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INFORM

WP1: Management and coordination

D1.8 Interim Evaluation Report

External Evaluator



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Executive summary

This document presents the external interim evaluation of the INFORM project, which is implemented with the support of JUST Programme of the European Commission under Grant Agreement №763866. The INFORM project is initiated to provide **comprehensive and multidisciplinary understanding** of the new Data Protection Legislation through elaborating analytical documents and training materials, as well as through trainings and information activities.

This external evaluation assesses the INFORM **current progress** towards its objectives. The findings shall contribute to the improvement of both project management and implementation process. The interim external evaluation report is going to be public and thus will enhance the project transparency to the preliminary identified target groups and key stakeholders, as well as to the general public.

Since the INFORM project **only started eight months prior**, an interim external evaluation has limitations. Science, learning, and dissemination activities are a long-term mission creating an impact that can only be partially captured after such a short period. A monitoring and evaluation system with indicators to systematically track quality and effectiveness is already established and will be applied during the whole project period. However, based on the evidences and information collected, the interim external evaluation finds that the **project achieves its objectives to a high degree**.

The interim evaluation report consists of the following parts: Introduction, Methodology, Elements of assessment (Project implementation - performance, Achievement of mandatory results - WPs and deliverables, Overall assessment - objectives and project management); Conclusions; Recommendations; Annexes.

The interim evaluation report is a **result of the collaborative work** with the Project Management Team, Project Team Leaders, and representatives from all partner organisations.



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List of Abbreviations

DPL	Data Protection Legislation
EC	European Commission
EU	European Union
GA	Grant Agreement
MS	Member State of the EU
WP	Work Package



1. Introduction

1.1. Background

The adoption of the **General Data Protection Regulation (GDPR)** in 2016 is an important step towards the modernisation of the EU data protection legislation, making it fit for protecting the fundamental right to personal data protection in the context of the digital age's economic and social challenges. The GDPR preserves and develops the main principles of the data subject provided for in the Data Protection Directive¹ and introduces new obligations for organisations to implement thoroughly the respective data protection requirements, to appoint a Data Protection Officer in certain circumstances, to comply with a new right to data portability and to comply with the principle of accountability. Due to its direct applicability across the EU, the GDPR creates consistent data protection rules throughout the EU, establishing an environment of legal certainty from which economic operators and individuals may benefit as “data subjects”.

Adopted in parallel with the General Data Protection Regulation, **Directive 2016/680** repealed Framework Decision 2008/977/JHA and established a comprehensive system of personal data protection in the context of law enforcement. While the GDPR lays down general rules for protection of individuals in relation to the processing of their personal data, and for ensuring the free movement of such data within the EU, the Directive lays down specific rules for data protection in the fields of judicial cooperation in criminal matters and police cooperation.

The new legislative environment in the field of data protection requires from institutions, judiciary, and individuals to be adequately prepared. Private and public sectors and individuals have to familiarise themselves with their new rights and obligations. There is an urgent **need to raise awareness and to acquire new knowledge and skills concerning the interpretation and implementation of the new data protection rules**. In the Impact assessment report regarding the new DPL, the Commission identifies that as regards administrative and judicial remedies and compensation, individuals are in most

¹ Directive 95/46/EC of the European Parliament and the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.



cases not aware of the possibility to lodge a complaint to the public authority responsible for the protection of personal data and therefore, in many Member States judicial remedies, although available, are very rarely pursued in practice. However, this situation will be reversed with the new rights and obligations under the DPL. GDPR provides data subjects with improved administrative and judicial remedies in cases of violations, which will ultimately lead to increased rate of cases, related to data protection. However, this requires increased recognition of the relevance of EU law. As stated in a study regarding Judicial Training in the European Union Member States (2011) there is general lack of sufficient knowledge of EU law. This additionally emphasises the need to ensure that judicial systems are aware and ready to provide adequate protection of personal data. Courts should act as a counterbalance to the unlawful acts of the competent authorities in the field. To this end, all actors involved in the performance of court activities should have extensive knowledge, skills, and competences, which will ensure the correct implementation, interpretation, and application of the new DPL.

1.2. Objectives of the INFORM project

In order to meet abovementioned challenges, INFORM aims to provide **comprehensive and multidisciplinary understanding** of the new DPL. Moreover, the analytical activities of the INFORM project will examine the **balance** between personal data protection and the other fundamental rights in order to deepen the expertise of the professionals, especially when it comes to judiciary, legal practitioners, and court staff.

The INFORM objectives, as they are pointed out in project agreement, are:

- to contribute to the effective and coherent application of the GDPR;
- to facilitate the implementation and practical application of Directive 2016/680;
- to elaborate specific training materials and methodologies tailored to the needs of judiciary, legal practitioners, and court staff;
- to train trainers from all Member States (MS) as multipliers of INFORM outputs and impact and mainly as a multiplier at a national level;



- to develop interactive practical-oriented e-Learning programme targeting judiciary, legal practitioners, and court staff as a training tool for distance self-learning and as an advanced training means;
- to improve target groups' knowledge, competences and attitudes to the DPL;
- to strengthen Data Subjects' right to data protection.

Therefore, the INFORM project targets the following groups of professionals - judiciary, legal practitioners, and court staff. These target groups have been chosen to encompass all relevant actors in the judicial system.

The first INFORM target group is the **Judiciary**. For the purposes of the project, “judiciary” refers to **judges (ordinary and administrative)** and **prosecutors**. Additionally, the partnership has decided that this group should include also the authorities responsible for the prevention, investigation, detection, or prosecution of criminal offences as well, as these are the “competent authorities” as defined in Directive 2016/680 and a main focus of it. Acknowledging the differences between the legal systems INFORM intends to customise its activities, while aiming to cover this diversity.

Legal practitioners are another target group. The group refers to lawyers, notaries, bailiffs, mediators. Enriching their knowledge in the field of DPL will enhance Data Subjects' rights, as will enable this group to provide adequate advocacy that considers DPL.

Furthermore, INFORM targets **court staff** since court clerks and officers are the ones handling the courts' communication with citizens, data handling, and storage, etc. INFORM initial desk-based research revealed that in all partner countries there is no data protection training designated for court staff.

The last target group are **trainers**. INFORM is going to conduct Training of Trainers from the national institutions responsible for the trainings of the Judiciary, Legal practitioners, and Court staff.

The project is scheduled to begin in October 2017 and conclude in March 2019. Part of the requirement for its successful implementation is the undertaking of external evaluation to:

- Monitor project processes and analyse critical success factors;
- Assess the achievement and potential scalability and sustainability of the project outcomes.



1.3. Purpose of the External Evaluation

External evaluation is a specific part of project management which is carried out on an ongoing basis by an evaluating body situated out of the structure of the main Project Management Team. External evaluation aims to conduct an independent assessment on the project progress and results, as well as their applicability and further exploitation, and to verify the quality of the implemented activities and results. Thus, external evaluation provides the Project Management Team and the Team Leaders with a complementary source of information about the effectiveness of the project implementation process and its capability to achieve consistent results that meet the target groups' needs.

The external evaluation is based on the following principles:

- **Independence and impartiality** – the External Evaluator does not belong to the corporate/administrative structure of any of the beneficiaries and does not participate in decision-making processes, so their opinion is not influenced by ties or conflict of interest with the management of the project.
- **Objectiveness** – the External Evaluator's opinions, conclusions, and recommendations are based on the facts and information which have been received. Personal feelings and interpretations, or prejudice should be avoided in the process of evaluation and assessment.
- **Confidentiality** – the External Evaluator is obliged not to disclose confidential information to third parties in any form. Information required by and provided to the competent state authorities pursuant to the law, shall not be considered disclosure of confidential information.
- **Professional conduct in compliance with the applicable standards.**

External evaluation helps to answer the questions on the achieved results and the key project implementation processes such as:

- Whether and to what extent does the project achieve the desired outcomes?
- What is the value of the outcomes for the key stakeholders and target groups?
- How well does the project implementation match the needs of the relevant groups?



- How effective are the management and coordination of the project?
- Is there a need to fine-tune or redesign the project implementation plan or schedule?

The external part of the evaluation process is carried out by the External Evaluator, chosen by the project partners during the Kick-off meeting held on 09-10 October in Sofia, Bulgaria and duly contracted.

2. Methodology

The external evaluation covers the three dimensions of monitoring and assessment. Firstly, it is about measuring of performance or how smooth, timely, and effectively the implementation of the project runs. Further, it is evaluation of deliverables, which assesses the outputs in accordance with their quality and quantity. Last but not least, the external evaluation includes overall project monitoring and assessment, which provides a complete picture of the activities, progress, and insufficiencies of the project as a whole. The three processes of external evaluation are connected in an external evaluation cycle.

In order to examine the project’s development and the achievement of the project outcomes, the external evaluation uses both processes and outcome-based approaches. It specifically examines the project implementation plan, project communication, as well as the dissemination strategy and reviews project outcomes within the overarching framework of the stated values of the INFORM partners. The findings and results are subject of evaluation against the following indicators, established in the INFORM Evaluation strategy and thus accepted by all project partners:

Indicator	Number / Percentage
Quantitative indicators	
Reports on legislation reviews	6
Comparative study	2
Guidelines	3
Workshops participants	180
Info day participants	1000



e-Learning programme modules	3
e-Learning programme participants	min 1000
Impact assessment reports	2
INFORM website/social media visitors	min 5000
International conference participants	min 100
Project reports & budget reviews	2
Project work meetings	5
Qualitative indicators	
Target groups' positive feedback & satisfaction	min 80%
INFORM outputs positive feedback	min 80%
Target groups' improved competences & motivation	min 85%
Dissemination & communication activities positive feedback	min 85%
INFORM staff satisfaction & motivation	min 90%
Process indicators	
Timely implementation of tasks	min 90%
Compliance with JUST Programme rules	no deviation
Continuous & transparent information flow	min 80% project documentation shared via the INFORM website/or project repository

External evaluation activities include observation, collecting of information, analysis, and conclusions, related to the overall performance of the project which supports the decision-making process. Despite its independent nature, external evaluation relies on collaboration with Project Management Team and project partners. External evaluation activities are applied in line with the overall provisions and logics of the project.

During the first eight months of the INFORM project implementation, the External Evaluator has established direct communication channels with the WP Leaders, representatives from partner institutions, and members of the Project Management Team. The External Evaluator received information about the project development from the Project Coordinator. In addition, the External



Evaluator has been provided with direct access to on-line based materials and documents which have been produced in the course of project implementation.

An on-line questionnaire has been composed, aiming to gather information on the partners' perception on the manner and effectiveness of management and administration of the project, as well as on the INFORM staff satisfaction and motivation. The project partners have been invited to fill in the questionnaire. Their responses gave insights on the project from partners' perspective, which is very important in the course of external evaluation.

3. Elements of assessment

3.1 Project implementation (performance)

Performance evaluation is focused on the very essence of project implementation and tracks the quality, quantity, and timeliness of the performance. External Evaluation examines whether and to what extent the desired outcomes have been achieved in the course of project implementation and whether the needs of the relevant groups have been met.

According to the overall logic of INFORM, the first 8 months of the project timeframe were dedicated to:

- the establishment of well-functioning project management and coordination mechanism;
- the elaboration of main intellectual outputs of the project, namely – Review reports on GDPR, aimed respectively at judiciary, legal practitioners, and court staff; Review reports on the Directive 2016/680, aimed respectively at judiciary, legal practitioners, and court staff; Guidelines aimed respectively at judiciary, legal practitioners, and court staff; Comparative study and Data Protection Glossary.

This is more or less a preparatory stage, as far as the results of the work will be used as a base for preparation of the training methodology and materials needed for ToT activities and e-Learning programme. The elaboration of written documents on the subject matter has its own value as well and serves to the achievement of the desired outcomes. “The outcomes of the analytical activities will deliver to the judiciary complex knowledge on Data Protection rights, encompassing its theoretical and



practical aspects, as well as its correlation to other fundamental rights. Moreover, the training materials will explain and systemize judiciary's rights and obligations related to Data Protection and at the same time will provide precise interpretation of the new EU legislation acts." (see GA – Annex 1, Part B).

During the period subject to the external evaluation, the following management and coordination activities have been completed: Kick-off meeting (9-10 October 2017); adoption of 'INFORM Implementation plan', 'INFORM Evaluation strategy'; contract with an external evaluator; organisation and conduct of First interim virtual meeting. Communication channels via e-mail and skype have been established and tasks have been distributed between parties. Monthly skype calls and circular letters from project coordinator by e-mail, should be underlined as a good practice in management and coordination, which keeps partners involved and informed on a daily basis. All respondents to the questionnaire agree or strongly agree that there are well established communication channels between the partners and that the Project Management Team facilitates the communication between partners, as well as with the Commission. There is a high degree of satisfaction of the joint work on the project implementation.

The following dissemination and communication activities have been completed during the first eight months of the project implementation: adoption of 'INFORM Dissemination and Communication Strategy'; elaboration of visual identity pack; development of INFORM website; set up of social media accounts; development of design for all project dissemination materials; elaboration of INFORM Days Guidelines as an internal for the project consortium document that will facilitate the organisation and conduct of the upcoming national events – INFORM Days. All intellectual products, which are completed and pass the approval of the EC, are made accessible free of charge on the INFORM website. A total of 669 website and social media visitors have been reported, which is approximately 14% of the planned visitors. Presence on social media like the INFORM Twitter account, the INFORM Facebook page, the INFORM LinkedIn Group, etc. is a popular and efficient tool to approach the target group and EU citizens, but it needs an active maintenance in order to assure transparency and dissemination of the results and achievements of the project.



Working on analytical documents, the project partners have so far managed to elaborate Review report on GDPR aimed at judiciary; Review report on Directive 2016/680 aimed at judiciary; Review report on GDPR aimed at legal practitioners; Review report on Directive 2016/680 at legal practitioners; Review report on GDPR aimed at court staff; Comparative study and Data Protection Glossary. Each partner worked on the reports end researches, which are distributed to them, and sent drafts to the other partners for review and feedback. Since MS differ in their legal systems, this can be evaluated as a good practice aimed to reach unified interpretation and application of DPL. On the other hand, this type of work leads to the necessity of strict and comprehensive time management and coordination. Otherwise it can cause a delay.

There is a delay in elaboration of Guidelines on GDPR & Directive 2016/680, aimed at the judiciary, Guidelines on GDPR & Directive 2016/680 aimed at legal practitioners, Review report on Directive 2016/680 aimed at court staff, Guidelines on GDPR & Directive 2016/680 aimed at court staff. The delay can be explained with non-performance of one of the project partners - Budapesti Corvinus Egyetem - CUB, Hungary due to internal administrative and financial problems. The parties have made a necessary step to overcome the risk of non-performance. CUB is now in a process of termination of its participation in the INFORM project. After a discussion via a skype call on 4th April 2018 the partner organisations took a unanimous decision for termination and redistribution of the tasks among the other partners. A Grant Agreement amendment procedure has been initiated in this respect. Changes are going to be made in the number of partners, the distribution of activities and the deadlines regarding the elaboration of the review and guidelines. At this stage of the project, the one-month delay in the elaboration of a review and guidelines (D2.3, D2.6, D2.8, D2.9) is not of such a type to put in risk the overall implementation of the project. It is recommended to work in parallel on finishing document elaboration and on preparation of training activities and upcoming project events – both INFORM Workshops and INFORM Days.

The work on INFORM Training of Trainers started on the 6th month of the project implementation period, which is in line with Project Implementation Plan. The preparation of the INFORM e-Learning programme started on the 5th month of the project implementation period, which is also in line with Project Implementation Plan.



At the end of evaluated period (Oct 2017-May 2018) the project performance results compared to the indicators are as follows:

Indicator	Number / Percentage	Performance	
Quantitative indicators			
Workshop participants	180	NA	
Info day participants	1000	NA	
INFORM website/social media visitors	min 5000		669
International conference participants	min 100	NA	
Qualitative indicators			
Target groups' positive feedback & satisfaction	min 80%	NA	
INFORM outputs positive feedback	min 80%	NA	
Target groups' improved competences & motivation	min 85%	NA	
Dissemination & communication activities positive feedback	min 85%	NA	
INFORM staff satisfaction & motivation	min 90%		100 %
Involvement of individual team members in performance monitoring, evaluation and improvement	min 40% of non-management staff, working on the project		60,61%
Process indicators			



Completeness of set requirements for deliverables	min 95%		100 %
Timely implementation of tasks	min 90%		70%
Schedule variance	max 2 months		1 month

Intermediate conclusion 1:

The project performance achieves the indicators in a satisfactory degree.

The project management and coordination activities have been conducted on time and precisely, establishing a solid base for effective and successful implementation.

The first dissemination and communication activities have been completed in accordance with the time framework and applicable standards. There is a need for more active maintenance of social media accounts. The contribution of all project partners will be appreciated.

The elaboration of Data Protection regulatory review and guidelines is completed by 70%. There is a delay in the preparation of Guidelines on GDPR & Directive 2016/680, aimed at the judiciary, Guidelines on GDPR & Directive 2016/680 aimed at legal practitioners, Review report on Directive 2016/680 aimed at court staff, Guidelines on GDPR & Directive 2016/680 aimed at court staff. Taking into account the nature of the project and the measures already taken to overcome the delay it can be concluded that the project is not under the risk of non-performance. After the official amendment of the Grant Agreement, an update of the INFORM implementation plan should be carried out, reflecting the changes which have been made.

3.2. Achievement of mandatory results (WPs and deliverables)

The main objective of the results evaluation is to ensure the WPs effectiveness and deliberation of the correct number and types of outputs, as envisaged in the GA and Project Implementation Plan. This is a process of collecting information about every single WP/task and measuring the results of the



activity against the requirements of the project. The process of results evaluation includes analysis on the following key points: layout of the deliverables, thoroughness of the deliverables contents, innovation level (if applicable), correspondence to the project objectives, relevance, response to user needs, communication of the achievements, sustainability of the results. In that connection, External Evaluation Process answers the questions: what the value of the outcomes for the key stakeholders and target groups is and how well the project implementation matches the needs of the relevant groups.

3.2.1. WP1 Management and Coordination of the Project

Project implementation started on time with a preparatory phase and elaboration of the main documents concerning the management, coordination, and administration of the project.

The following deliverables have been completed/elaborated:

- Deliverable D1.1 ‘Kick-off meeting report’;
- Deliverable D1.2 ‘INFORM Implementation plan’;
- Deliverable D1.3 ‘Contract with evaluator’;
- Deliverable D1.4 ‘INFORM Evaluation strategy’;
- Deliverable D1.5 ‘INFORM Interim Virtual Meeting’;
- Deliverable D5.1 ‘INFORM Dissemination strategy’;
- Deliverable D5.2 ‘Visual identity pack’;
- Deliverable D5.3 ‘INFORM website’;
- Deliverable D5.4 ‘Social media accounts’;
- Deliverable D5.5 ‘INFORM Dissemination materials’.

Most of the above mentioned deliverables meet the standards in terms of structure and content, clarity, and format². Where applicable, the documents contain a comprehensive and clear executive summary and clearly described and adequate methodology.

² In June 2018, Deliverable D5.5 has been rejected by the EC with a request for improvements. This took place outside of the evaluated period and will be subject to monitoring and evaluation for the next project implementation period.



In addition, communication channels via e-mail and skype have been established and tasks have been distributed between the parties. Monthly skype calls and circular letters from the project coordinator by e-mail, should be underlined as a good practice in management and coordination, which keeps the parties involved and informed on a daily basis.

90,9% of the respondents to the questionnaire express their opinion that the Project Management Team provides guidelines on the quality assurance and various templates. There is a high degree of satisfaction with regard to the joint work on the project implementation. Some relevant suggestions have been made by the participants who filled in the questionnaire – establishment of a common approach to upcoming events, preparation in advance, proactive participation from all of the partners, rescheduling of monthly skype calls, etc. These suggestions have been distributed to the Project Management Team for future consideration.

3.2.2. WP2 Data Protection regulatory review & training material elaboration

The main objective of WP2 is to provide summarised knowledge tailored to the practical needs of the INFORM target groups, through elaboration of analysis and guidelines on GDPR and Directive 2016/680. In the evaluation period the following deliverables have been elaborated:

- D2.1 Review report on GDPR aimed at judiciary;
- D2.2 Review report on Directive 2016/680 aimed at judiciary;
- D2.4 Review report on GDPR aimed at legal practitioners;
- D2.5 Review report on Directive 2016/680 at legal practitioners;
- D2.7 Review report on GDPR aimed at court staff;
- D2.9 Comparative study;
- D2.11 Data Protection Glossary.

All documents are result of joint work of the partners. The extent of participation of the different partners have been adequate. The majority of the documents have been reviewed, and the contents adequately reflected the remarks and suggestions from other partners.



Where applicable, the documents contain a comprehensive and clear executive summary and clearly described and adequate methodology. The language of the reports and analysis is accurate.

The submitted deliverables are still in a process of evaluation and approval by the EC. Comments and rejections have been received from the EC on D2.2 и D2.5. Individual Skype meetings have been organised with the respective responsible partners to identify strategies for addressing EC comments and improving the quality of these deliverables. The partners (e-Law and UWr) upgraded the documents according to the action plan defined during the skype talks, after which the LIF made a follow-up review of the reports and submitted them back to the Home Participants Portal³.

The submission of Deliverables D2.1, D2.4 and D2.7 has been validated provisionally by the EC until further evaluation of the Policy unit⁴.

The following deliverables have been approved by the EC:

- D2.9 Comparative study;
- D2.11 Data Protection Glossary.

At the end of the 8-month period it can be concluded that a significant part of WP2 has been done. Most of the elaborated deliverables are elaborated, but there is a necessity for further improvements in order to reach the best quality of written materials which will assure the desired project results.

There is a delay in elaboration of Guidelines on GDPR & Directive 2016/680, aimed at the judiciary, Guidelines on GDPR & Directive 2016/680 aimed at legal practitioners, Review report on Directive 2016/680 aimed at court staff, Guidelines on GDPR & Directive 2016/680 aimed at court staff (see 3.1). At the end of the 8-month period, the work on these documents is in progress.

³ In June 2018, Deliverables D2.2 and D2.5 have been rejected by the EC with comments and request for improvements. This took place outside of the evaluated period and will be subject to monitoring an evaluation for the next project implementation period.

⁴ In June 2018, Deliverables D2.1, D2.4, and D2.7 have been rejected by the EC with comments and request for improvements. This took place outside of the evaluated period and will be subject to monitoring an evaluation for the next project implementation period.



3.2.3 WP3 INFORM Training of Trainers

WP3 is dedicated to the training of at least 2 trainers per MS on the new Data Protection legislation and on specific training methodologies.

This activity started on the 6th month of the project implementation, which is in line with the Project Implementation plan. The work is in progress.

3.2.4 WP4 INFORM e-Learning programme

The main objective of WP4 is to increase the capacity of the judiciary, legal practitioners, and court staff with regard to the new Data Protection legislation by using a sophisticated e-Learning programme.

This activity started on the 5th month of the project implementation, which is in line with the Project Implementation plan. The work is in progress.

3.2.5 WP5 Dissemination & Communication

The purpose of WP5 is to raise awareness on the new Data Protection Legislation and further promote the INFORM project and deliverables to the target groups, other stakeholders, and the general public. The dissemination and communication activities are scheduled to start from the 1th month and to be conducted during the whole project implementation period.

In the evaluation period the following deliverables have been elaborated:

- Deliverable D5.1 ‘INFORM Dissemination strategy’;
- Deliverable D5.2 ‘Visual identity pack’;
- Deliverable D5.3 ‘INFORM website’;
- Deliverable D5.4 ‘Social media accounts’;
- Deliverable D5.5 ‘INFORM Dissemination materials’.



The significant part of the above mentioned deliverables meet the standards in terms of structure and content, clarity, format, and technical level⁵. Where applicable, the documents contain a comprehensive executive summary and clearly described and adequate methodology. The documents are useful, accurate, independent, credible, and ethical. All intellectual products, which are completed and pass the approval by EC, are made accessible free of charge on INFORM website. A total of 669 website and social media visitors are reported (see 3.1).

The work is in progress. Partners are in the course of preparation of the upcoming INFORM Days. It is important to assure a wide range of stakeholders to be informed on the main provisions of GDPR and Directive 2016/680.

At the end of the evaluated period (Oct 2017-May 2018) the achievement of the mandatory results compared to the indicators is as follows:

Indicator	Number / Percentage	Results
Quantitative indicators		
Reports on legislation reviews	6	In progress
Comparative study	2	2
Guidelines	3	In progress
e-Learning programme	3	NA
Project reports & budget reviews	2	NA
Qualitative indicators		
Dissemination & exploitation activities positive feedback	min 85%	NA
Process indicators		

⁵ In June 2018, Deliverable D5.5 has been rejected by the EC with a request for improvements. This took place outside of the evaluated period and will be subject to monitoring an evaluation for the next project implementation period.



Completeness of set requirements for deliverables	min 95%		In progress
Timely implementation of tasks	min 90%		70 %

Intermediate conclusion 2:

The project deliverables achieve the indicators to a high degree.

During the elaboration of the documents, a comparative approach has been applied and participants managed to produce reports and analysis which are relevant to 9 different national legal systems. This makes the intellectual outputs innovative. The deliverables correspond to the project objectives. They are relevant to the target groups' needs.

Most of the elaborated deliverables meet the standards in terms of structure, clarity, and format. There is a necessity for further improvements in line with the EC request.

It is recommended to fine-tune the organisation of WPs by encouraging proactive participation from all of the partners, preparation in advance, and common approach to upcoming events.

It is recommended to apply non-discrimination and gender equality principles during the process of invitation of participants to take part in the INFORM Days.

3.3. Overall project monitoring and assessment

The overall project monitoring and assessment helps to answer the question whether and to what extent the project has achieved the desired outcomes and how effective the governance and management of the project have been. The goal is to create a full understanding of the implementation of the project, its achievements, progress, and indicators fulfilment. The findings of the overall assessment are based on collection of data and evaluation, which have been made in previous parts of external evaluation process (see 3.1 and 3.2). The project started 8 months ago and most of its activities are going to be implemented in the upcoming 10 months. Taking into account the above-mentioned,



the findings are not sufficient to build a final conclusion on the project success. This evaluation is intermediate and can be used as a starting point for future improvements and the successful completion of the project.

At the end of the evaluated period (Oct 2017-May 2018), the overall achievements of the project compared to the indicators are as follows:

Indicator	Number / Percentage		Achievements
Quantitative indicators			
Project reports & budget reviews	2	NA	
Project work meetings	5		2
Qualitative indicators			
INFORM staff satisfaction & motivation	min 90%		100 %
Involvement of individual team members in performance monitoring, evaluation, and	min 40% of non-management staff, working on the project		60,61%
Process indicators			
Timely implementation of tasks	min 90%		70 %
Updates made to the INFORM Implementation plan	min 2	NA	
Compliance with JUST Programme rules	no deviation		no deviation



Completeness of set requirements for deliverables	min 95%		In progress
Schedule variance	max 2 months		1 month
Continuous & transparent information flow	min 80% project documentation shared via the INFORM website		100% approved deliverables shared via the INFORM website 100% project documentation and communication shared by the project repository

The planned milestones and outcomes for the period have been achieved and completed on time except for the deliverables related to the guidelines and review for court staff, which have been delayed due to the termination of participating of Budapesti Corvinus Egyetem - CUB, Hungary in the INFORM project.

In addition, the observation did not find any violations of the gender equality and non-discrimination legislation. The project partners respect the language diversity by maintaining INFORM website in 10 different languages and by preparing INFORM Days in their national languages.

As a complementary result, the implementation of the project contributes to the development of mutual trust among the representatives from the Member States and to the improvement of cross-border cooperation. 91% of the respondents to the questionnaire rate the overall experience of the work in partnership as highly satisfactory and satisfactory. All of the representatives from partner institutions strongly agree/agree that joint implementation of the project activities will contribute to the development of mutual trust among Member States and to the improvement of cross-border cooperation.

Intermediate conclusion 3:



This project is funded by the EU. This deliverable has been produced with the financial support of the Justice Programme (2014-2020) of the European Union. The contents of this deliverable are the sole responsibility of the authors and can in no way be taken to reflect the views of the European Commission. [24]

Taking into account the nature of the project, its expected impact and the stage of implementation, it can be concluded that the project achieves its objectives to a satisfactory degree. Partial delay of the implementation in the framework of WP2, can be overcome. The project is not under the risk of non-performance. The project partners respect language diversity, gender equality, and non-discrimination rules. As a complementary result the implementation of the project contributes to the development of mutual trust among the representatives from the Member States and to the improvement of cross-border cooperation.

Conclusions

Taking into account the nature of the project, its expected impact and the stage of implementation, it can be concluded that the project achieves its objectives to a satisfactory degree.

The project management and coordination activities have been conducted on time and precisely, establishing a solid base for effective and successful implementation.

The first dissemination and communication activities have been completed in accordance with the time framework and applicable standards.

The deliverables correspond to the project objectives. They are relevant to the target groups' needs. Most of the deliverables meet the standards in terms of structure and content, clarity, and format. There is a necessity to further improvement of the deliverables in line with the EC's request, provided feedback, and constructive comments.

Partial delay of the implementation in the framework of WP2 can be overcome. The project is not under the risk of non-performance.

The project partners respect language diversity, gender equality, and non-discrimination rules. As a complementary result the implementation of the project contributes to the development of mutual trust among the representatives from the Member States and to the improvement of cross-border cooperation.



Recommendations

Based on the findings, the following recommendations are given in order to strengthen the effectiveness of the project implementation process and its capability to achieve consistent results that meet the target groups' needs:

- There is a need for more active maintenance of the social media accounts. The contribution of all project partners should be encouraged.
- After the official amendment of the Grant Agreement, an update of the INFORM implementation plan should be carried out, reflecting the changes which have been made.
- It is recommended to fine-tune the organisation of WPs by encouraging proactive participation from all of the partners, preparation in advance, and common approach to upcoming events.
- It is recommended to put efforts on further improvement of the deliverables in line with the EC's request, provided feedback, and constructive comments.
- Partners should continue to apply non-discrimination and gender equality principles during the process of invitation of participants to take part in the upcoming project events – both INFORM Workshops and INFORM Days.



Statement

I hereby declare that I have conducted this Interim Evaluation Report in accordance with the applicable standards. My responsibilities under those standards are further described in the INFORM Evaluation strategy and in the Contract, concluded between me and Law and Internet Foundation, dated 12.10.2017.

I am independent of the corporate/administrative structure of any of the Project Partners, and I have fulfilled my ethical responsibilities in accordance with the requirements of the INFORM Evaluation strategy and the Contract, concluded between me and Law and Internet Foundation, dated 12.10.2017.

I believe that the documents and the other evidence I have obtained during the evaluation process are sufficient and appropriate to provide a basis for my opinion.

My opinion on the project implementation does not cover the other information and I do not express any form of assurance conclusion thereon, unless and to the extent explicitly specified in my report.

I hereby declare to the best of my knowledge that I have no conflict of interest with any of the persons or organisations/institutions having participated in the process of project implementation.

NELLY MADANSKA, PhD
External Evaluator
INFORM Project



Appendix A

LIST OF BENEFICIARIES

Name	Short name	Country
1 Law and Internet Foundation	LIF	Bulgaria
2 CONSIGLIO NAZIONALE DELLE RICERCHE	ITTIG	Italy
3 INTHEMIS	INTHEMIS	France
4 UNIVERSITEIT LEIDEN	eLAW	Netherlands
5 GEORG AUGUST UNIVERSITÄT GOTTINGENSTIFTUNG OFFENTLICHEN RECHTS	UGOE	Germany
6 Masarykova univerzita	MU	Czech Republic
7 BUDAPESTI CORVINUS EGYETEM	CUB	Hungary (in a process of termination of participation)
8 UNIwersytet WROCLAWSKI	UWr	Poland
9 UNIVERSITY OF CYPRUS	UCY	Cyprus
10 UNIVERZITA KOMENSKEHO V BRATISLAVE	UNIBA	Slovakia



Appendix B

LIST OF WORK PACKAGES

WP Number	WP Title	Lead beneficiary	Person months	Start month	End month
WP1	Management and Coordination of the	1 - LIF	12.91	1	18
WP2	Data Protection regulatory review & training material elaboration	5 - UGOE	25.35	2	7
WP3	INFORM Training of Trainers	4 - eLAW	5.59	6	17
WP4	INFORM e-Learning programme	9 - UCY	6.37	5	17
WP5	Dissemination & Communication	10 - UNIBA	13.08	1	18
Total			63.30		



Appendix C

PROJECT PERFORMANCE AND IMPLEMENTATION INDICATORS

Midterm results Oct 2017-May 2018

Indicator	Number / Percentage	
Quantitative indicators	Expected	Achieved
Reports on legislation reviews	6	In progress
Comparative study	2	2
Guidelines	3	In progress
Workshops participants	180	-
Info day participants	1000	-
e-Learning programme modules	3	-
e-Learning programme participants	min 1000	-
Impact assessment reports	2	-
INFORM website/social media visitors	min 5000	669
International conference participants	min 100	
Project reports & budget reviews	2	-
Project work meetings	5	2
Qualitative indicators		
Target groups' positive feedback & satisfaction	min 80%	-
INFORM outputs positive feedback	min 80%	-
Target groups' improved competences & motivation	min 85%	-
Dissemination & communication activities positive feedback	min 85%	-
INFORM staff satisfaction & motivation	min 90%	100 %
Process indicators		
Timely implementation of tasks	min 90%	70%



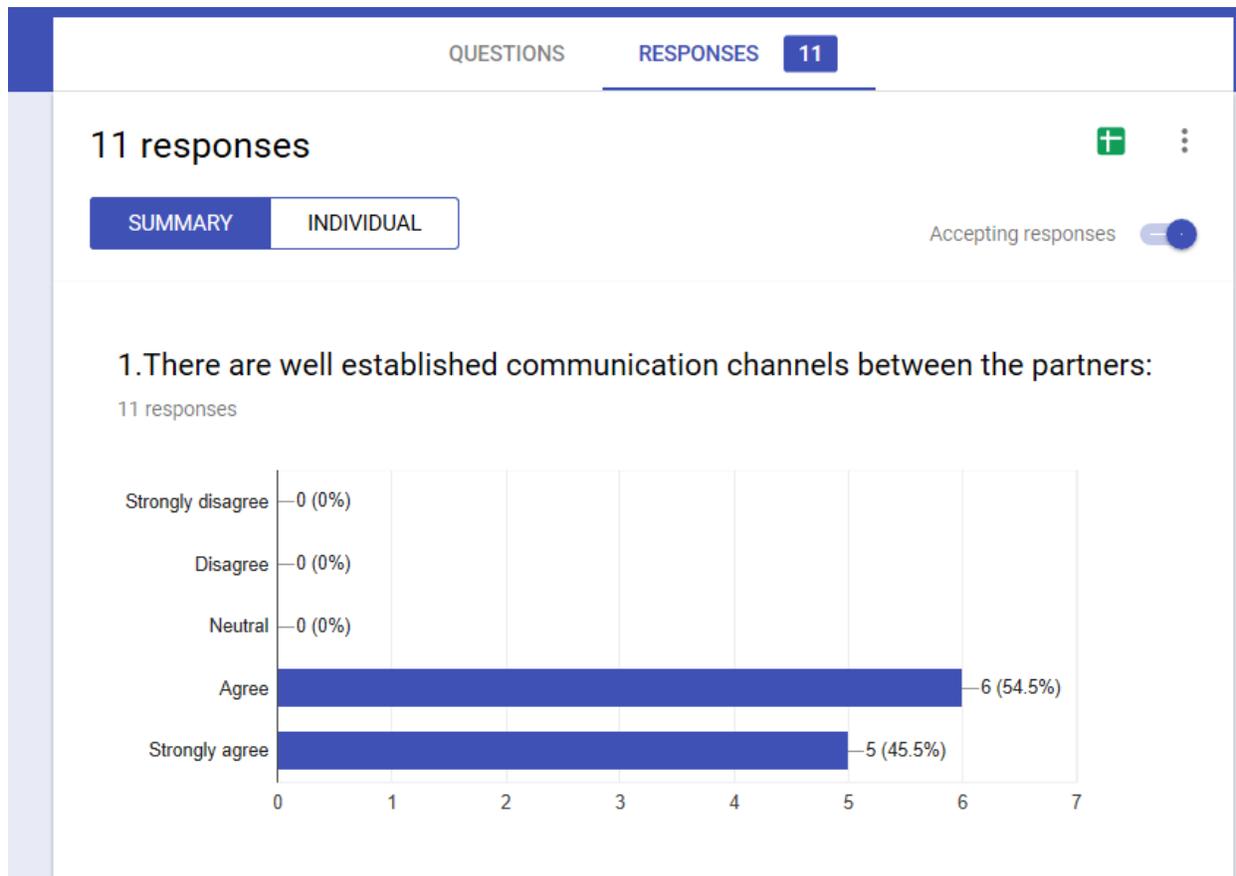
This project is funded by the EU. This deliverable has been produced with the financial support of the Justice Programme (2014-2020) of the European Union. The contents of this deliverable are the sole responsibility of the authors and can in no way be taken to reflect the views of the European Commission. [30]

Compliance with JUST Programme rules	no deviation	No deviation
Continuous & transparent information flow	min 80% project documentation shared via the INFORM website	100% project documentation via the project repository



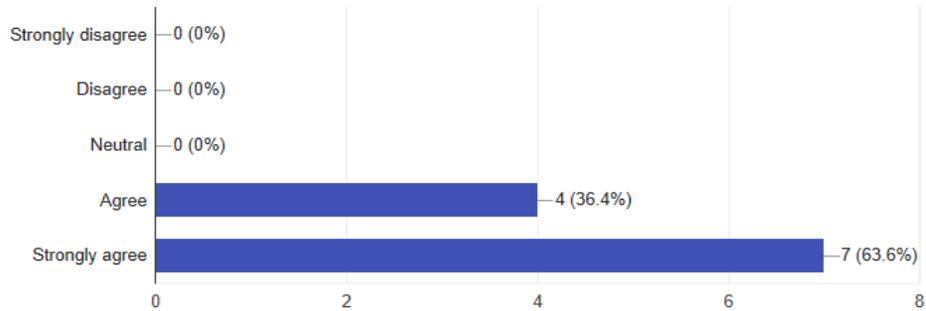
Appendix D

RESULTS OF THE QUESTIONNAIRE



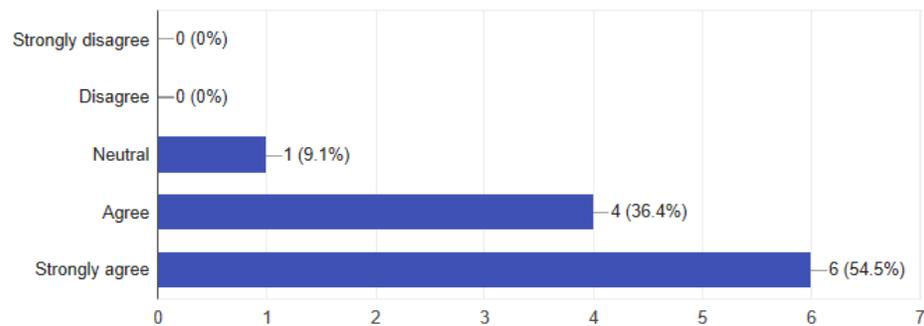
2. The Project Management Team facilitates the communication between partners, as well as with the Commission :

11 responses



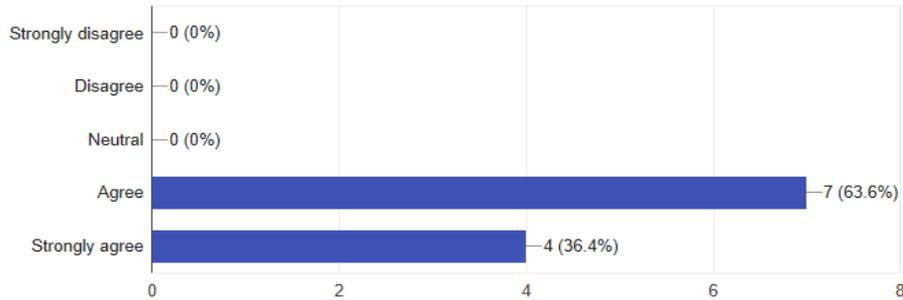
3. The Project Management Team provides guidelines on quality assurance and various templates :

11 responses



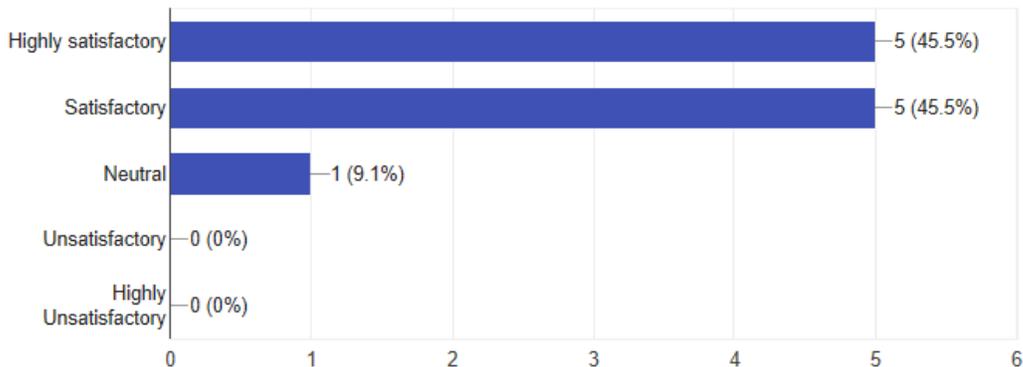
4. The joint implementation of the project activities will contribute to the further development of mutual trust among Member States and the improvement of cross-border cooperation.

11 responses



5. How would you rate your overall experience as a project partner ?

11 responses



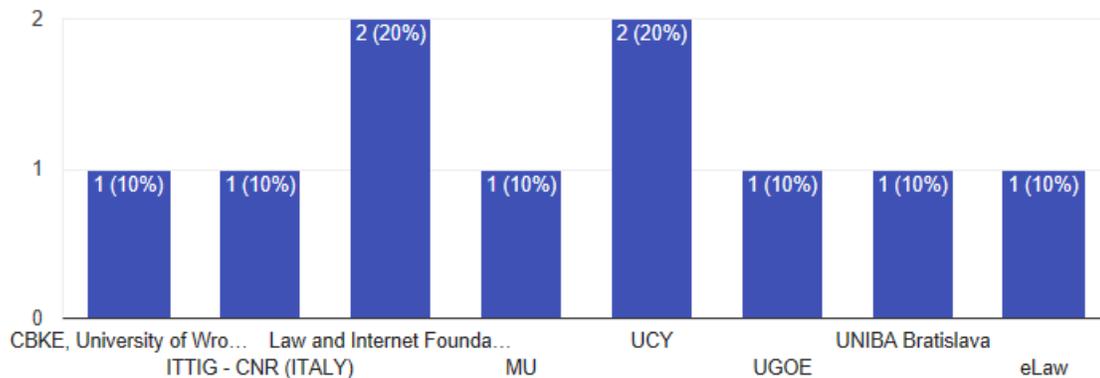
6. What could we do to make project implementation better?

9 responses

Common approach to the upcoming project events, which will be very useful for organisation and conduct of the future workshops and INFORM Days.
-
To get some hints in advance rather than subsequent correction
Everything works well in the Project. More coordination in the organization of workpackages among partners (especially those who are involved in the same tasks) should be considered as an advantage for the good implementation of the Project.
Encourage pro-active participation by all project partners.
Everything is great and a big congratulations to the management team! The only thing we would like to change is to not have a fixed day and time for the monthly Skype calls, or if we will, please change the time to make it sooner in the day so that everyone in our organization is still in the office to participate. Thank you.
We are satisfied with the management of the project.
Hard to say if it is even possible given our means in this project.
From our perspective the timetable for this project is very tight in relation to its broad topic. This is a point which should be taken into account for new projects.

7. Please indicate your organization.

10 responses



3. The Project Management Team provides guidelines on quality assurance and various templates :

11 responses

