



# **Annual Programme Report No.3 EEA Grants 2009-2014**

**Programme CZ05 – National, Regional and Local  
Initiatives to reduce Inter-Group Inequalities and to  
Promote Social Inclusion**

**Reporting period: 1.1.2015 – 31.12.2015**

**Programme Operator: Ministry of Finance**

**Programme Partner: N/A**

**Donor Programme Partner: N/A**

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## 1. Executive summary

Implementation of pre-defined project/programme was influenced by three main issues in the year 2015 – Mediterranean migration wave, Charlie Hebdo attack in January 2015 and changes in school legislation. Migration wave became the dominant topic in the Czech media and wide public discussions in spite of the fact that the migration did not massively touch the Czech Republic within its geographical borders. Hate violence was increased especially towards Muslims and Muslims became dominant group in media and social networks communication. Two major changes in school legislation were started in 2015, i.e. pro-inclusive provisions to welcome socially or health handicapped pupils in mainstream classes and obligatory preparation year for pre-school children.

The only pre-defined project “Campaign against Racism and Hate Violence” was under realization during the year 2015. The main project activity – Media campaign – progressed in excellent way. However, implementation of all other activities was delayed especially due to several rounds of tender procedures and personal changes in the project team in mid-year 2015. The project implementation period was therefore prolonged till April 2017. The programme output indicator *Number of video spots aimed at young people under 25, aired nationwide* was far more exceeded. Altogether 550 spots were aired in TV and 238 spots were broadcasted in radio within the media campaign. The project website as well as the facebook page attracted many visitors, competition of Hate Free song and many more small events were realized. Some progress towards programme outputs and outcomes was thus reported and the Programme Operator expects that all outputs and outcomes shall be reached till April 2017.

Just one modification of the programme occurred in 2015 thanks to the prolongation of the pre-defined project implementation period till April 2017. The programme ranks as the first least risky programme out of 15 programmes implemented in the Czech Republic. A positive trend in results of the risk analysis made in 2015 in comparison with those made in previous years can be seen especially thanks to the minimisation of the time risk. Owing to the prolongation of the PDP implementation till April 2017, the time risk was minimised in spite of the fact that two main risk factors related with the time were identified in 2015 – personal changes in project team and repeated tendering. Programme Operator therefore closely monitored all tender procedures and project time schedule in the monitoring reports as well as during the on-the-spot control of the project realized on 30 September 2015.

Implementation of the pre-defined project within the programme contributes to horizontal concerns and cross-cutting issues. All outputs related to the media campaign promote the respect of human rights and mediate multicultural dialogue. Within the media campaign several well-perceived activities such as e.g. campaign called “We’re in this together” and opened breakfasts were organized. The LGBT (lesbian, gay, bisexual and transgender) theme was included in the campaign communication. Equal representation of women and men is taken into consideration during selection of campaign faces, spot screenplays, documentary movies, etc. in media campaign.

Programme Operator launched the first open call for submission of grant applications for initiatives financed from the Fund for Bilateral Relations at Programme Level – measure B on 6 March 2015. In order to increase the attractiveness of the fund, the call was revised in December 2015. Programme Operator together with Project Promoter prepare an international conference called “We accept inclusion” which is planned for the dates 16 and 17 March 2016.

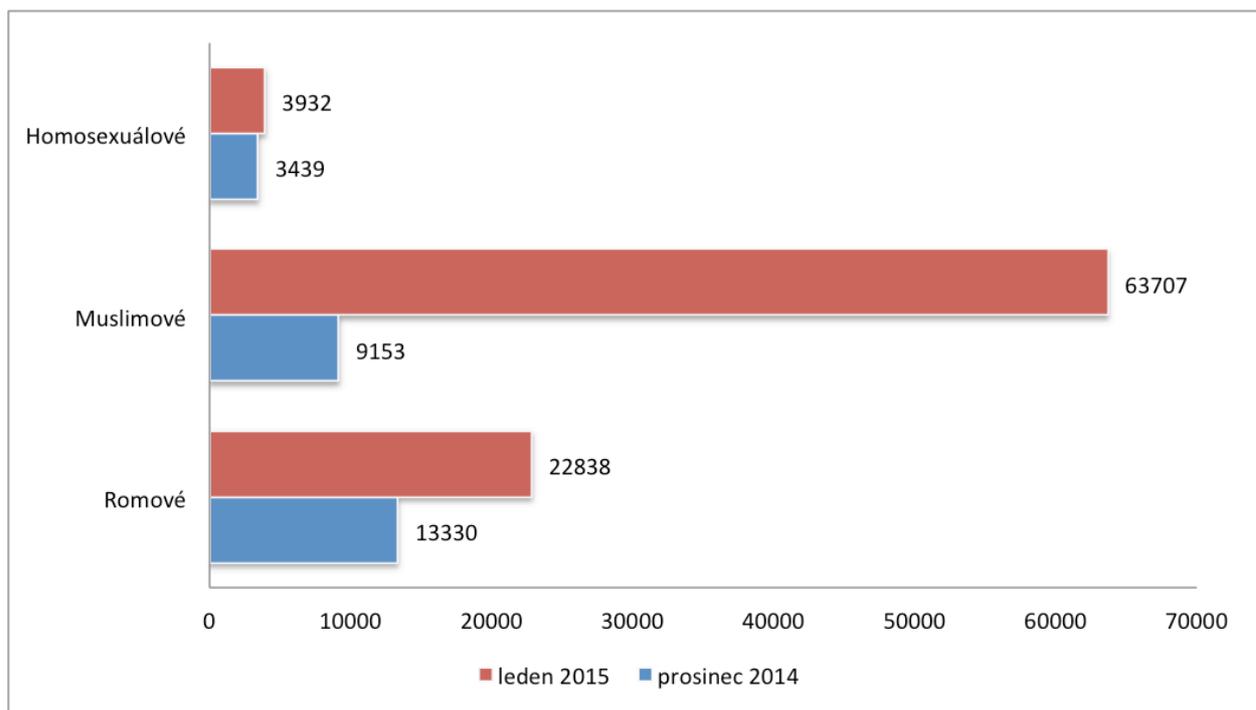
Realization of the pre-defined project within the programme is regularly monitored by the Programme Operator. The project was controlled on-the-spot on 30 September 2015. General information about the programme and updates are on the website of Programme Operator as well as on facebook <https://www.facebook.com/EHPaNF>.

## 2. Programme area specific developments

As in many other countries in Europe, the issue of the Mediterranean migration wave dictated the discourse about the social inclusion, xenophobia and violence in general. The media, politicians and even common people discussed this topic very dramatically. There is a big difference in approaches across the Czech society and the dynamics of the opinion exchanges (or presentations) is extremely high. The hate violence can hence appear in big parts of the society, not only within extremists groups. Although the migration wave did not massively touch the Czech Republic within its geographical borders, it became the dominant topic in the media and wide public discussions.

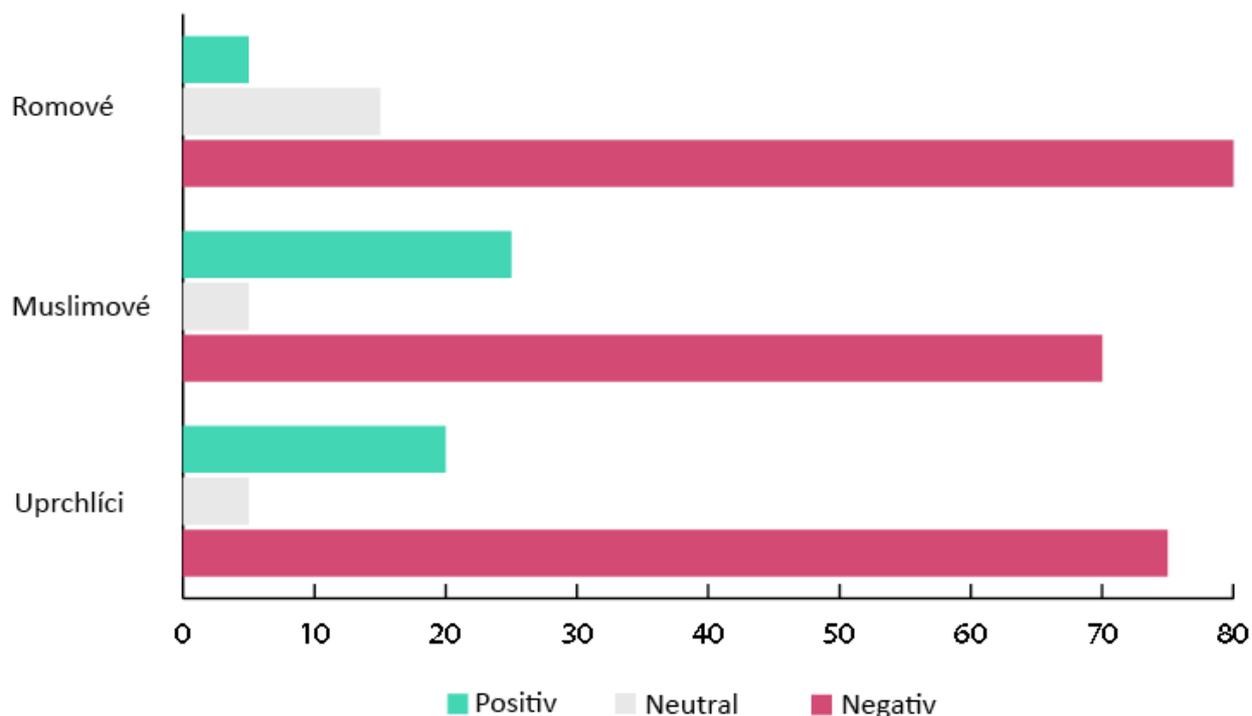
The migrant crisis found the Czech policy makers unprepared; this applies also to the public grant schemes. Higher investments were needed to moderate public discussion. The pre-defined project has piloted various tools for this purpose and has had some remarkable impacts, which shall be visible and promoted also in 2016.

Some other scandal situations also escalated public discussion. The first significant event in 2015 was the Charlie Hebdo attack in January 2015. Muslims became dominant group in media communication and in communication among social networks users which is depicted in the graph below. The graph shows the number of communication entries by monitored groups – homosexuals, Muslims and Roma. Red line represents data from January 2015; blue line represents data from December 2014.



*Explanation: Homosexuálové = Homosexuals, Muslimové = Muslims, Romové = Roma; Source: [www.hatefree.cz](http://www.hatefree.cz)*

According to the buzz monitoring carried out within the pre-defined project, hate violence as an increase of hatred against a specific group also influences other groups with similar potential to be hatred (e.g. Roma, Jews or homosexuals). The proportion of the quality of comments on the internet in June 2015 showed that new massively hated groups are even worse perceived than traditional target of hate speech – Roma. As it is shown in the graph below, migrants and Muslims were quite negatively perceived in the period of May and June 2015. The red line in the graph illustrates negative attitude.



*Explanation: Monitored groups May-June 2015; Muslimové = Muslims, Romové = Roma, Uprchlíci = Migrants. Source: [www.hatefree.cz](http://www.hatefree.cz)*

Tolerance towards minorities is also an issue in the school system. The pre-defined project touches the school reality only partially (piloting of mediation provided by peers and teachers as a tool of hate violence in schools), schools stakeholders (parents, teachers, pupils) were, however, influenced by the wide-public discourse. Two major changes in school legislation were started in 2015 (pro-inclusive provisions to welcome socially or health handicapped pupils in mainstream classes and obligatory preparation year for pre-school children), implementation of which depends on the perception of minorities by school stakeholders. Thus, a synergy of the pre-defined project targets on school system and on wide population approaches is necessary.

### 3. Reporting on outputs

Realization of the pre-defined project *Campaign against Racism and Hate Violence* was under way during the year 2015. The main activity - Media campaign – progressed in excellent way, while all other activities struggled due to several rounds of procurements and personal changes in the project team. In mid-year 2015 project coordinators of five out of seven project activities including the project manager left the project team due to political reasons (director of the Agency for Social Inclusion was suspended from office). This fact had a remarkable impact on the project timeline and the continuity of project activities. Within two project activities – Project activities for pupils and teachers in Ústecký and Moravskoslezský Regions and Exchange of good practices in socially excluded localities – the third round of public procurement will take place at the start of 2016. The Project Promoter therefore asked the Programme Operator for project prolongation till April 2017 which was approved on 9 December 2015.

The value of programme output indicator *Number of video spots aimed at young people under 25, aired nationwide* was far more exceeded as you can see in the table with output indicators below. Altogether 550 spots were aired in TV and 238 spots were broadcasted in radio in the framework of the media campaign. The website [www.hatefree.cz](http://www.hatefree.cz) attracted in average 27.375 unique visitors monthly with the

highest records in November 2015 (76.327 unique visitors). The facebook page [www.facebook.com/HateFreeCulture](http://www.facebook.com/HateFreeCulture) had over 30.000 fans in December 2015. A competition for Hate Free song was conducted (with 64 songs competing) and 17 exhibitions were realized based on the Hate Free Art (2D arts, videoart, performances) competition. Many more small events have been organized both by the project team and the volunteers or fans of the Hate Free idea.

A supplier has been contracted and learning resources have been prepared within the activity Regional educational activities for the police in Ústecký and Moravskoslezský Regions. Seminars shall take place in the year 2016. Also for both researches – internal migration and usury in socially excluded localities – suppliers have been contracted and the methodology was set up. Relevant programme outputs will be fulfilled in 2016.

As regards the activity Exchange of good practices in socially excluded regions, no successful bid was submitted in the procurement. Thus, the tender documentation has been adjusted and the procurement will be repeated in 2016. In the activity Project activities for pupils and teachers in Ústecký and Moravskoslezský Regions, just a supplier for the sub-activity – the online media workroom – has been contracted and the demo-version of the software had been developed as well as methodology guide for the teachers. All other sub-activities such as e.g. piloting of school mediation are subject to repeated public procurement. The tender documentation has been adjusted accordingly and the tender will be launched at the start of 2016.

In case of the activity Evaluation of the project impact, a supplier has been contracted and the methodology was being set up. The first evaluation report and the first flash report have been delivered. The activity Project management mainly focused on support of the public procurement, setup of the collaboration with the suppliers, the project monitoring and reporting.

Outcome	Output	Output indicator	Indicator value		
			Baseline	Target	Actual
Local and regional authorities, as well as private subjects and civil society actors, are developing initiatives to strengthen anti-discriminatory measures for groups vulnerable to social and economic exclusion	Young people aged 15 – 25 will be informed via the nationwide media campaign about manifestations of racism and hate violence as well as about means of how to face them with personal attitudes and by supporting the inclusive policies	Number of video spots aimed at young people under 25, aired nationwide	0	200	788
	The research of new forms of moneylending and migration in socially excluded localities will provide new information on how to combat these phenomena.	Number of researches conducted in socially excluded localities	0	2	0
	Increase of awareness regarding social risks of extremism and racism by educational activities and support for implementation of pro-inclusive measures.	Number of local actors in the Ústecký and Moravskoslezský region trained in the processes how to face the racism and hate violence	0	650	0
		Number of school with deeper	0	10	0

Outcome	Output	Output indicator	Indicator value		
			Baseline	Target	Actual
		cooperation and supervision			
	Exchange of best practice on the international, national and regional level	Number of special webpages created	0	2	0
		International workshop/conference	0	1	0

#### 4. Reporting on Programme outcome(s)

Some progress towards the programme outcomes has been achieved in 2015; the actual value of indicators has not been increased though. The idea of Hate Free points attracted over 150 local institutions (NGOs, restaurants, galleries etc.) and 102 of them became official Hate Free Zone in 2015. The Media campaign has been presented on the workshop of the hate crime prevention organised by the Ministry of the interior of the Czech Republic (September 2015, Prague), Syria Strategic Communications Advisory Team meeting (October 2015, Brussels) and to the National Security Council in (October 2015, Prague). The impact of the project with regard to the approach of the majority to the ethnical minorities (including Roma) will be measured in 2016.

Outcome	Indicator	Indicator value		
		Baseline	Target	Actual
Local and regional authorities, as well as private subjects and civil society actors, are developing initiatives to strengthen anti-discriminatory measures for groups vulnerable to social and economic exclusion.	Attitudes towards ethnic minorities, including Roma (survey)	0 %	20 %	0
	Number of institutions with strengthened capacities	0	100	0

#### 4.1. Progress on horizontal concerns

##### Respect of human rights, Multicultural dialogue incl. integration of national minorities

Since the only fully running activity in 2015 was the Media campaign, the main contribution to the horizontal concerns has been done through its' outputs. All outputs related to the Media campaign promote the respect to human rights and mediate the multicultural dialogue.

The most perceived campaign was called "We're in this together". It had several components, starting with the viral "social experiment" (video casting young Syrian family asking for help in Middle-Bohemian town), the official TV spot was virally shared on youtube and facebook (showing members of various minorities in everyday situations and real hate speech used against them in subtitles) and set of photos of celebrities, that faced the hate-speech as well. The TV spot was broadcasted in the national TV channel and consequently promoted by number of national media, the campaign was discussed nationwide and its creator has been invited to various media discussions to explain the ideas behind. All

resources are available on the project website at [www.hatefree.cz/blo/aktuality/1210-jsme-v-tom-spolecne](http://www.hatefree.cz/blo/aktuality/1210-jsme-v-tom-spolecne), many of respected media dedicated front-page articles (e.g. [idnes.cz](http://idnes.cz) ) or stable pages (e.g. [prima.cz](http://prima.cz)) for this campaign.

Another well-perceived activity was set of “Opened breakfasts”, where dozens of members of ethnic minorities meet and have breakfast together, with the attention of mainstream media.

Through the facebook page of the Hate Free media campaign, daily communication with proponents and opponents of the minorities is held. To moderate and cultivate the discussion, a codex of the page user has been developed. Some aggressive contributors have been banned and the Office of the Government faced many official complaints, both organised (a way of bullying the project workers by aggressive part of the debaters) and spontaneous (sometimes even proponents of the hate-free idea call banning of the aggressive debaters as the censorships).

Great part of the media campaign work is related to the anti-hoax service. The campaign team becomes the first choice for the journalists who are seeking explanation and prove of the facts appearing in the internet communication. The team established collaboration with the expert on religion, migration and similar topics to be able to provide relevant information to journalists and the facebook or twitter followers.

The online media workspace, the sub-activity of the school activities, provides several tools for the pupils and their teachers to open and moderate. This has been tested on pilot schools and will be opened to all interested school groups in 2016.

## 5. Project selection

The project was approved by the Programme Operator in March 2014. Based on the evaluation and verification of the submitted project the project is in line with the set outcomes and outputs of the programme. The appraisal of the project formal application, budget and technical documentation (especially in the terms of the preparedness and consistency) facilitated further administration and implementation of the project.

## 6. Progress of bilateral relations

### **Bilateral Fund at Programme Level – Measure B (BFB)**

On 6 March 2015, the Programme Operator announced the 1st Open Call for submission of grant applications for initiatives financed from the Fund for Bilateral Relations at Programme Level – measure “B” under the programme CZ05. The allocated amount under the 1st Open Call is **150, 000 CZK**, that means **5, 660 EUR**.

On 4 December 2015, the Programme Operator updated the open call in the light of making the bilateral call more attractive for the promoter of the pre-defined project. The update lied mainly in prolongation of period for submitting applications till 31 December 2016 and the possibility to submit the application even after the pre-defined project financed from the programme CZ05 has been completed. The eligibility of expenditures was also broadened reflecting the update in Regulation of EEA and Norway Grants. The revision of the call was made by the Programme Operator in order to make the bilateral fund more attractive and to increase the interest of the project promoter.

The PDP promoter plans to submit an initiative in partnership with Icelanders focused on production of a documentary film with the main theme of adoption of Roma children by Icelandic families.

### **Conference “We accept inclusion”**

The planned Conference "We accept inclusion" which should have been held in November 2015 and co-financed from Bilateral Fund at Programme Level – measure “B” and Bilateral Fund at National Level was postponed to 16-17<sup>th</sup> March 2016. This change was reasoned by many similar activities, workshops on the topic held in the end of 2015 which limited the interest and the focus of the conference. In the end of 2015 main speakers at the conference were confirmed. First invitations will be distributed in January 2016. The programme and the structure of the conference were created in cooperation with the experts and representatives of the pre-defined project promoter. The conference is planned for 120 participants and will be in the form of plenary session, 3 parallel workshops and study visit.

## **7. Monitoring**

Programme Operator regularly monitors progress of the pre-defined project within the programme. Project Promoter sends four-month monitoring reports together with requests for payments to the PO for check in line with the Guidelines for Project Promoters.

In line with the internal manual, the Programme Operator performs interim on-the-spot control of the pre-defined project as well as final/financial on-the-spot control after the project has been finished. There are three types of factual/interim controls carried out by the Programme Operator - ordinary, ad hoc and controls of corrective measures' fulfilment.

On 10 January 2015 the Programme Operator signed a contract for the technical assistance with on-the-spot controls with the company AQE advisors, a.s. (after the closure of the open tender). The pre-defined project was controlled on-the-spot on 30 September 2015. One minor finding was identified and is being solved.

The Monitoring Plan for 2016 is not enclosed to the report as the final on-the-spot control of the pre-defined project is planned for 2017 after the project closure.

## **8. Need for adjustments**

The National Focal Point (NFP) asked the Financial Mechanism Office (FMO) for prolongation of the pre-defined project implementation period within the programme CZ05 in July 2015. The request was confirmed by the FMO. The Project Agreement was subsequently amended by the FMO (prolongation of the programme implementation period) and confirmed by the NFP in November 2015.

No further adjustments of the programme were made in 2015.

## **9. Risk management**

Programme Operator updated the programme risk analysis in September 2015 under the guidance of the National Focal Point. According to the results of the analysis, the programme CZ05 ranks as the first least risky programme out of 15 programmes implemented in the Czech Republic. In relation to this report the PO updated the risk analysis in January 2016 and the results remained the same. There was a

positive trend in results of the risk analysis made in 2015 in comparison with those made in 2014 and 2013.

The main progress in positive rating can be seen by the risk of time delay in the programme implementation. Thanks to the prolongation of the PDP implementation period till April 2017, the risk was minimised. The promoter envisages that all the project/programme outcomes and outputs should be achieved till April 2017.

Two main risk factors connected with the time were identified in the year 2015 – personal changes at the Agency for Social Inclusion and repetition of open tender procedures. In mid-year 2015 project coordinators of five out of seven project activities including the project manager left the project team due to political reasons - director of the Agency for Social Inclusion was suspended from office. This fact had a remarkable impact on the project timeline and the continuity of project activities. Within two project activities – Project activities for pupils and teachers in Ústecký and Moravskoslezský Regions and Exchange of good practices in socially excluded localities –public procurement had to be repeated and the third round of procurement will take place at the start of 2016. Programme Operator therefore closely monitored all tender procedures and the time schedule in the monitoring reports of the PDP submitted three times per year as well as during the on-the-spot control realized in September 2015.

## 10. Information and publicity

General information about the programme is available on the website [www.eeagrants.cz](http://www.eeagrants.cz) and the updates are published on the facebook profile <https://www.facebook.com/EHPaNF>. The project promoter participated at the seminar for project promoters organized by the programme operator in February 2015. All issues relevant to monitoring, publicity and financial matters were presented and discussed at the seminar. Since the publicity of the programme thematically overlaps with the activities of the pre-defined project (national media campaign <http://www.hatefree.cz/>), the publicity activities are mainly held at the project level.

## 11. Cross - cutting issues

**Good governance:** The programme adheres to the principles of good governance. It follows the internal rules of the Office of the government, which are strict especially in terms of procurement process and the principles of collaboration with the suppliers.

**Social sustainability:** The authority of the Office of the Government – Agency for Social Inclusion is valuable resource in negotiation on collaboration with governmental bodies, NGOs, other institutions and local actors. The project focuses on various target groups (young adults, teachers, policemen, local opinion makers etc.) which generates opportunities for whole-society impact and synergy of conducted actions.

**Economic sustainability:** No specific measures were realized during the monitored period. The project has only indirect impact on the economic situation, realised through promotion of diversity in society, social stability and safety.

**Gender equality:** In the monitored period the LGBT (lesbian, gay, bisexual and transgender) theme has been included in the campaign communication. The photo-campaign (set of printed “comics bubbles” with the inscriptions supporting gender equality) continually enriched the events organised by or with support of Hate-Free campaign. It is promoted on the campaign facebook page, on the exhibitions organised by or with support of the project team and became part of the Woman congress in June 2015 in Prague. The equal representation of women and men is taken into consideration during the media

campaign (selection of campaign faces, spot screenplays, documentary movie, etc.) and in the other educational activities, especially in supporting the civic education.

## **12. Attachments to the Annual Programme Report**

### **Annex 1: Risk assessment of the programme**

**SIGNATURE:****For Programme Operator**

*I certify that I am duly authorised to sign this Annual programme report and that I have thoroughly reviewed the progress of the programme, reporting on outcomes and outputs, risk management provided in this report and the information are correct and accurate.*

				<b>Optional second signature</b>		
<b>Name</b>	Zuzana Kudelová			Martina Bečvářová		
<b>Position</b>	Head of the Department of International Relations			Head of the Monitoring Unit		
<b>Organisation</b>	Ministry of Finance of the Czech Republic			Ministry of Finance of the Czech Republic		
<b>Signature</b>						
<b>Date</b>	Day	Month	Year	Day	Month	Year
	09	02	2016	03	02	2016

**For the National Focal Point**

*The National Focal Point certifies that the status of reporting of the programme described above is accurate.*

				<b>Optional second signature</b>		
<b>Name</b>	Lenka Jurošková					
<b>Position</b>	Deputy Minister of Finance					
<b>Organisation</b>	Ministry of Finance of the Czech Republic					
<b>Signature</b>						
<b>Date</b>	Day	Month	Year	Day	Month	Year
	12	02	2016			

## Annex 1: Risk assessment of the programme

Type of objective <sup>1</sup>	Risk	Description of risk in the reporting period	Likelihood <sup>2</sup>	Impact <sup>3</sup>	Importance <sup>4</sup>	Mitigation planned/done
<b>Cohesion (Programme) outcomes:</b>	Programme absorption capacity	Irrelevant, the Programme is composed of one PDP.	Low	Middle	Low	Not relevant
	Legislation changes	The PDP is not directly linked to legislation. The area of Roma issues is, however, a part of political parties' election programs, so it can, to a limited degree, influence the governmental strategy.	Low	Low	Low	All legislative proposals are monitored in advance and evaluated with regard to their impact on the PDP realization. In case of need, changes will be implemented to reflect the actual legislation.
	Time risk - delay in commitment and disbursement of funds	The time risk was lessened in this period thanks to the prolongation of the pre-defined project implementation till 30 April 2017. Although some delays in tender procedures occurred and some tenders had to be repeated several times, the PO as well as the Project Promoter expects fulfilling of all the project and programme outcomes and outputs till April 2017.	Low	High	Middle	Realization period of pre-defined project was prolonged till April 2017. Tender procedures are and will be monitored by the Programme Operator and the time schedule is closely monitored in the monitoring reports of the PDP.
	Specific programme risk (risk identified in PP relating to PRG outcomes)	Failing cooperation with other ministries, lack of trust of regions, NGOs, etc., in the planned activities.	Middle	Middle	Middle	Representatives of ministries, NGOs and regions are members of the PDP Steering committee. Memorandum of cooperation was signed with

<sup>1</sup> The risks should be categorised in one of 3 ways, depending on whether it poses a risk to the cohesion objective, the bilateral objective, or is more of an operational issue.

<sup>2</sup> Likelihood is described as Low, Middle or High according to its scoring gained in the risk analysis. (Low: 1-2, Middle:3-4, High:5)

<sup>3</sup> Impact is described as Low, Middle or High according to its scoring gained in the risk analysis. (Low: 1-2, Middle:3-4, High:5)

<sup>4</sup> Importance is counted as Likelihood multiplied by Impact and described as Low, Middle or High according to its scoring gained in the risk analysis (Low: 1-8, Middle: 9-15, High: 16-25).

Type of objective <sup>1</sup>	Risk	Description of risk in the reporting period	Likelihood <sup>2</sup>	Impact <sup>3</sup>	Importance <sup>4</sup>	Mitigation planned/done
						the Police Presidium and the Ministry of Interior. Communication with all the relevant stakeholders will continue during the whole project implementation. During the on-the-spot control of the project it was also recommended to make contracts will all 10 schools in two regions collaborating in the activity focused on pupils and pedagogical staff.
<b>Bilateral outcome(s):</b>	Bilateral relations	The Programme Operator together with the Project Promoter of the PDP prepare the international conference on pro-inclusive education which will be held on 16 and 17 March 2016. Project Promoter also prepares an initiative financed from the Bilateral Fund at Programme Level – measure B.	Middle	Low	Low	Postponement of the international conference from the autumn 2015 to spring 2016 due to many similar activities, workshops on the topic held in the end of 2015 which limited the interest and the focus of the conference. Support of Bilateral Fund at Programme Level – measure B by PO – update of Guidelines, revision of call.
<b>Operational issues:</b>	Management and control structures, programme management	Communication at the PO level as well as between the PO and the Promoter proceeded well. There were some personal changes at the management of the project.	Low	High	Middle	Procedure according to the PO Manual, regular check and update of PO Manual. Meetings with the Project Promoter.
	Programme implementation set up	All the manuals and guidelines are elaborated and regularly checked	Low	Middle	Low	Check and update of manuals and guidelines.

Type of objective <sup>1</sup>	Risk	Description of risk in the reporting period	Likelihood <sup>2</sup>	Impact <sup>3</sup>	Importance <sup>4</sup>	Mitigation planned/done
		and updated. Guidelines for the Project Promoters were revised in September 2015. Guidelines for the applicants and promoters within Bilateral Fund at Programme Level – measure B were revised in November 2015.				
	Reports and irregularities within programme	No irregularities have been reported.	Low	High	Low	Consistent verification of monitoring reports and on-the-spot controls.
	Programme audits/controls	Audit of programme management was carried out in the period of January – August 2015 with no irregularities reported. On-the-spot control of the pre-defined project was performed on 30 September 2015 with one minor finding.	Middle	Middle	Middle	Regular monitoring, on-the-spot visits and audits.
	Information system	The information and monitoring system CEDR is in service. Adjustments are ongoing.	Middle	Middle	Middle	Adjustments of the system are solved with the contractor. Breakdowns and failures will be minimized by intensive cooperation with the contractor.
	Corruption risk	The PO system of control and tender procedures is well set up.	Middle	Middle	Middle	Set-up of a transparent system and regular check.