2.2. Intervention logic

For the purpose of the evaluation, a detailed analysis was carried out identifying the Agency's objectives (general/specific) and tasks and the links between them. This intervention logic is based on the Regulation establishing the Agency as well as the relevant Regulations and Decisions that govern the systems under its operational management. A detailed analysis was carried out that identifies the Agency's objectives (general/specific), tasks and the links between them.

The diagram below depicts the intervention logic. The tasks can be considered 'macro-tasks', which can be broken down into several more detailed specific tasks entrusted to eu-LISA by the applicable legal framework. These specific tasks which are not illustrated in the diagram have been examined by the external contractor in Annex 10 of the final evaluation report. The fulfilment of these tasks is assessed later on in the chapters on effectiveness and efficiency.

[10] 'The Agency may also be made responsible for the preparation, development and operational management of large-scale IT systems in the area of freedom, security and justice other than those referred to in paragraph 2, only if so provided by relevant legislative instruments, based on Articles 67 to 89 TFEU, taking into account, where appropriate, the developments in research referred to in Article 8 of this Regulation and the results of pilot schemes referred to in Article 9 of this Regulation.' (Article 1(3) of the Regulation).

[11] Proposal for a Regulation of the European Parliament and of the Council establishing an Entry/Exit System (EES) to register entry and exit data and refusal of entry data of third country nationals crossing the external borders of the Member States of the European Union and determining the conditions for access to the EES for law enforcement purposes and amending Regulation (EC) No 767/2008 and Regulation (EU) No 1077/2011. COM(2016) 194 final of 6.4.2016.



On the basis of the intervention logic, the Commission defined the evaluation questions in close cooperation with eu-LISA (and the Agency's Management Board). EY then supplemented them with additional questions to ensure that all evaluation criteria and all components of the intervention logic were covered.

A detailed analytical framework was then developed. Precise evaluation criteria, indicators and descriptors were identified for each evaluation question (for details, see Annex 3 of the annexes of the final evaluation report) as well as the underlying sources of data. The exceptional cases where the indicators could not be analysed (e.g. due to the lack of Service Level Agreements, indicators and data quality controls used for incident management) were duly reported, and corresponding recommendations were made in the final report.

2.3. Baseline – situation before December 2012

Before a dedicated Agency was created, the Commission was in charge of the development and management of Eurodac and VIS. The Commission also developed SIS II.

However, the legal instruments that establish SIS II and VIS entrusted the Commission with the operational management of the systems for a transitional period only, with the possibility to delegate operational management and tasks related to the implementation of the budget to

national public sector bodies in two Member States. The same legal instruments also established the location of the central systems in Strasbourg (France), with a backup in Sankt Johann im Pongau (Austria). However, they did not establish which specific entity (a management authority funded from the general budget of the European Union) should be responsible for long-term management.

A long-term management solution for SIS II, VIS and Eurodac was needed. Five policy options[12] were analysed, and the creation of a dedicated regulatory agency was chosen as the most efficient solution.[13]

The first evaluation of eu-LISA is the first opportunity to gauge the extent to which the objectives of the long-term solution have been met and to what extent eu-LISA has achieved its mandate.

3. MAIN EVALUATION QUESTIONS

In accordance with the terms of reference, the evaluation aimed to formulate findings, conclusions and recommendations, in particular to answer the following questions:

- Whether changes to eu-LISA's legal framework should be considered and, if so, which? and
- Whether other structural, organisational or staffing changes and/or changes to eu-LISA's working practices and administrative documents, which do not require amendments to its legal framework, should be considered and, if so, which?

Specific evaluation questions were formulated in the terms of reference and adapted to the intervention logic. For details on these questions and replies to them, see Chapter 6.

4. METHOD

4.1. Timeline and steering

The evaluation covered the period from 1 December 2012 to 30 September 2015, and took into account two issues: first, that the Agency took over its core tasks in December 2012[14], and second, the completion of the Smart Borders pilot project in September 2015.

The fieldwork and data collection phase ran from March to September 2015, with additional ad hoc data collection on specific questions, such as financial management or matters related to data protection, in late 2015 and early 2016. The deliverables of the contractor consisted of:

- the inception report;
- two progress reports;
- the draft final report and the final report and its annexes; and
- two presentations to the eu-LISA Management Board (March and November 2015 meetings).

[12] 1) The Baseline option (i.e. the Commission fully responsible for Eurodac and shared responsibilities for SIS II and VIS with two Member States); 2) The Baseline + option (shared responsibilities between the Commission and two Member States for SIS II, VIS and Eurodac); 3) New Regulatory Agency, which would assume responsibility for the long-term management of SIS II, VIS, and EURODAC; 4) Handing over the management of the three systems to FRONTEX; 5) The Commission for VIS and Eurodac, and Europol for SIS II.

[13] For details, refer to the Impact Assessment accompanying the proposal for a Regulation establishing a European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice, SEC(2009) 837.

[14] eu-LISA took over VIS on 1 December 2012, SIS II in May 2013 and Eurodac in June 2013.

Each deliverable was the subject of online consultations via SharePoint and meetings involving a dedicated Inter-Service Steering Group (ISSG) that supported the evaluation and was made up of the representatives of relevant Commission departments (DG HOME, DG JUST (+SRD), DG HR, DG BUDG, DG DIGIT, DG CNECT, Secretariat-General, Legal Service). A Steering Committee chaired by the Commission then reviewed and approved all deliverables submitted by the contractor. The Steering Committee was composed of three representatives of the Commission/DG HOME, two members of the eu-LISA Management Board (delegates of Estonia and Finland) and one eu-LISA representative.

The contract between the Commission and EY was scheduled to run from March to December 2015 but the evaluation exercise proved to be too complex for the contractor to deliver the required quality within this timeframe. To perform all the tasks, a thorough analysis of both the complex legal framework of this Agency, as laid down in the systems' legislative instruments and in the establishing Regulation and its functioning was needed. In addition, the two monitoring bodies (the Steering Committee and ISSG) that closely followed the evaluation provided valuable feedback for the contractor, who needed time to ensure the appropriate follow-up.

All these objective factors led to more review cycles and to the overall project schedule being updated, resulting in the contract being extended to 30 March 2016. However, there was no financial impact on the EU budget.

4.2. Consultation (information sources)

The methodology took into account the views of relevant stakeholders at European and national level. Different data collection tools, an e-survey and interviews were used to consult the following stakeholders in particular:

- EU institutions (European Commission, European Parliament, Council of the European Union, European Court of Auditors) and the European Data Protection Supervisor;
- eu-LISA stakeholders (Management Board and Advisory Groups, external contractors);
- National competent authorities (authorities responsible for/with access to SIS II, VIS and Eurodac at national level) in Member States, Schengen and Dublin/Eurodac Associated Countries (Iceland, Liechtenstein, Norway, Switzerland);
- EU agencies active in the JHA field (Eurojust, Europol, CEPOL, EASO, FRA, EBCGA) and ENISA.

The eu-LISA staff and management were also interviewed to ensure that the experience and views of the Agency were duly taken into account.

In all, 50 interviews were conducted with eu-LISA staff in Tallinn and Strasbourg, as well as 47 interviews with other stakeholders (European Commission, European Parliament, Council, European Court of Auditors, European Data Protection Supervisor, eu-LISA Management Board and Advisory Groups, EU agencies).

The e-survey sent to the eu-LISA Management Board and Advisory Group members had a 50 % response rate, with 92 replies in total.

In addition, the contractors observed one Management Board meeting and three Advisory Group meetings.

An extensive document review and five thematic project case studies were also carried out. For details, see Annexes 4, 5, 9 and 12 to the final report.

4.3. Evaluation risk assessment

A number of risks were identified for the evaluation, as detailed in the inception and progress reports. Appropriate mitigation measures were identified for each risk, including the parties responsible for implementing the corrective measures.

The most significant risks were identified and ranked in order of impact and probability:

- requested documents may not exist or do not include the expected information;
- interviewees may not be able to answer questions on specific topics due to confidentiality concerns or lack of information;
- the benchmark exercise cannot be completed due to lack of data comparability and unavailability of agencies;
- stakeholders' written comments may contradict each other.

In the end, only the risks related to the unavailability of data materialised in part. This was the case for the benchmarking exercise, which failed to yield the expected results despite repeated attempts; this was mainly due to the unique nature of the evaluated entity. It proved impossible to benchmark the activities of the Agency carried out within its mandate against an equivalent organisation dealing with IT, not only at the corporate level but also at the core business level. The efforts made to obtain at least comparable data, even from other JHA agencies, were equally futile. However, it did manage to use some data collected from the Agency for benchmarking in the analysis, in particular in the assessment of cost-effectiveness.

4.4. Limitations of the evaluation

- Approach limitations for assessment criteria

The terms of reference for the external evaluation provided that '*eu-LISA's activities and in particular its core tasks of the operational management of SIS II, VIS and Eurodac, shall be evaluated taking into account the evaluation criteria*'. When responding to the questions relating to effectiveness and efficiency, it was possible to evaluate, in many instances, eu-LISA's specific tasks due to their direct link to the Agency's objectives. However, on coherence, relevance and added-value, it was not possible to evaluate each individual task in turn as questions relating to these evaluation criteria related primarily to the Agency's overall activities. The evaluation therefore assessed eu-LISA's overall activities against these criteria.

- Approach limitations for assessment of security

The security requirements described by the legal instruments governing the Agency and the systems under its responsibility can be categorised in three levels as follows:

- Security controls and measures that must be implemented in technical terms in the systems;
- Security requirements related to the management of the systems; and
- Security requirements related to the organisation of security functions and roles in the Agency.

EY was able to evaluate the effective implementation of the security controls and measures that must be technically implemented in the system (level 1), with the exception of the requirements that would have involved the evaluation team accessing the systems for testing, which was not legally possible. In addition, EY failed to share all the details of the methodology that applied to the IT and physical security assessment (as specified in Annex 7 of the final evaluation report) with the Steering Committee.

- Data availability (confidentiality of documentation)

The high level of criticality and confidentiality of some documents prevented access to all the requisite documents. However, the triangulation of data that was gathered allowed coverage, with a few exceptions, of all the indicators and descriptors. Where the confidentiality of documentation impacted the provision of an answer to the evaluation questions, this was indicated in the final report. In addition, the evaluators received security clearance in order to ensure that documentation that was inaccessible due to security concerns could be accessed as appropriate.

It is also worth noting that the restrictions due to confidentiality were not significant. Of the 157 documents required for the evaluation, only three[15] were not provided due to reasons of confidentiality.

A distinction between documentation not available due to confidentiality and non-existence is provided in the annexes to the final report (Annex 5).

- Detail and quality of reports

The current eu-LISA budgeting system does not allow a systematic comparison of costs versus individual tasks. This limited the extent to which the evaluation could draw conclusions on cost effectiveness.

5. IMPLEMENTATION STATE OF PLAY (RESULTS)

5.1. State of play

The Agency took up its core tasks on 1 December 2012 and gained financial independence in May 2013. The seat agreement with the Estonian government was signed in November 2014 and became applicable on the same date.

The site agreements with Austria and France were signed in May 2013 and December 2013 respectively and entered into force on 13 October 2013 and 28 August 2016 respectively. By March 2016, 12 Management Board meetings had been held. In principle, four sessions of each Advisory Group (AG) (for SIS II, VIS and Eurodac) are organised per year, resulting in 15 regular meetings of SIS II AG and 16 meetings of VIS and Eurodac AG by March 2016. An extraordinary ad hoc meeting of all three AGs was held in late February 2016 to discuss the 2017 draft annual work programme.

On the basis of the annual work programmes and the annual activity reports of eu-LISA or the European Court of Auditors' discharge reports, the evaluation confirmed that although still a work in progress, eu-LISA has already reached 'cruising speed'. Against the background of ever-changing developments in the JHA area and budgetary restrictions, the Agency gradually took up its responsibilities with increasing success. It also took a proactive approach to developing a constructive relationship with the stakeholders, handled new tasks efficiently and further explored the potential to fulfil its 2014-2020 strategy.[16]

While acknowledging that the Agency made a successful start, the evaluation also identified room for improvement under all evaluation criteria**.**

[15] List of ITIL certified staff; List of PRINCE 2 certified staff; Report of the last Business Investments Committee (BIC).

[16] eu-LISA Strategy 2014-2020 as set out in Document 2014-029 adopted by the eu-LISA Management Board of 11-12 March 2014, http://europa.eu, ISBN 978-92-95203-04-4.

5.2. Cooperation with the main stakeholders

eu-LISA was clearly instrumental in meeting the needs of the Member States by guaranteeing operational management at central level. Judging by the outcome of the evaluation, the level of satisfaction with eu-LISA's performance among Member States can be considered positive, with implementation of the Eurodac recast deemed exemplary. However, the evaluation also established that the Agency could make better use of the expert potential of the Advisory Groups, in particular through adequate consultation both in terms of content and timing on the programming documents. With cooperation progressively developing, certain legal and resource constraints to strengthening the practical cooperation between the Agency and the Member States were identified.

The **Commission** plays a dual role in the governance of the Agency, both as a Member of the Management Board and the Advisory Groups and as an EU institution. As a result, the relationship between the Commission and the Agency is relatively complex. The rules on the cooperation mechanisms between the Commission and eu-LISA were developed in the Memorandum of Understanding required by the establishing Regulation and signed on 18 June 2014.[17]

To ensure coordinated action, a video conference takes place every 2 weeks between the Agency and the partner Directorate-General (DG HOME). Whilst cooperation is generally satisfactory and mutually beneficial, some issues for concern were identified, in particular on reporting and research monitoring. While reporting done by the Agency on implementation of its annual work programme at the start of its operations was deemed insufficient in terms of transparency, coherence and frequency, there was a gradual improvement in 2014 and 2015. However, there is still room for improvement. Both the preparation and content of eu-LISA programming documents could be improved and strictly aligned with its mandate in line with the Commission's opinions. They should also be clearer. The Agency must also ensure that its monitoring of research activities is closely coordinated with its main stakeholders. There has also been the occasional inconsistency between the Agency's interventions and the Commission's policy line (e.g. intervention in the European Parliament on sensitive policy matters without prior coordination with the Commission).

Both **Europol** and **Eurojust**, which are observers in the Management Board and the Advisory Groups as well as end-users of SIS II, were satisfied with the support provided by the Agency. However, although Europol legally has access to VIS and Eurodac, it had still not connected to these systems by the end of the evaluation, despite eu-LISA's readiness to assist with the necessary technical implementation.

On overall **inter-agency cooperation**, eu-LISA has so far concluded working arrangements that cover common fields of interest and seek possible synergies with CEPOL (2013), FRONTEX (now EBCGA) (2014) and EASO (2014). During the evaluation, eu-LISA also made progress on negotiations for a similar working arrangement with Europol (signed on 22 March 2016). In 2015, eu-LISA successfully chaired the JHA Agencies network.

[17] Commission Decision of 11 June 2014 on the adoption of a Memorandum of Understanding between the European Commission and the European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice C(2014)3486 final.

6. FINDINGS — ANSWERS TO THE EVALUATION QUESTIONS

6.1. Effectiveness

The aim of this criterion was to assess the extent to which eu-LISA achieved its objectives as described in the intervention logic.

6.1.1 To what extent has eu-LISA been effective in ensuring the operational management, technical development and security of large-scale IT systems in the JHA area entrusted to it, and their improvement?

The evaluation found that the Agency had achieved its objective of ensuring effectively the operational management of the three IT systems entrusted to it in general. According to the findings of the evaluation, the Agency:

- successfully fulfilled the tasks stemming from the Agency establishing Regulation;
- met the Service Level Agreements put in place;
- correctly implemented the evolution of the systems; and
- met the requirements from security, data protection and industry best practices.

The Agency also established the appropriate capacities and organisational framework to cope with tasks related to the evolution of systems under its responsibility (ITILv3, Prince2, ISO 2700x[18]).

The evaluation also identified ways to improve, in particular on the implementation of ITILv3 best practices. While the Agency made progress on this (e.g. by establishing appropriate project management tools for projects such as VIS Evolutions, Testa-NG), there is still work to be done. For example, the performance of implemented IT processes could be better monitored and the scope of performance indicators, currently limited to corporate business performance, should be extended to cover the performance and functioning of the systems

The evaluation highlighted a risk to business continuity linked to the absence of a unique and transversal Disaster Recovery Plan (DRP) and Business Continuity Plan (BCP) that covers all three systems (e.g. personnel, facilities, resources etc.). This risk was identified by the Agency and was being addressed by an ongoing project during the evaluation period. Although there is a DRP and BCP for each system, the Agency should ensure that all possible scenarios (e.g. necessity to transfer all three systems to the backup site at the same time) are taken into account when defining them at organisational level.

On capacity management, the evaluation confirmed, by means of the VIS evolution case study, the need for the Agency to establish and formalise a review process that allows for a regular review with Member States of the systems' capacity needs based on the statistics generated by the systems and a forward-looking exercise.

On IT security, the evaluation identified the need to implement a cross-functional architecture management function tasked with:

- validation of infrastructure choices;
- selection of application technology; and

[18] As part of the IT best practices framework, **ITILv3** emphasises the concept that IT is a service that supports business goals. **Prince 2** (PRojects IN Controlled Environments) is a process-based method for effective project management recognised and used internationally. **ISO 2700x** is a series of standards/objective benchmarks that provide a comprehensive set of security-related topics and objective means for measuring compliance.

- implementation at transversal level rather than at system level.

There is a need for a common strategy and roadmap for improving the integration of secure architecture principles into all three systems to reduce security-related risks.

On data protection, there is a need to ensure that appropriate data protection clauses are included in the agreements concluded with external contractors. The evaluation also identified concerns about the production of additional statistics and data quality/data analysis reports. The evaluation therefore highlighted the need to provide the possibility for eu-LISA to produce additional statistics, data quality/data analysis reports in a future amendment of the current legal framework. It also identified the need to reinforce the data protection capacity in Strasbourg by either transferring the Data Protection Officer (DPO) from Tallinn to the technical site or appointing a deputy DPO there.

On eu-LISA's obligations for the production of documents and reports, the Agency should increase the quality control carried out on the documents/reports delivered.

6.1.2a. To what extent has eu-LISA been effective in monitoring research?

The task given to eu-LISA of monitoring of research is deemed appropriate and necessary for the effective and efficient functioning of the Agency and development of the systems. However, no clear examples of its impact could be identified due to the low level of maturity of this activity during the Agency's first years of operation. The Agency identified the importance of monitoring research and acknowledged, in its 2015 work programme, that greater effort should be made to feed the results of the activity into the operational management of the systems.

The evaluation also found that efforts need to be made to ensure that synergies are created with other entities in this area, including the Commission. This would apply in particular to coordination with the Commission's research programmes. An example of wasteful duplication of effort is in the research monitoring activities on biometric identifiers. The Agency issued a report on this in 2015 due to its links with the systems it manages, although specific research activities have already been developed in the area of biometrics under Horizon 2020 and other research programmes.

6.1.2b. To what extent has eu-LISA been effective in providing training?

Since it was established, the Agency has made laudable efforts to develop appropriate training activities, both technical and practical, in line with the needs of national authorities. National contact points (NCP), which consist of Member State representatives, prepare the training strategy each year.

The evaluation found that training needs to be aligned further with the technical needs. However, this could in part be due to the passive participation of the relevant stakeholders (e.g. the Advisory Group and the NCPs) in developing the training strategy, despite the Agency's efforts to keep them involved.

6.1.2c. To what extent has eu-LISA been effective in its tasks particular to Eurodac relating to transmission, collection and comparison of data, access to and correction or erasure of data?

Since eu-LISA took over Eurodac, it has been effective in its tasks, specific to the system, with processes and procedures put in place to control the effective transmission of data as well as the comparability of fingerprints sent by the Member States.

6.1.3 To what extent has eu-LISA been capable to respond to the new tasks entrusted to it?

The Agency has demonstrated its capabilities in responding to new tasks entrusted to it. On DubliNet and VISION, the Agency successfully ensured the effective integration and management of these operational tasks. While the Agency was successful, no formal reporting currently exists in terms of the impact on the Agency's resources for assuming these tasks.

On the Smart Borders pilot project, the Agency was effective in implementing the technical aspects and assisting the Member States in performing tests. The implementation of the pilot also showed that the Agency staff in charge should have been trained in financial management in relation to EU grants management. Another lesson learned from the pilot is to ensure that the Agency develops sufficient project management and development capacity so that the different systems always receive the attention they need and new projects do not rely on ad hoc reshuffling of staff and priorities.

6.1.4 To what extent has eu-LISA been successful in establishing partnerships and looking for synergies with other EU agencies and in building strong and trusting relations with its stakeholders when operating and maintaining the systems under its mandate?

eu-LISA has developed adequate strategies and working practices to ensure a sufficient level of communication with key stakeholder groups. This enables the Agency in particular to ensure that the allocation of roles and responsibilities at EU and national level is respected. The Member States' level of satisfaction appears high, and the relationship with the Commission is also deemed adequate. The organisational structure of eu-LISA facilitates communication and discussion through the Management Board and Advisory Groups, although the potential of these bodies, in particular the latter, could be better exploited in the future.

Since it was established, the Agency has developed cooperative and effective relationships with other JHA agencies. By the end of the evaluation period, it had signed three working arrangements that formalise cooperation with other EU agencies (CEPOL, FRONTEX (now EBCGA), EASO). This cooperation was considered a success in the evaluation, with the synergies helping to fulfil eu-LISA's tasks (i.e. cooperation with FRONTEX (now EBCGA) on the Smart Borders pilot project). However, the Agency establishing Regulation provides a limited mandate for such cooperation. As a result, when developing cooperation with other JHA agencies within the scope of its mandate, eu-LISA should take all necessary steps to ensure that it gives priority to its core business which is the operational management of the systems.

6.2. Efficiency

The aim of this criterion was to assess the costs (financial, staff, time, expertise) directly incurred by the Agency to achieve results, and also the way resources are allocated and managed.

6.2.1 To what extent has eu-LISA been efficient in implementing the tasks set out in its mandate as laid down in the Agency establishing Regulation?

Since it was established, the Agency has undertaken significant work to align its functions, operations and internal processes with the management of an IT framework. eu-LISA introduced changes to the operational department in order to identify and introduce operational synergies.

The evaluation found that there is a need for a review of how staff resources are allocated in certain areas which are not considered as the core task of the agency (e.g. cooperation with agencies and other EU bodies, communication with industry) in order to ascertain whether it

is in proportion to the objectives and whether some resources should be reallocated. The evaluation also found (e.g. case study on Eurodac Recast) that there was a need to put appropriate controls in place to ensure that sufficient staff resources are available for project management based on project needs.

6.2.1a To what extent did external factors influence the efficiency of the Agency?

While the evaluation found that the Agency faced issues due to external factors (recruitment in Tallinn, lack of synergies in system procurement due to the Agency being tied to existing contracts), it is expected that the second problem will be resolved over time, with procurement and contracting arrangements eventually falling into line with the Agency's approach (i.e. concluding contracts that cover all three systems).

6.2.1b To what extent are the internal and external mechanisms for monitoring, reporting and evaluating eu-LISA adequate for ensuring accountability and an appropriate assessment of the overall performance of eu-LISA?

The Agency has gradually improved reporting on the implementation of its annual work programmes. However, the evaluation identified a need for the Agency to further improve the quality of its reporting in order to ensure transparency of the Agency's overall performance, with issues identified on the accountability and transparency of the Agency's activities in its reports (e.g. difficulties in identifying links between the work planned in the work programme and that actually undertaken in the annual activity report).

6.2.2 Were the annual budgets of the Agency implemented in an efficient way and with a view to achieving results?

With regard to budget execution in 2013 and 2014, the evaluation found a low execution level of annual commitment appropriations in 2014. Considerable progress was made in 2015 compared to 2014 in achieving the target level of execution in general, i.e. on both the commitments and the payments. On payment execution, a gradual improvement was noted over the whole evaluation period. Nevertheless, the Agency should continue to develop its planning capacities, allowing more detailed work programmes to be developed in particular in terms of their multi-annual dimension (activities and related financial estimates) and a close follow-up of the implementation process.

6.2.3a To what extent are eu-LISA's organisational solutions, HR and procedures adequate for carrying out the work entrusted to it and the actual workload?

EU-LISA should make use of the flexibility that exists in the Staff Regulations of Officials and other Servants of the Union on recruitment grades, judging on a case-by-case basis when the recruitment of highly skilled and sought-after staff justifies the use of this flexibility. The evaluation underlined that anticipating changes in the Agency's workload and new tasks is crucial to allow enough time to adapt existing resources and deploy additional means where necessary.

However, it has been underlined by the external evaluation and on the basis of the execution of the case study on the Smart Borders pilot in particular that if eu-LISA were to be entrusted with the development of any new large-scale IT system or additional tasks, the current level of resources and the required staff profiles would need to be adapted accordingly as eu-LISA was initially staffed to operate three systems, not to develop new ones.

6.2.3b Is the planning cycle of the Agency (annual work programme and budget) in line with the objective of achieving efficient results?

The evaluation found that the process of preparing the annual work programme and budget is adequate as the Agency introduced adequate and appropriate accounting practices and

systems. However, there is a lack of foresight due to the current lack of a detailed multi-annual work programme which, in accordance with Article 32(1) of the Commission delegated Regulation (EU) No 1271/2013[19] and of the Agency's Financial Regulation, should be incorporated in the single programming document. Some improvements should be made, such as:

- involving the stakeholders earlier in the process; and
- strengthening alignment with the budget and the multi-annual work programme.

To this end, eu-LISA should swiftly adopt a detailed multi-annual work programme, as envisaged in the establishing Regulation, to ensure effective planning by the Agency. In addition, the Agency should carry out systematic ex-ante and ex-post evaluations of programmes and activities that entail significant spending as required by Article 29.5 of the Commission delegated Regulation (EU) No 1271/2013 and of the Agency's Financial Regulation.

6.2.3c To what extent has eu-LISA succeeded in building up the in-house capacities for handling various tasks entrusted to it?

While the organisational set-up and internal processes are still evolving, the evaluation found that these are properly structured and described. The Agency has been able to identify solutions to carry out the assigned tasks. This was observed in particular in the project case studies (e.g. Smart Borders pilot project, Common Shared Services Studies). On new tasks, the Agency has dealt with these efficiently reallocating staff internally, prioritising tasks and limiting or reducing the effort on implementation and subcontracting.

However, it may be difficult to deal with such challenges in the future if new responsibilities that cannot be handled by existing internal resources are allocated.

On subcontracting, the evaluation found that there is a need for a formal and transverse sourcing strategy as well as for internal staff to closely manage the work carried out by external contractors.

6.2.4 Do eu-LISA's processes and procedures successfully contribute to the efficiency of its operations?

The Agency has made laudable efforts to set up the appropriate policies, processes and procedures that allow it to govern structure and organise its operations and deliver the required level of service. This was seen, for example, in the implementation of the project on the Common Shared Services Study.

The evaluation found a need for the implementation of a quality management system aimed at updating and reviewing all processes, policies and procedures on a regular basis.

In the case studies undertaken for the evaluation, a need was also identified to ensure availability of complete and sufficiently transparent documentation that deals with all aspects of project management (VIS Evolutions).

[19] Commission delegated Regulation (EU) No 1271/2013 of 30 September 2013 on the framework financial regulation for the bodies referred to in Article 208 of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council.

6.2.5 To what extent has eu-LISA's governance, organisational structure and locations, as created by the Agency establishing Regulation, been conducive to its efficiency and to achieving economies of scale?

No major changes are needed to the current governance system. There is room for improvement in the active participation of Advisory Group members in providing expertise to the Agency on the operational management of the three IT systems. The Management Board functions efficiently, with no major changes required to current practice. Nevertheless, current use of the written procedure may in some cases fail to ensure that issues are given sufficient attention. In addition, the evaluation found (i.e. case study on Common Shared Service Study) that the Agency could potentially improve its level of communication on progress related to projects.

On multi-site arrangements, the evaluation found that the geographical dispersal of eu-LISA has an impact on the efficient implementation of eu-LISA's tasks and responsibilities. It generates costs that would not have been incurred had the Agency been established on just two sites (technical and backup), necessary due to security reasons. While direct and indirect costs exist, these are considered justified and reasonable. Since the political reasoning associated with the establishment of the seat in Tallinn also continues to be relevant, the evaluation concluded that the justification for the current multi-site arrangement is still valid. For more details, please refer to point 4.9.3 of the final report.

6.3. Coherence

The aim of this criterion was to examine the extent to which eu-LISA cooperation activities are aligned in an effective way with those of stakeholders, including Member States and Associated Countries, the European Commission, the other EU institutions and EU bodies, to ensure complementarity and avoid duplication of effort. The evaluation also assessed the alignment of strategies, the coherence of cooperation activities, the risk of overlaps, the procedures in place to ensure that eu-LISA's cooperation activities are coherent with the policies and activities of its stakeholders and stakeholders' perception of the quality of the latter.

6.3.1 To what extent is eu-LISA acting in cooperation with the European Commission and other EU bodies to ensure complementarity and avoid duplication of efforts?

The Agency establishing Regulation and the Memorandum of Understanding between the Agency and the Commission provide a solid framework for effective cooperation, which is considered to be largely satisfactory. The Commission provided adequate support to the Agency during its establishment until it took over its tasks on 1 December 2012 and in the transition period, until the Agency reached budgetary independence on 22 May 2013.

The cooperation established with other EU institutions is considered to be beneficial to ensure complementarity in the implementation of EU policy and strategy, provided the cooperation remains within the mandate. The relationships developed with the private sector by way of industry-related events have created a useful platform for discussion on future needs and opportunities in relation to IT development.

The following improvements were identified:

- Coherence of the management of communication infrastructure tasks, which are divided between the Agency and the Commission, could be improved by transferring the Commission's tasks (in particular implementation of the budget, acquisition and renewal, and contractual matters) to the Agency. The Agency has the competence and capacities to cope with these tasks, which could also lead to greater efficiency;

- In addition, a risk of duplication was identified in the Agency's activities on monitoring of research with regard to the operational management of the systems. An example was the Agency's report on biometric identifiers in 2015 while other studies on biometrics had already been carried out by the Commission under the framework of Horizon 2020 and other research programmes. These should be aligned with the Commission's research work in this area and coordinated with the Commission in accordance with Article 15 of the Memorandum of Understanding; and
- The evaluation considers that the Agency could continue to develop cooperation activities (with other EU agencies) provided that they comply with the Agency's mandate and the core activities are not impacted, for example in terms of quality of service and promptness in responding or reporting.

6.3.2 To what extent is eu-LISA acting in cooperation with the Member States and Associated Countries to ensure complementarity and avoid duplication of efforts?

The evaluation found that the Agency has been largely successful in respecting the clear allocation of roles and responsibilities at EU and national level concerning its core business of managing large-scale IT systems. This stems from the clear division of responsibilities in the legal framework of the Agency, as provided in the Agency establishing Regulation and more specifically in the systems' legislative instruments. While no duplication of effort was identified, further complementarity could be possible in relation to increased interaction among Advisory Group members as well as increased involvement of the Agency in the provision and analysis of statistics and reports, including those on the data quality statistics of Member States.

6.3.3 To what extent are eu-LISA activities coherent with the strategy documents adopted in the policy field?

The evaluation found that the activities are well aligned in general with the relevant JHA policy frameworks and strategies. The coherence of the Agency's activities was confirmed through eu-LISA strategy 2014-2020. Due to the low level of maturity of this strategy, the evaluation cannot gauge its impact. However, the alignment with JHA policies is expected to continue as the strategy develops over the coming years. This should also be demonstrated by the alignment of the eu-LISA strategy with the first multi-annual work programme, which has not yet been adopted.

6.3.4. Are the procedures put in place effective to ensure that eu-LISA's cooperation activities are coherent with the policies and activities of its stakeholders?

The evaluation found that the Agency has developed a coherent cooperation strategy for engaging with different stakeholders in a structured way by adopting its stakeholder management strategy. However, no specific mechanisms are in place at Agency level for eu-LISA to ensure coherence between its cooperation strategy and its mandate.

The Agency has undertaken cooperation activities within the JHA area with EU institutions and other JHA agencies. However, greater efforts need to be made by the Agency to ensure coherence between these activities and its mandate and better coordination with the Member States and with the Commission on this topic.

6.4. Relevance and added value

The aim of this criterion was to examine the extent to which the creation of the Agency brought benefits in terms of efficiency and effectiveness compared with previous operational arrangements.

6.4.1. What have been the benefits of acting at Agency level from an operational and strategic perspective?

The establishment of a single management authority to assume operational management of the three IT systems inherently created a high level of added value, to the extent that the Agency carries out its tasks in an effective and efficient manner. The ultimate added value of eu-LISA is therefore highly dependent on its ability to fulfil its core tasks in an efficient and effective manner.

The key elements to eu-LISA's added value are the pooling of expertise, harnessing of synergies by bringing systems 'under one roof' and the creation of a more flexible operational framework.

6.4.2 To what extent has eu-LISA been more effective in achieving its results compared to other past, existing or alternative national or EU level arrangements?

By making a comparison of the costs linked to Eurodac (i.e. the only system for which such a comparison could be carried out) before and after the Agency was created, the evaluation did not identify economies deriving from its creation, with costs appearing to be higher. While the difference in costs can be explained, in some cases, by the tasks associated with the systems (i.e. training, Advisory Group meetings), an overall comparative assessment of the costs cannot be made due to a difference in how costs are recorded (e.g. for central unit and backup central unit, quality assurance, hardware and software) before and after Eurodac was handed over by the Commission to eu-LISA. The evaluation identified a lack of an internal recording process to measure all costs associated with each system.

The comparison of operational costs identified the need for clear recording of costs for each system (activity-based management) in the future in order to be able to ascertain whether efficiency gains have been achieved. The Agency should therefore ensure in the accounting system that all costs associated with each system are recorded (including staffing costs maintenance costs, evolution costs) and can be identified for each system.

6.4.3 To what extent has eu-LISA strengthened the involvement of Member States in the operational management and evolution of the systems entrusted under its mandate?

The evaluation noted positive feedback in general on the level of involvement and communication with national level stakeholders. The Agency's governance contributes to the quality of communication and involvement of national authorities, ensuring that a platform is provided to Member States to be involved in the Agency and to ensure that their needs are taken into account.

While the Advisory Groups are a relevant and valuable forum for Member State involvement, the evaluation found that the wealth of expertise within these groups could be better exploited in order to improve the quality of dialogue with national authorities. This could take place by establishing guidelines for the Advisory Groups and setting out annual key objectives for the Advisory Groups.

7. WAYS TO IMPROVE

7.1. What are the specific needs and opportunities to ensure increased practical cooperation with Member States and EU bodies?

To be able to identify the needs in the Member States on the development, operational management and evolution of the respective systems, there is a need to ensure closer cooperation and dialogue in the Management Board and the Advisory Groups, for instance on the monitoring of research or training. Another particular area of support that eu-LISA could offer the Member States could be an enhanced role for the Agency in the provision of

additional statistics and data analysis/data quality reports. The Smart Borders pilot project also demonstrated the added value of closer practical cooperation between the Agency and the Member States. On data protection, the evaluation also identified the need to develop better communication with the European Data Protection Supervisor. On the JHA agencies, the practical cooperation has proved beneficial so far, and further practical cooperation could be sought, whilst fully respecting the mandate, in order to leverage potential synergies and avoid the risk of overlap and duplication.

7.2. To what extent could eu-LISA's current mandate, tasks and/or capabilities address these needs?

Some of the tasks mentioned above, such as monitoring of research and training, are already covered by the establishing Regulation, and increased cooperation could therefore be undertaken in accordance with the Agency's mandate. However, for other activities such as those related to statistics or cooperation with other Agencies, the mandate is not explicit or does not exist at all. Similarly, on increased practical cooperation between the Agency and the Member States in relation to ad hoc support for the implementation of systems, there are clear legal and financial limitations to what eu-LISA can deliver.

In addition, the Smart Borders pilot experience pointed out the limitations that currently exist in the establishing Regulation with regard to pilot schemes.[20]

7.3. How could eu-LISA's mission, tasks, working practices or activities be further developed in order to meet these needs?

Some of the needs identified, in particular those related to monitoring of research, training or the Advisory Groups' added value, can be addressed to some extent by developing the current working practices within the Agency and enhanced dialogue with the Commission and the Member States. With regard to taking on new projects, the working practices of the Agency could be improved in order to increase internal expertise and experience on grant management. Other needs, such as cooperation with other Agencies, the provision of further statistics, data analysis and data quality reports and the provision of ad-hoc support to Member States would require a clarification and/or extension of the mandate.

7.4. How could eu-LISA increase its added value and its contribution to the EU and the Member States in the future using the capabilities and competencies already in place?

By assuming a central role in the operational management of large-scale IT systems in the area of freedom, security and justice, the Agency can provide added value due to synergies it can offer, ensuring that all systems are working as effectively and efficiently as possible. As the needs of the EU and Member States develop due to ever-changing migratory flows and internal security challenges, the Agency should ensure that the existing and future systems take into account developments in technology, in particular with regard to biometrics.

To ensure that the systems are working as effectively and efficiently as possible, the Agency could increase the interoperability of the systems while respecting the legal framework applicable to each system. eu-LISA can also provide additional added value to the EU institutions by identifying technical solutions for legislative proposals on existing or new systems. It can also provide added value to the Member States by advising on matters linked to fine-tuning their national systems.

[20] Article 9 of the Regulation.

This could be done by means of increased communication with Member States through the Management Board and the Advisory Groups or through ad hoc support.

8. OTHER IMPACTS

As was the case with the impact assessment accompanying the proposal for the establishing Regulation, the evaluation questions did not look into the social or environmental impact as it was not considered relevant to the purpose or the mandate of the Agency. The assumption that the establishment of the Agency has no significant social or environmental impact remains valid for the period covered by the eu-LISA evaluation.

Although the creation of the Agency generated some new costs and the cost effectiveness of some of the Agency's actions have not yet been fully proven, this is considered to be outweighed by the Agency's added value. This EU intervention therefore also has no significant economic or financial impact.

9. CONCLUSIONS

9.1. Main findings

In general, the evaluation provided reassurance that the Agency contributes to the operational management of large-scale IT systems in the area of freedom, security and justice and effectively fulfils the tasks laid down in the Regulation as well as new tasks entrusted to it.

It also found that by bringing the management of the three systems together, the envisaged pooling of resources and more consistent approach were effectively ensured. This therefore allowed the Agency to contribute to the establishment of a more coordinated, effective and coherent IT environment for the management of large-scale IT systems that support the implementation of JHA policies.

However, the evaluation also identified room for improvement at both the corporate and business level.

9.2. Recommendations

The recommendations corresponding to the findings are numerous and mixed in nature. Most have an organisational and financial impact, although some also have a legal impact. Altogether, the evaluation produced 66 recommendations.

In terms of significance, **seven recommendations** are considered **critical** in the area of business continuity and security (**effectiveness**), financial management and procedures (**efficiency**) and cost management (common to **coherence, relevance, added value**):

1) To prepare for the possible need to transfer all systems to the backup site at the same time, the Management Board should formally define and agree the sequence of switch-over/switch-back between the three systems. The organisation that is currently being implemented for DRP and BCP should be aligned with the operational needs of the Member States and leading industry practices, especially in terms of scope, roles and responsibilities, testing (periodicity, procedures and scenarios) and emergency procedures.
2) Since the continuity and disaster recovery of the three systems are tested separately and not at the same time, it is also recommended that the Agency defines, together with the Advisory Groups, a realistic and feasible Recovery Point Objective (RPO) and Recovery Time Objective (RTO) for each large-scale IT system.
3) To strengthen its security management competencies, the Agency should review the segregation of security duties between security staff members. Implementation,

enforcement and testing should be conducted by specific staff members to guarantee an independent approach and efficient management of all potential security risks.

4) The Agency should define and implement an activity-based management approach to improve eu-LISA's planning capabilities and reinforce transparency and accountability, as well as facilitate greater prioritisation and trade-offs by providing accurate data on costs. Technical staff should be involved in developing this approach.
5) The written procedure should not be used to enable decisions on points with a significant financial impact without prior discussion in the Management Board.
6) To improve efficiency in the Agency's activities, the communication infrastructure tasks under the Commission's responsibility should be transferred to the Agency.
7) To be able to measure the efficiency gains of the Agency, eu-LISA should ensure that all costs associated with each system are recorded and can be identified per system. This recommendation is also associated with another non-critical yet 'very important' recommendation (the Agency should consider putting in place appropriate controls to ensure that sufficient staff resources are available for project management based on project needs and that the use of in-house capacities are prioritised over outsourcing in the Agency's sourcing strategy).

The vast majority of the recommendations can be followed up at management and organisational level by way of modifications to the rules of procedure etc.

Pursuant to Article 12(o) of the Regulation,[21] the March 2016 Management Board asked the Executive Director of the Agency 'to prepare and provide for discussion an assessment for an action plan at the next Management Board meeting [in November 2016] and further to provide for discussion and adoption not later than end of March 2017 of the action plan to address the recommendations not requiring a legislative amendment.'

At the same time, the evaluation identified the possible need for revision or extension of the tasks entrusted to eu-LISA in the establishing Regulation and/or the systems' legislative instruments.

The recommendations for legislative amendments to the Agency Regulation made in the external evaluation can be summarised as follows:

- The Commission's responsibilities relating to the communication infrastructure should be transferred to eu-LISA. This amendment will also require amendments to the systems' instruments, the SIS II Security Decision and the Memorandum of Understanding between the Commission and the Agency. It will entail a transfer of the related budget.
- A new provision on the cooperation framework between eu-LISA and other JHA agencies should clarify the scope of cooperation within the eu-LISA mandate.
- A risk assessment and ex-ante assessment should be prepared for projects of more than EUR 500 000 that are carried out by eu-LISA within its current mandate (i.e. not derived from a legislative instrument that entrusts it with a new system, for which an impact assessment will be provided by the Commission).[22]

[21] 'In order to ensure that the Agency carry out its tasks, the Management Board shall: ….ensure adequate follow-up to the findings and recommendations stemming from the various internal or external audit reports and evaluations;'.

[22] As explained in the report from the Commission to the European Parliament and the Council on the evaluation of the European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (eu-LISA), this recommendation does not require a change of the Agency Regulation as Article 29.5 of the Commission delegated Regulation (EU) No 1271/2013 and of the Agency's

An interim report should be adopted by the Management Board by the end of August each year on progress made on the implementation of planned activities covering the first six months of that same year. The scope of pilot projects that can be entrusted to eu-LISA by the Commission (Article 9) should be extended. The scope is currently limited to pilot projects referred to in Article 54(2)a) of the Financial Regulation, i.e. those that may be implemented without a basic act. This should be extended at least to pilot projects with an existing basic act. The external evaluation also made other recommendations for amendments to the Agency's mandate. These should be inserted into the systems' legislative instruments and would, in principle, not require an amendment to the Agency Regulation:

- Increased responsibility for eu-LISA to generate/publish the statistics for each system.
- A new task for eu-LISA to produce data quality reports and data analysis reports.

Financial Regulation already require prior and subsequent evaluations of programmes and activities that entail significant spending.