FINAL REPORT

Evaluation of the Council of Europe Action Plan for Bosnia and Herzegovina 2022-2025

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COUNCIL OF EUROPE

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List of abbreviations

SLAPP	Strategic Lawsuit Against Public Participation
AML	Anti-Money Laundering
AP	Action Plan
CDCJ	European Committee on Legal Co-operation
CDENF	Steering Committee for the Rights of the Child
CDENF-GT-VAE	Working Group on responses to violence against children
CEPEJ	European Commission for the Efficiency of Justice
CFT	Countering the Financing of Terrorism
CoE	Council of Europe
CPT	European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment
CSO	Civil Society Organisation
DAC	Development Assistance Committee
DG JUST	Directorate General for Justice and Consumers
DGI	Directorate General of Human Rights and Rule of Law
DGII	Directorate General of Democracy and Human Dignity
DIO	Directorate of Internal Oversight
DoA	Description of Action
DPC	Directorate of Programme Co-ordination
ECHR	European Convention on Human Rights
ECRI	European Commission against Racism and Intolerance
ECSR	European Committee on Social Rights
ECtHR	European Court of Human Rights
EFEx	Enhancing Institutional Capacities on Freedom of Expression and Information project
ESPA-VEP	Ensuring Sustainable Penitentiary Actions in managing rehabilitation of violent extremist prisoners in Bosnia and Herzegovina
EU	European Union
FGD	Focus Group Discussion
FRA	EU Agency for Fundamental Rights
GDPR	General Data Protection Regulation
GO	General Objectives
GRECO	Group of States Against Corruption
GRETA	CoE Group of Experts on Action against Trafficking in Human Beings
GREVIO	CoE Group of Experts on Action against Violence against Women and Domestic Violence
HELP	Human Rights Education for Legal Professionals Programme
HQ	Headquarters
HRTF	Human Rights Trust Fund
IDI	In-depth interview (sometimes referred to as Key Informant Interview)
iPROCEEDS2	iPROCEEDS2 - Cooperation on Cybercrime: targeting crime proceeds on the Internet and securing electronic evidence (Action Plan regional project)
JUFREX	2019-2019 HFII project "Freedom of Expression and Freedom of the Media in Bosnia and Herzegovina" (HFII: HF33)
LGBTI	Lesbian Gay Bisexual Transgender and Intersex
MAEs	Major Administrative Entities

MiCA	Markets in Crypto-Assets Regulation
MONEYVAL	Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
NGO	Non-governmental organisation
ODIHR	The OSCE Office for Democratic Institutions and Human Rights
OO	Operational Objectives
OSCE	Organization for Security and Co-operation in Europe
PACE	Parliamentary Assembly of the Council of Europe
PCCP	Council for Penological Co-operation
PROFREX	2023-2026 HFIII Project: "Protecting Freedom of Expression and of the Media in Bosnia and Herzegovina" (HFIII: HF38)
SDG	Sustainable Development Goal
SO	Specific Objectives
QAE	Quality Assurance Expert
THB	Trafficking in human beings
ToC	Theory of Change
ToR	Terms of Reference
UN	United Nations
USAID	U.S. Agency for International Development
VEPs	Violent Extremist Prisoners

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Executive summary

Introduction

1. This evaluation report analyses the progress in implementing the Council of Europe (CoE) Action Plan (AP) for Bosnia and Herzegovina 2022-2025. The evaluation covers years 2022 to 2024 and focuses on examining the relevance, coherence, efficiency, effectiveness, and sustainability of the AP.

Background

2. The Action Plan aims to support the country in aligning its legislation, institutions, and practices with European standards in human rights, the rule of law, and democracy. It assists Bosnia and Herzegovina in fulfilling its obligations as a Council of Europe member state and advancing its EU accession priorities. Adopted in December 2021, the Action Plan builds on previous frameworks (2015–2017 and 2018–2021) and was developed in consultation with national authorities.

3. The Action Plan includes 44 projects organised into three key thematic areas—Human Rights, Rule of Law, and Democracy. These projects follow three primary intervention approaches: legislative and policy expertise, capacity building and awareness-raising.

Figure 1. Action Plan thematic areas

Source: Ecorys, evaluation team's elaboration.

The Action Plan is a living document that evolves to respond to emerging needs. Initially budgeted at €19.1 million, funding has increased to €22 million as of mid-2024, with approximately 10% still unfunded[1]. The initiative is implemented by the Council of Europe office in Sarajevo[2].

Methodology

4. The evaluation is aligned with the OECD DAC criteria of relevance, coherence, effectiveness, efficiency, and sustainability. The evaluation matrix, presented in the annexes is the foundation for data collection and analysis. The data collection process combined desk research and qualitative and quantitative methods. Desk The research involved reviewing key documents and reports, providing context and background information. Primary data collection included 55 in-depth interviews with key stakeholders, a project survey completed by 24 CoE project

1 7% in March 2025 (data shared by the CoE at the commenting stage).

2 CoE Offices are managed by Directorate of Programme Coordination (DPC) staff, while the project teams in the Office are staff members of different operational entities (Major Administrative Entities - MAEs).

implementation team members. A mixed-method approach guided the data analysis, integrating qualitative insights with quantitative findings to assess the AP's outcomes. The analysis distinguished between the AP and project levels, incorporating thematic distinctions, where applicable.

Findings

Relevance

5. The Council of Europe Action Plan for Bosnia and Herzegovina is aligned with the country's commitments and obligations as a member state of the Organisation. It also reflects Bosnia and Herzegovina's international commitments and obligations, such as UN SDGs, and it is aligned with the EU enlargement process, the association agenda, and the 2018 EU Strategy for the Western Balkans[3]. The AP considers the recommendations of the Council of Europe advisory and monitoring bodies, including the Venice Commission, Council of Europe MONEYVAL and Council of Europe GRECO. The AP considered the lessons learned during previous AP design and implementation processes. The document was built on an extensive consultation process and considered a useful practice for the next AP cycles. The AP addresses a broad range of needs and country priorities, and the document is perceived as flexible.
6. The AP is aligned with the national agenda. It was drafted considering twelve sector strategic documents and strategies (the full name of the sector strategies is listed in the AP document, page 7). It was drafted considering the country's reforms, and projects under the AP align with the needs and specific objectives. Gender mainstreaming measures are present across all projects and align with the recommendations of CoE advisory bodies. Gender analysis has been conducted in several projects, and gender considerations are present in each project design document. The entire AP was built upon the four principles of the Human Rights Approach of the CoE: participation and inclusion, equality and non-discrimination, accountability and transparency and access to information.

Coherence

7. The AP is compatible with and complementary to the country's and other donors' measures. Stakeholders acknowledged and praised the strategic triangle approach of integrated standard-setting, monitoring and technical assistance. Formal coordination was also recognised, but there seems to be a need for additional coordination in some thematic and sub-thematic areas. Project level coordination appears to work well on both formal and informal levels, and projects implemented under the AP seem very well coordinated. The coordination with other donors, projects, and initiatives also works well, but a few examples of areas that might need improvement have also been mentioned; this is particularly true for areas where many activities funded by different donors are implemented.
8. Complementarity exists for some projects; many examples have been provided during the research. However, some areas have been mentioned where complementarity could be improved, such as topics related to prison and police reforms. Efforts to avoid redundancy across various donor-funded initiatives are in place, but some challenges remain. This is mainly due to insufficient accountability and coordination amongst a multitude of public stakeholders.
9. The CoE constantly strives to contribute and improve coordination; this is done through regular steering committees, coordination meetings, project meetings, working groups, etc. The CoE maintains regular communication with major donors in the country, participates in thematic area meetings, and provides annual reports on cooperation activities. There are also efforts to prevent and address duplication, such measures as constant mapping of needs, close ongoing communication at the project level, which could be expanded at the thematic area level, and good coordination between local and headquarters offices.

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[3] A Credible Enlargement Perspective for an Enhanced EU Engagement with the Western Balkans, https://neighbourhood-enlargement.ec.europa.eu/system/files/2019-03/western_balkans_strategy_brochure.pdf.

10. The evaluation recommends organizing structured semi-annual coordination meetings involving representatives from civil society, non-profit organisations, and local institutions across all thematic areas. Continue the mapping of relevant donor activities, continue to participate and initiate coordination platforms, share CoE outputs through accessible hubs.

Efficiency

11. The AP has been implemented cost-efficiently, with minor delays. Nevertheless, the evaluation concluded that project implementation was challenging with the provided resources. The projects are complex, and the financial and human resources sometimes feel insufficient.
12. The projects have generally been implemented on time, though the COVID-19 outbreak has caused some delays. Some other implementation challenges were linked with political instability and delays in implementing certain actions related to partners' decisions.
13. Most project activities have been implemented cost-efficiently, and multiple measures to reduce costs have been provided, including using online tools and learning opportunities, cost-sharing with other projects, and the use of in-house training capacities. Some project activities had to accept trade-offs to lower costs, such as reducing the number of participants in training, placing greater workload on the project teams, and spending more time on the procurement process. The implementing structures are adequate to execute project-level measures. Some administrative, decision-making, and approval processes are assessed as time-consuming and overly bureaucratic.
14. Resource allocation does not follow a centralised, overarching, AP-level budget structure but is divided across project budgets.
15. The evaluation recommends requiring each project to include a sustainability plan outlining handover strategies and long-term engagement pathways. Consider contingency budgeting and flexible allocation mechanisms to allow timely and responsive funding flows. Be flexible in disbursement schedules to reflect project complexity and ensure the availability of funds in unpredictable environments.
16. Conduct an internal needs assessment on staffing capacities to anticipate resource bottlenecks. Consider expanding these capacities during peak periods and providing tools and processes to streamline delivery. Outsource technical tasks when necessary and support cross-project learning to ease workload distribution

Effectiveness

17. This evaluation credited the AP with advancing the country's reforms and priorities in many areas concerned. In the rule of law, the provided examples are related to progress on anti-trafficking, combating corruption, increasing institutional cooperation, and improving preventive measures on anti-money laundering. The major advancements in human rights areas mentioned by the interviewees include the ECHR implementation and advancement in preventing hate speech, as well as advancements in the field of LGBTI rights. In democracy, the main advancements are related to creating opportunities for cohesion and participation and fostering democratic governance. At the same time, the stakeholders agreed that intense dialogue with public authorities needs to continue to ensure that progress is sustained.
18. Across main activities, the analysis underlines capacity building as the most effective (good examples include capacity building of police, judges, prosecutors, prison staff), followed by legal and policy advice and, lastly, awareness-raising measures (such as awareness raising on topics like equal rights and community campaigns).
19. Not all outcomes of the AP have been achieved; some are ongoing, and few have not been achieved. Although some information on the completeness of outcomes is available in the annual report to donors, assessing overall outcome completeness remains challenging, due to the absence of a holistic outcome monitoring matrix. Project-level outcomes are easier to track; examples of completed outcomes have been provided across all

thematic areas, but there are non-completed outcomes in all thematic areas. Most challenging to complete were the legal and policy expertise-related outcomes; many action plans and road maps, protocols, and procedures have been elaborated and institutionalised, but at the same time, some of the envisaged changes in laws and regulations are delayed. Most of the time, this is due to external factors, such as political and context challenges. The capacity-building component seems to achieve most of its outcomes and targets, and the capacity-building activities provided have been praised by partners. It is important to mention that some partners also express a certain saturation level with training and capacity-building activities. Most awareness-raising activities have been completed, and some examples of successful campaigns have been provided; at the same time, it was stressed that there is a need for a clear method to assess the success of such measures.

20. The AP contributed to more effective cooperation between stakeholders; this is true for national and local levels. At the national level, positive cooperation has been mentioned for the rule of law thematic area, including cooperation between the police, judiciary, and labour inspectorate. Enhancement of collaboration at the local level was also mentioned as one of the important achievements of the AP; many examples of interregional cooperation (with the Balkan countries and beyond the region) have been provided during the data collection. The AP also contributed to improved cooperation between the public sector and civil society, building cooperation and communication platforms (for example, in the areas of freedom of expression and social cohesion).

21. The evaluation defined several factors that have been positively and negatively affecting the efficiency of the AP implementation. Amongst the positive factors, partners and interviewees often mentioned the recognised role of the CoE in the country: to provide high-quality and consistent technical and financial assistance, and as a driver for reforms. The institutional memory that the team brings across with their professionalism and commitments, has also been mentioned as a success factor. A good understanding of the country's context, flexibility, and adaptability of projects are among the success factors. What was seen as challenging was the broad scope of the AP, resulting in the challenge of defining accountability. Political instability, fragmented governance, economic constraints, and COVID-19 outbreak consequences are other hindering factors of AP implementation.

22. This evaluation recommends convening pre-implementation workshops with key implementing partners to define thematic and sub-thematic responsibilities. For the implementation of future AP create a role matrix outlining a clear distribution of tasks beyond project-specific activities to strengthen stakeholder ownership and accountability. Engage community level actors and institutions and expand local partnerships.

23. Design and implement a unified monitoring system that aggregates project-level indicators into a thematic dashboard. Detail oversight of the AP coordination unit, ensure quarterly updates, and conduct a mid-term review using this system to assess the overall AP progress.

Sustainability

24. The results achieved under the Action Plan are generally expected to be sustainable across the thematic areas. The evaluation established that the AP enhanced institutional capacities and awareness for both public and non-public sectors, and in most cases, this was done sustainably. Examples of sustainable transfer of knowledge have been provided across all thematic areas and are related to using such tools as training of trainers, mentoring activities, institutionalisation of training modules, and use of training modules by universities or public institutions as part of their curricula. At the same time, sustainability challenges remain and are related mainly to beneficiary institutions' staff turnover, challenges due to political instability, and resistance to change, which are also mentioned as one of the main risk factors to sustainability. Financial challenges to continuing some projects are also a major hindering factor. The AP moderately contributes to fostering the sense of ownership of the local stakeholders, with some exceptions. The projects that were more successful in fostering this ownership have been implemented in cooperation with local authorities and community-level projects.

1 Introduction

Purpose, scope and objectives of the evaluation

25. This evaluation aims to provide an independent assessment of the progress made under the Action Plan (AP) and offer stakeholders an impartial review of the outcomes achieved through the Council of Europe's (CoE) collaboration with key partners. The objectives of the evaluation are as follows:

    - to assess the outcomes achieved by the projects implemented under the AP in ensuring Bosnia and Herzegovina's alignment with European standards;
    - to assess to what extent the recommendations from the evaluation of the previous Action Plan, which were fully accepted by the CoE, were considered under this AP;
    - to draw lessons, identify good practices, and provide recommendations related to the management of the AP, project implementation methods, and mitigation measures for the challenges faced, if any.

26. This evaluation generates insights to inform future actions and shape future APs for Bosnia and Herzegovina. In addition, careful consideration was given to ensure that the findings are relevant and useful for donors and national authorities, supporting their engagement with and oversight of the AP's outcomes.

27. The evaluation's geographic scope is Bosnia and Herzegovina, and the time scope is 2022 to 2024. Following the Terms of Reference (ToR) requirements, the basis for the evaluation judgment is the OECD DAC framework comprising five out of six evaluation criteria (relevance, coherence, effectiveness, efficiency, and sustainability). The evaluation assesses the overall efforts to implement the AP (promotion and monitoring of human rights, advocacy, expert advice, etc.) and the contribution to the overall implementation of the individual country and regional projects (23 country-specific projects and two regional projects).

28. For further details on the evaluation purpose, scope, and objectives, please refer to Annex 1.

Background

29. The Council of Europe launched the Action Plan for Bosnia and Herzegovina 2022-2025 to assist Bosnia and Herzegovina in aligning its legislation, institutions, and practices with European standards in human rights, the rule of law, and democracy. It aims to support the country in fulfilling its obligations as a member state of the Council of Europe and advance its reform priorities, particularly in the context of its European Union (EU) accession agenda. Adopted by the Committee of Ministers in December 2021, the Action Plan builds on the outcomes of previous Action Plans (2015-2017 and 2018-2021) and was developed through a process that incorporated decisions, resolutions, recommendations, and reports from various Council of Europe bodies, alongside extensive consultations with the authorities of Bosnia and Herzegovina.

30. The Action Plan projects are organised into three thematic areas and seven areas of cooperation (also referenced as sub-thematic areas in this report), as presented in the table below.

Table 1. Action Plan areas

Action Plan		
Thematic areas	**Sub-thematic areas**	**Project**
 Human rights	Effective European Convention on Human Rights Implementation	12 projects (7 regional, 5 country-level)
	Equality and human dignity	9 projects (5 regional, 4 country-level)
	Social rights	No projects funded
 Rule of law	Rule of law-based institutions	4 projects (2 regional, 2 country-level)
	Action against crime, security, and protection of citizens	13 projects (6 regional, 7 country-level)
 Democracy	Democratic governance	4 projects (1 regional, 3 country-level)
	Democratic participation	2 projects (both country-level)

Source: Ecorys, evaluation team's elaboration.

31. As a strategic 'living document', the Action Plan is designed to evolve in response to emerging needs and the development of new projects. The budget, initially set at €19.1 million at the time of adoption, is subject to revisions. The current budget (07/2024) amounts to €22 million. For more details on the funding, see *Funding and organisation* below (page 19).

Country and regional projects

32. As of September 2024, the Action Plan comprises 44 projects, including 23 country-specific initiatives. The list of projects included in the evaluation is provided below. Regional projects are highlighted in **orange**. Projects that have already been evaluated individually or as part of a thematic review, as well as those covered in previous assessments, are shaded in **grey**.

Table 2. Projects under evaluation

1. HUMAN RIGHTS	
1.1. Effective European Convention on Human Rights Implementation	
	Support to a coherent national implementation of the European Convention on Human Rights and facilitating execution of ECtHR judgments in Bosnia and Herzegovina
HFII: HF33	Freedom of Expression and Freedom of the Media in Bosnia and Herzegovina (JUFREX)
	Media and Information Literacy: for human rights and more democracy
	Enhancing institutional capacities on freedom of expression and information in Bosnia and Herzegovina (EFEx)
HFIII: HF38	Protecting Freedom of Expression and of the Media in Bosnia and Herzegovina (PRO-FREX)
1.2. Equality and human dignity	
	Combatting digital and sexual violence against women in Bosnia and Herzegovina
HFII: HF19	Promotion of diversity and equality in Bosnia and Herzegovina
HFIII: HF23	Towards an equal, inclusive and tolerant Bosnia and Herzegovina
	Combating discrimination, hatred and racism in Bosnia and Herzegovina
2. RULE OF LAW	
2.1. Rule of law-based institutions	
HFIII: HF4	Strengthening the Efficiency and Quality of Justice in Bosnia and Herzegovina (Bosnia and Herzegovina SEJ)
	Initiative for Legal Certainty and Efficient Judiciary in Bosnia and Herzegovina - Phase III
2.2. Action against crime, security and protection of citizens	
	Action against corruption, money laundering and terrorist financing in Bosnia and Herzegovina
HFIII: HF17	Action against corruption, money laundering and terrorist financing in Bosnia and Herzegovina
HFII: HF20	Preventing and Combating Trafficking in Human Beings in Bosnia and Herzegovina
	Strengthening action against trafficking in human beings in Bosnia and Herzegovina
HFII: HF4	Strengthening human rights treatment of detained persons based on European standards and best practice
HFIII: HF5	Further strengthening the treatment of detained and sentenced persons in line with European standards in Bosnia and Herzegovina
	Ensuring Sustainable Penitentiary Actions in managing rehabilitation of violent extremist prisoners in Bosnia and Herzegovina (ESPA-VEP)
HFII: HF38	Enhancing penitentiary capacities in addressing radicalisation in prisons in the Western Balkans
	iPROCEEDS2 - Cooperation on Cybercrime: targeting crime proceeds on the Internet and securing electronic evidence
3. DEMOCRACY	
3.1. Democratic governance	
	Support to more integral and inclusive electoral processes in Bosnia and Herzegovina
	Innovating democratic participation at local level in Bosnia and Herzegovina
	Strengthening democratic innovations and promoting human rights at local level in Bosnia and Herzegovina: Phase I
3.2. Democratic participation	
HFII: HF21	Quality Education for all (QUALITY ED - BOSNIA and HERZEGOVINA)

HFIII: HF24	Quality Education for All - Bosnia and Herzegovina

Source: Ecorys, evaluation team's elaboration.

33. The projects listed in the table above demonstrate broadly three distinct types of intervention methods derived from the Action Plan log frame. These are: 1) capacity-building activities, 2) awareness-raising activities, and 3) legislative and policy expertise. An assessment of each project shows that approximately one-third of the projects include activities related to capacity building, one-third of awareness raising and one-third of legislative and policy expertise. Often, projects combine these three categories of activities to achieve project objectives.

Human Rights

Effective European Convention on Human Rights Implementation

34. Five projects focus on effectively implementing the European Convention on Human Rights (ECHR) in Bosnia and Herzegovina. These include ongoing efforts to harmonise national mechanisms with ECHR standards and facilitate the execution of ECHR judgments, a completed project (JUFREX) promoting freedom of expression and media, another completed project enhancing media and information literacy, an ongoing project strengthening institutional capacities for freedom of expression and access to information, and the ongoing PRO-FREX initiative aimed at creating a safer media environment in line with Article 10 of the ECHR. The projects primarily focus on achieving the goals through training legal professionals, raising public and professional awareness through events and other activities, providing legal advice, promoting research and policy support, and facilitating the exchange of best practices.

Equality and human dignity

35. Under the focus of achieving equality and human dignity, the country projects aim to enhance legal and support frameworks to combat digital and sexual violence against women, strengthen capacities to address anti-discrimination and protect rights of minorities and LGBTI persons, improve efforts against discrimination and hate speech and crimes, and increase awareness and develop coordinated approaches to combat racism and intolerance in South-East Europe. The projects employ a range of strategies to achieve this, including analysing policy frameworks to align them with the recommendations of the Group of Experts on Action against Violence against Women and Domestic Violence, providing targeted support and capacity building, and raising awareness about digital and sexual violence, and those of the European Commission against Racism and Intolerance, with a focus on the legislative and policy framework in the anti-discrimination domain. Additionally, the projects are based on the Council of Europe's monitoring conclusions and recommendations to help Bosnia and Herzegovina uphold CoE standards, which align with its commitments as a member State. The projects also promote inter-institutional dialogue to enhance cooperation and effectiveness in addressing discrimination and fostering diversity.

Rule of Law

Rule of law-based institutions

36. The country projects set out focusing on the improvement of the rule of law-based institutions work to enhance the efficiency and equality of Bosnia and Herzegovina's justice system by addressing delays, reducing backlogs, and advancing data collection and analysis by the methodologies set out by the Council of Europe European Commission for the Efficiency of Justice (CEPEJ). The projects also seek to ensure high-quality and consistent justice in line with ECHR standards. They pursue these goals by implementing recommendations on CEPEJ tools for justice efficiency, quality, and mediation, coupled with targeted capacity-building activities. Additionally, the projects develop and deliver structured training modules for judges and prosecutors, thematic extracurricular activities for law students, and efforts to integrate a Human Rights curriculum into public law faculties.

Action against crime, security and protection of citizens

37. Seven country projects and two regional projects under the scope of this evaluation focus on action against crime, security and protection of citizens. This encompasses efforts against economic crime, cybercrime, and trafficking in human beings, as well as focusing on prisons and police. In the area of economic crime, projects contribute to the fight against corruption, money laundering, and terrorist financing by supporting legal reforms, improving transparency, and strengthening operational capacities for the detection, investigation, and recovery of criminal assets. These efforts are aligned with Council of Europe MONEYVAL and Council of Europe GRECO recommendations and involve the development of practical tools and risk-based supervision mechanisms. Under the focus on combating trafficking in human beings (THB), a particular emphasis is put on labour exploitation and child trafficking.

38. These initiatives aim to enhance responses, strengthen victim protection measures, and ensure improved access to justice and effective remedies for victims. To achieve these goals, the projects focus on building capacity among key stakeholders, including judiciary professionals, law enforcement officers, labour inspectors, social workers, education professionals, and healthcare providers. They also emphasise the development of practical tools, delivery of specialised online training on THB, provision of expert advice and recommendations, support for policy development, and the facilitation of inter-institutional and interdisciplinary cooperation. In the area of prisons and police, the projects work to strengthen the protection and rights of persons deprived of liberty.

39. The efforts encompass multiple initiatives, including improving human rights in policing, enhancing the resocialisation of forensic patients, and developing software for prisoners' electronic data exchange. Specific efforts include strengthening the rehabilitation of violent extremist prisoners (VEPs) and other prisoners vulnerable to radicalisation, their preparation for release and their reintegration back into the community. Moreover, the projects focus on enhancing the well-being and mental health of prison staff and supporting the Ombudsman for Human Rights in developing the working methods to fully assume its role as the designated National Preventive Mechanism. The efforts against cybercrime aim to strengthen the region's capacity to combat organised and cybercrime by supporting regional and EU cooperation in seizing cybercrime proceeds, preventing online money laundering, and securing electronic evidence.

Democracy

Democratic governance

40. The following country projects aim to enhance democratic governance in Bosnia and Herzegovina through three key initiatives. The first initiative focuses on long-term electoral assistance, improving the electoral system by aligning it with European standards through technical support, capacity-building for electoral authorities, and raising public awareness to boost electoral integrity and confidence. The second initiative, "Innovating Democratic Participation at Local Level", aims to advance local democracy by promoting deliberative democracy and empowering citizens in decision-making, particularly in Mostar and Banja Luka. It also seeks to build the skills of local authorities and support human rights-based policymaking. The third initiative continues to strengthen democratic practices and local governance by enhancing transparency, accountability, and citizen engagement in local decision-making processes nationwide.

Democratic participation

41. There is a completed project focused on advancing democratic participation through educational reform in Bosnia and Herzegovina, and the current ongoing project serves as a follow-up, building on the previous efforts to further align educational standards with European benchmarks and enhance democratic competencies. To achieve the goal, the main efforts are supporting the coordination of key stakeholders, such as educational institutions, the development of the Quality Education for All web platform (which has not yet been integrated at the time of drafting) and promoting education as a social value through targeted communication strategies that address the needs of vulnerable groups and integrate gender perspectives.

Stakeholders involved

Table 3. General overview of categories of stakeholders relevant to the evaluation

Action Plan level

• Directorate of Programme Co-ordination (DPC)
• Directorate of Internal Oversight (DIO)
• Council of Europe's Major Administrative Entities (MAEs):
  ○ Directorate General of Human Rights and Rule of Law (DGI)
  ○ Directorate General of Democracy and Human Dignity (DGII)
  ○ the Secretariat of the Parliamentary Assembly of the Council of Europe (PACE)
  ○ the Congress of Local and Regional Authorities of Europe (the Congress)
• Donors (EU), Germany, Norway, Sweden, Belgium, the Human Rights Trust Fund (HRTF), Liechtenstein, Lithuania, Slovenia)
• CSOs (incl. BH Journalists Association, NGO Novi Početak, Association of Municipalities and Cities of Federation of Bosnia and Herzegovina / Association of Municipalities and Cities of Republika Srpska)
• External experts per sub-thematic area (incl. consultants)
• Other actors active in the region (incl. EU, USAID)

Project level
• (Senior) Project Officers • Project Supervisors in Strasbourg • Project stakeholders (notably the national and local-level authorities and institutions)

Source: Ecorys, evaluation team's elaboration.

42. As presented in the table above, the Action Plan impacts a broad and diverse range of stakeholders at different levels. This section will describe the key stakeholders directly involved in the evaluation process.

43. Key stakeholders include **Project Officers and Senior Project Officers** based in the Council of Europe Office in Sarajevo, responsible for country-level projects under the Action Plan, as well as officers managing the sampled regional projects, iPROCEEDS2 (based in the Council of Europe Office in Bucharest) and HFII: HF38 Enhancing penitentiary capacities in addressing radicalisation in prisons in the Western Balkans (managed by the Council of Europe Headquarters in Strasbourg, with the support of a senior project officer based in the Council of Europe Office in Belgrade).

44. **Council of Europe representatives** based in the Council of Europe Headquarters in Strasbourg are identified for their macro-level perspective on the Action Plan and strategic oversight of project supervision.

    This group primarily includes representatives of:

    - Directorate of Programme Co-ordination (DPC)[4]
    - Directorate of Internal Oversight (DIO)
    - Council of Europe's Major Administrative Entities (MAEs)

45. **National-level authorities and institutions** are included to provide insights into reform implementation and the broader challenges at the national level, contributing to an understanding of the Action Plan's overall impact.

46. **Independent experts and donors**, selected for their technical expertise in sub-thematic areas of the Action Plan, represent academia, consultancy, and other actors active in Bosnia and Herzegovina, such as the EU and USAID. **Civil Society Organisations** (CSOs), including the BH Journalists Association, NGO Novi Početak, and Associations of Municipalities, are also identified for their on-the-ground perspectives relevant to specific sub-thematic areas of the Action Plan.

[4] Previously Office of the Directorate General of Programmes, as referred to in the Action Plan.

Funding and organisation

47. The Action Plan had an indicative budget of €19,137,647, but this was extended to €22,033,031. Around 10%[5] of the revised budget remains unfunded. The funding sources are the Council of Europe's ordinary budget and donor contributions. The donor contributions come mainly from the EU and Council of Europe member states. Out of total contributions, non-earmarked contributions represent 34% of the total extra-budgetary funding.

Table 4. Action Plan funding

	Initial budget, Euros		Current budget (07.24), Euros	
Total cost	19 137 647		€22 033 031	
Funded	19 887 203	104%	€19 887 203	90%
Unfunded	0	0%	€2 145 828	10%

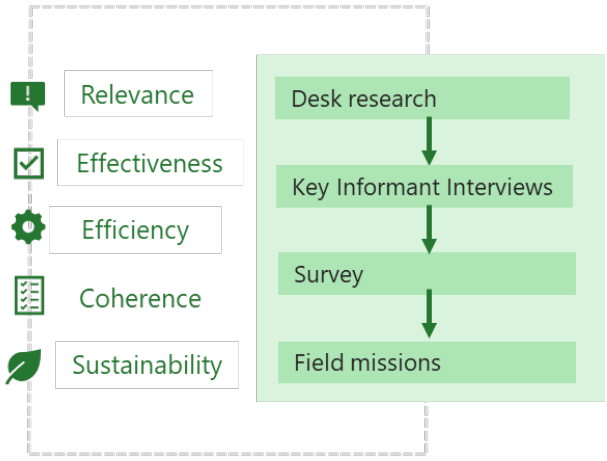
Source: Ecorys, evaluation team's elaboration based on Action Plan funding situation, document provided by CoE.

48. The overall coordination of the Action Plan is done by the DPC; the implementation is done by the Major Administrative Entities (MAEs) responsible for each topic area. The actual projects are managed by one (Senior) Project Officer and one Project Assistant in the field, with the support of a Project Manager in Strasbourg. One evaluated regional project is managed by the Council of Europe Office in Bucharest, and one is managed by the Council of Europe Headquarters in Strasbourg, with the support of a Senior Project Officer based in the Council of Europe Office in Belgrade. Support for project monitoring is being offered by the Council of Europe Office in Sarajevo by the Head and the Deputy Head of Office. The projects are managed based on the Council of Europe Project Management Methodology.

Methodology

49. The evaluation employed a mixed-methods approach for data collection and analysis. Data was collected through desk research, in-depth interviews (IDI), including online and during field missions to Strasbourg and Sarajevo[6], and a project survey. Data collection activities took place between July 2024 and January 2025.

Figure 2. Data collection and tools



Source: Ecorys, evaluation team's elaboration.

5 7% in March 2025 (data shared by the CoE at the commenting stage).

6 Mission to Strasbourg took place 16-17 October, and mission to Sarajevo took place 11-15 November.

50. Desk research focused on the documents shared by the CoE, key reference documents and monitoring reports informing the design of the Action Plan, as well as other documents identified based on the ToR, Action Plan, and online desk review. During primary data collection, 55 IDIs[7] were conducted with 71 respondents[8], including representatives of the CoE, government, and donor communities, as well as others (including academia and CSO representatives). A project survey was also launched targeting project-level stakeholders involved in implementing the AP. 68 invitations were sent, and 24 completed the survey, which has a response rate of 35%.

51. The team employed a mixed methods approach for data analysis, combining qualitative and quantitative techniques to best answer the specific evaluation questions. The primary data analysis method was Intervention Logic Analysis (logic model analysis), which evaluated the intervention logic to identify the critical conditions necessary for achieving the desired outcomes. For specific details, please refer to Annex 2. The analysis distinguishes between the AP, thematic area and project-level where possible.

52. Gender mainstreaming and human rights approach considerations were integrated throughout all evaluation phases. This was achieved systematically, ensuring that gender considerations are embedded in the design, data collection, analysis, and reporting processes. This evaluation was conducted using a human rights-based approach, enabling a comprehensive examination of how the AP respects, protects, and fulfils human rights, particularly for marginalised and vulnerable groups. The detailed methodology can be found in Annex 1.

Limitations

Limited data availability and reliability

53. The evaluation relied heavily on desk research and secondary data, which was not always comprehensive, up-to-date, or fully reliable. Limited access to recent or high-quality documentation addressing the AP holistically added difficulty to the analysis, especially concerning the most recent developments or project changes. To mitigate this, findings were triangulated using stakeholder interviews and survey responses.

Bias in data collection

54. Some interviewees/survey respondents may have provided biased or subjective responses based on their direct involvement with the AP or other related projects, potentially skewing the evaluation findings. This is particularly relevant to the CoE representatives. To minimise bias, responses were cross validated with alternative data sources (desk research and independent stakeholder perspectives). For future evaluations, a larger pool of external respondents who know the AP but have no direct link with its implementation would bring a more balanced analysis.

Limited perspective of stakeholders

55. Most interview and survey participants were project-level stakeholders, which, in some cases, may have resulted in a limited understanding of the broader context or a general overview of the AP and its overall implementation status. This narrowed focus may have constrained the evaluation's ability to fully assess systemic changes or capture higher-level outcomes influenced by the AP. To address this, interviews were conducted with policymakers and donor representatives to complement project-level perspectives and provide insights into broader strategic considerations.

Survey response rate and representativeness

56. The overall response rate to the survey was low; however, sufficient representation across diverse projects and thematic, as well as sub-thematic areas, allowed for meaningful analysis. Survey results were triangulated with the interview and desk research data to ensure representativeness. Additionally, qualitative insights from in-depth interviews supplemented survey findings.

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7 Scoping interviews (4 IDIs), field mission to Strasbourg (14 IDIs), field mission to Sarajevo (30 IDIs), online interviews (7 IDIs).

8 59% (42 respondents) were women and 41% (29 respondents) were men.

2 Findings

2.1 Relevance

To what extent is the Action Plan addressing the needs of Bosnia and Herzegovina in supporting the alignment with European standards and practices in the areas of human rights, rule of law and democracy?

This evaluation finds that the AP is highly relevant to Bosnia and Herzegovina's needs. It aligns with the country's international obligations, EU accession agenda, and national reforms, addressing key areas like human rights, anti-corruption, and electoral processes. Stakeholder consultations on the AP and flexibility to adapt to emerging priorities enhance its impact. While more efforts are necessary to increase local-level support, the AP's alignment with European frameworks and pragmatic reforms ensures its continued relevance.

Relevance of objectives

57. **The AP aligns with Bosnia and Herzegovina's international obligations, obligations as a Council of Europe member state and the European Union enlargement process.** The desk research concluded that the AP aligns with the needs under the general objectives and is in line with Bosnia and Herzegovina's international obligations and commitments. The document contributes to the country's implementation of the United Nations Sustainable Development Goals (UN SDGs)[9]. The AP aligns with the EU's association agenda, and its measures are relevant to several areas of the enlargement process. Specifically, they relate to "Alignment of the laws of the country to those of the EU", "Justice, freedom and security", and "Cooperation policies".[10] The AP is in line with the provisions of the EU Strategy for the Western Balkans[11], with actions one, two, and six of the AP in Support of the Transformation of the Western Balkans document annexed to the Strategy.

58. **The alignment of AP with the EU's accession process has been confirmed by both interviews and survey data.** On the survey, the overall perception is that the AP directly addresses key priorities, as evidenced by the high average score of **4.67**. Respondents frequently noted the alignment between the AP's objectives, the European Commission's 2024 Report recommendations, and the broader EU integration requirements.[12] The open comments emphasise that the AP and its associated projects are structured around recommendations from **European and international monitoring bodies**, including the CoE and its monitoring and advisory bodies, such as the Venice Commission, Council of Europe MONEYVAL, and Council of Europe GRECO. These recommendations include, amongst others, ensuring transparent political party financing, preventing conflicts of interest, professionalising corruption prevention bodies, addressing the freezing and confiscation of criminal assets, anti-money laundering, and countering the financing of terrorism. Practical examples were also provided to illustrate the relevance of ongoing projects to the EU agenda. One respondent noted that their project is directly informed by the **European Commission annual report on Bosnia and Herzegovina**, with specific points aligning with the topics being

9 This refers to several targets under goals 3, 4, 5, 7, 8, 10, 11 and 16 in particular.

10 Stabilisation and Association Agreement between the European Communities and their Member States, of the one part, and Bosnia and Herzegovina, EUR-Lex - 22015A0630(01) - EN - EUR-Lex.

11 A Credible Enlargement Perspective for an Enhanced EU Engagement with the Western Balkans, https://neighbourhood-enlargement.ec.europa.eu/system/files/2019-03/western_balkans_strategy_brochure.pdf.

12 https://neighbourhood-enlargement.ec.europa.eu/document/download/451db011-6779-40ea-b34b-a0eeda451746_en?filename=Bosnia%20and%20Herzegovina%20Report%202024.pdf.

addressed. Another highlighted the focus on compliance with CoE standards and ECtHR jurisprudence, describing these as "pre-runners of the EU accession process".

59. **The AP is aligned with the national and entity-level agendas.** It is in line with key strategic documents, including the Strategic Framework for Public Administration Reform in Bosnia and Herzegovina 2018–2022[13] and the Action Plan for Public Administration Reform[14], (…), which collectively contribute to strengthening the rule of law, increasing transparency, and improving governance structures. Additionally, at the entity level, it aligns with the Development Strategy of the Federation of Bosnia and Herzegovina 2021–2027[15], particularly on the strengthened rule of law, increased opportunities for all, and improved quality of life. The AP's objectives are based on pragmatic sector reforms underlined in these and other national and sectorial documents.[16] The interviewed national authority stakeholders confirmed the AP's alignment with the current reforms, national agenda, and priorities. Additionally, respondents pointed out that the AP considers Bosnia and Herzegovina's national reform agenda, further ensuring its relevance to the country's EU integration process. For example, the AP incorporates measures to ensure that elections are conducted per European standards, as noted in the European Commission's reports. This includes implementing recommendations from the OSCE Office for Democratic Institutions and Human Rights (ODIHR) and aligning with CoE standards.

60. **Overall, both interview and survey respondents look positively at how the AP addresses the country's needs**. The survey responses reflect a consistently high perceived relevance for the AP across roles, work locations, and thematic areas.[17] The overall score[18] is **4.46**[19], indicating a strong perception that the AP effectively addresses Bosnia and Herzegovina's needs in supporting alignment with European standards and practices. For example, one comment emphasised the AP's contribution to professionalising law enforcement practices and ensuring compliance with human rights standards, particularly in areas such as treating persons deprived of liberty.[20]

61. **The AP considers lessons learned during the projects' design and implementation phases.** The current AP considered the findings of the Progress Report of the 2018-2022 AP, builds on the findings of its external evaluation, and the adjustments made to overcome the implementation challenges caused by COVID-19. Moreover, the evaluation concluded that the AP measures have been built on an extensive internal and external consultation process. Interviews with key stakeholders representing public entities that are partners in AP implementation confirmed that they had been included in the document preparation process. All respondents were aware of the document and confirmed commenting on it during preparation. Stakeholders appreciated project staff efforts to ensure continuity and the local team's institutional memory of the AP and project planning and implementation processes.

Relevance of specific objectives

62. **Projects under the AP align with needs and specific objectives.** The project objectives reflect concrete reform plans at the national level and contribute to fulfilling the international and EU agenda. They are pragmatic and linked

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13 Public Administration Reform Coordinator's Office (PARCO). Report on the Implementation of the Strategic Framework for Public Administration Reform in Bosnia and Herzegovina (PARSFAP). April 2023. Available at: https://parco.gov.ba/wp-content/uploads/2023/04/Report-on-PARSFAP-implementatio_draft.pdf.

14 Validity of these strategic documents has been extended by five years, until the end of 2027.

15 Development Strategy of the Federation of Bosnia and Herzegovina 2021-2027, in particular with strategy goals two and four and their subsequent objectives. https://www.fzzpr.gov.ba/files/Strategic%20documents%20of%20FBiH/Development%20Strategy%20of%20the%20FBiH%202021-2027-summary_ENG.pdf.

16 A total of 12 strategies and actional plans have been consulted in total, and actions contributed to the needs identified in these documents, the full names of the strategies are presented on page 7 of the Action Plan document.

17 Survey respondents were primarily AP implementers, which may introduce a positive bias in perceptions of relevance.

18 Based on the Likert scale (where 0 = "I do not know" and 5 = "To a great extent").

19 On a Likert scale from 1 to 5, with 1 being very low and 5 being very high. This scale is used throughout the report.

20 Survey response data.

with concrete strategic actions, mainly sectorial strategies and sectorial APs. Respondents frequently highlighted that the objectives of the projects are grounded in established CoE standards, such as European Commission against Racism and Intolerance (ECRI) recommendations, EU country reports, and specific institutional needs.[21] Most projects performed one or several rounds of needs assessment during the implementation years, aligning and adjusting their objectives to context changes. All projects hold stakeholders and partner discussions. Some of the projects also conducted needs assessments of the population targeted (i.e., national minorities, people/children with disabilities, and local communities) and integrated the results into the project design. Some projects supported the national authorities to develop sectorial strategies and APs and support their implementation. Other projects have been designed directly at the specific request of national authorities to help implement specific recommendations (i.e., GRECO and MONEYVAL reports, Istanbul Convention and Budapest Convention provisions, GRETA report recommendations, etc.)[22].

63. **Respondents are also optimistic in the survey, rating the relevance *vis-à-vis* the corresponding areas at 4.67. Respondents from HQ are slightly more positive about the relevance than** those in the Council of Europe Office in Sarajevo (4.73 versus 4.58). No significant differences are seen between the thematic areas.

64. **National stakeholders confirmed that they were consulted on project objectives**, and that these were discussed, adjusted if necessary, and are aligned with ongoing reforms and measures. The measures have been consulted with authorities, CSOs, and other donors in a multisectoral format. The priorities have further been cross-checked across multiple partners. The project objectives have also been coordinated with the needs identified during the implementation of the previous AP and its evaluation recommendations. Some interviewees mentioned that CSOs, as well as the local-level authorities, should be more involved in preparing the AP. Some partners proposed having preliminary, less formal discussions ahead of drafting the next AP so there could be a better understanding of CoE possibilities and the partner needs; other implementing partners expressed an interest in being more involved in the preparatory process of the next AP for a better match between the needs of the institution and understanding of what could be provided through the AP.

Relevance of operational objectives

65. **The evaluation acknowledges the operational relevance of the AP,** with capacity-building activities being perceived as the most relevant, followed by legislative and policy expertise, and then awareness-raising activities. With an average score of **4.79**, capacity-building was highlighted for its lasting impact, mainly through training schemes for law enforcement in human rights and programs at police academies. With an average score of **4.29**, legislative and policy expertise was valued for establishing the national preventive mechanisms, including those developed to support the Ombudsman in its role as the National Preventive Mechanism, and digitalisation efforts in prison, as well as improvements of psychiatric treatment, though respondents noted a need for further alignment with international standards. Awareness-raising activities, rated at **4.17**, were perceived as important for enhancing oversight of economic crime and strengthening Bosnia and Herzegovina's AML/CFT framework.

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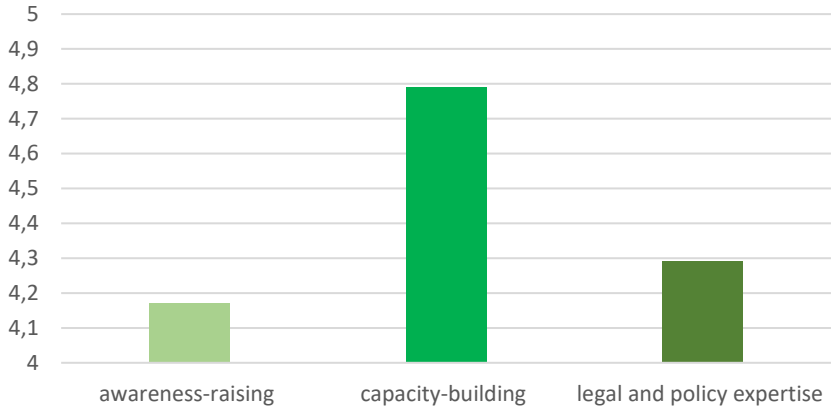
21 IDI and survey data.

22 IDI and survey data.

Figure 3. Relevance of operational objectives



Source: CoE survey.

Response to country and sector needs

66. **The AP is a comprehensive framework designed to address a broad range of needs and priorities**. Several respondents specified that the AP document is "*too generic, too broad, an umbrella where any action would fit",* which was seen as positive since the actions and measures could be flexible and adjust to changing needs but also challenging from the perspective of ensuring proper implementation and accountability on the national actors. The AP is also perceived as a strategic 'living document': "*There is constant monitoring of the evolving needs and flexibility to adapt*"; the adaptation is primarily visible at the project level (i.e., the iPROCEEDS2 project, the Mostar project on democratic citizenship, etc.).

67. Key stakeholders noted that the **AP objectives address needs across all thematic areas,** but identified areas need continued focus.

- Progress was observed in delivering **Human Rights** training, integrating gender mainstreaming into law enforcement, and enhancing pre-release programs for forensic offenders/patients in the forensic hospital. Achievements can be mentioned: strengthening the capacity of judges and prosecutors to apply freedom of expression standards—particularly in cases related to defamation, Strategic Lawsuits Against Public Participation (SLAPPs), and hate speech—in line with European norms; fostering connections between legal and media professionals in Bosnia and Herzegovina; producing in-depth research on harmful content online; facilitating the dialogue between representatives of authorities from different entities; and establishing points of contact (POCs) within prosecutorial offices and police departments dedicated to ensuring the safety of journalists.
- Additional achievements include the digitalisation of prisoner records and improvements in data protection compliance. However, key areas requiring further attention include addressing freedom of expression and media, journalism safety, support to local media, election oversight, anti-hate speech, protection of national minority rights, prevention and combating of labour exploitation and child exploitation. In the **Rule of Law** domain, respondents highlighted that projects have supported efforts to combat corruption, money laundering, and terrorist financing. Examples include improving the political funding oversight regime, enhancing institutional capacities, and developing comprehensive guidelines for monitoring compliance with targeted financial sanctions—all in line with Council of Europe MONEYVAL and Council of Europe GRECO's recommendations.
- Areas identified as requiring particular focus include the enhancement of civil judiciary rights, enforcement of directives regulating international trade and financial disputes, victim compensation mechanisms, better protection of victims, fostering capacities to effectively address violent extremism and radicalisation within the penitentiary establishments, specific forms of trafficking, and the protection of children against trafficking as well as safeguarding child witnesses and child victims of crimes. Overall, stakeholders agreed that the Rule of Law should remain a central focus of CoE activities, with continued support for judicial adjustments necessary to advance EU accession.
- **Democracy**-focused projects were praised for their relevance, particularly in addressing electoral challenges. Respondents noted improvements in voter list accuracy, efforts to combat electoral corruption, and initiatives to enhance cooperation between prosecutor offices, police agencies, and election commissions. The respondents indicated limited progress in election oversight.

Unaddressed needs

Action Plan-level needs

68. While the AP broadly covers key thematic areas and remains flexible to address emerging priorities, several specific needs remain unaddressed. Respondents highlighted the importance of **expanding efforts in social cohesion** by working with religious and sports communities, school children, and other stakeholders to promote inclusion, diversity, and equality. Additionally, **prison healthcare** was identified as an area requiring improvement, with suggestions to CoE to further offer support to the authorities for the equivalence with community healthcare and to strengthen cooperation between Ministries of Health and Ministries of Justice to achieve this. More work is needed to address the situation of people in social care institutions, including persons with disabilities and other vulnerable

groups, as well as to prevent and support victims of domestic violence (although research shows that this topic is covered by other donors), prevent and address bullying and violence in schools, etc. Preventing abuse and promoting gender equality in the military was also mentioned as a topic where attention is needed. Interviews also revealed that homelessness is not a topic on the policy agenda in the country, but it is necessary to start this discussion.

69. Developing **probation service** in Bosnia and Herzegovina was also noted as a critical need. Bosnia and Herzegovina is among the few CoE member States without a probation service, and while some progress has been achieved in 2013-2016, there is currently a growing willingness to advance this sector. Targeted programmes to prevent radicalisation in prisons are also needed, along with specific integration and employment support for women prisoners.

70. Stakeholders could not offer detailed information on which needs are a priority; such discussions should take place in a larger forum.

71. Stakeholders also expressed their opinion on emerging areas, such as **media literacy**, **artificial intelligence**, and **disinformation**, into ongoing actions. One additional area highlighted is the **management of conflicts of interest and methodologies for verifying asset and interest declarations**, which are currently addressed within the Horizontal Facility for the Western Balkans and Türkiye III (2023-2026). Despite this complementary effort, certain elements, such as specific GRECO recommendations, have not been sufficiently covered due to resource constraint It is important to mention that the resources to advance the anti-corruption efforts have been suspended due to stagnation of the country progress in this area, with redirecting of the funds to areas where progress was possible to attain.

72. However, the comments also identified areas where further action is needed, such as **enhancing the Central Election Commission's audit capacity** to monitor compliance with political party financing laws. These gaps suggest opportunities for further refinement and prioritisation within the Action Plan. Discussions with the CoE staff revealed that a dedicated software to enhance the CEC's oversight capacity of political party funding is being developed.

Project-level needs

73. Several specific needs remain unaddressed by projects, primarily due to **limited funding** and the **necessity to focus on key aspects of work**. While respondents identified **study visits as a valuable but underutilised activity**, these visits can serve as important opportunities for professional networking and cross-jurisdictional learning. Ensuring a more strategic use of study visits could help further strengthen capacity-building efforts and knowledge exchange. **Educational activities** for journalists were another area of concern, with respondents advocating for more active involvement of state and entity-level institutions in journalist protection. Work related to **access to information in the context of Freedom of Expression** has not been addressed by the PROFREX project but is being covered under EFEx by the same Division[23].

Changes of needs since 2022

74. The evaluation found that while **some needs have evolved, others remain unchanged**. A broader contextual analysis of recent CoE reports and donor reports indicates that the country continues to face challenges in democratic governance, legal certainty, and protection of vulnerable groups. Despite the changing landscape, some fundamental issues - such as institutional reforms, the independence of the judiciary, and the rule of law enforcement - remain core and unchanged. Stakeholder feedback indicates that respondents are undecided on whether needs have changed. The portion of respondents that indicated that Bosnia and Herzegovina's needs have changed indicates that these changes are notably driven by recent developments in the EU framework, such as the adoption of the new AML package, the asset recovery directive, and (Markets in Crypto-Assets Regulation) MiCA requirements for regulating crypto asset providers in 2024. The publication of the latest MONEYVAL evaluation report in February 2025 further highlights the emerging priorities for addressing economic crime. Despite these changes, a

[23] The Division for Cooperation on Freedom of Expression.

notable number of survey respondents (particularly those who selected "No" or "I do not know") **perceive the overall needs as consistent**, suggesting that while some needs evolve, the core priorities remain steady.

75. The **AP has been recognised for its flexibility in responding to new and emerging challenges**. The survey average score for how well the AP addresses changing needs is high, with most survey respondents indicating that it does so "to a significant extent" or "to a great extent". Key elaborations highlight the AP's flexibility in adapting to new priorities. For instance, it has supported Bosnia and Herzegovina in addressing new AML/CFT challenges, such as mitigating terrorist financing risks in the NPO sector through risk-sensitive and proportionate approach, implementing risk-based supervision, assessing the ML/TF risks of virtual assets and virtual assets service providers and improving beneficial ownership transparency. In the field of Freedom of Expression, targeted support has been flexibly directed towards countering SLAPPs and enhancing the safety of journalists, in response to the specific needs expressed by project beneficiaries. Moreover, the Interim Progress Report highlights progress in areas such as combating trafficking in human beings, judicial data collection, and anti-corruption reforms. Respondents also praised the CoE for its **proactive approach**, such as starting a risk assessment of crypto asset providers before bilateral projects commenced, demonstrating the AP's adaptability to new standards and requirements.

76. Finally, while the AP has been praised for its flexibility, some gaps in addressing specific needs remain. The **probation service**, for instance, is **not explicitly part of the current AP** but has seen incremental progress (mainly raising awareness and securing reform commitment) through related projects in the prison field. Additionally, challenges persist in the areas of freedom of expression, constitutional justice, and social rights, where the lack of comprehensive reform has been noted.[24]

Gender mainstreaming and human rights approach

77. **Gender mainstreaming aspects are present or discussed in most projects**, in line with the recommendations of the relevant CoE monitoring and advisory bodies and the organisation's strategic documents, such as the Gender Equality Strategy 2018-2023.[25] Gender analyses have been conducted in several projects under the HFII and HFIII, including those related to Freedom of Expression and of the Media, and Combating Trafficking in Human Beings and strengthening the efficiency and quality of justice in BiH (Gender Analysis documents shared by CoE[26]), as well as the projects related to economic crime[27]).

78. Gender considerations are also in the projects' documentation under the "Cross-cutting issues" section.[28] While several interviewees highlight the efforts to ensure gender equality in both the composition of activity participants and the implementing teams for activities, some of them expressed feeling somewhat artificially "pressured" to achieve this, especially in sectors lacking gender-balanced representation (e.g., teachers). Similar observations on hesitation to include gender provisions in some projects were noted in the previous evaluation of the AP, where some stakeholders justified the lack of gender mainstreaming by arguing that the project's "focus was not on gender equality"[29]. At the same time, interviewees note that projects with the most significant gender impact specifically

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24 Bosnia Herzegovina - AP level donor report - Year 2023.

25 https://rm.coe.int/prems-093618-gbr-gender-equality-strategy-2023-web-a5/16808b47e1; Gender Equality Strategy for 2024-2029 (https://search.coe.int/cm# #{%22CoEIdentifier%22:[%220900001680ae569b%22],%22sort%22:[%22CoEValidationDate%20Descending%22]}), directly applicable to HFIII from its second year of implementation.

26 Gender analysis HFIII Education Bosnia and Herzegovina; Gender Analysis HFIII Efficiency and quality of Justice (CEPEJ) Bosnia and Herzegovina; Gender Analysis HFIII Persons deprived of liberty Bosnia and Herzegovina; Gender analysis HFIII REG anti-discrimination; Gender analysis HFII Anti-trafficking Bosnia and Herzegovina; Gender analysis HFII Freedom of expression and media - Bosnia and Herzegovina.

27 Clarification provided by CoE at the commenting stage.

28 Individual project documents (DoAs, reports) shared by CoE.

29 Documents shared by the CoE: Final-AP-BiH-EvaluationReport-2018-2021.

target gender equality and human dignity, such as initiatives addressing violence against women, anti-discrimination, hate speech, and diversity promotion.

79. **The approach to gender mainstreaming is not entirely coherent across projects.** For instance, one interviewee noted that while gender-related indicators are being developed in her department, gender considerations will only be more systematically ensured in future actions, with no clear timeline at this stage. This aligns with the CoE's pilot project aimed at developing common indicators across different sectors of cooperation, including gender equality. Some of these indicators are expected to serve as cross-cutting measures for gender mainstreaming across all CoE projects. However, operational teams are currently limited in their awareness of these indicators, as they have not yet been fully implemented. Once incorporated into the PMM platform, CoE operational entities will be informed, which should help enhance coherence and knowledge exchange in this area. **On the level of the AP, it is also unclear how gender mainstreaming has been ensured**. At the start of the AP, until 2021, a dedicated person was responsible for gender-related work at the HQ-level (Gender Mainstreaming Advisor for South-East Europe and Türkiye). Due to staff rotation, this person moved to a different unit, and the role remained vacant until November 2024, when a new advisor, seconded by Germany, was appointed.[30]

80. **Interviewees generally confirmed applying a human rights approach under the AP**. However, many could not elaborate on the specific meaning of this statement or provide concrete examples, potentially indicating a lack of a fully mainstreamed and in-depth approach and understanding in this area. Similar findings were noted in the course of evaluation of the previous AP: "*While there is high recognition that the work done by the CoE on integrating human rights principles at all stages, the way(s) in which projects had this implemented in practice are sometimes unclear to project managers and staff*".[31] Nonetheless, the desk review identified several examples that confirm the integration of human rights principles within the AP. These include adherence to principles such as participation and inclusion, equality and non-discrimination, accountability, transparency, and access to information in the region.[32]

81. The AP strongly commits to incorporating a human rights perspective and promoting gender equality across its projects. Several key efforts were highlighted, such as integrating gender-sensitive approaches into anti-trafficking strategies and supporting initiatives that empower marginalised groups, including survivors of trafficking. In alignment with the human rights approach, the project collaborates with CSOs to ensure their involvement in activity development and implementation, including voices of marginalised communities through initiatives such as "Living Libraries."

82. Efforts to address gender equality include specific actions to promote women in law enforcement, such as establishing a multidisciplinary working group to identify and address current challenges faced by female police officers. Gender dimensions are integrated into small grant calls, and activities are implemented through a gender-sensitive lens.

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30 CoE comments on the draft Evaluation Report.

31 Final-AP-BiH-EvaluationReport-2018-2021.

32 Documents shared by the CoE: Abstract from the HFII Final report - HRA examples from HF actions in Bosnia and Herzegovina, Abstract from the HFIII First Annual report - HRA examples from HF actions in Bosnia and Herzegovina.

2.2 Coherence

Compatibility and complementarity

To what extent was the CoE's support compatible with other interventions in the country?

This evaluation finds that the AP achieves strong coherence. The CoE's strategic triangle approach ensures alignment with national and international initiatives, addressing gaps through effective collaboration. While informal communication and consultations enhance coordination, formal sectorial alignment challenges and overlapping risks in areas like economic crime highlight the need for more systematic approaches. Despite this, the AP effectively fosters synergies and complements broader objectives.

83. **The feedback suggests that the CoE's support is compatible and complementary**[33]. Respondents from the survey and interviews praised the CoE's "**strategic triangle**" approach, which integrates standard-setting, monitoring, and technical assistance. This ensures that CoE projects address gaps that might otherwise be overlooked, bridging high-level international standards with practical applications at the local level. Nonetheless, **the degree of complementarity with other donor-funded interventions and cooperation activities is hard to assess**. The formal sectorial coordination (e.g. coordination based on thematic areas) seems insufficient, and the public stakeholder ownership and ensuring complementarity and limit overlap is fragmented (more on this in the next section).

84. The analysis from interviews and the survey shows that CoE support is widely perceived as compatible with other interventions in Bosnia and Herzegovina. The overall average score of **4.04** reflects strong alignment and complementarity between the CoE's initiatives and those of other international and local actors.

85. **Informal communication is happening, but to what extent does it translate into complementarity?** There was insufficient information for a complete picture of coordination and complementarity per each thematic area. Still, many interviews mentioned examples of good coordination at project and area level, amongst them: JUFREX, PROFREX, and EFEX, coordination of CoE projects and OSCE, IOM, IFS-EMMAUS on combating human trafficking, "Strengthening the Efficiency and Quality of Justice in Bosnia and Herzegovina" (BiHSEJ) has been mentioned as good example of complementarity. ROMACTED projects have also been mentioned as another example.

86. **In addition,** respondents identified several examples of areas where the CoE's support complements other interventions:

    - **Combating hate speech**: Synergies were established with CSOs and international organisations, ensuring effective collaboration.
    - **LGBTI rights**: The CoE fills a gap in this area, as no other international organisation directly implements activities, instead providing grants to CSOs.
    - **Economic crime**: The CoE's work in this field incorporates GRECO and MONEYVAL recommendations and complements broader EU and other international efforts.
    - **Anti-trafficking**: Regular consultations with local and international stakeholders ensure a coordinated approach and successful joint efforts.

87. While the CoE's compatibility is strong, some **challenges remain**. CoE's efforts to build synergies in areas with limited interventions, such as prison and police reform, demonstrate the need for sustained engagement to address these

[33] Compatible means projects can exist or work together without conflict. Complementary means projects enhance or complete each other.

gaps. Efforts are made to ensure coordination across donors and projects in all areas of AP implementation. Still, the interviewed stakeholders mentioned that **more coordination is necessary to ensure complementarity and avoid redundancy across various initiatives**.

88. The coordination is a task of the national authorities and should be conducted by the line ministries; at the same time, interviews with authorities revealed that the meetings are scarce ("*we held donors' meeting once per year*" or have an ad-hoc nature. This was considered insufficient by almost all respondents for the coordination needs, considering the large number of projects, initiatives, and donors involved in various thematic areas. The view that the donor community did not step in and ensure proper coordination across various projects and initiatives was also expressed. However, it is not clear if the donor community had the necessary mandate to do it.

Donor- and project-level coordination

89. **The CoE tries to be included and contribute to donor coordination.** The CoE has established mechanisms to coordinate effectively with other interventions. Examples include semi-annual project Steering Committee Meetings (SCMs), which facilitate coordination at the individual project level, and annual Beneficiary Steering Committee Meetings (BSCMs) organised for all actions implemented in Bosnia and Herzegovina under the Horizontal Facility III, which help share results, avoid duplication, and align actions. Coordination with international organisations such as the EU, OSCE, IOM, and USAID was highlighted in areas like anti-trafficking and journalist safety. The CoE is part of many working groups and participates in several ad-hoc meetings on different topics related to the areas covered by the AP. Some examples include representation in the **major donor's quartet** (CoE, UN, EU, OSCE) that works mainly but not exclusively on peacebuilding measures. Amongst the examples of CoE participation in the coordination meetings are the participation in the group led by the High Judicial and Prosecutorial Council (HJPC) with the support of the EU4 Justice project, the Gender Equality working group, and other sector donors. The CoE is also part of the groups that are participating in human rights-focused meetings organised by EUD.

90. **These efforts expand towards constant communication and coordination with EUD**; formal meetings on implementing the actions under HF[34] are regularly held. Ad-hoc meetings are being organised as well, as per the arising needs. Moreover, the HF Beneficiary Steering Committee meetings are held annually, co-chaired by the EU, CoE, and the Ministry of Foreign Affairs, which are responsible for coordinating HF at the domestic level. **Thematic areas meetings** are also being held with staff of the EUD, and regular meetings of the CoE Sarajevo office management with EUD representatives take place to discuss progress and avoid project duplication. Interviewed donors expressed the readiness to have even more systemic contact with projects and ensure coordination with other projects they fund.

91. **Project-level coordination** seems to work well; the project managers seem well-informed about other projects and initiatives in the country, both at formal and informal levels. Topic/project-specific meetings seem to be organised more often, and the project managers communicate well with their implementing partners and other projects. Mechanisms and procedures to ensure synergies across AP projects work better include formal regular meetings with all project staff, excellent interpersonal cooperation, and joint initiatives. Constant efforts to leverage links and synergies between projects have been confirmed in interviews. Moreover, synergies and complementarities with other projects are systematically addressed across the project documents, providing a variety of examples. One such example is the HF19 - Promotion of Diversity and Equality in Bosnia and Herzegovina and the ROMACTED (regional Joint Programme for South-East Europe and Türkiye), joining efforts in the organisation of events such as in-person discussions with pedestrians under the campaign "Block the hatred. Share the love".[35]

92. The project staff interviews revealed a formal tool (matrix) where information about all projects is presented, so all are informed about other projects and could work towards complementarity. Many partners and stakeholders confirmed during interviews that project staff also exchange learnings (guidelines, training materials, reports) and

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[34] This refers to six actions currently implemented in Bosnia and Herzegovina under HF III and five actions implemented under HF II.

[35] HF19 - Anti-discrimination Final report, document shared by CoE.

share best practices with them. Regular meetings and close collaboration between Strasbourg and Sarajevo allow for good planning.

Risk of duplication

93. Several thematic areas where interventions by other actors, such as international organisations, bilateral donors, and local entities, overlap with the CoE initiatives. Some thematic areas highlighted by stakeholders are:

    - **Democracy, women's rights, and domestic violence** are areas where significant overlap exists with other interventions. However, respondents noted that complementarity is ensured in this area, avoiding duplication while leveraging.

    - **Financial investigation** training is an area of potential overlap, with multiple actors providing support. Respondents suggested that a more systematic and coordinated approach could enhance effectiveness, particularly in addressing the country's low capacity and limited inter-agency collaboration.

    - **Institutional support**. Specific institutions like the Ombudsman receive assistance from various organisations and bilateral donors. The CoE focuses on establishing preventive mechanism and setting rules of function while coordinating with partners like the EU and OSCE to ensure aligned support.

    - Many interventions in Bosnia and Herzegovina focus on **vulnerable groups**, including Roma, persons deprived of liberty, vulnerable women The CoE distinguishes its efforts by providing an all-encompassing approach tailored to these groups' unique needs. Its perspective and engagement in niche areas set it apart from other actors.

    - **Prisons and detention facilities** are another area where multiple interventions exist, although the CoE's efforts often complement broader international initiatives.

94. Most stakeholders perceive **no significant coordination issues with international donors**. This reflects a strong level of collaboration and systematic approaches to avoid duplication. Effective mechanisms such as regular consultations with stakeholders, Steering Committees, and coordination with international missions (e.g., ICITAP, OSCE, IOM) ensure that interventions are complementary and aligned. For example, in anti-trafficking, respondents highlighted regular consultations with the State Anti-Trafficking Coordinator, local CSOs, and international organisations like GIZ and USAID to ensure activity complementarity. Coordination challenges were noted in a few cases, particularly with newer projects, such as "EUPA4BiH," where the lack of clarity regarding specific initiatives was cited as a potential source of overlap. Areas with good coordination highlighted by stakeholders are:

    - **Freedom of expression**: Strong coordination and cooperation mechanisms were reported in this field, with no major issues.

    - **Anti-trafficking**: Complementarity was achieved through multi-stakeholder consultations, ensuring alignment and effectiveness.

95. There is **no indication of coordination issues with philanthropic organisations or other stakeholders**. The involvement of these actors appears to be less prominent in Bosnia and Herzegovina compared to international donors. However, one stakeholder noted that entering new technical assistance programmes with large budgets and unclear objectives could challenge coordination, particularly in areas like economic crime.

96. Despite risks and limited indication of overlap, stakeholders emphasise the importance of close collaboration among international and national stakeholders to ensure efficient and complementary support. Key areas at risk of duplication are:

- **Combating economic crime**, including corruption, money laundering, and terrorist financing, is identified as particularly vulnerable to duplication. This is due to the many actors involved in addressing these issues. Without proper coordination, overlapping initiatives could lead to inefficiencies and potential gaps in implementation. Respondents stressed the importance of systematic mapping and coordination in addressing these challenges effectively.

- **Media literacy and governance** in the digital landscape are also mentioned as areas where duplication could occur. The growing importance of these topics has led to increased involvement by multiple stakeholders, highlighting the need for collaboration and clear delineation of roles.

- **Hate speech** is another field that overlaps with the efforts of several organisations. Respondents noted that while the topic is broad and much work remains, the potential for duplication exists. However, regular meetings and coordination with other organisations have thus far prevented overlapping activities.

- Multiple interventions frequently target **vulnerable group** (such as Roma and LGBTI individuals) creating the potential for overlapping efforts. Coordination among stakeholders is critical to ensuring these groups receive comprehensive and non-redundant support.

97. Finally, stakeholders highlighted several measures taken to prevent duplication:

- Proper **mapping of needs** ensures that needs mapping gaps rather than duplicating existing efforts.

- **Regular coordination**. The CoE's Sarajevo office actively engages with national and international stakeholders to align efforts and avoid redundancy.

- **Close, ongoing communication** with national institutions and other actors helps maintain awareness of existing initiatives.

- **Coordination with the CoE headquarters** ensures, in general terms, that the Action Plan and project log frames are designed to complement, not overlap, other efforts.

2.3 Efficiency

Overall efficiency

To what extent was the implementation of the AP efficient?

This evaluation finds that the AP demonstrates overall efficiency. Despite financial constraints, limited staffing, and phased funding, project teams have shown resilience and adaptability in delivering results. Technical resources scored the highest in terms of efficient allocation but also experienced concerns about adequacy. Financial and human resources are areas for improvement, particularly in maintaining staffing levels and budget allocations.

Flexibility in project implementation allowed adjustments to contextual changes, such as the COVID-19 pandemic, while cost-efficiency measures like co-organised events and back-to-back scheduling maximised resources. However, administrative processes, inflation, and workload strains often hindered efficiency. The AP effectively balances challenges with creative solutions, ensuring strong alignment between resources and project outcomes.

98. The overall average score for the question of whether the implementation of your respective project was efficient is **4.04**. When asked how well project staff thought resources were allocated to their respective projects, it provided insights into their strengths and challenges. Respondents frequently cited the need for better alignment of resources with the complexity of projects. Financial constraints and limited staffing levels often placed undue strain on teams, while phased funding hindered progress in some initiatives. Nevertheless, the strategic use of technical resources and the creative optimisation of financial and human resources demonstrated the resilience and adaptability of project teams. **Financial resources** received an average score of **3.88**, reflecting moderate satisfaction. Respondents noted that **rising inflation and constrained budgets** posed significant challenges, requiring creative approaches to optimise expenditures. **Human resources** were rated slightly higher, with an average score of **4.04**, but there were recurring mentions of **insufficient staffing levels**. Some projects operated with **single-individual teams**, which introduced risks during critical periods, such as illness or sudden surges in workload.

99. **Technical resources** received the highest rating, with an average score of **4.25**, demonstrating overall satisfaction with their allocation and use. Specific examples highlighted the effectiveness of technical resources in supporting capacity-building and innovative approaches. One notable example involved the **training and certification** of law enforcement officers and labour inspectors to combat human trafficking. This initiative led to improved identification and intervention capabilities and directly supported successful police actions. Furthermore, the development of **tools and workshops**, such as those addressing online and technology-facilitated trafficking, enhanced knowledge-sharing and regional cooperation.

Timeliness of the projects

100. **Timely delivery of project outputs** was generally confirmed through interviews, survey[36], as well as project documentation, with delays primarily attributed to external factors such as the COVID-19 pandemic and political circumstances. However, the evaluation could not comprehensively assess timeliness due to the lack of targeted documentation on the matter.

101. There are limited indications that delays in project have negatively affected outcomes. However, there have been challenges during project implementation:

[36] The overall average score assessing the extent to which projects under the AP delivered results within the planned timeline is 4.46.

- Projects like PROFREX and EFEx faced delays due to **external factors** such as political instability, administrative changes, and the COVID-19 pandemic. However, these issues were largely addressed, and projects caught up to their planned timelines.

- Some delays, such as in prison digitalisation, were attributed to the lack of legal amendments and changes, budgetary constraints, and challenges during government transitions (**institutional and political challenges**). However, respondents noted that new officials typically integrated into ongoing efforts quickly.

- The outbreak of **COVID-19** disrupted initial project activities, particularly in-person training sessions. Teams adapted by reshuffling their plans and focusing on other priorities during the initial phases, ensuring that the overall project timelines remained on track.

- Broader **systemic issues**, such as changes in partner institutions and government transitions, were cited as recurring challenges. Despite this, respondents emphasised that the pace of implementation often increased once these obstacles were resolved.

102. Overall, the feedback points to the resilience and adaptability of project teams in delivering results despite early challenges. Open comments to the survey underscore the **importance of flexible planning and proactive coordination with stakeholders** to overcome delays and maintain project momentum. In fact, interview feedback confirms that **the AP is flexible and can adjust to contextual changes** (societal, economic, and political). The need to have a long-term vision for the overall thematic areas and some projects was raised by several interviewees, most particular in the area of rule of law.

103. The AP had a wide scope and permitted project changes and flexibility without the need to make many adjustments to the projects themselves. Some outcomes have been added (i.e. creating a coordination board on the Gender Action Plan 2023-2027), and some have been changed (several outcomes in the education area) as per the implementation needs. Stakeholders mentioned that CoE projects adjusted the implementation of activities to the realities of working during the COVID-19 pandemic. This experience was useful in general and showed that flexibility is possible. Several projects were highlighted for their flexibility and the ability to adjust to political and social changes (e.g., innovating democratic participation at local level in Bosnia and Herzegovina project, iPROCEEDS2 project). For the Mostar project, interviewed stakeholders mentioned that good political timing was one of the factors that contributed to the successful implementation.

Cost-efficiency

104. **Interviews and desk research showed that most of the project activities had been delivered cost-efficiently**. Respondents noted the presence of cost-efficiency considerations throughout the projects, including combining activities and using online formats, cascade trainings, where possible, to save resources. Several projects reported doing more activities than initially planned within the allocated budget. Some of the partners reported that project budgets should also fund some of the organisational costs of the partner institutions to ensure the implementation and sustainability of some measures.

105. Most projects applied cost-efficiency measures when implementing projects. Several effective strategies were employed to manage costs, ensuring that projects maximised their impact within financial constraints. For example, the CoE **collaborated with international partners** like OSCE, IOM, GIZ, and others to co-organise events such as the annual symposium on combating trafficking in human beings for prosecutors in Bosnia and Herzegovina. This partnership enabled cost-sharing and enhanced the quality of capacity-building initiatives. Additionally, **back-to-back scheduling of activities**, **free-of-charge training venues**, and **transitioning to online or hybrid formats** whenever possible were other significant cost-saving measures.

106. **Renegotiation of expert fees** and **strategic planning of activity locations to minimise travel costs** also contributed to cost efficiency. The use of modest venues and joining forces with other organisations further

optimised budgets. Moreover, the emphasis on **capacity-building and fostering in-house training capabilities** was highlighted as a sustainable approach that reduced long-term reliance on external resources.

Trade-offs

107. Whether the cost-efficiency considerations have led to trade-offs with other project aspects, such as quality or scope, most projects indicated this was not the case. However, project staff did highlight that while maintaining cost-efficiency, there were instances where compromises were necessary:

- In some cases, the number of participants in training sessions was reduced to manage costs effectively (**scope reduction**). While the targeted values were still met, fewer professionals received training, potentially limiting the overall reach and impact of the sessions.

- Under HFII, non-competitive grants were extensively used to address resource constraints. However, this approach increased staff workloads due to the **additional grant management responsibilities**. Furthermore, compared to direct project implementation by the CoE, the reduced control over the quality and relevance of outputs delivered by grantees emerged as a concern.

- **Internal procurement rules** sometimes require use of specific service providers. One example involved a design/printing company whose outputs were not satisfactory, rendering them unsuitable for publication. While efforts were made to address these issues, the process highlighted inefficiencies in balancing cost and quality. Nevertheless, the Council of Europe's procurement contracts include a written acceptance procedure, which allows for the rejection of deliverables and, if necessary, contract termination to ensure quality standards are met.

- The volume of procedural and reporting requirements, coupled with the need to implement a wide range of activities, was identified as a strain on field teams (**administrative burden**). Although these challenges did not result in significant trade-offs, they posed operational difficulties.

Adequacy of funding

108. **The resource allocation for each sub-thematic area, action, or project under the AP does not follow a centralised, overarching budget structure.** The funding is channelled primarily to individual projects. Several areas need additional funding so all activities can be implemented as per the AP; these are combatting trafficking in human beings, deliberative democracy, and rule of law. Out of the total AP funding, 44% are contributions of the EU, 34% are voluntary contributions of the individual states, and 22% comes from CoE ordinary budget.[37] When aggregating project budgets per AP pillar, there are discrepancies in funding allocated to each pillar.

109. Democracy, is often referred to as the "poor brother" in comparison to other pillars, as highlighted in several interviews. A recent development worth noting is the introduction of contributions from the CoE's ordinary budget at the AP level, improving financial predictability. Donors are also encouraged to contribute directly at the AP level, allowing for greater fund allocation flexibility. As noted in the AP interim progress report, AP-level funding will be "critically needed to ensure the implementation of the Action Plan until the end of its term".[38] On the other hand, members of the Reference Group note that „with 91% of the needs under the current AP for Bosnia and Herzegovina being funded with almost all areas addressed, the donor-driven aspect would appear reduced (compared to a situation with a significantly lower level of funding)".[39]

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37 Action Plan funding situation.

38 AP interim progress report.

39 Second RGM minutes

110. **At the project level, the funding generally seems adequate for the envisaged measures.** However, some of the projects reported severe funding cuts (i.e. one of the respondents reported that only one-third of the initial budget was provided for their project without any revision of activities. Several projects also reported that they had to cancel activities (i.e., summer schools, the higher education component of one of the projects), reduce the duration of some activities, combine events to reduce costs, or do some of the activities online. Overall, all projects reported measures to reduce the costs. Several documents highlight the impact of high inflation rates on implementation costs, emphasising the importance of flexibility in revising projects but without providing specific details.[40] While most respondents did not address this issue, those who did expressed contrasting views. Some noted that "proper adjustments were made to stay within budget", while others stated that "stronger adjustments were needed" to effectively manage the financial challenges posed by inflation.

Adequacy of human and technical resources

111. **Implementation structures are in place to execute (human and technical resources), monitor, and fund the AP measures.** The AP is implemented through its projects; the organisational and operational aspects are discussed during the Steering Committee meetings, with the overall coordination of the AP done by the DPC; and the implementation done by the MAEs responsible for each topic area. At the project level, the structures to implement are in place and work well. Projects are implemented through memorandums of understanding with their partners, with well-defined responsibilities, APs, budgets, and implementation timelines. The Project Steering Committee is the coordination body; meetings are held regularly to inform and organise project implementation.

112. When asked about the level of human and technical resources available, the analysis indicates that the latter caused more concerns.

Human resources

113. The project team structure is generally adequate and consistent across projects but could benefit from additional human resources. Project implementation is typically managed by one (Senior) Project Officer and one Project Assistant in the field, with the support of a Project Manager in Strasbourg overseeing several projects. Although interviewees generally managed to fulfil their tasks, they noted that meeting all responsibilities often required a fast-paced and stressful approach. They suggested that additional resources could enable more comprehensive implementation and the inclusion of additional activities. Through the interviews and discussion, project managers give the impression of being very professional, motivated, and deeply understanding of the topic and context. During in-depth interviews, the external stakeholders highly appreciated the work of the local teams, praising the team for their determination to achieve the expected results. At the same time, the local staff seems overburdened due to the workload and the lack of transparency related to the financial sustainability of the projects and, consequently, their jobs, which also affects their motivation.

114. For the Rule of Law projects, feedback emphasises the importance of maintaining the current setup, which is optimal, with strong institutional knowledge and a network of renowned experts within the CoE. However, earlier gaps, such as the need for a dedicated PR and communication officer, were noted, and while this was addressed in Sarajevo, it underscores the need for proactive resourcing. In the Human Rights domain, trust dynamics between field offices and headquarters emerged as an area for improvement. Some respondents expressed the need for more trust in field staff from the headquarters and additional staffing to manage workloads. Recruitment delays and challenges with staff retention were also highlighted, though existing staff's expertise and long-term experience were positively acknowledged. In Democracy projects, the expertise of project officers was highly praised, particularly their competence in managing complex political environments such as elections in Bosnia and Herzegovina.

Technical resources

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40 2022 donor report, 2023 donor report, interim progress report.

115. Issues such as overcrowded office spaces and the lack of specialised tools for activities like evaluation and graphic design were noted. These gaps often led to inefficiencies, with tasks being outsourced and time lost. Suggestions included investing in software to streamline processes and providing training for project staff to enhance capacity. Additionally, advanced data collection and analysis tools were identified as crucial for better programme management and indicator tracking. Respondents also recommended harmonising work methodologies to improve alignment across projects.

116. When asked about project monitoring and reporting systems, respondents provided mixed responses. Structured approaches like the CoE's Project Management Methodology (PMM) and IT tools were praised. Also, the regular reporting mechanisms and Steering Committee Meetings were highlighted as instrumental in tracking progress and guiding project implementation. In the area of Democracy, there was positive feedback on monitoring practices, particularly in elections. The use of reports from the CoE's institutions and the Electoral Cycle Group was identified as invaluable for evaluating progress and ensuring effective monitoring. These mechanisms were recognised for fostering collaboration and facilitating timely interventions.

117. However, some respondents pointed out that the demanding nature of reporting could detract from fieldwork, suggesting that granting more autonomy to local teams might enhance efficiency. Also, challenges such as a lack of automated tools for data collection and the need for more structured reporting cycles were raised. Respondents emphasised the importance of tools that enable efficient data management, such as tracking event participation and pre- and post-training assessments. It was suggested that quarterly reporting be restructured to focus on bi-annual cycles with greater emphasis on impact.

- **Certain administrative, decision-making, and approval processes are heavily time-consuming and bureaucratic, particularly at the headquarters level**; the country-level project managers acknowledged this, but it was also remarked by the interviewed external stakeholders and in the desk research[41]. Interviews with key informants in Strasbourg revealed that the organisation is trying to simplify workflows and ease the administrative burden.

Support from HQ and Sarajevo

118. Project staff from HQ were asked about the support provided by country-level project staff and vice versa. The comparison between local and HQ staff satisfaction levels highlights overall positive perceptions, with HQ staff reporting a higher average score (4.88) than local staff (4.42).

119. Both groups expressed strong satisfaction with the Rule of Law, where HQ staff rated it a perfect 5.00, slightly higher than the 4.75 reported by local staff. Satisfaction with Human Rights was similarly aligned, with HQ staff scoring it at 4.67 and local staff at 4.50. However, a notable divergence emerged in Democracy, where HQ staff reported satisfaction (5.00), while local staff rated it significantly lower at 3.50[42]. This difference underscores the need for closer alignment between HQ and local staff experiences and expectations, particularly in Democracy, to ensure consistent satisfaction and project outcomes across all thematic areas.

41 e.g.- External audit SIDA- freedom of expression.

42 Limitation: small survey sample should be noted in the analysis of this finding.

2.4 Effectiveness

To which extent has the AP achieved its objectives and outcomes?

This evaluation finds that the AP has been effective in contributing to overarching objectives in human rights, rule of law, and democracy in Bosnia and Herzegovina. Achievements include advancing anti-trafficking measures, promoting freedom of expression, and supporting institutional reforms aligned with European standards. Projects in the Rule of Law have strengthened anti-corruption frameworks and inter-agency cooperation, while Human Rights initiatives have enhanced national minority protections and gender equality measures. Democracy-focused efforts have improved electoral processes and fostered multilateral collaboration. Despite these successes, challenges remain in sustaining outcomes, addressing gaps in governance, and ensuring local ownership, highlighting the need for continued engagement and resource allocation to maintain progress.

Effectiveness of objectives

Effectiveness of overall objectives

120. The responses regarding the extent to which the AP contributed to achieving overarching objectives in human rights, rule of law, and democracy in Bosnia and Herzegovina suggest a significant positive impact, with an overall average score of **4.32**.

121. Interviewed and surveyed stakeholders **credited the AP with advancing priorities** such as anti-trafficking and technical cooperation for the **Rule of Law**. However, they emphasised the need for proactive local policymaker engagement to sustain progress, highlighting that while the AP provides critical technical assistance, local ownership is vital to achieving lasting outcomes. Respondents noted that the AP's effectiveness could be enhanced with a more comprehensive approach and increased resources to address structural challenges.

122. **On Human Rights**, the AP was praised for its instrumental role in achieving key milestones, such as the adoption by national authorities of the first national LGBTI Action Plan and "Mapping responses to hate speech in Bosnia and Herzegovina." These achievements were considered significant in a complex political environment where state-level initiatives are often hindered. Additionally, the AP's support for national minority language representation and institutional implementation of strategic documents was highly valued. For **Democracy**, the AP's impact is suggested to foster progress in areas requiring multilateral engagement. Respondents highlighted the importance of the AP's collaborative efforts with local and international stakeholders in advancing democratic reforms.

Effectiveness of specific objectives

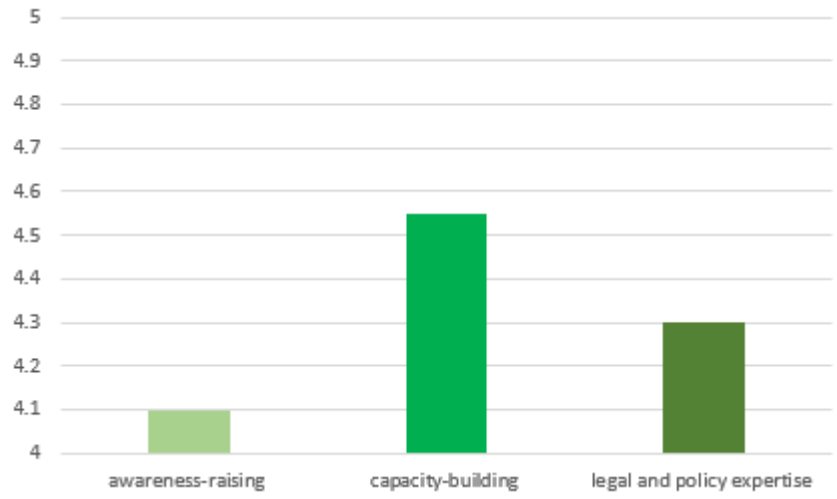
123. The analysis of projects' effectiveness in addressing the specific objectives of the AP reveals an overall average score of **4.41**, indicating a high level of perceived effectiveness.

124. Projects in the **Rule of Law** thematic area were praised for their substantial contributions, particularly in anti-trafficking, combating corruption, money laundering and terrorist financing, and enhancing inter-agency cooperation. Notable achievements included improved preventive measures against money laundering and terrorism financing and advancements in risk-based supervision. Stakeholders emphasised the need for sustained momentum to ensure long-term impact. In **Human Rights**, projects effectively supported key objectives, such as implementing the ECHR and promoting equality and human dignity. Specific outcomes included enhanced measures for national minority rights and systemic improvements in addressing hate speech. Some feedback highlighted structural issues that could further refine the alignment of actions with overarching goals. For **Democracy**, the high scores reflected the success of initiatives fostering democratic governance and participation. Respondents pointed to the importance of maintaining this level of engagement to build on the progress achieved.

Effectiveness of operational objectives

125. Analysing the effectiveness of awareness-raising, capacity building, and legislative and policy expertise highlights significant contributions across these activities, with average scores of 4.10, 4.55, and 4.30, respectively. Capacity building achieved the highest overall score, reflecting its strong perceived impact, followed by legislative and policy expertise and awareness-raising.

Figure 4. Effectiveness in achieving the operational objectives



Source: CoE survey.

126. **Awareness-raising activities** were particularly effective in enhancing understanding of key issues across all thematic areas, with notable efforts in promoting victim protection, hate speech, and addressing trafficking. **Capacity building** was highly praised for pioneering efforts, such as online and in-person training for civil servants. It targeted training for police officers, sports trainers, and religious leaders on combating hate speech and promoting equality. **Legislative and policy expertise** were recognised for advancing reforms in sensitive areas, such as freedom of expression and transparency in regulatory frameworks. However, the legal framework still presents areas where improvement is needed. "

Action plan level outcomes

127. Not all outcomes of the AP have been achieved; some are completed, some are not done or ongoing, and the level of completion of some is difficult to assess (when asked about the status of some outcomes the implementing partners have not been able to provide a clear answer) clear me of the outcomes were adjusted at project-level during the implementation of the AP. Stakeholders mentioned that adjusting outcomes is inevitable in complex and changing implementation contexts, and more should have been adjusted. To monitor the outcome achievement is difficult. There is no clearly defined ownership of each outcome; the partner institutions are mentioned not by the specific outcome but by the action area. To illustrate, about 70 public entities are stated in the AP as implementation partners, plus municipal entities CSOs, and other stakeholders, making it hard to follow the outcome implementation and check it with the respective partners. Project managers confirmed during interviews that one of the struggles to implement the projects effectively is a large number of beneficiary institutions, which leads to fragmentation of resources, coordination, and accountability challenges. While the country's complex administration setup dictates this, it might be possible to define one leading partner per each AP outcome to track progress more easily. A consolidated indicators dashboard could be developed, where project teams could update project-level and AP-level indicators that will build up to the completion of AP outcomes.

Project-level results

Project-level outcomes per thematic area

128. While the methodological limitations of the current analysis did not permit for a complete analysis of the completion of all output actions and measures per each thematic area, the evaluation found the following examples of successful implementation of AP and project activities[43]. Many measures have been completed, and good results have been achieved in **human rights**. Amongst these, the following have been underlined:

- Supporting the changes and adoption of different legislations and secondary legislation as a part of general measures imposed by the European Court judgments (e.g. Hadajlic and others, Hadzimejlic and others, Scepanovic), as well as enhancing procedures for various institutions, and making recommendations for law amendments for freedom of speech and expression.
- Several documents and national action plans were developed and supported (e.g. LGBTI Action Plan[44]; mapping of responses to hate speech, gap analysis on legislative and policy levels on digital and sexual violence against women).
- A focal point for the prosecutor's office on freedom of speech was appointed.
- Various research, expert opinions, and revisions of recommendations on relevant topics were done, contributing to better knowledge, awareness, and understanding of various human rights topics.
- One especially praised initiative was the installation of topographic signs in national minority languages.
- Cross-sectorial cooperation on relevant topics has been established and enhanced, among other things. For instance, work done in collaboration with municipalities has led to various initiatives and efforts benefiting the Roma community, ranging from infrastructure (roads, school infrastructure, playgrounds), employment opportunities, access to quality education, youth empowerment and children protection, as well as increased civil society participation. This includes efforts in Tuzla Canton, where the Programme supported initiatives in to incorporate the Romani language in school curricula. Supported by the Ministry of Education and the City of Tuzla, Romani language, traditions and culture will be studied in all primary schools in Tuzla Canton from 2025.

129. The results achieved by several projects on the **Rule of Law** area have been mentioned as very good, especially under the action area of independence and efficiency of justice (as examples the appointment of advisers to the Supreme Courts, the adoption by three Ministries of Justice of tools to put in place programs to rehabilitate the violent extremist prisoners). Moreover, the highlights included enforcing multi-sectorial cooperation and signing memorandums of understanding across key stakeholders to advance justice reforms. Other achievements include offering free legal aid to victims of trafficking, developing an Anti-trafficking strategy, improving various procedures, work processes, and standards, and introducing various protocols on several pillar-relevant topics, such as protocols to detect and investigate trafficking in human beings for labour exploitation and child trafficking cases, as well as to refer victims to appropriate assistance providers. Translation and adaptation to the local context of international guidelines and procedure (i.e., HELP module on anonymisation and privacy during public court decisions, HELP module on combating trafficking in human beings) Additional measures included the introduction of procedures to evaluate judges and prosecutors, the implementation of case management in the prison system and its operationalisation, and the digitalisation of several processes in justice-related sectors (e.g. e-sentence database, cybercrime interconnectivity with outside structures). The generation and use of justice statistics in line with CEPEJ methodology, standards and tools were also noted as a key accomplishment.

130. **Democracy** is a smaller pillar than the other two, but notable results have been achieved. Among these are advancing and signing cross-sectorial coordination and cooperation agreements on improving the election process, various

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43 Based on the 2023 Progress Review Report of the CoE AP for Bosnia and Herzegovina 2022-2025 and by the testimonies collected during key stakeholders in-depth interviews.

44 LGBTI Action Plan for Bosnia and Herzegovina 2021-2024.

peer learning, and capacity-building events. Local-level efforts included the engagement of citizens in shaping policies and incorporating the Reference Framework of Competences for Democratic Culture (RFCDC) into school environments, which aimed to support the implementation of the Policy Recommendation and Roadmap for Improving Inclusive Education adopted by the Counsil of Ministers. One of the most praised results under the good governance sub-pillar is the promotion of the deliberative democracy, with the Citizen Assemblies in Mostar and Banja Luka serving as a highly symbolic and pioneering example of this award-winning initiative.

Project-level outcomes per activity type

131. The level of AP and individual project contribution to ongoing country reforms differs between the main project activity types:

- **Legal and policy expertise.** There is limited reporting on adopting laws under the AP (with few exceptions). More work was done to develop road map documents, needs assessment, and gap analysis of legislative changes, sectoral APs, and changes in regulations of specific institutions. Adjustments to work processes, development of methodologies, risk assessments, analysis of recommendations to legal adjustments, and research to support legal changes were also performed. The interviewed stakeholders acknowledged the difficulties in changing the legal background in the country context but also mentioned the need for more efforts to support legal changes.

132. **Capacity building**, such as exchange of knowledge and training measures, at some level, was seen in all projects. There have been hundreds of trained professionals in most areas. Stakeholders have qualified many trainings as useful, and several concrete examples of follow-up have been brought (i.e., police training that has been integrated into the institution circuit, training for trainers of the police officers, and the municipal election commission). The stakeholders also mentioned international and national expertise as very useful; on-the-job training seems to be highly valued by partners. This component was mostly successfully implemented across all sub-thematic areas, although the interviews also revealed that for some of the training, it was difficult to ensure the necessary attendance. Interviews revealed a saturation point with receiving training; interviewees mentioned this about gender and education; some interviewees also pointed to the fact that knowledge transfer should also be "*from us, not only to us*".

133. **Awareness-raising** within most activities has been completed, but the results of these campaigns are more complex to evaluate. Small examples of good practices, such as summer schools and activities to support inter-ethnical connections, have been expressed during interviews. At the same time, there is little insight into how the actual results of awareness-raising measures will be assessed. In the future, some studies on measuring changes in societal attitudes, knowledge, and practices could be considered for these components.

Improved institutional capacity

134. **The projects have significantly improved the capacity of institutions in Bosnia and Herzegovina to uphold European standards.** Key achievements include integrating Council of Europe anti-trafficking standards into national strategies, enhancing institutional capacities to combat trafficking, and advancing risk-based supervision for lawyers and notaries, as well as the CoE work with the representatives of the judiciary, including the development and ongoing implementation of HR curriculum and modules. The EFEx and PROFREX projects have strengthened collaboration across stakeholders and improved the judiciary's knowledge of freedom of expression and journalist safety, with measurable impacts on practice.

135. However, challenges remain, including high staff turnover in local institutions, which undermines long-term knowledge retention. According to stakeholders, strategic approaches and career development initiatives are needed to mitigate this. Additional support for result-based reporting methodologies and coordination among entities is crucial to sustaining progress.

Tangible changes in laws, policies or institutional practices

136. According to stakeholders, the projects under the AP have made contributions to tangible changes in laws, policies, and institutional practices in Bosnia and Herzegovina. The integration of the anti-trafficking standards into national strategies and APs exemplifies this. Another example is the adoption of judicial training programs on freedom of expression has strengthened the legal interpretation of media rights and defamation cases. Another example is the regulatory gap analysis in the area of gender equality. Feedback also points to measures such as establishing networks for victim support, incorporating gender mainstreaming, measures to address hate speech and developing protocols for trafficking detection and investigation, which have led to meaningful policy and institutional improvements. More examples are presented above as per the thematic area.

137. In the Rule of Law, projects facilitated the adoption of international standards in local bylaws, such as the Rulebook on the functioning of the Preventive Mechanism, human rights modules in police academies, and resocialisation programmes for vulnerable forensic patients. Key advancements include the adoption of the risk assessment report on money laundering and terrorist financing related to virtual assets and virtual asset service providers, and draft amendments to laws on political party funding, which, if passed, will enhance transparency and accountability.

More effective cooperation between stakeholders

138. The analysis highlights varied levels of collaboration across different actors in Bosnia and Herzegovina, with significant contributions noted for government and international actors, and moderate to high effectiveness in working with civil society:

- Collaboration was positive at the **state and local levels**, particularly in the Rule of Law thematic area. Initiatives such as developing anti-trafficking protocols and enhanced cooperation between police and labour inspectors illustrate the success of partnerships with government actors. Notable achievements include the Ministry of Security incorporating GRETA recommendations into the new Anti-Trafficking Strategy and judicial training programs.
- Collaboration with **international organisations and other governments** received strong praise, particularly in Democracy and Rule of Law. Partnerships with organisations like the OSCE enabled joint activities, such as post-election conferences, showcasing effective complementarity between actions. However, responses suggest areas for greater alignment and cooperation to maximise impact.
- Engagement with **national and international CSOs**, as well as academia, varied significantly. National CSOs were often instrumental, such as in the EFEx project, which fostered improved stakeholder cooperation in monitoring freedom of expression. Nevertheless, with some exceptions, challenges persist, especially in engaging civil society in the Rule of Law, where only a few NGOs are active in the deprivation of liberty area. Stakeholders recommend additional funding and capacity-building support for CSOs in these areas.

Factors supporting and hindering the effectiveness of the project implemented under the AP

Factors supporting effectiveness

139. **A key driver of success is the active role of the CoE in providing technical and financial assistance, coupled with its strong partnerships across governance levels**. Stakeholders view the CoE as a critical partner with a recognised mandate and capacity to support complex reforms. The organisation's ability to reconcile diverse actors demonstrated through inter-sectoral and multi-administrative measures, further enhances its impact. Public stakeholders mentioned in some of the interviews that if provided with the same support by different donors, they would choose to work with CoE due to the professionalism and long-standing partnership with the CoE team; "they know how to reach the goals", "they are easier to cooperate with".

140. **The CoE's long-standing presence and institutional memory in Bosnia and Herzegovina**, bolstered by its professional and experienced project teams, are significant strengths. Strategic planning under the AP, alongside tools such as ML/TF risk assessment methodologies and anti-trafficking, has provided a solid foundation for targeted

interventions. Flexibility and adaptability in project implementation, particularly in adjusting to political and contextual changes, are also highlighted as major supporting factors. Collaboration with civil society organisations and initiatives like "Novi Početak" exemplifies how partnerships have been leveraged to enhance outcomes, particularly in addressing human trafficking and supporting survivors. This initiative also plays a key role in integrating survivors' perspectives into policy development, ensuring inclusiveness and incorporating rights-holders' feedback.

Factors hindering effectiveness

141. The broad scope of the AP, with its extensive measures, partners, and indicators, complicates its implementation. Political instability, marked by reform stagnation and a fragmented governance structure spanning state, entity, and municipal levels, creates uncertainty and challenges for sustained progress. Economic constraints, including inflation and limited funding, further hinder implementation.

142. Unforeseen factors like the COVID-19 pandemic significantly impacted projects, particularly between June 2020 and June 2022, disrupting activities and requiring major adjustments. Additionally, time-consuming approval processes and bureaucratic hurdles have delayed project execution, adding to the operational challenges.

Challenges in measuring effectiveness

143. **Measuring the effectiveness of the Action Plan was challenging.** This is mainly due to the complexity of the plan and its broad scope. The AP defines a total of 80 objectives. There are 32 outcomes under the Human Rights pillar, 29 for the Rule of Law, and 19 under Democracy. The AP log frame defines indicators for each area action; a total of 109 indicators have been defined in the log frame. The indicators align but do not completely match the project-level indicators. At the level of each project, in project-specific log frames, more indicators than the ones mentioned in the AP log frame are presented. No document or matrix show how individual project indicators build up or relate to the AP indicators and, consequently, with AP outcomes. Interviews with CoE representatives revealed that such a document is envisaged to be drafted for the next AP.

144. At the time of data collection, it also seemed unclear how individual outcomes or indicators of the AP will be measured[45], while for some indicators measuring is straightforward (i.e. number of investigations, percentage of trained staff, number of measures taken), others are more ambiguous (i.e. number of local policies and initiatives to integrate Roma minority, number of collaboration platforms for learning, exchange of practices and information). Some outcomes are broadly defined (i.e. awareness raising amongst voters, active involvement of citizens in decision-making, and inter-ethnical dialogue reinforced). At the same time, the related indicators are narrow and more concrete and might not fully lead to the fulfilment of these generic outcomes. Stakeholders also raised concerns during interviews about measuring the outcomes of the AP and individual projects; they stressed that more impact data need to be collected by individual projects and aggregated into macro impact/results reports. This is especially important in the areas where the national statistics also lack to collect and analyse such data.

[45] This has been clarified by the CoE at the commenting stage in March 2025: "The next AP will also include a further developed intervention logic, with outputs, outcomes and impact, related indicators, target groups, sources of data, and assumptions.".

2.5 Sustainability

To what extent has the CoE contributed to a sustainable implementation of reforms and capacity development in Bosnia and Herzegovina?

This evaluation finds that the CoE has significantly contributed to sustainable reforms and capacity development in Bosnia and Herzegovina through the AP. Initiatives such as police training accreditation, digital prison management tools, and anti-corruption reforms are well-integrated into institutional frameworks. However, sustainability faces risks from political instability, financial constraints, staff turnover, and stakeholder commitment gaps. While measures like institutionalising training and fostering local ownership mitigate these risks, challenges in governance complexity and reliance on donor funding remain. Continued support is essential to ensure the long-term impact of these achievements.

Overall expected sustainability of results

145. **Results achieved by the AP are generally expected to be sustainable,** as confirmed in the desk review, interviews and survey.[46] According to survey responses, the Rule of Law consistently scores the highest across all categories, reflecting strong sustainability of outcomes, particularly in Capacity Building and Legal and Policy Expertise. Human Rights demonstrate moderate sustainability, with some gaps noted in awareness-raising activities. Democracy, however, is rated lower, indicating the need for continued efforts to sustain progress and maintain momentum in this area. Stakeholder feedback from the survey suggests that results are expected to be largely sustainable. Respondents give an average score of **4.22**. Rule of Law scores highest **(4.33),** followed by Human Rights **(4.13)** and Democracy **(4.00).** These scores reflect a high likelihood of sustaining project outcomes.

146. Feedback points to the **expectation that the AP has achieved significant progress in ensuring the sustainability** of its outcomes, with many initiatives integrated into institutional frameworks. Examples include accreditation schemes for police training, setting up and providing training to a network of points of contacts for Safety of journalists among prosecution services and police officers, trafficking protocols, election training resources, and digital tools for prison management. The undertaken interventions in the area of combating economic crime lay a solid foundation for strengthening the capacity of institutions in preventing and combating money laundering/terrorist financing in Bosnia and Herzegovina.

147. However, sustainability faces risks, including dependency on donor funding for civil society organisations, institutional commitment gaps in areas like prison management, and reliance on international coordination. Addressing these challenges is essential to maintaining the long-term effectiveness of the AP's achievements. In addition, **it is hard to assess the level of changes in the legislative and regulatory framework achieved** due exclusively to the AP measures and as well as their level of implementation. Sustainability is hard to ensure due to the complicated decision-making process and difficulty establishing accountability across multiple partners.

Sustaining institutional capacity

148. **Implementing AP interventions has influenced institutional capacities, awareness, and changes in views and opinions across both public and non-public sectors.** Evaluation survey results indicate that the AP's projects have notably strengthened institutional capacities in Bosnia and Herzegovina, with the Rule of Law scoring the highest (4.20), followed by Human Rights (4.00) and Democracy (3.00), demonstrating consistent but varied progress across

[46] The analysis of the sustainability of results achieved by the AP indicates an overall average score of 4.22.

thematic areas. These projects have fostered partnerships and networking among public institutions, CSOs, and professionals, promoting mutual capacity-building and gradually transferring ownership to local authorities.

149. The surveyed CoE staff pointed out overall the expected sustainability of the institutional capacity delivered through the AP, with an average score of **4.13**.

150. Reference is made to projects that have fostered partnerships and networking among public institutions, CSOs, and professionals, ensuring mutual capacity-building and gradual transfer of ownership to local authorities. Examples include:

- Centres of judicial and prosecutorial training have integrated freedom of expression and several HELP courses on various human rights topics into their curricula, making continuous human rights training mandatory for newly appointed judges and prosecutors.
- Prisons have been equipped with software and hardware for data exchange, ultimately leading to better prison management.
- Projects have influenced the legal framework while providing technical and capacity-building support for implementation.

151. While significant progress has been achieved, challenges remain in ensuring active engagement from beneficiaries and resilience to political instability. Some initiatives, particularly in Democracy, require further development to reach their full potential. Sustainable partnerships, especially in politically sensitive areas, remain essential. Overall, the projects have laid a solid foundation for institutional independence, though continued support and adaptive strategies are needed to build on these gains. The degree of capacities (including new staff), awareness, views, and opinions change in the public, as well as the non-public sector, as a result of the implementation of AP measures.

152. The sustainability of the **capacity-building component is at risk due to high staff turnover** in the public sector, mainly caused by low salaries. Emigration is high in the country, including people from the active workforce, exacerbating the stability of the human resources in the public sector. The **project design considered**, to some extent, **these risks** and made efforts to institutionalise as much of the capacity-building measures as possible by preparing trainers from inside institutions and providing them with materials, guidelines, manuals, etc.

"…change is hard here, even when you have the impression you succeed, it could be turned around…"

153. **Political instability, resistance to change, and the complex setup of the decision-making** process in the country have been mentioned as the most critical risks to the sustainability of the implemented measures. Some projects focus on creating change at the local level (engaging with local level administration as well as local communities), and participation of civil society organisations helps mitigate some of these risks; external stakeholders highly appreciate such projects. At the same time, the limited resources of local civil society organisations pose another sustainability risk. Some public entities mentioned during interviews that they aim at replicating some of the measures done by the projects (i.e., creation of excellence and resource centres for democratic education) or replicating some of the training programs, which shows, to some extent, sustainability. Some stakeholders hope that the digitalisation and automatisation of some processes cannot be reversed by some reforms; this was especially mentioned in the context of the Rule of Law projects.

Sustaining skills and knowledge

154. The likelihood of continued use of skills and knowledge gained through the AP varies across activity types. Capacity Building is the most likely to have a lasting impact, followed by Legal and Policy Expertise and finally Awareness-raising.

155. Survey feedback suggests that the **Rule of Law** projects consistently score the highest across all categories, indicating strong sustainability of outcomes in this area, particularly in **Capacity Building** and **Legislative and Policy Expertise. Human Rights** shows moderate sustainability with some gaps, particularly in some **Awareness-raising**

measures. **Democracy is rated somewhat lower**, suggesting continued efforts are needed to maintain the momentum. On challenges, some respondents highlighted financial constraints and political instability as barriers to sustaining outcomes, especially in **Human Rights.** Also, gaps in political will and institutional readiness to internalise skills and knowledge were noted.

Sense of local ownership

156. The analysis shows that the AP has moderately fostered a sense of ownership among local stakeholders, with an average score of **3.83**.

157. Key actions fostering ownership are:

- Protocols for detecting and investigating trafficking are examples of ownership, as these will be implemented by local institutions, with certified trainers now included in Ministry pools for ongoing anti-trafficking training.

- Local trainers are involved in developing curricula and manuals to independently disseminate knowledge, reflecting sustained ownership.

- Ownership through close collaboration with institutions and needs-based assessments during project development and implementation.

158. The projects' focus on a **grassroots approach and the active engagement of local stakeholders and CSOs** have been highlighted as effective measures for ensuring sustainability. This approach ensures buy-in and fosters local ownership and a participatory approach. Focusing on local communities, professionals at the local level, and mayors was underlined as a critical measure to endure sustainability.

159. For example, agreements with local communities to maintain national minority language topographical signs have been indicated as a good practice in embedding sustainable change. Additionally, a respondent noted that some CSOs, initially supported through CoE grants, have successfully secured alternative funding sources, enabling them to continue their initiatives independently.

160. Challenges to ownership are:

- Ownership often depends on a critical mass of motivated individuals, making it uneven across institutions and projects.

- The country's governance structure challenges strategic ownership, particularly in Human Rights projects.

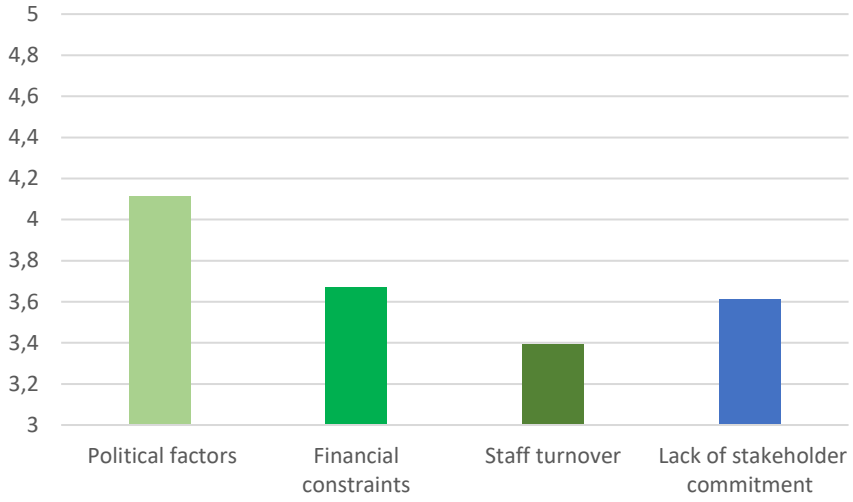
Factors influencing long-term sustainability

Jeopardising factors

161. The evaluation identifies key factors that could jeopardise the long-term sustainability of outcomes achieved under the AP. **Political instability, resistance to change, and the complex setup of the decision-making** process in the country have been identified as critical risks to the sustainability of the implemented measures. Survey respondents also highlighted a lack of stakeholder commitment and financial constraints as additional challenges. High staff turnover in the public sector, driven primarily by low remuneration, poses a significant risk, particularly to the sustainability of the capacity-building component. Emigration in the country, including the active workforce, exacerbates the stability of the human resources in the public sector. The project design considered, to some extent, these risks and made efforts to institutionalise as much of the capacity-building measures as possible by preparing trainers from inside institutions and providing them with materials, guidelines, manuals, etc.

162. When asked, survey respondents rated these factors as follows.

Figure 5. Factors influencing long-term sustainability



Source: CoE survey.

163. **Political factors** scored the highest, highlighting the significant influence of political instability and changes (as mentioned above), such as elections and party turnovers, on the sustainability of outcomes. These factors can disrupt institutional progress and commitment to AP objectives. The second-highest concern is that **financial challenges** were frequently noted as a potential barrier, particularly for CSOs and long-term project funding. The **high turnover** rate in local institutions, especially political appointments, poses risks to the continuity of trained personnel and sustained implementation of project outcomes. **Commitment gaps** were identified in certain areas, including limited involvement by stakeholders in sustaining outcomes, particularly where continuous engagement is required.

164. Other identified factors are emerging, such as **anti-gender rhetoric** in Bosnia and Herzegovina. This could negatively affect topics like gender equality and human rights. Also, there is mention of **dependency of the civil society on the funding** received under the AP. Examples like "Novi Početak" illustrate the need for sustained support to ensure their activities continue beyond the funding period. Finally, the **complex governance and socio-political context** in Bosnia and Herzegovina amplifies the impact of these factors on sustainability.

Supporting factors

165. As previously mentioned, the projects' focus on a **grassroots approach and the active engagement of local stakeholders and CSOs** has been highlighted as an effective measure for ensuring sustainability. These projects foster buy-in, local ownership, and a participatory approach by concentrating on creating change at the local level, including collaboration with local administrations and communities. This strategy helps mitigate some sustainability risks, earning high appreciation from external stakeholders. For example, agreements with local communities to maintain national minority language topographical signs have been indicated as a good practice in embedding sustainable change. Some public entities mentioned during interviews that they aim at replicating some of the measures done by the projects (i.e., creation of excellence and resource centres for democratic education) or replicating some of the training programs, which shows, to some extent, sustainability. At the same time, the local civil society organization's limited resources pose a risk to sustainability. The need to support various partners with knowledge of how to do fundraising was mentioned several times during interviews.

3 Conclusions and recommendations

3.1 Conclusions

Relevance

This evaluation finds that the Action Plan (AP) is highly relevant to Bosnia and Herzegovina's needs. It aligns with the country's international obligations, EU accession agenda, and national reforms, addressing key areas like human rights, anti-corruption and money laundering, freedom of expression and safety of journalists, and electoral processes. Stakeholder consultations on the AP and flexibility to adapt to emerging priorities enhance its impact.

Coherence

This evaluation finds that the AP achieves strong coherence. The AP effectively fosters synergies and complements broader objectives. While informal communication and consultations enhance coordination, formal sectorial alignment challenges and overlapping risks in areas like economic crime highlight the need for more systematic approaches.

Efficiency

This evaluation finds that the AP demonstrates overall efficiency. Despite financial constraints, limited staffing, and phased funding, project teams have shown resilience and adaptability in delivering results. Technical resources are efficiently allocated. Financial and human resources are areas for improvement, particularly in maintaining staffing levels and budget allocations. Flexibility in project implementation allowed adjustments to contextual changes, such as the COVID-19 pandemic, while cost-efficiency measures like co-organised events and back-to-back scheduling maximised resources. However, administrative processes, inflation, and workload strains often hindered efficiency. The AP effectively balances challenges with creative solutions, ensuring strong alignment between resources and project outcomes.

Effectiveness

This evaluation finds that the AP has effectively contributed to overarching objectives in human rights, the rule of law, and democracy in Bosnia and Herzegovina. Achievements include advancing anti-trafficking measures, promoting freedom of expression, and supporting institutional reforms aligned with European standards. Projects in the Rule of Law have strengthened anti-corruption and money laundering frameworks and inter-agency cooperation, while Human Rights initiatives have enhanced minority protections and gender equality measures. Democracy-focused efforts have improved electoral processes and fostered multilateral collaboration. Despite these successes, challenges remain in sustaining outcomes, addressing gaps in governance, and ensuring local ownership, highlighting the need for continued engagement and resource allocation to maintain progress.

Sustainability

This evaluation concludes that the CoE has been crucial in advancing sustainable reforms and development in Bosnia and Herzegovina through the AP. Many policy areas have been institutionalised, e.g., police training accreditation and anti-corruption frameworks. Nevertheless, among sustainability challenges remain issues like gaps in awareness-raising that cause human rights reform to have moderate sustainability or high staff turnover, driven by low salaries and emigration, which threatens the sustainability of institutional capacity.

3.2 Recommendations

The recommendations emerging from this evaluation have been grouped into three thematic categories. These categories reflect key strategic priorities for improving the implementation and sustainability of the AP in Bosnia and Herzegovina. Each category addresses distinct but interconnected dimensions of the AP's delivery.

These categories have been presented and discussed with a reference group from the Council of Europe on 3 April 2025. On that basis, some adjustments were made to ensure that the recommendations are actionable and grounded in practical realities.

- **Coordination and stakeholder engagement**: Improving collaboration, ownership, and dialogue across all actors.
- **Knowledge sharing**: Strengthening systems for learning, data use, and communication of good practices.
- **Resource allocation**: Enhancing the planning and use of financial and human resources.

1. Coordination and stakeholder engagement

This category focuses on strengthening collaborative mechanisms with all relevant stakeholders—government bodies, local institutions, civil society organisations, and community actors—to ensure inclusive, well-coordinated, and accountable implementation of the AP.

Recommendation 1

Finding: The report concludes that consultation and coordination efforts need to be enhanced, especially at the higher administrative level and for selected thematic and sub-thematic areas. Coordination with other donors, projects, and initiatives works well. However, a few examples of thematic areas that might need improvement have been mentioned. More involvement of civil society organisations is also needed.

Responsible actor(s): DPC, MAEs, with coordination support from the CoE Office in Sarajevo.

Recommendation: Organise structured semi-annual coordination meetings involving representatives from civil society, non-profit organisations, and local institutions across all thematic areas. Use these meetings to feed directly into project planning and ensure alignment with evolving needs.

Recommendation 2

Finding: One of the main implementation challenges, both at AP and project levels, is its fragmentation across a multitude of beneficiary institutions and stakeholders. The main challenge with working with such many stakeholders is fragmented ownership, resources, and coordination challenges.

Responsible actor(s): MAEs, in consultation with DPC and project teams (Senior Project Officer, Project Manager).

Recommendation: Convene pre-implementation workshops with key implementing partners to define thematic and sub-thematic responsibilities. Create a role matrix outlining a clear distribution of tasks beyond project-specific activities to strengthen stakeholder ownership and accountability.

Recommendation 3

Finding: The CoE successfully built strategic partnerships, but interviews revealed that this is not true for all thematic and sub-thematic areas (i.e. human rights).

Responsible actor(s): MAEs, with facilitation from project staff in the CoE Office in Sarajevo and supported by the field-based Project Officers.

Recommendation: Identify and engage community actors and institutions that have demonstrated leadership in politically sensitive areas. Establish local partnership roadmaps outlining shared objectives and support measures for implementation and visibility.

2. Knowledge sharing

This category highlights the need to improve knowledge management through better documentation, sharing of project results, and integrated monitoring systems to strengthen learning across projects and ensure alignment with strategic goals.

Recommendation 4

Finding: The report concluded that while AP and projects generally avoid duplication with other initiatives, there are some exceptions. The Council of Europe Office in Sarajevo makes considerable efforts to ensure complementarity, but these efforts are not always within their direct sphere of influence. Coherence is often reliant on externally coordinated platforms, and the complex institutional landscape in Bosnia and Herzegovina creates additional challenges.

Responsible actor(s): DPC and CoE Office in Sarajevo, in coordination with project teams and external donors.

Recommendation: Continue to conduct annual mapping of donor activities and project interventions within relevant sectors. Continue to participate actively in externally convened coordination platforms and systematically share CoE outputs and learning materials through accessible knowledge hubs.

Recommendation 5

Finding: While monitoring data was collected at the project level, there is no systematic approach to consolidating this information at the sub-thematic and thematic area levels. This makes it difficult to assess whether the Action Plan is meeting its overall objectives.

Responsible actor(s): DPC with technical input from the CoE Office in Sarajevo, supported by MAEs.

Recommendation: Design and implement a unified monitoring system that aggregates project-level indicators into a thematic dashboard. Assign oversight to the AP coordination unit, ensure quarterly updates, and conduct a mid-term review using this system to assess overall AP progress.

3. Resource allocation

This category addresses the challenges related to financial and human resources, proposing ways to improve funding continuity, reduce implementation delays, and strengthen project delivery capacity.

Recommendation 6

Finding: Many activities implemented by projects sometimes lack consistent continuity beyond project implementation, which limits the AP's long-term sustainability. Some stakeholders noted that they themselves are not trained enough to teach fundraising and highlighted the broader challenge of ensuring sustainability in Bosnia and Herzegovina's volatile institutional and political environment.

Responsible actor(s): Project teams (Project Managers/Coordinators, Senior Project Officers, Project Assistants), in collaboration with local CSOs and MAEs.

Recommendation: Require each project to include a robust sustainability plan outlining handover strategies and long-term engagement pathways. To the possible extent, build partnerships with local civil society organisations and provide them with access to capacity development to ensure the long-term continuation of results beyond the project duration.

Recommendation 7

Finding: Some delays in project implementation have been reported, which are mainly caused by delays in funding allocations. These delays, when coupled with limited flexibility in funding modalities, have occasionally hindered timely project delivery and adaptive responses to contextual needs.

Responsible actor(s): DPC, in coordination with CoE financial and operational units.

Recommendation: Introduce contingency budgeting and flexible allocation mechanisms to allow timely and responsive funding flows. Adjust disbursement schedules to reflect project complexity and ensure the availability of funds for rapid mobilisation in unpredictable environments.

Recommendation 8

Finding: Projects reported challenges in implementation due to limited human resources. The project staff in the Council of Europe Office in Sarajevo is reported to be overstretched, leading to bottlenecks in delivery and reduced capacity to respond to contextual shifts. The workload is particularly affected by complex project portfolios and the demands of adapting activities to a volatile operating environment.

Responsible actor(s): Council of Europe Office in Sarajevo (Head and Deputy Head of Office), with support from DPC and project managers.

Recommendation: Conduct an internal staffing needs assessment to anticipate resource bottlenecks. Consider expanding staffing capacity during peak periods and provide tools and processes to streamline delivery. Outsource technical tasks when necessary and support cross-project learning to ease workload distribution.

Implementation matrix

The matrix below provides an at-a-glance summary of the recommendations, grouped by estimated level of effort and their expected impact on the AP's overall effectiveness. 'Effort' reflects the estimated workload, coordination needs, or financial requirements. 'Impact' reflects the degree to which the recommendation is likely to improve the sustainability, effectiveness, or coherence of the AP. The recommended approach is intended to guide prioritisation and resource planning accordingly.

Recommendation	Effort (low/medium/high)	Expected Impact (low/medium/high)	Recommended approach
Rec 1: Multistakeholder coordination	Medium	High	Carefully plan and schedule
Rec 2: Clarify stakeholder roles	Medium	High	Carefully plan and schedule
Rec 3: Build local partnerships	Medium	Medium	Implement in parallel with other activities
Rec 4: Share best practices and avoid duplication	Medium	Medium	Implement in parallel with other activities
Rec 5: Develop monitoring/dashboard	High	High	Prioritise and allocate sufficient planning and resources
Rec 6: Promote fundraising and sustainability	Medium	Medium	Implement in parallel with other activities
Rec 7: Improve funding models	Medium	Medium	Implement in parallel with other activities
Rec 8: Address staffing/resource challenges	High	High	Prioritise and allocate sufficient planning and resources

3.3 Lessons learned

The evaluation highlights several lessons learned:

Strategic framework and flexibility

166. The AP provides a strong strategic framework, allowing flexibility in responding to evolving priorities. While the broad scope has posed some implementation challenges, the focus on specific areas and priorities was clearer at the project level, allowing project designs to be adjusted in response to emerging needs.

Coordination and complementarity

167. While the CoE's interventions align well with national and international efforts, sectoral coordination remains inconsistent, leading to potential overlaps, particularly in areas such as e.g. economic crime. Continuous coordination efforts are needed to enhance complementarity among donor-funded initiatives and prevent duplication of efforts.

Capacity-building, awareness-raising & legal and policy reform

168. Training programs have been highly effective, and awareness-raising efforts have improved public understanding of key issues across all thematic areas. However, legal and policy reforms progress slowly due to political and institutional constraints. More substantial local ownership is needed to sustain legislative changes.

Sustainability and local ownership

169. Ensuring long-term sustainability remains a significant challenge, particularly given high staff turnover in institutions, political instability, and occasional resistance to change. Projects that actively engaged local institutions and communities demonstrated stronger long-term impacts.

Monitoring and accountability challenges

170. Assessing the full impact of the AP has been challenging due to the absence of a comprehensive outcome monitoring matrix. While some reporting mechanisms exist, such as annual donor reports, a more structured and systematic approach to tracking progress could improve accountability.

3.4 Good practices

The evaluation highlights several good practices:

Effective institutional capacity-building

171. One of the AP's strongest aspects has been its focus on institutional capacity-building. By integrating CoE standards into training curricula for judges and law enforcement officers, the projects have ensured long-term impact. The institutionalisation of several curricula, the "train-the-trainer" model, has also proven effective, equipping local experts with the skills to continue knowledge transfer beyond the project lifecycle.

Grassroots initiatives for awareness-raising and community engagement

172. Grassroots initiatives have been important in promoting awareness and civic participation. For instance, citizen Assemblies in Mostar and Banja Luka have pioneered deliberative democracy, encouraging public engagement in decision-making. Interactive, community-driven approaches have proven to be an effective method within the AP, leading to meaningful and sustainable social changes.

Coordination through formal and informal mechanisms

173. Formal and informal mechanisms have improved coordination between projects and stakeholders. Regular project-level meetings and structured thematic coordination groups have helped ensure alignment between initiatives. Using a coordination matrix has also reduced duplication, allowing teams to identify synergies between various projects.

Cost-efficiency measures

174. Many projects have optimised resources through cost-sharing and innovative implementation strategies. Collaborations with international partners such as OSCE, IOM, and the EU have enabled joint events, reducing costs while maximising outreach. Using online and hybrid training formats has also improved accessibility and efficiency.

Annex 1. Detailed methodology

Purpose, objectives and scope

This evaluation aims to provide an independent assessment of the progress made under the Action Plan and offer stakeholders an impartial review of the outcomes achieved through the Organisation's collaboration with key partners. By drawing lessons from the successes and challenges encountered during implementation, this evaluation generates insights to inform future actions. The results are meant to contribute to shaping future Action Plans for Bosnia, Herzegovina, and other countries to improve their relevance and effectiveness.

The objectives of the evaluation are as follows:

- to assess the outcomes of the projects implemented under the Action Plan in ensuring Bosnia and Herzegovina's alignment with European standards.
- to draw lessons, identify good practices, and provide recommendations related to the management of the Action Plan, project implementation methods, and mitigation measures for the challenges faced, if any.
- to assess to what extent the recommendations from the evaluation of the previous action plan, which were fully accepted by the Council of Europe, were considered under this Action Plan.

The evaluation deliverables have been tailored to meet the Council of Europe's MAEs and DPC's specific needs, including those of management and project teams. In addition, careful consideration is given to ensuring that the findings are relevant and useful for donors and national authorities, supporting their engagement with and oversight of the Action Plan's outcomes.

The evaluation geographic scope is Bosnia and Herzegovina; the time scope is 2022 to 2024. The basis for the evaluation judgement is the OECD DAC framework comprising five out of six evaluation criteria (relevance, coherence, effectiveness, efficiency, and sustainability). The impact criteria are out of the scope of the current task. The evaluation assesses the overall efforts to implement the Action Plan (promotion and monitoring of human rights, advocacy, expert advice, etc.) and the contribution to the overall implementation of the individual country and regional projects (23 country-specific projects and 2 regional projects).

Intervention logic

The intervention logic serves as the basis of the evaluation and all research carried out as part of this evaluation. It helped structure the information needs and the corresponding data collection and analysis approach. Reflection on the logic behind the intervention allowed the evaluators to elaborate on the links between the intervention's elements (objectives, inputs, activities) and its expected effects (outputs, outcomes, impact). The intervention logic is built around five evaluation criteria: relevance, coherence, efficiency, effectiveness, and sustainability. The following figure presents a simplified intervention logic with links to the specific evaluation criteria the research will cover. To illustrate, the evaluation of the Action Plan starts with an understanding of the objectives it aims to achieve.

General objectives (GO):

GOa To support reforms in Bosnia and Herzegovina to bring the country's legislation, institutions and practice further into line with European standards in the area of **human rights**

GOb To support reforms in Bosnia and Herzegovina to bring the country's legislation, institutions and practice further into line with European standards in the area of the **rule of law**

GOc To support reforms in Bosnia and Herzegovina to bring the country's legislation, institutions and practice further into line with European standards in the area of **democracy**

Specific objectives (SO):

Linked to GOa

SOa To support effective ECHR implementation

SOb To support equality and human dignity

SOc To support social rights

Linked to GOb

SOd To support rule of law-based institutions

SOe To support actions against crime, security and protection of citizens

Linked to GOc

SOf To support democratic governance

SOg To support democratic participation

Operational objectives (OO)

OOa To design and implement regional and country-specific initiatives through awareness-raising

OOb To design and implement regional and country-specific initiatives through capacity building

OOc To design and implement regional and country-specific initiatives through legislative and policy expertise

To achieve these objectives, stakeholders deploy resources (input) which translate into activities (organised within regional and country-specific projects). This intervention generates outputs, outcomes and, ultimately, impacts. They illustrate different layers:

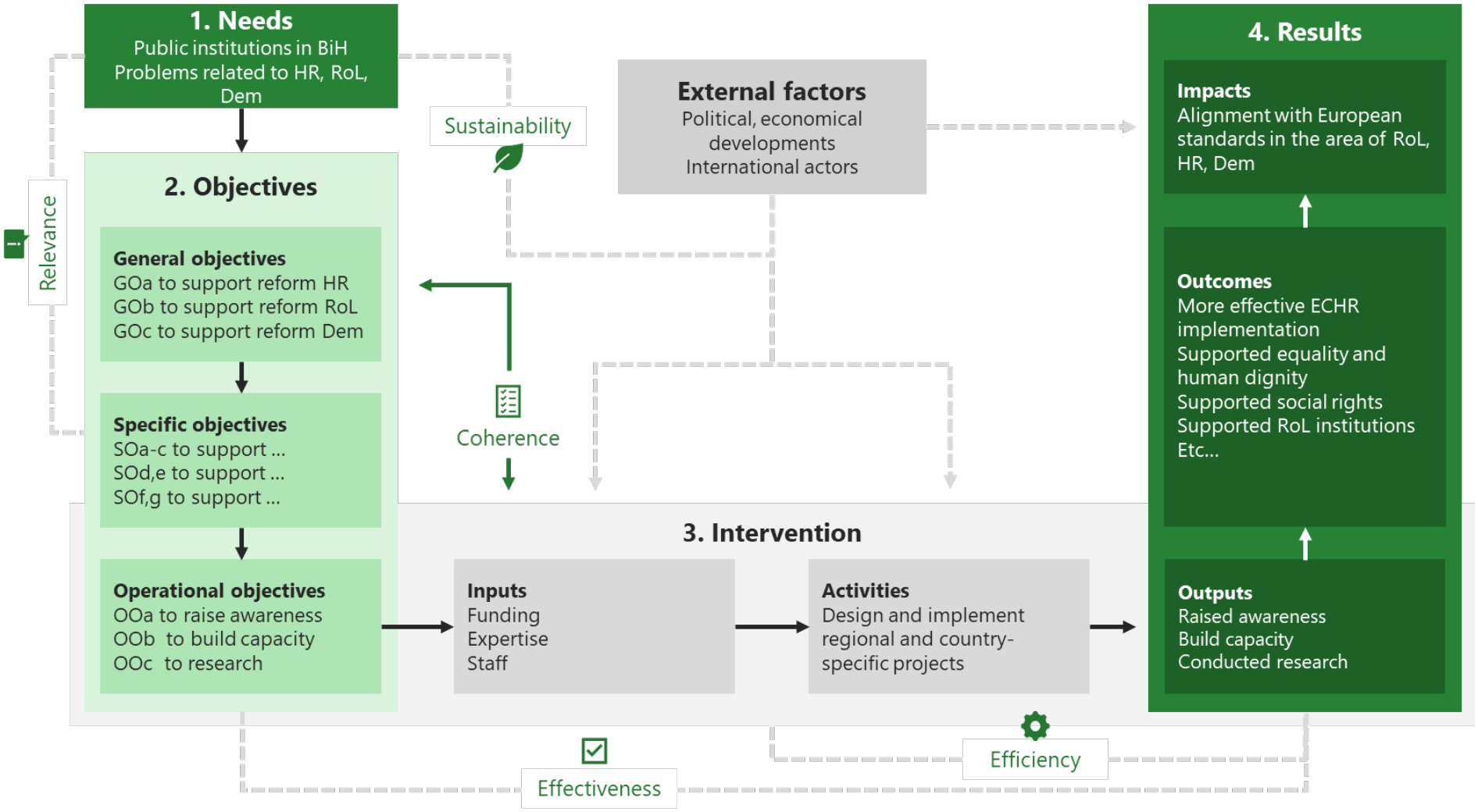
- **Outputs** are the end products or services directly resulting from a project activity.[47] They are closely aligned to the operational objectives. CoE implements a country-specific project that includes providing legal assistance, capacity building, communication activities, and others.
- **Outcomes** are changes brought by an activity.[48] They can also be linked to specific intervention objectives. For example, through the training, the CoE strengthens civil servants' skills, hence supporting rule-of-law-based institutions.

The figure in the next section elaborates more on the evaluator's understanding of the intervention logic underpinning the AP. This intervention logic builds on general and specific objectives as described in the ToR and the AP documentation, which we have refined based on the understanding of the AP within the scope of the evaluation.

47 Council of Europe, *Project Management Methodology*, Strasbourg, 2016, available at: https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168064d4fb

48 Ibidem.

Figure 6. Intervention logic



Source: Ecorys, evaluation team's elaboration.

Evaluation criteria, questions and indicators

The evaluation will be guided by the principles of the Council of Europe Evaluation Policy and the Council of Europe Evaluation Guidelines and other relevant instruments, such as the Council of Europe Gender Equality Strategy 2024-2029. The evaluators will comply with the Council of Europe Code of Conduct for Evaluation.

Per the ToR requirements, the evaluation uses five OECD DAC criteria: **relevance**, **coherence, efficiency, effectiveness**, **and sustainability.** For each evaluation criterion, the ToR formulates questions. The matrix below presents the evaluation questions, sub-questions and judgment criteria, indicators, data collection instruments, data sources and analysis methods.

Gender and human right mainstreaming

Gender mainstreaming was systematically integrated into all project phases, ensuring its inclusion in design, data collection, analysis, and reporting processes. A gender-sensitive evaluation framework was developed initially, incorporating indicators to measure gender-specific outcomes. Data collection methods were adapted to be gender-sensitive, with trained teams and gender-sensitive approaches, where necessary, ensuring inclusive stakeholder engagement. Gender analysis was applied during data analysis to evaluate the differential impact of policies on women and men, identify equity gaps, and provide recommendations to address disparities. Findings were presented with actionable insights to strengthen gender equality in future activities. The evaluation also applied a human rights-based approach, with a framework assessing activities against international human rights standards. This ensured a comprehensive review of how the Action Plan respected and protected rights, particularly for marginalised groups, and provided recommendations to address gaps and align future activities with human rights principles.

Table 5. Evaluation matrix

Evaluation question (as per the ToR)	Evaluation sub-questions	Judgement criteria	Indicators	Data Collection Instruments	Data Sources	Data Analysis
Relevance						
To what extent is the AP addressing the needs of Bosnia and Herzegovina in supporting the alignment with European standards and practices in the areas of human rights, rule of law and democracy.	To what extent is the CoE AP relevant and responsive to the needs and priorities of the country in the area of human rights, rule of law and democracy (including EU accession agenda)?	**AP Level** AP aligns with needs under the general objectives Projects under the AP align with needs under the specific objectives Stakeholders confirm alignment needs **Project level** Degree the project was designed in response to specific needs assessments or country request Level of consideration of lessons learned at project design and implementation phases	Documentary evidence of AP alignment with country agenda, international obligations, accession agenda Documentary evidence of projects under the AP alignment with the needs of local stakeholders Stakeholder perception of alignment needs AP	Desk Research and in-depth project analysis Analysis of data collected through IDIs and the survey	Documents, reports, evaluations IDIs Survey	Intervention Logic Analysis
	Have the outcomes built on the results already achieved under the previous CoE AP?	Degree the AP considers the recommendations of the external evaluation of the 2018-2021 AP and given the actions foreseen by the CoE management response to the evaluation. Degree the project was built on needs identified during the	Documentary evidence of AP and projects considered the recommendations of the 2018-2021 AP Stakeholder testimonies of integration of recommendations into AP and project design			

Evaluation question (as per the ToR)	Evaluation sub-questions	Judgement criteria	Indicators	Data Collection Instruments	Data Sources	Data Analysis
		implementation of the previous AP				
Coherence						
To what extent was the CoE's support compatible with other interventions in the country?	To what extent and how has the CoE ensured coordination and complementarity with other donors active in the areas of human rights, rule of law and democracy at strategic and operational levels?	Mechanisms and procedures of coordination with other major donors in the areas of human rights, rule of law and democracy • Coordination of strategic vision and approaches • Coordination of actions and measures Degree of complementarity with other major donors in the areas of human rights, rule of law and democracy	Documentary evidence of the existence of coordination mechanisms at both AP and project levels (i.e., coordination meetings, committees, working groups, notes on coordination meetings, etc.) Documentary evidence of efforts to ensure complementarity with other major donors (i.e., analysis and reports, action matrixes, meeting notes, etc.) Stakeholders' perception on coordination and complementarity of CoE AP with other donor initiatives and measures (formal and informal coordination, effectiveness of mechanisms, etc.)	Desk Research and in-depth project analysis Analysis of data collected through IDIs and the survey	Documents, reports, evaluations IDIs Survey	Intervention Logic Analysis
	To what extent have the synergies been promoted/achieved between the projects implemented under the AP?	Mechanisms and procedures to ensure synergies across AP projects	Documentary evidence of efforts to ensure project synergies (i.e., meetings, working groups and platforms, exchange of information and its regularity, etc.) Stakeholders' perception of the level of synergies across AP projects (i.e. formal, informal, bottom-up, bottom-down)			
Efficiency						
To what extent was the implementation of the AP efficient?	To what degree have outputs been produced on time?	All thematic outcomes are produced promptly All project outputs are produced on time	Documentary evidence of AP outcomes and project outputs produced promptly Stakeholder testimonies on causes of delays, difficulties of implementation, delays in funding, etc (if relevant)	Desk Research and in-depth project analysis	Documents, reports, evaluations IDIs	Intervention Logic Analysis

Evaluation question (as per the ToR)	Evaluation sub-questions	Judgement criteria	Indicators	Data Collection Instruments	Data Sources	Data Analysis
			Stakeholders' testimonies of actions taken (or failed to) to address the potential delays	Analysis of data collected through IDIs and the survey	Survey	Cost Benefit Analysis
	To what extent has the choice of implementation approaches, modalities, and their combination been appropriate for pursuing the intended objectives?	Degree the AP and the projects have clear, measurable, coordinated, and attainable objectives Degree the AP focus on most critical areas established by former measures Degree the AP is flexible to adjust to contextual changes (social, economic, political) Implementation structures in place to implement (human, and technical resources), monitor and fund the AP measures	Documentation of evidence of clear intervention logic (log frame) that connects the inputs, activities, and outputs to achieve the AP outcomes Documentary evidence that the log frame connects the individual project outputs to the AP sub-thematic area outcomes Documentary evidence that the AP was drafted with consideration for the most critical areas that needed intervention Documentary evidence that the AP adjusted to contextual changes (i.e., change in funding, change in political agenda, change in local agenda, use of opportunity windows of change) Documentary evidence of efficient implementation structures (i.e., CoE level structures, country level bodies, project level implementation units) Stakeholder testimonies on the quality of the intervention logic, AP and project prioritisation approaches, AP and project flexibility and the efficiency of the implementation structures			
	To what degree was cost considered during the selection of the most appropriate methodology for	The level of the resource allocation of each sub-thematic area/ action/ project	Documentary evidence (budget analysis) of resource allocation per sub-thematic area/ action/ project Documentary evidence of efficient resources management (i.e. training of resource use for project staff, efficient use			

Evaluation question (as per the ToR)	Evaluation sub-questions	Judgement criteria	Indicators	Data Collection Instruments	Data Sources	Data Analysis
	implementing the actions?		of resources for project actions (i.e. most efficient way for capacity building measure)). Stakeholder testimonies on the efficiency of using the allocated resources (examples of project activities).			
Effectiveness						
To what extent has the AP achieved its objectives and outcomes?	To what extent has the AP contributed to enhancing the quality and efficiency in the targeted areas of reforms and towards partner institutions?	Level of AP and individual project contribution to ongoing country reforms in each thematic area: • Laws and regulations • Capacity building • Awareness raising Level of AP and individual	Documentary evidence of adopting/improving laws, regulations, and procedures contributing to country reform (by thematic and sub-thematic areas). Documentary evidence of increased capacities, skills, and knowledge (by thematic area and sub-thematic area). Documentary evidence of more awareness on topics of relevance of public and non-public entities by thematic area and sub-thematic area). Stakeholder testimonies on changes in laws and regulations, on capacity building, and on raising awareness.	Desk Research and in-depth project analysis Analysis of data collected through IDIs and the survey	Documents, reports, evaluations IDIs Survey	Intervention Logic Analysis Cost Benefit Analysis
	Which factors have supported and hindered the effectiveness of the projects implemented under the AP?	Mapping supporting and hindering factors for successful implementation of AP measures Mapping supporting and hindering factors for the successful implementation of the project	Stakeholder testimonies on factors that contributed to successful or hindering AP implementation (i.e. resources allocation or lack of, prioritisation or lack of, stakeholder engagement or lack of, state ownership or lack of, etc).			
	To what extent did the AP and its	The existence of human rights and gender equality-	Documentary and interview evidence of human rights enhancing measures part of			

Evaluation question (as per the ToR)	Evaluation sub-questions	Judgement criteria	Indicators	Data Collection Instruments	Data Sources	Data Analysis
	implementation mainstream a human rights approach, including a gender equality approach?	enhancing measures in the AP and individual projects	the AP and across the projects (i.e. human rights modules introduced in professional training institutions and law faculties, effective responses to complaints on human rights violations, recommendations of Human Rights Ombudsperson implemented). Documentary and interview evidence of gender dimension enhancing measures is part of the AP and across the projects (i.e. training of legal professionals onwomen's access to justice, increased turnout of women at the elections, enhanced cooperation among women mayors).			
	To what extent has the results-based reporting system been integrated and applied at the individual project and AP levels?	Result-based reporting system applied at the level of the AP Result-based reporting system applied at the project level	Documentary evidence of reporting on the achieving the AP outcomes and project outputs Monitoring framework in place at AP and project levels to collect data on results Data collection mechanism established and used to collect data AP and project implementation indicators Periodic reports on the progress implementation of AC and projects, impact evaluation reports for closed projects			
	To what extent were the recommendations from the evaluation of the previous AP - fully accepted by the CoE - taken into account in the	The extent of integration of the recommendations of the external evaluation of the 2018-2021 AP has been integrated into the current AP, its measures as well as at project level	Documentary evidence that the results of the external evaluation have been integrated into the AP and the projects			

Evaluation question (as per the ToR)	Evaluation sub-questions	Judgement criteria	Indicators	Data Collection Instruments	Data Sources	Data Analysis
	design and implementation of the AP?					
Sustainability						
To what extent has the CoE contributed to a sustainable implementation of reforms and to capacity development in Bosnia and Herzegovina?	To what extent have the CoE recommendations been implemented, thanks to the support of the AP integrated into the adopted legislative and policy frameworks?	Level of changes in the legislative and regulatory framework, changes in standards, work processes and procedures achieved due to AP measures	Documentary evidence of changes in the legislative and regulatory framework, changes in standards, work processes and procedures achieved due to AP measures Stakeholders' testimonies about foreseen or current changes in the legislative and regulatory framework, changes in standards, work processes and procedures achieved due to AP measures	Desk Research and in-depth project analysis Analysis of data collected through IDIs and the survey	Documents, reports, evaluations IDIs Survey	Intervention Logic Analysis Cost Benefit Analysis
	To what extent were the capacity-building tools and practices provided under the AP integrated into formal settings of beneficiary institutions?	Degree of capacities (including new staff), awareness, views and opinions change in the public as well as non-public sector as result of the implementation of AP measures	Documentary evidence of changes in capacities, awareness, views and opinions in public as well as non-public sector as result of the implementation of AP measures Stakeholders' testimonies about foreseen or current changes of capacities, awareness, views and opinions in public as well as non-public sector changed as result of the implementation of AP measures			

Source: Ecorys, evaluation team's elaboration.

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11. Action against crime - Management response.
12. CEPEJ evaluation.
13. CEPEJ Evaluation - Management response.
14. Combating Digital and Sexual Violence Against Women in Bosnia and Herzegovina.
15. Combating Discrimination, Hatred, and Racism in Bosnia and Herzegovina.
16. Enhancing Institutional Capacities on Freedom of Expression and Information in Bosnia and Herzegovina.
17. Ensuring Sustainable Penitentiary Actions in Managing Rehabilitation of Violent Extremist Prisoners (ESPA-VEP).
18. Evaluation of the action against crime and protection of citizens.
19. External audit report on 2022-2023 BiH FoE (VC3164).

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21. HELP in the WB end-term evaluation.
22. HFII: HF19 - Promotion of Diversity and Equality in Bosnia and Herzegovina.
23. HFII: HF20 - Preventing and Combating Trafficking in Human Beings.
24. HFII: HF21 - Quality Education for All.
25. HFII: HF33 - Freedom of Expression and Freedom of the Media in Bosnia and Herzegovina (JUFREX).
26. HFII: HF38 - Enhancing Penitentiary Capacities in Addressing Radicalisation in Prisons in the Western Balkans (Regional).
27. HFIII: HF17 - Action Against Corruption, Money Laundering, and Terrorist Financing.
28. HFIII: HF23 - Towards an Equal, Inclusive and Tolerant Bosnia and Herzegovina.
29. HFIII: HF24 - Quality Education for All.
30. HFIII: HF38 - Protecting Freedom of Expression and of the Media in Bosnia and Herzegovina (PRO-FREX).
31. HFIII: HF4 - Strengthening the Efficiency and Quality of Justice in Bosnia and Herzegovina (BiHSEJ).
32. HFIII: HF5 - Further Strengthening the Treatment of Detained and Sentenced Persons.
33. iPROCEEDS2 - Cooperation on Cybercrime.
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45. Abstract from the HFII Final Report – Human Rights Action Examples from HF Actions in Bosnia and Herzegovina.
46. Abstract from the HFIII First Annual Report – Follow-up to ECM expertise.
47. Abstract from the HFIII First Annual Report – Gender mainstreaming examples from HF actions in Bosnia and Herzegovina.
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