





Valencia Centros Escolares II Spain

Complaints SG/E/2012/05

Complaints Mechanism - Complaints Mechanism - Complaints Mechanism - Complaints Mechanism

CONCLUSIONS REPORT

7 February 2013

Prepared by

Complaints Mechanism:

Vladimir Klechtchev Consultant

Esther de Kruijff Senior Complaints Officer

Felismino Alcarpe

Head of Division Complaints Mechanism

External Distribution

Complainant:

on behalf of the Parents Association of C.P. Emilio Lluch Public School

Internal Distribution

Management Committee Secretary General Inspector General EIB services concerned

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The EIB Complaints Mechanism

The EIB Complaints Mechanism intends to provide the public with a tool enabling alternative and pre-emptive resolution of disputes in cases whereby the public feels that the EIB Group did something wrong, i.e. if they consider that the EIB committed an act of maladministration. When exercising the right to lodge a complaint against the EIB, any member of the public has access to a two-tier procedure, one internal – the Complaints Mechanism Division (EIB-CM) - and one external – the European Ombudsman (EO).

If complainants are unhappy with the reply they may, on a pure voluntary basis, within 15 days of the receipts of the EIB-CM's reply, submit a confirmatory complaint. Furthermore complainants who are not satisfied with the outcome of the procedure before the EIB-CM and who do not wish to make a confirmatory complaint may also lodge a complaint of maladministration against the EIB with the European Ombudsman.

The EO was "created" by the Maastricht Treaty of 1992 as an EU institution to which any EU citizen or entity may appeal to investigate any EU institution or body on the grounds of maladministration. Maladministration means poor or failed administration. This occurs when the EIB Group fails to act in accordance with the applicable legislation and/or established policies, standards and procedures, fails to respect the principles of good administration or violated human rights. Some examples, as set by the European Ombudsman, are: administrative irregularities, unfairness, discrimination, abuse of power, failure to reply, refusal of information, unnecessary delay. Maladministration may also relate to the environmental or social impacts of the EIB Group activities and to project cycle related policies and other applicable policies of the EIB.

The EIB Complaints Mechanism intends to not only address non-compliance by the EIB to its policies and procedures but to endeavour to solve the problem(s) raised by complainants such as those regarding the implementation of projects.

For further and more detailed information regarding the EIB Complaints Mechanism please visit our website: http://www.eib.org/about/cr/governance/complaints/index.htm

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CONCLUSIONS REPORT

1. EXECUTIVE SUMMARY

The complaint

On 13 April 2012 the the Parents Association of C.P. Emilio Lluch Public School in Náquera, Valencia, Spain (hereinafter the Complainant) lodged a confidential complaint with the EIB. The complaint primarily referred to the appalling current state of the existing educational facilities. According to the Complainant the educational facilities have become substandard and inadequate since the construction of the School in 1980 due to a significant increase in the local school age population. According to the complainant all nursery classes and some primary classes at the School are housed in pre-fabricated classrooms affecting over 200 pupils, a half of all pupils in the School. In addition, eleven primary classes are taught in the obsolete and substandard existing educational facilities in the main building, which are overdue for renovation and modernisation.

Moreover, the Complainant questioned which schools were finally included in the Crea Escola programme and challenged the EIB lending operations Valencia Centros Escolares II-2 and III in relation with the monitoring of the loans and their financial aspects.

The project

The purpose of the loans Valencia Centros Escolares II-1, II-2 and III is (i) to improve the quality of pre-university educational infrastructure in the Valencia region by eliminating pre-fabricated (temporary, modular building constructions) classrooms and by replacing obsolete educational spaces, providing educational facilities suited to delivery of modern curricula and (ii) to expand its capacity to face a fast growing school age population due to heavy immigration flows into the region.

Findings and Conclusions

From the gathered information and the inquiry carried out, the EIB-CM found that of the total of 320 schools sub-projects originally identified by CEE under Crea Escola programme, approximately 2/5th were distributed in Valencia, 2/5th in Alicante and 1/5th in Castellon. The programme covered primary, secondary and vocational schools, including some specialised music and sports academies and aimed to eliminate 386 pre-fabricated classrooms spread over 215 primary and 171 secondary schools. The project Valencia Centros Escolares II-2 of which the School is a sub-project, significantly falls short of expectations. Eighteen months after the programme's anticipated completion date, 113 of the planned 409 school sub-projects are yet to be started. As a result many schools included in the Crea Escola programme remain without sufficient pupil places with some of them still accommodated in rented, pre-fabricated classrooms.

Regarding the particular case of the Emilio Lluch School, according to the information provided by the promoter, an initial budget of EUR 4.4 million was allocated to meet the costs of new construction which was later revised to EUR 6.2 million. The renovation was due to start on 1 October 2008 and expected to be completed on 1 July 2010. Ultimately the public tender was published in June 2010. Reportedly EUR 0.5 million was spent on the School to date with no construction having started and the tender was subsequently cancelled. In the absence of a clear explanation on the rationale for the upward budget revision and information on what constituted the above mentioned expenditure the EIB-CM is not in a position to comment

The project is facing a major challenge which is the budgetary constraints of the project promoter as a result of the economic crisis and EIB monitoring mission in July 2012, the results of which the EIB-CM took into consideration for its assessment, coincided with a major staff reorganisation undertaken by the promoter whereby the Promoter's technical and cost advisory staff has been reduced by nearly two-thirds. Such reductions represent a major risk for the Promoter to complete the *Crea Escola* programme and thus to meet its objectives. Based on the review of the complaint, its findings and conclusions, the EIB-CM recommends that, the EIB considers conducting a full and detailed assessment of the Valencia Centros Escolares projects in the near future.

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CONCLUSIONS REPORT

Complainant:	, on behalf of the Parents Association	of C.P. Emilio Lluch Public School
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<u>Subject of complaint</u>: concerns over the lack of progress in renovation of C.P. Emilio Lluch Public School, Náquera, one of the Valencia Centros Escolares or *Crea Escola* sub-projects.

COMPLAINT

- 2.1. On 13 April 2012 (hereinafter called "the complainant"), a representative of the Parent's Association of the C.P. Emilio Lluch Public School, Náquera, Spain ("the School"), sent to the EIB a letter of complaint, where he listed the issues concerning the lack of work undertaken to renovate the School's existing educational facilities.
- 2.2. In his complaint the complainant requested confidentiality.
- 2.3. On 27 April 2012 the EIB-CM acknowledged receipt of the complaint, and informed the complainant of the fact that a review of his case had been launched, as well as of the date by which he might expect an official reply from the EIB.
- 2.4. The part in the complaint regarding a request for information was transferred to the EIB relevant services who replied on 6 June 2012.
- 2.5. On 5 July 2012 the EIB-CM informed the complainant that it was necessary to extend the timeframe for the handling of the complaint in order to form an informed opinion.

3. ALLEGATIONS

- 3.1. In his complaint the complainant specifically referred to the appalling current state of the existing educational facilities. According to him since the construction of the School in 1980 its educational facilities have become substandard and inadequate due to a significant increase in the local school age population.
- 3.2. The complainant specifically stated in his complaint that "one of the objectives of Crea Escola programme was to get rid of pre-fabricated, portable classrooms used in many primary schools on the assumption that educational facilities commensurate with modern demands are indispensable to improve quality and effectiveness of education".
- 3.3. According to the complainant all nursery classes and some primary classes at the School are housed in pre-fabricated classrooms affecting over 200 pupils, a half of the pupils in the School. In addition, eleven primary classes are taught in the obsolete and substandard existing educational facilities in the main building, which are overdue for renovation and modernisation.

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¹ Quoted from translation into English of original Spanish complaint

- 3.4. The complainant further mentioned that since 1999 the matter was brought forward to the Valencia regional government, Comunidad Autónoma de Valencia (CAV), Department of Education and Culture (CCE), the Valencia Ombudsman and the Valencia Parliament on a number of occasions. However, very little or no progress has been made to remedy the reported situation.
- 3.5. The complainant noted that according to his knowledge the funds were allocated by CAV/CCE to renovate the School under the Crea Escola programme on 7 June 2010 with a tender call published in the local press. The deadline for the tender was set as at 28 June 2010. However, according to the complainant no contract was awarded and no work has started since.
- 3.6. In addition, the complainant expressed his awareness that the EIB co-financed a significant part of the *Crea Escola* programme in recent years and that CAV had plans to renovate the School as part of the programme. Therefore, he assumed that the EIB was aware of the status of projects it finances and requested the EIB to provide him with a progress report on the *Crea Escola* programme performance to date and to update him on any CAV plans to renovate the School.
- 3.7. The Complainant requested to be informed about the list of the schools included in the Crea Escola programme and whether the Emilio Lluch nursery and primary school in Náquera was included in this programme. In addition, the Complainant challenged the EIB lending operations Valencia Centros Escolares II and III in relation to the monitoring of the loans and their financial aspects and requested information about the rollout of the Crea Escola programme. He also inquired if there is an evaluation report relating to the aforementioned operations.

4. THE PROJECT

- 4.1. The Valencia region is one of 17 autonomous regions of Spain containing 3 provinces: Valencia, Alicante and Castellon. Over the last two decades the population in the Valencia region has grown significantly through immigration from the European Union (EU) and other countries; thus putting the existing educational facilities and infrastructure under more pressure.
- 4.2. In 1983 the full responsibility for education in the region was transferred by the Spanish state to the Valencia regional government, *Comunidad Autonoma de Valencia* (CAV). In 1990 the Law in Education, *Ley Organica 1/1990 de Ordenacion General de Sistema Educativo* (LOGSE), required to improve the existing primary and secondary education facilities.
- 4.3. Under LOGSE from 1990 onwards mandatory education in Spain has been established for all pupils from ages 6 to 16, with CAV having a wider remit to provide additional *Baccalaureate* and *Formación Profesional* (Intermediate Specific Vocational Training).
- 4.4. In the late 1990's CAV drafted a first plan to modernise the existing educational facilities and to build new facilities required, which was partially financed in 2002 by a loan from the EIB under Valencia Centros Escolares I investment programme (1999-0311).
- 4.5. In 2000, CAV created Construcciones e Infraestructuras Educativas de la Generalitat de Valencia (CIEGSA), a limited liability company, taking the responsibility of adapting the educational facilities to the needs of LOGSE. CIEGSA (the Promoter) is a 100% subsidiary of the CAV and is supervised by the Conselleria de Cultura I Educacion, CAV's Department of Education and Culture (CCE). CIEGSA's general purpose is to plan, modernise and build primary and secondary education facilities in the region of Valencia.
- 4.6. Following the success of the investment programme and as a result of a continuous strong growth in school age population, CAV designed in 2004 a new programme of educational facilities named *Crea Escola*. The programme comprised of planning for new buildings, rehabilitation and extension of the existing buildings for primary, secondary and vocational education as well as provision of fittings, furniture and equipment and other related infrastructure throughout the Valencia region.

- 4.7. The purpose of the *Crea Escola* programme is (i) to improve quality of pre-university educational infrastructure in the Valencia region by eliminating pre-fabricated (temporary, modular building constructions) classrooms and by replacing obsolete educational spaces, providing educational facilities suited to the delivery of modern curricula and (ii) to expand its capacity in order to face a fast growing school age population mainly due to heavy immigration flows into the region. These core objectives were then later developed by CAV into specific programme objectives as follows:
 - Improvement in education quality through provision of new and modern teaching methods;
 - Improvement in learning environment by providing facilities stimulating positive behaviour, attendance, achievement and aspiration;
 - Development of internet connectivity of all schools to the CCE network in line with the European Commission (EC) eLearning Action Plan;
 - Replacement of 386 existing pre-fabricated classrooms with more permanent and modern educational facilities;
 - Development of sport facilities with a particular emphasis on nautical sports as well as on ball court sports popular in the Valencia region;
 - Contribution towards integration of immigrant families and kids in the existing communities in Valencia.
- 4.8. The total investment envisaged for the *Crea Escola* programme was initially estimated at EUR 1.6 billion funded by CAV and investment loans from the EIB. The *Crea Escola* programme initially included 320 identified sub-projects (later dropped to 306 and revised upwards to 393 and 409 respectively by CCE).
- 4.9. The EIB participated in a partial funding of the *Crea Escola* programme through two loans: (i) Valencia Centros Escolares II-1 (2004-0726) for EUR 500 million and (ii) Valencia Centros Escolares II-2 (2006-0215) for EUR 300 million. A third loan (Valencia Centros Escolares III) to finance new School sub-projects included in the programmes *Crea Escola* and *Millor Escola* (a new programme devised by CAV) was approved in 2010 but was never signed.
- 4.10. Crea Escola programme co-financed by the EIB comprises a large number of school sub-projects whose execution, scheduled over several years, is the sole responsibility of CAV. It also should be noted that CCE (CAV's Department for Education and Culture) determines a general scope for the Crea Escola programme as well as specifics of individual school sub-projects.
- 4.11. The C.P Emilio Lluch Public School in Náquera is one of the schools included in the list of sub-projects by CEE under the *Crea Escola* programme and is listed on the website of the Department d'Educació, Formació i Ocupació of the Valencia region http://www.cefe.gva.es/creaescola/es/actuaciones.htm
- 4.12. The School is a sub-project financed through the Valencia Centros Escolares II-2 project.

5. APPLICABLE REGULATORY FRAMEWORK

- 5.1. From the assessment of the present complaint, it appears appropriate to elaborate on the scope of the EIB-CM and the allocation of responsibilities between the EIB and the Promoter as regards the handling of procurement procedures related to the EIB-financed projects.
- 5.2. In regards to the recourse to the EIB-CM, it is worth mentioning that it enables any person or group, who alleges there may be a case of maladministration by the EIB in its actions and/or omissions, to lodge a complaint with the EIB Secretary General. Article 4 of the EIB-CM describes the scope of the mechanism as including all complaints of maladministration lodged against the EIB Group.
- 5.3. Within the framework of the present complaint, it is to be noted that pursuant to article 2.3, part IV of the EIB Complaints Mechanism Principles, Terms of Reference and Rules of Procedures (CMPTR) "the EIB Complaints Office is not competent to investigate complaints concerning international organisations, Community institutions and bodies, national, regional or local authorities".

- 5.4. When financing a project such as the *Crea Escola* the EIB, in its role of financier, relies on the borrower and project promoter to implement the project as it is not part of the local decision making process regarding allocations and priority setting of the scheme, but reviews and monitors progress.
- 5.5. As regards the allocation of responsibilities between the EIB and the Promoter when the latter carries out a procurement procedure for a EIB-financed project, Section 1.4 of the EIB Guide to Procurement (GtP), published in February 2004², states that "promoters are fully responsible for implementing projects financed by the Bank, in particular for all aspects of the procurement process, from drafting tender documents and awarding contracts through to implementing contracts. The involvement of the Bank is confined solely to verifying whether or not the conditions attached to its financing are met. The Bank may advise or assist Promoters in the procurement process, but is not a party to the resulting contracts. The rights and obligations of the Promoter vis-à-vis the tenderers for works, goods or services to be furnished for a project are governed by the local legislation and tender documents published by the Promoter and not by this Guide".

6. THE EIB-CM WORK DONE

- 6.1. In the course of the enquiry the EIB-CM reviewed the complaint to the EIB together with various relevant correspondence enclosed to the complaint. The EIB-CM relied on the English translations of Spanish documents and correspondence provided during the course of the enquiry.
- 6.2. Other documentation reviewed by EIB-CM under this complaint includes the following:
 - The EUR 500 million Valencia Centros Escolares II-1 Project Appraisal documents and the Board Report;
 - The EUR 300 million Valencia Centros Escolares II-2 Project Appraisal documents and the Board report;
 - The Finance Contracts between the European Investment Bank (EIB) and Construcciones e Infraestructuras Educativas de la Generalitat de Valencia (CIEGSA) in relation to Valencia Centros Escolares II-1 and II-2 projects;
 - The mid-term monitoring and the 2012 monitoring for Centros Escolares II-1 and II-2 projects and the project completion report for Valencia Centros Escolares II-1 (dated 18.09.2012).
- 6.3. After having reviewed the complaint received and all the elements provided by the complainants, the EIB-CM held internal consultation meetings with the relevant EIB services.
- 6.4. In July 2012, the EIB services conducted a monitoring mission to the Valencia region to assess any progress in the project implementation, realised investment costs to date and any planned investments until the project completion. In addition the EIB services had engaged a specialist expert who assisted in the mission with the objective to provide a full report on the local situation.
- 6.5. In the course of the monitoring mission conducted on 2-6 July 2012, the EIB services visited the Valencia regional authorities including CAV, CEE and CIEGSA as well as nineteen school sub-projects across the region including the one represented by the complainant.
- 6.6. The EIB-CM has followed the preparation of the monitoring mission and a debriefing meeting was held between the EIB-CM and the EIB services, where the mission's preliminary findings and conclusions were discussed. Some of these findings and conclusions have been used by EIB-CM in the assessment of this complaint.

² Applicable at the time, an updated GtP was released on 1 June 2011 and relevant Article is 1.3.

7. FINDINGS

Request for information

- 7.1. On 6 June 2012 the EIB Communication Department replied to the Complainant providing the information requested. In this reply they stated that they would like to highlight that the project financed by the EIB comprises a large number of interventions / sub-projects whose execution, scheduled over several years, is the sole responsibility of the competent authorities of Comunidad Valenciana.
- 7.2. Furthermore, and based on the monitoring of the project by the EIB to date, the Bank is aware that, as is more often the case in such projects, the Crea Escola program has undergone several modifications and delays in the implementation of some of the individual sub-projects.
- 7.3. However, the Complainant was informed that the Bank will only have a final evaluation report of the project once the project is completed. Such an evaluation normally includes an assessment of the overall impact of EIB financing from the economic, technical, environmental and financial points of view.
- 7.4. In addition the complainant was also informed that the EIB also understands that the center CEIP Emilio Náquera Lluch Crea Escola Program is part of, as stated in the information available to the EIB on the project and in the list of centers included in the program available on the website of the Department d'Educació, Formació i Ocupació of the Valencía: http://www.cefe.gva.es/creaescola/es/actuaciones.htm

Complaint inquiry

- 7.5. In the course of its enquiry the EIB-CM established that of the total of 320 schools sub-projects originally identified by CEE under the *Crea Escola* programme, approximately 2/5th were distributed in Valencia, 2/5th in Alicante and 1/5th in Castellon. The programme covered primary, secondary and vocational schools, including some specialised music and sports academies and aimed to eliminate 386 prefabricated classrooms spread over 215 primary and 171 secondary schools.
- 7.6. In September 2007 CEE made a number of modifications to the *Crea Escola* programme with the number of schools included dropping from 320 to 306. The revised number was then revised upwards to 393 in 2010/2011. In June 2012 CIEGSA reported 409 school sub-projects under the *Crea Escola* programme.
- 7.7. According to the report of the monitoring mission of July 2012, 296 of the original 306 school sub-projects of project Valencia Centros Escolares II-1 have been completed or close to completion (10 sub-projects were still under implementation at the end of May 2012). During its monitoring mission in July the EIB services visited a number of school sub-projects, already completed under the Valencia Centros Escolares II-1 and considered them as successful in delivering a generally accepted short- to medium-term quality at a reasonable cost. However, the EIB services noted that some issues remained unresolved as there were still existing pre-fabricated educational facilities at some of these schools.
- 7.8. In contrast the project Valencia Centros Escolares II-2 significantly falls short of expectations. Eighteen months after the programme's anticipated completion date of 31 December 2010, 113 of the planned 409 school sub-projects have not been launched yet for the overall Valencia II programme. As a result many schools included in the *Crea Escola* programme remain without sufficient pupil places with many of them still accommodated in rented, pre-fabricated classrooms. Based on the monitoring of the project by the EIB to date, the Bank is aware that, as it is more often the case in such projects, the *Crea Escola* programme has undergone a number of modifications and delays in the implementation of some of the individual sub-projects.



Source: El País, 4 July 2012

- 7.9. In the course of the monitoring mission it became clear that the promoter pursued first some "easier" school sub-projects, i.e. with no construction permits issues and not those classed as a top priority in terms of insufficient and inadequate educational facilities. As a result these top priority cases were put on hold.
- 7.10. Furthermore, at the time of the monitoring mission, it was noted that the pace of the implementation of the Valencia II programme fell significantly over the last few months. The reason behind the slowdown is the recent and significant reduction of CAV's annual budget due to the on-going economic crisis in Spain and subsequent spending cuts made by the Spanish central government.
- 7.11. It was further noted that in order to commence and complete the remaining school sub-projects under the Crea Escola programme (through the Valencia Centros Escolares II-2 project), CAV needs to raise additional funds. It is yet currently unclear how this may be achieved in the near future.

The Emilio Lluch Public School

- 7.12. The Emilio Lluch School provides infant and primary education in the Náquera region and was one of the 320 school sub-projects originally selected for the Crea Escola programme. The School's inclusion in the Crea Escola programme was prompted by a dramatic increase in demand for pupil places due to high immigration into the Náquera region. The School listed 180 pupils in 2002, 200 pupils in 2007 and nowadays it accommodates 440 pupils, nearly 2.5x higher than 10 years ago. Pupils arrive to the School on 4 different busses from the surrounding area with 40% pupils living in town and 60% in surrounding area.
- 7.13. The main School building was built in 1980 and the local authorities put next to it a couple of prefabricated, modular constructions to meet the increasing demand for pupil places. Currently one temporary facility holds (i) 2x junior classrooms and 1x WC section, located on a lower playground. Another temporary facility holds (ii) 9x infant classrooms with paired WC sections, located on a higher playground level. These facilities are rented for one and four years, respectively.







Source: EIB Monitoring Team

- 7.14. During the monitoring mission, it was noted that these temporary pre-fabricated facilities are an unsatisfactory medium to provide a long-term solution to cope with the increased number of pupils. Indeed, these facilities have poor educational layouts, uninspiring interiors and compromised environmental conditions for teachers and pupils. Moreover, this approach is considered not cost-effective as the regional and local authorities have to pay for these temporary pre-fabricated facilities installation and rent costs.
- 7.15. The new extension to the main building proposed under the *Crea Escola* programme will more than double the size of the existing facilities in the main building and will consist of the following key elements:
 - A courtyard two storey extension connecting the School's existing main building with the existing playground area;
 - A two storey extension to the west of the School's existing main building containing a new dining/kitchen area with a teaching area in the upper floor;
 - A new upper terrace sports/car park area and a new caretaker house;
 - A new sports hall and ball courts on the lower terraced site.





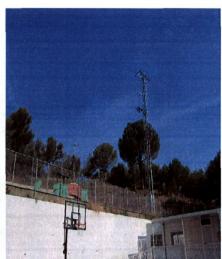
Source: EIB Monitoring Team

7.16. According to the information provided by CIEGSA, an initial budget of EUR 4.4 million was allocated to meet the costs of the new construction as outlined above. The renovation was due to start on 1 October 2008 and expected to be completed on 1 July 2010. According to project monitoring reports from the promoter it seems that the initial budget was later revised by regional authorities to EUR 6.2 million. In the absence of a clear explanation or further information the EIB-CM cannot comment on the rationale for this upward revision.

7.17. However, despite the commencement/completion dates outlined above, the public tender to renovate the School was published by CIEGSA only in June 2010. The EIB-CM found that to date EUR 0.5 million was spent on the School sub-project with no construction started and that the tender was subsequently cancelled. The EIB-CM has no information on what constituted the above mentioned expenditure.







Source: EIB Monitoring Team

- 7.18. Regarding the tender cancellation and according to the regional and local authorities CAV and CIEGSA the tender had to be suspended as the existing overhead high voltage electric cable needed to be removed first before any construction might commence. This issue was finally resolved in April 2012.
- 7.19. Subsequent to the monitoring mission, it was found that the construction of a drainage diversion to cope with temporary excess surface rainwater is being currently discussed with the local authorities. However, it is now unclear whether this issue can be yet another setback for the School's renovation plans.
- 7.20. CAV and CIEGSA seem to demonstrate a lack of a 'problem solving' approach when land issues arise such as in this case. The HV electricity pylons across the corner of the extended C.P. Emilio Lluch Public School site at Náquera, which are quoted as having posed a problem regarding work progress, did not directly affect the proposed location for the fully designed and tendered new facilities, but nevertheless work has not commenced for 5 years.
- 7.21. It appears that, from a technical point of view and with the removal of pylons earlier this year and resolving any other issues as outlined above, the School's new facilities could now, in principle, be constructed. That assertion was once again reconfirmed verbally by CIEGSA. However, it appears that CAV is currently under significant constrains regarding thr finance of the School's renovation as well as renovation of other schools in the Valencia region due to budgetary constraints.

8. CONCLUSIONS

- 8.1. The EIB-CM concludes that, although the monitoring of the project had been lacking in the past, the EIB did not commit an act of maladministration. In particular the EIB-CM commends the proactive action taken by the EIB relevant services in addressing the allegations during their monitoring mission.
- 8.2. As a result of the monitoring visit, the EIB has recommended that an action plan regarding the number of critical school sub-projects should be developed by the promoter and presented to the EIB in in the context of the implementation of the loan Valencia Centros Escolares II-2. Notwithstanding that it is ultimately the Promoter to decide upon the action plan, it is expected that this action plan will specify not only a timeline for the school sub-projects commencement, implementation and completion for Valencia Centros Escolares II-2, but also include the C.P. Emilio Lluch Public School in Náquera.

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8.3. The project is facing a major challenge because of the budgetary constraints of the project promoter is confronted with as a result of the economic crisis. The monitoring mission coincided with a major staff reorganisation undertaken by the promoter whereby the Promoter's technical and cost advisory staff has been reduced by nearly two-thirds. Such reductions represent a major risk for the Promoter to complete the *Crea Escola* programme and thus to meet its objectives.

9. RECOMMENDATIONS

- 9.1. Based on the review of the complaint, its findings and conclusions, the EIB-CM recommends that the EIB considers conducting a full and detailed assessment of the Valencia Centros Escolares projects in the near future.
- 9.2. Additionally, the complainant should be provided with the link to the webpage of the EIB's website providing supplementary information on the EIB Complaints Mechanism, including available recourses if applicable.

F. Alcarpe Head of Division Complaints Mechanism 7 February 2013 A. Abad Senior Complaints Officer 7 February 2013