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From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
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To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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Subject:	COMMISSION STAFF WORKING DOCUMENT EXECUTIVE SUMMARY OF THE EVALUATION Mid-term Evaluation of the Internal Security Fund (ISF) for the 2021-2027 programming period

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Delegations will find attached document SWD(2025) 275 final.

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SWD(2025) 275 final

**COMMISSION STAFF WORKING DOCUMENT**  
**EXECUTIVE SUMMARY OF THE EVALUATION**

**Mid-term Evaluation of the Internal Security Fund (ISF) for the 2021-2027  
programming period**

{SEC(2025) 254 final} - {SWD(2025) 274 final}

## BACKGROUND TO THE EVALUATION

The Regulation<sup>1</sup> establishing the Internal Security Fund (ISF) for the 2021-2027 period, was adopted on 7 July 2021. The ISF was established as the successor of the Internal Security Fund - Police (ISF-P) for the 2014-2020 programming period. The ISF benefits from a larger budget, enabling more comprehensive support to Member States. With a total EU contribution of EUR 1.93 billion<sup>2</sup> for the 2021-2027 programming period compared to the EU contribution of ca. EUR 1.21 billion for the 2014-2020 programming period. The ISF is implemented through shared management, direct management and indirect management. The programming occurs either at the Member State level through the Member State programmes or at the Commission level, via the Thematic Facility<sup>3</sup>.

Moreover, the ISF is now under the Common Provisions Regulation (CPR)<sup>4</sup> which sets the financial and implementation rules for most EU funds in shared management. This new legal framework introduced more flexible payments, improving financial management and easing administrative burdens. The ISF's Thematic Facility provides greater flexibility to respond to pressing needs and to changes in policy and Union priorities, and to steer funding towards actions with a high level of Union added value<sup>5</sup>. Accordingly, part of the ISF funding is periodically allocated, via the Thematic Facility, to Specific Actions, to Union Actions, and Emergency Assistance.

The ISF has one overall policy objective: “to contribute to ensuring a high level of security in the Union, in particular by preventing and combating terrorism and radicalisation, serious and organised crime, and cybercrime, by assisting and protecting victims of crime, as well as by preparing for, protecting against and effectively managing security-related incidents, risks and crises.”

The ISF has three Specific Objectives:

1. Improving and facilitating the exchange of information between and within competent authorities and relevant Union bodies, offices and agencies and, where relevant, with third countries and international organisations;
2. Improving and intensifying cross-border cooperation, including joint operations, between competent authorities in relation to terrorism and serious and organised crime with a cross-border dimension; and
3. Supporting the strengthening of Member States' capabilities in relation to preventing and combating crime, terrorism and radicalisation, as well as managing security-related incidents, risks and crises, including through increased cooperation between public authorities, relevant Union bodies, offices or agencies, civil society and private partners in different Member States.

The implementation of the programmes in shared management started with some delay, due to the late approval of the Member State programmes and the nature of share management which requires Member States to set up necessary structures and procedures,

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<sup>1</sup> Regulation (EU) 2021/1149 (OJ L 251, 15.7.2021, p. 94, ELI: <http://data.europa.eu/eli/reg/2021/1149/oj>

<sup>2</sup> Article 7(1) of the ISF Regulation.

<sup>3</sup> Article 8(1)(a), (b) and (c) of the ISF Regulation.

<sup>4</sup> Regulation (EU) 2021/1060 (OJ L 231, 30.6.2021, p. 159), ELI: <http://data.europa.eu/eli/reg/2021/1060/oj>

<sup>5</sup> Recital (37) of the ISF Regulation.

launch calls, and complete project selection procedures before being able to spend their appropriations.

Moreover, the implementation context was considerably impacted by the Russian war of aggression in Ukraine and the COVID-19 pandemic. These events have had an influence in the initial implementation of the fund.

According to Article 29(1) of the Regulation establishing the ISF, the Commission should carry out a mid-term evaluation of the ISF by 31 December 2024 to assess:

- (a) its effectiveness, including the progress made towards the achievement of its objectives;
- (b) the efficiency of the use of resources allocated to the instrument and the efficiency of the management and control measures put in place to implement it;
- (c) the continued relevance and appropriateness of the implementation measures set out in the Regulation;
- (d) the coordination, coherence and complementarity between the actions supported under the instrument and support provided by other Union funds;
- (e) the Union added value of actions implemented under the instrument.

The temporal scope of this mid-term evaluation of the Internal Security Fund (ISF) covers the period from 1 January 2021 until 30 June 2024. The geographical scope of the evaluation is the 26 Member States bound by the ISF Regulation, i.e. excluding Denmark<sup>6</sup>. The evaluation relied on qualitative and quantitative methods, including the consultation of Member States, Commission officials, implementing partners and beneficiaries.

This document sums up the results of that evaluation. In general, figures and data used for the analysis had 30 June 2024 as a cut-off date. Later developments are in principle not covered by the evaluation.

## **MAIN FINDINGS AND LESSONS LEARNED**

### *Effectiveness*

At different speeds, the interventions funded have been progressing in operational terms. At fund level and Member States' programmes level, the distribution of committed and spent resources between the three Specific Objectives show that Specific Objective 1 (furthering information exchange) is predominant followed by Specific Objective 3 (strengthening of Member States' capabilities).

As regards the progress of output indicators towards their milestones, some Member States are making significant progress towards achieving their milestones and targets. However, ten Member States have not reported any progress for the output and result indicators. Overall, 20% for milestones of output indicators have been achieved.

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<sup>6</sup> As per Recital (66) of the ISF Regulation, in accordance with Articles 1 and 2 of Protocol No 22 on the position of Denmark annexed to the TEU and to the TFEU, Denmark is not taking part in the adoption of this Regulation and is not bound by it or subject to its application.

Concerning the suitability of the monitoring and evaluation framework to inform on the progress towards the achievement of the objectives of the instrument, the evaluation concludes that the monitoring and evaluation framework for ISF has seen significant improvements compared to the 2014-2020 period thanks to predefined performance indicators, the differentiation between output and result indicators, and more explanatory documents and resources provided to Member States. Nonetheless, the need for Member States to adapt to a new reporting and monitoring framework explains the still uneven provision of performance data on the implementation of ISF programmes.

### *Efficiency*

As the information on performance is still insufficient, it is too early to carry out a full cost-effectiveness analysis, but there are indications that financial progress is advancing efficiently. At mid-term, under the ISF programmes, Member States had committed an amount (EUR 409 million) equivalent to ca. 61% of the total initial allocation for 2014-2020 ISF-P for national programmes of Member States (EUR 662 million).

The fund demonstrates a commitment to supporting cost-effective measures. Nonetheless adjustments are still needed to ensure an efficient delivery of the funding and reduce the administrative burden that is perceived as substantial by beneficiaries and Managing Authorities. Some elements may have impacted the efficiency of implementation, notably the need to adapt to the new legal framework, under the Common Provisions Regulation. In addition, there is a limitation in human resources, while facing increased available funding, workload, and complexity of the various tasks, as well as a learning process due to new reporting mechanisms and tools.

With the move to the common frame for shared management under the Common Provisions Regulation, there has been a shift toward a more transparent, accountable, and performance-oriented reporting system, addressing inefficiencies identified in the earlier period. The introduction of simplification measures such as flat rates, lump sums, and electronic data exchange systems have contributed to easing administrative burdens and streamlining certain processes.

However, some beneficiaries and Managing Authorities report that regulatory and monitoring requirements remain cumbersome. Stakeholders indicated that, the administrative burden should be reduced, once they adapt to new regulatory and reporting requirements, as well as new ways of working.

### *Relevance*

The Fund is addressing the needs it was meant to address and has been able to respond both structural long-term needs and emergency needs.

There is general agreement that the ISF is still relevant for the needs identified in the definition of the fund and translated into the overall objective of the ISF: to improve and facilitate the exchange of information (SO1), to improve and intensify cross-border cooperation (SO2), and to support the strengthening of Member States' capabilities (SO3).

Overall, the flexibility afforded by the ISF Regulation has allowed Member States to adapt their Member State programmes to evolving needs over the course of implementation. The Thematic Facility has also proved a flexible component and helped address emerging needs and emergency situations.

However, the ambitions of the ISF may be curtailed by the limited funds available. A strategic approach is needed to make the most of the available resources with a view to achieving its policy and specific objectives. This should be done by ensuring resources are concentrated where they can have the largest impact.

### *Coherence*

The Member State programmes and the Commission Work Programmes for the Thematic Facility are fit for purpose and coherent with other national and EU funds.

Concerning internal coherence, there is room for reinforcing the complementarity between Union Actions and Member State programmes and to increase the awareness and knowledge of the other's respective projects.

Awareness of stakeholders regarding the coherence and complementarity of the three funds in the area of home affairs (AMIF, ISF and BMVI) should be reinforced in order to optimise the achievement of the respective policy objectives in the interrelated areas of border management, migration and security.

There is coherence between the ISF and other EU Funds, particularly the Horizon Europe and the ESF+. Coordination between ISF and other funds are achieved through several coordination mechanisms, such as the Monitoring Committee and exchange of information.

As far as coherence with external spending programmes is concerned, and notably the NDICI, enhanced cooperation and coordination on programming both between the Commission services and with Member States are needed. There are several challenges in the current funding architecture that should be addressed, including notably: the insufficient alignment of the Union's external security funding with the Union policies in this area; the persistent challenge to use all existing (policy, funding, investment and other) tools, both at the disposal of the EU and its Member States in a Team Europe spirit, to use strategically and timely leverage in relation to partner countries in order to improve cooperation on security; the limitations for funding security-related actions in third countries, given that most of spending in the external dimension must comply with the criteria for development assistance eligibility.

### *EU Added Value*

The ISF provides an EU added value across all Fund components by supporting projects that go beyond the financial and operational capacities of individual Member States and mobilising resources and reaching otherwise inaccessible areas. Notably, transferability and transnationality bring the highest added value of the ISF, and are most expressed through Union Actions, which should be considered in future programming.

Stakeholders agree that by fostering cooperation, ensuring compliance with EU standards, and alleviating national budget constraints, the Fund significantly contributes to ensure a high level of security in the Union.