

*Annex IV to the Agreement establishing the European Union Emergency Trust Fund for stability and addressing root causes of irregular migration and displaced persons in Africa and its internal rules.*

**EU Trust Fund Action Document for operational committee decisions**

**1. IDENTIFICATION**

Country	Multicountry		
Title/Number	Reference : <b>T05-EUTF-SAH-REG-03</b> Support to the strengthening of police information systems in the broader West Africa region (WAPIS)		
Total Cost	EU Trust Fund for Africa contribution: 5,000,000 €		
Aid modality(ies)/ Implementation modalities(ies)	Direct Management: PAGODA Grant with INTERPOL		
Code CAD	150	Sector	
Sector of intervention of the Trust Fund	Objective n° 2.4 "Supporting improvements in the overall governance, in particular by promoting conflict prevention, addressing human rights' abuses and enforcing the rule of law, including through capacity building in support of security and development as well as law enforcement, including border management and migration-related aspects."		
Sector of intervention of the Valletta Action Plan	Sector 1 :Development benefits of migration and addressing root causes of irregular migration and forced displacement Sector 4 :Prevention of and fight against irregular migration, migrant smuggling and trafficking in human beings		

**2. JUSTIFICATION AND CONTEXT**

**2.1. Summary of the action and its objectives**

Security challenges in the Sahel and in the wider West Africa region are manifold ranging from terrorism to organised crime, migrants smuggling etc. In order to tackle them effectively law enforcement cooperation and sharing of criminal information is of paramount importance. This is particularly challenging in Africa as most of police data is paper based and no region has developed to date a police data-sharing platform. As a result, effective investigations, police controls on persons and goods, and data sharing at all levels are seriously jeopardized.

On numerous occasions, the main regional instances, such as the ECOWAS and the G5 Sahel, have expressed their willingness to address this situation and asked for support to provide local law enforcement authorities with effective means to collect, search, analyse and share relevant criminal information connected with terrorism, organized crime and trafficking cases at national, regional and international levels.

The European Union (EU) started addressing these requests already in 2012 (following a request expressed by ECOWAS in 2011) when it was decided to support under the then Instrument for Stability (now Instrument contributing to Stability and Peace) the development, by Interpol, of the so-called West Africa Information System (WAPIS) in four pilot countries, i.e. Benin, Ghana, Mali and Niger.

The WAPIS system was conceived to provide local law enforcement authorities with national police data systems allowing them to create, manage and share files on criminal cases and events (suspected persons, victims and witnesses of crimes; weapons and objects used to commit crimes; stolen vehicles and vehicles associated with a crime; stolen identity documents, etc.). National systems are then supposed to be connected regionally into a single police and then also connected with the INTERPOL I/24/7 network at the global level.

As of today, in parallel with the progressive digitization of relevant police paper files, the WAPIS system has been successfully installed in these four countries providing local law enforcement authorities with a tool to create, manage and share files on criminal cases and events, first at national level and then potentially at regional and international levels.

In order not to lose this momentum and to effectively face urgent security threats, the EU considers it relevant to continue supporting under the EU Emergency Trust Fund for Africa 1) the further consolidation and expansion of the WAPIS system in the first four pilot countries and 2) to explore the feasibility of setting up WAPIS or WAPIS-like systems in other countries from ECOWAS as well as from the G5 Sahel.

This is fully in line with the objectives of the Trust Fund, with the priority areas identified in the Valletta Action Plan and also contributes to the implementation of the Sahel Regional Action Plan 2015-2020.

It is relevant to note the support provided under the EU Trust Fund is limited in scope and nature as it is meant to bridge the support provided so far under the then Instrument for Stability (concluded in February 2016) and the one to the WAPIS programme already foreseen in the European Union – West Africa Regional indicative Programme 2014 – 2020. Indeed, in the latter document the EU and ECOWAS included the full roll out of the WAPIS system to the ECOWAS Member States and Mauritania amongst the measures to supporting "regional initiatives to address the main threats to peace, security and stability". This could also be coupled with the parallel setting-up of Automated Fingerprint Identification Systems (AFIS) in countries that do not already possess an operational AFIS and that have the capacity to maintain it as a tool to enhance the identification of criminals.

*As such, the present Action Document covers only the activities taking place under the bridging support of the EU Trust Fund.*

## **2.2. Context**

### **2.2.1. Sectorial Context: Policies and Objectives**

Security challenges in the Sahel and in the wider West Africa region are numerous and include terrorism, transnational organized crime and its manifold facets, the proliferation of small arms and light weapons, migrants smuggling and trafficking in human beings, etc.

In order to counter these threats effectively and in order for coordination between law enforcement authorities to take place, criminal information, as the key element of efficient modern policing, needs to be properly stored and exchanged.

One of the major challenges in this respect is the fact that almost the entirety of police data in Africa is paper-based. This situation seriously impacts police work as paper-based police data is difficult to retrieve, search, analyse, and share, therefore impeding investigations, police controls on persons and goods, and data sharing at all levels.

As of today, in sub-Saharan Africa, only three countries have developed or started developing a national centralized police information database: South Africa, Botswana and Benin. No African region has developed a regional police data-sharing mechanism.

As regards West Africa in particular, it is worth noting that 1) the number of criminal records originating from West Africa only represent 0.035% of INTERPOL data; 2) the number of searches originating from West Africa only represent 0.53% of the total number of searches globally and; 3) the number of Red Notices for wanted persons originating from West Africa only represent 88 out of a total of 30,400, meaning 0.03% of all INTERPOL Red Notices.

As a result, without effective capacity to collect police information, manage and share it within the region, as well as between the region and the rest of the world, law enforcement authorities cannot efficiently coordinate and no enforcement strategy can effectively tackle urgent security threats.

It is therefore urgent to support the development of systems which would allow for both the national collection and centralization of police data, as well its regional (and international) sharing and analysis.

This corresponds to the request put forward by the Economic Community of West African States (ECOWAS), who first convened in 2011 at ministerial level and then also in the framework of the West African Police Chiefs Committee (WAPCCO), asking for support in the development of a regional police information system as a key tool to step up their fight against transnational organised crime and terrorism affecting the region. It also reflects more recent efforts within the G5 Sahel to improve their Member States (Burkina Faso, Chad, Mali, Mauritania, Niger) capacities in the field of security, migration and border management, also via the setting-up of a common secure information platform.

Over the past four years, the European Union (EU) has already started addressing requests coming from the region by financing under the then Instrument for Stability (now Instrument contributing to Stability and Peace, long-term component) the development, via Interpol, of the so-called West Africa Police Information System (WAPIS) in four pilot countries, notably Benin, Ghana, Mali and Niger. This funding concluded in February 2016.

The WAPIS System was conceived to provide local law enforcement authorities with national police data systems allowing them to create, manage and share files on criminal cases and events; persons suspected of having committed or participated in a crime or offence, as well as victims and witnesses of crimes; weapons and objects used to commit crimes; stolen vehicles and vehicles associated with a crime; stolen identity documents and documents of persons associated with a crime.

Moreover, the digitization of existing paper police data prevents this valuable data from being accidentally lost or purposely destroyed.

At regional level, the national systems are supposed to be networked into a single police information sharing platform, whose format and procedures remain to be defined politically, legally and technically. Last but not least, the direct connectivity between the WAPIS system and the INTERPOL I/24/7 network, would allow better participation of local law enforcement agencies to INTERPOL network. An overview of the WAPIS architecture is in Annex I.

To date, WAPIS National Committees (WANACO), composed of local law enforcement authorities taking part in this project, have been established in the four pilot countries and meet on a regular basis; National Data Collection and Registration Centers (DACORE), where the WAPIS System has been installed, have been created and the first wave of operators been trained. In addition, the digitization of relevant police paper files via electronic archiving systems has been initiated and is in progress.

Against the good results achieved so far and in order to respond to the pressing threats affecting the region, the EU considers extremely relevant for the Trust Fund 1) to support the further consolidation and expansion of the WAPIS system in the first four pilot countries and 2) to explore the feasibility of setting up WAPIS or WAPIS-like systems in other countries from ECOWAS as well as from the G5 Sahel.

Indeed, this intervention is fully in line with the objectives of the Trust Fund, in particular objective 2.4 "Supporting improvements in the overall governance, in particular by promoting conflict prevention, addressing human rights' abuses and enforcing the rule of law, including through capacity building in support of security and development as well as law enforcement, including border management and migration-related aspects."<sup>1</sup>

It is also coherent with priority domains and the specific objectives identified in the Valetta Action Plan, in particular Objective 1.3 sub-actions, "promote police and judicial cooperation", and "encourage exchange of information at regional level"<sup>2</sup>.

In addition, this Action will contribute to progress in the implementation of the Sahel Regional Action Plan 2015-2020, notably in the field of security and rule of law, as well as of border management, illicit trafficking and transnational organised crime.<sup>3</sup>

Last but not least, it would feed into the possible further full roll out of WAPIS as foreseen in the European Union – West Africa Regional indicative Programme 2014 – 2020, Priority area 1: *Peace, Security and Regional Stability*; Specific objective 2: *Support regional initiatives to address the main threats to peace, security and stability*.<sup>4</sup>

### **2.3. Lessons learned**

Previous phases of the WAPIS programme have confirmed that the development of police information systems relies entirely on the commitment of national authorities. The development of WAPIS in beneficiary countries should follow a bottom up approach rather than a top down methodology and adapt to national procedures rather than projecting an external tool in the existing systems.

"Single points of contact" (SPOCs) should be appointed at local level. They should be of sufficiently high-level to "make things happen" within his/her own agency and to be able to have impact on other participating agencies (e.g. chief of cabinet Ministry of the Interior). Technical and legal points of contact should also be appointed to support the Action's implementation.

The implementation of the action requires continuous assistance and monitoring for all activities, notably through country officers, and the possibility of building links and synergies with Interpol's national central bureaus should be explored.

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<sup>1</sup> [https://ec.europa.eu/europeaid/sites/devco/files/annexe-1-c-2015-7293-20151020\\_en.pdf](https://ec.europa.eu/europeaid/sites/devco/files/annexe-1-c-2015-7293-20151020_en.pdf)

<sup>2</sup> <http://www.consilium.europa.eu/en/valletta-summit-2015/>

<sup>3</sup> <http://www.consilium.europa.eu/en/press/press-releases/2015/04/20-council-conclusions-sahel-regional-plan/>

<sup>4</sup> [https://ec.europa.eu/europeaid/sites/devco/files/eeas-2015-rip-west-africa\\_en.pdf](https://ec.europa.eu/europeaid/sites/devco/files/eeas-2015-rip-west-africa_en.pdf)

Considering the lack of technical expertise in law enforcement agencies in implementing countries, solutions must be developed in order to ensure that the police information systems benefit from a local first line of technical support.

#### **2.4. Complementary actions**

This Action will look for synergies with a number of EU and non-EU funded initiatives and actors, including those conducted by EU Member States at bilateral level. These include (but are not limited to):

- Civilian CSDP missions, notably EUCAP Sahel Mali and EUCAP Sahel Niger to help training, monitoring, mentoring and advising of police officers on the use of WAPIS system (INTERPOL has already benefitted from the support of EUCAP Sahel missions for the implementation of WAPIS in their respective countries);
- EDF-funded projects, like PAJED II in Niger; the 10<sup>th</sup> EDF ECOWAS's Praia Action Plan on Drugs, implemented by UNODC; the 10<sup>th</sup> EDF "Freedom of Movement and Mobility in West Africa" regional programme, implemented by the International Organization for Migration (IOM);
- IcSP-funded projects like AIRCOP (implemented by UNODC in partnership with INTERPOL and the World Customs Organization) or SEACOP (implemented by FIIAPP), aiming at fighting against drugs trafficking by air and sea;
- DCI/PANAF-funded "Enhancing African Capacity to Respond More Effectively to Transnational Organised Crime (TOC)".

In the same vein, synergies will be sought with relevant regional and international organizations and related initiatives, such as:

- the ECOWAS Commission, in particular for possible synergies with ECOWAS Integrated Maritime Strategy (EIMS);
- the International Organization for Migration (IOM) to explore the possible interoperability with their MIDAS border management tool being implemented in several countries of the region, as well as other relevant projects;
- UNODC, in particular their Regional Office for West and Central Africa, in particular in relation with anti-organised crime and anti-drugs projects;
- the World Customs Organization (WCO).

This Action will naturally develop synergies with the several other INTERPOL initiatives in the wider West Africa region, such as the Operation Hydra, targeting individuals wanted for people smuggling.<sup>5</sup>

#### **2.5. Donor coordination**

This Action, in its effort to modernize police data management across the broader West Africa region, will naturally be brought to cooperate with the numerous other security-related initiatives carried out in the region by the European Union, European Union Member States, and other donors.

To this end, existing donor coordination mechanisms and platforms, led or not by the EU, both in the field and at HQs level, will be fully exploited. For instance, participation will be

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<sup>5</sup> <http://www.interpol.int/News-and-media/News/2015/N2015-162> See also <http://www.interpol.int/News-and-media/News/2016/N2016-022>.

pursued to the Fontanot Group, which includes EU Member States' experts, to share views and experience on EU police technical assistance and operational coordination in West Africa, or to the Dakar and Accra Drugs Liaison Officers Platforms.

### **3. DETAILED DESCRIPTION**

#### **3.1. Objectives**

The **overall objective** of this Action is to harmonize and structure the national and regional management of police information in the broader West Africa region in order to increase and improve law enforcement capabilities from the concerned countries in their daily work.

The **specific objectives** of this Action are the following:

1. Building on the results achieved over previous phases, supporting the consolidation and further expansion of the WAPIS system in the four original pilot countries (Benin, Ghana, Mali, Niger);
2. Exploring the feasibility of expanding WAPIS to or supporting and ensuring interoperability of already existing police information systems in other interested countries in ECOWAS region so as to contribute to strengthening their law enforcement capacities to collect, centralize, manage and share police data.
3. Exploring the feasibility of expanding WAPIS to or supporting and ensuring interoperability of already existing police information systems in other interested countries from the G5 Sahel so as to contribute to strengthening their law enforcement capacities to collect, centralize, manage and share police data.

#### **3.2. Expected results and main activities**

In order to achieve the overall and specific objectives outlines above, the expected results and main activities of this Action are the following:

**Result 1: The WAPIS System in the four original pilot countries (Benin, Ghana, Mali, Niger) is fully operationalized.**

- **Activity 1.1:** Providing active change management support in the four pilot countries (Benin, Ghana, Mali, Niger), via capacity-building, mentoring and peer-coaching.
- **Activity 1.2:** Performing WAPIS System extensions in selected greater capital area locations (as will be possible within the 15-month timeframe).
- **Activity 1.3:** Establishing a direct link with INTERPOL databases through the I-24/7 communications system.
- **Activity 1.4:** Have the four pilot countries participating and using the WAPIS system in the INTERPOL Operation Infra in West Africa, which targets international fugitives wanted for serious crimes with a view to localizing and arresting them.<sup>6</sup>

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<sup>6</sup> Pilot countries will be encouraged to insert all wanted persons data into their national WAPIS System. Other countries will be encouraged to do the same, but in the offline version of the WAPIS System that would be possibly deployed to digitize paper-based police data.

- **Activity 1.5:** Preparing a user-feedback report on the use of the WAPIS System software in the four pilot countries (Benin, Ghana, Mali, Niger) so as to develop technical specifications for the possible upgrade on the software.

Key results indicators include:

- Number of local officers trained and mentored in the use of WAPIS system;
- Number of local officers consulting and encoding data in the WAPIS system on a regular basis;
- Amount of digitized paper-based files;
- Number of WAPIS stations installed in the greater capital area;
- Number of countries participating in the Operation Infra and amount of data encoded in WAPIS during the Operation.

**Result 2: Favourable conditions and an enabling environment for the collection, centralization, management and sharing of police data by local law enforcement capacities, via already existing police information system and/or WAPIS, have been created at ECOWAS and its willing Member States.**

- **Activity 2.1:** Conducting technical needs assessment, of ECOWAS and interested Member States.
- **Activity 2.2:** Conducting an implementation study outlining technical options for a regional data-sharing platform, as well as their implications for maintenance cost and data protection.
- **Activity 2.3:** If appropriate, signing an ECOWAS Act to commit ECOWAS Member States to strengthening their law enforcement capacities to collect, centralize, manage and share police data, possibly via the WAPIS system and establishing the responsibilities of all parties (ECOWAS Commission, ECOWAS Member States, INTERPOL, and European Union).

Key results indicators include:

- Number technical assessments conducted;
- Number of countries committed to using police information system (i.e. WAPIS);
- Number of feasible options identified for a regional data sharing platforms, including suggestions on data protection;
- Signature of an ECOWAS Act (if appropriate).

**Result 3: A strategic partnership with G5 Sahel is established and favourable conditions and an enabling environment for the collection, centralization, management and sharing of police data by local law enforcement capacities, via already existing police information system and/or WAPIS, have been created at the G5 Sahel and its remaining willing Member States (Burkina Faso, Chad, Mauritania).**

- **Activity 3.1:** Conducting scoping missions to establish a strategic partnership with the G5 Sahel in the field of security and police information sharing.

- **Activity 3.2:** Conducting scoping missions, including technical needs assessment missions, to the three remaining G5 Sahel countries (Burkina Faso, Chad, Mauritania). This will lead to the appointment of Single Points of Contact (SPOCs).
- **Activity 3.3:** On the basis of the findings of the scoping missions, setting-up of digitization platforms for the conversion of existing paper-based police data into electronic data along with the training/mentoring of the relevant officers.
- **Activity 3.4:** Offering the G5 Sahel countries a common secure information platform based on INTERPOL's I-24/7 network.

Key results indicators include:

- Number of countries visited;
- Number of needs assessment missions conducted;
- Number of countries interested in and committed to using police information systems (i.e. WAPIS);
- Number of SPOCs appointed;
- Number of digitization platforms installed and operational;
- Full operationalization of a common secure information platform for the G5 Sahel.

### 3.3. Risks and assumptions

<b>Risk</b>	<b>Risk level (H/M/L)</b>	<b>Mitigating measures</b>
Lack of political commitment in the targeted countries	Medium	<ul style="list-style-type: none"> <li>- EEAS EU Member States political dialogue</li> <li>- Ensure continued support, visibility and awareness raising at political level through visits in the countries and presence at conferences, especially WAPCCO Annual General Assembly, INTERPOL General Assembly, INTERPOL Regional Conference for Africa, etc.</li> <li>- In case of political changes (new ministers, chiefs of police, etc.): EU MS and EU Delegation to reiterate importance of this intervention, of respect of country commitments, and foresee a field mission to obtain full buy-in.</li> </ul>
Turnover in the implementation team	Low	<ul style="list-style-type: none"> <li>- Ensure stable working conditions, including through long-term contracts.</li> <li>- Guarantee the information flow within the team to allow a takeover of responsibilities/ tasks/ in the case of changes due to departure/illness.</li> </ul>
Turnover of staff in beneficiary countries	High	<ul style="list-style-type: none"> <li>- Secure partner countries' commitment in assigning dedicated staff to the DACORES;</li> <li>- Adopt train-the-trainers approach and regular mentoring, peer-coaching of relevant officials.</li> </ul>
Difficulty to identify reliable and affordable national communication means	Medium	<ul style="list-style-type: none"> <li>- Work in close collaboration with national authorities to learn from past experiences.</li> <li>- Establish contact with international organization and non-governmental organizations present on the field and learn from their experience.</li> </ul>



Legal Framework not in place at national level to ensure adequate usage of the police information system	Medium	<ul style="list-style-type: none"> <li>- Use EU and INTERPOL leverage to speed up the legislative process.</li> <li>- Work with experts from the regions to advise countries and assist them in drafting legal texts.</li> </ul>
Failure of countries to allocate suitable staff and premises for police information systems	Low	<ul style="list-style-type: none"> <li>- Use EU and INTERPOL leverage to secure the allocation of a specific budget line for premises as well as human resources in national budgets.</li> </ul>
Failure of countries to build inter-agency cooperation	Medium	<ul style="list-style-type: none"> <li>- Push forward the agency taking ownership of the national WAPIS system to prove its value and convince sceptical agencies.</li> </ul>
Failure by countries to maintain IT equipment	High	<ul style="list-style-type: none"> <li>- Use EU and INTERPOL political leverage to secure the allocation of a specific budget line for equipment maintenance.</li> <li>- Foster partnerships between law enforcement agencies and local IT companies.</li> </ul>
Assumptions: Interest in and commitment of beneficiary countries to using police information systems whereby they can share relevant criminal information at national, regional and international levels.		

### 3.4. Cross-cutting issues

In order to share police information effectively, it is highly desirable that the different participating national law enforcement agencies develop operational coordination in the form of a national integrated command centre. This Intervention will encourage countries to this end, using available structures where appropriate (i.e. the WAPIS Data Collection and Registration Centres (DACORE), with its inter-agency police information infrastructure and interconnection with the INTERPOL National Central Bureau, where relevant and existing). In addition, it will be necessary to identify, where possible absorb or connect other existing data collection systems

In order to guarantee **data protection** and its related regime, each country should be compliant with INTERPOL rules for data processing. Data will be regionally shared under the aegis of ECOWAS.

The possible impact of the project on the respect of **human rights, good governance and gender** issues will be constantly monitored and corrective measures will be carried out where relevant and necessary.

Particularly, care will be taken towards law enforcement agencies' respect of human rights. Training to law enforcement agencies may integrate a component on human rights and gender issues. The role of women in the fight against the proliferation of small arms will also be taken into account.

### 3.5. Stakeholders

NAME	ROLE
<b>EEAS/Civilian CSDP missions</b>	<p>The European External Action Service sets the strategic priorities and is present in every country through European Union Delegations.</p> <p>Civilian CSDP Missions will provide technical support, training monitoring, mentoring and advising, where available in their respective theatres of operations. They will also support the negotiation and implementation of strategic partnerships at regional level.</p>
<b>European Commission (DG DEVCO)</b>	The European Commission is the Donor of the Action
<b>INTERPOL</b>	<p>INTERPOL's role is double:</p> <ol style="list-style-type: none"> <li>1. As the implementing partner, the Organization is responsible for designing the action plan and managing the Programme's implementation.</li> <li>2. INTERPOL is responsible for developing the core technical standards of the WAPIS system as the Operator of the I-24/7 global secure police information system, to which the WAPIS System will be interconnected.</li> </ol>
<b>ECOWAS Commission</b>	<p>As the regional body representing the 15 countries of West Africa (at the unique exception of Mauritania), the Economic Community of West African States (ECOWAS) is a crucial political actor. As such, it will play a central role in:</p> <ol style="list-style-type: none"> <li>1. Facilitating negotiations among Member States leading to the selection of the type of mechanism to be used for the exchange of data at regional level and to the adoption of the required legal framework.</li> <li>2. Providing legal advice and support in its role of custodian of the <i>Supplementary Act on Personal data Protection Within ECOWAS</i>, which is the appropriate legal framework for the processing of personal data within the ECOWAS region.</li> <li>3. Providing political support for the Intervention among its Member States.</li> <li>4. Participating in the monitoring the Intervention's progress in its Member States.</li> </ol>
<b>Beneficiary countries/Target groups</b>	<p>The beneficiary countries include: the four original pilot countries (Benin, Ghana, Mali, Niger); the remaining countries of the G5 Sahel (Burkina Faso, Chad, Mauritania); any other interested country from ECOWAS.</p> <p>Beneficiary countries are involved in the implementation of the action also via the appointment of Single Points of Contact (SPOCs) and the establishment of WANACOs (WAPIS National Committees).</p> <p>The main targeted groups are law enforcement authorities and officers (police, gendarmerie, customs, etc) from the beneficiary countries.</p>
<b>WAPCCO /CCSS</b>	<p>In an effort to promote regional security, the West African Police Chiefs Committee (WAPCCO), whose secretariat is located at the ECOWAS Commission Headquarters in Abuja, drives intra-community police cooperation, including information exchange and coordinated enforcement strategies. The WAPCCO will assist the ministerial council in the preparation of related political decisions and in the drafting of the relevant ECOWAS regulations. The WAPCCO will contribute to</p>

	<p>monitoring the Intervention's implementation.</p> <p>The Committee of Chief of Security Services (CCSS) includes all agencies involved in ensuring national security across the region. It facilitates intra-community cooperation and information exchange towards the collective fight against crime. The CCSS will assist the ministerial council in the preparation of political decisions and in the drafting of relevant ECOWAS regulations. The CCSS will contribute to monitoring the Intervention's implementation.</p>
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#### 4. IMPLEMENTATION MODALITIES

##### 4.1. Financing agreement

In order to implement this action, it is not foreseen to conclude a financing agreement with the partner country.

##### 4.2. Indicative implementation period

The indicative implementation period of the Grant contract is 24 months.

##### 4.3. Method of implementation

The implementation method will be **direct management** through the signature of a **PAGODA** Grant with INTERPOL.

As far as the governance of the Action is concerned, a **Project Steering and Coordination Committee** (PSCC) will be established in order to ensure/strengthen coordination in planning and reviewing the Action's implementation. In particular, it will fulfil oversight functions, validate the overall direction of the Action, review implementation and provide guidelines for planning.

Chaired by the Contracting Authority and INTERPOL, the PSCC will include representatives from both of them along with the EEAS, including civilian CSDP missions, and other Commission's line DGs as observers. Selected representatives from the main national and regional stakeholders (ECOWAS, WAPCCO, G5 Sahel) and other relevant actors may participate as relevant. The exact composition of the PSCC will be agreed with the Contracting Authority during the inception phase of the Action.

With a view to the support to the further roll out of the WAPIS system foreseen under the 11<sup>th</sup> EDF, the relocation - as requested by ECOWAS - of the Action's management team to Ivory Coast, where INTERPOL Regional Bureau for West Africa is placed (including new recruitments as necessary) shall be completed by the end of the bridging implementation period under the EU Trust Fund so as the new team can be operational in Abidjan within the first 3 months of the EDF funding segment.

##### *4.3.1. Grant: direct award Support to the strengthening of police information systems in the broader West Africa region (direct management)*

(a) Objectives of the grant, fields of intervention, priorities of the year and expected results

The objective of this grant is to contribute to the improvement of the regional management of police information in the broader West Africa region in order to increase and improve law enforcement capabilities from the concerned countries in their daily work as illustrated in section 3.1 above. The type of actions eligible for financing includes capacity building activities (i.e. training, mentoring, conduct of joint operations), the provision of equipment, as

well as the organization of conferences and workshops. The expected results are those described in section 3.2 above.

(b) Justification of a direct grant

Under the responsibility of the Commission’s authorising officer responsible, the grant may be awarded without a call for proposals to INTERPOL.

Under the responsibility of the Commission’s authorising officer responsible, the recourse to an award of a grant without a call for proposals is justified in line with the provisions of Article 190(2) RAP because the beneficiary (INTERPOL) is in a factual monopoly situation. Indeed, it is the only organisation competent to centralise and manage a multilateral exchange of police information at regional (and possibly wider) level, including personal data and other confidential and sensitive information, through the Interpol National Central Bureau of the member countries. Due to its security and confidentiality requirements, the activities under this Action places Interpol in a monopoly situation.

(c) Maximum rate of co-financing

The maximum possible rate of co-financing for this grant is 100% of the eligible costs of the action.

In accordance with Articles 192 of Regulation (EU, Euratom) No 966/2012 applicable by virtue of Article 37 of (EU) regulation n° 323/2015 if full funding is essential for the action to be carried out, the maximum possible rate of co-financing may be increased up to 100 %. The essentiality of full funding will be justified by the Commission’s authorising officer responsible in the award decision, in respect of the principles of equal treatment and sound financial management.

(d) Exception to the non-retroactivity of costs

The Commission authorises the eligibility of costs prior to the submission of the grant application as of 14 February 2016.

**4.4. Indicative budget**

The indicative amount of the Action is 5,000,000 EUR.

	<b>Indicative amount in EUR</b>
<b>Direct Grant to INTERPOL</b>	<b>5, 000, 000</b>
Human Resources	1,410,000
Travel and Per Diem	700,000
System, Equipment and Supplies	1,500,000
Local offices	150,000
Other costs, services, including visibility	700,000
Contingency reserve 5%	220,000
Administrative costs 7%	320,000
<b>Total</b>	<b>5, 000, 000</b>

#### **4.5. Evaluation and audit**

The Commission may decide to undertake a final evaluation of this action and, if deemed relevant, a mid-term evaluation for one or more of its components. Evaluations will be carried out via independent consultants.

The mid-term evaluation will be carried out for problem solving in the concerned components.

The evaluation reports shall be shared with the partner country and other key stakeholders. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner country, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audits or expenditure verification assignments for one or several contracts or agreements.

The financing of evaluation and audit contracted by the Commission shall be covered by another measure.

#### **4.6. Communication and visibility**

Communication and visibility of the EU is a legal obligation for all external actions funded by the EU.

This action shall contain communication and visibility measures which shall be based on a specific Communication and Visibility Plan of the Action, to be elaborated at the start of implementation and supported with the budget indicated in section 4.4 above.

In terms of legal obligations on communication and visibility, the measures shall be implemented by the Commission, the partner country, contractors, grant beneficiaries and/or entrusted entities. Appropriate contractual obligations shall be included in, respectively, the financing agreement, procurement and grant contracts, and delegation agreements.

The Communication and Visibility Manual for European Union External Action shall be used to establish the Communication and Visibility Plan of the Action and the appropriate contractual obligations. Nonetheless, confidentiality of some of the outputs and activity might lead to specific arrangements restricting their circulation and information thereon.

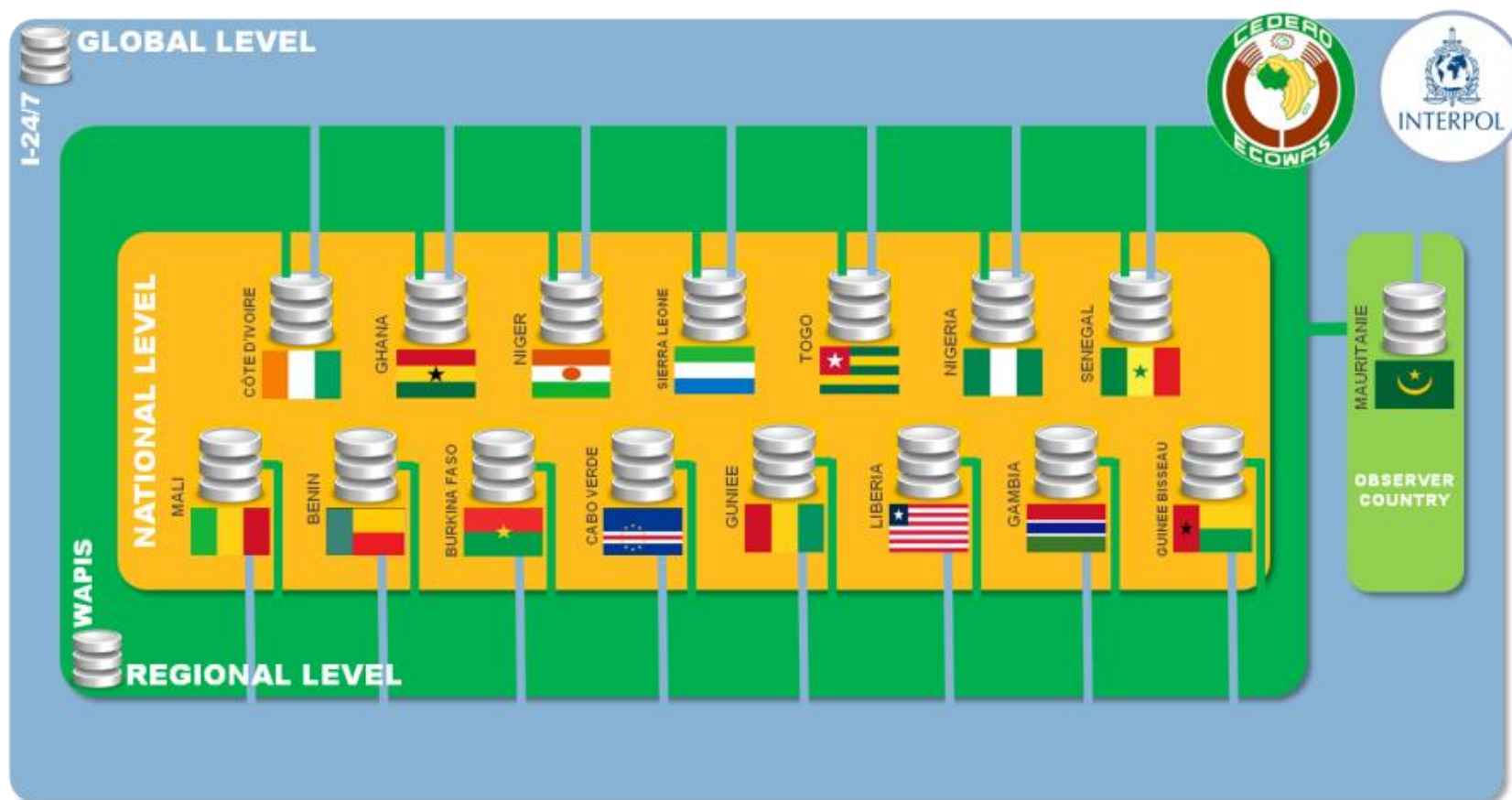
In addition, during the implementation period, three separate events will give the opportunity to give visibility to the Action and its stakeholders:

1. INTERPOL will organize, in cooperation with West African law enforcement authorities, a so-called INTERPOL Operation "Infra", targeting fugitives from or operating across the region. Besides the standard press releases, this Operation will be used to produce a promotional video for the WAPIS Programme.
2. The 2016 WAPCCO Annual General Meeting will be a key opportunity to assess the implementation of the WAPIS Programme and to gather the support of the region's Heads of Police for the programme's full implementation. The Ministerial meeting that immediately follows should endorse a recommendation for the programme's full implementation. This will be an important opportunity to give the WAPIS Programme media attention.

3. An ECOWAS Act would be signed by either ECOWAS Heads of State and Government or Ministers. This high-level event will be the opportunity to organize a side event with high-level European Union and INTERPOL officials.

## ANNEX 1

The following figure presents the three levels of the WAPIS Programme:



Countries are at the heart of the data-sharing scheme. Each country will be able to exchange data at the regional level through the WAPIS regional police data-sharing platform and at global level through INTERPOL's I-24/7 network. Countries will remain sovereign and, as owners of their police data, will decide which data will be shared at regional and/or global level. There will be no direct link between the regional WAPIS System and the INTERPOL's I-24/7.