

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

Name of Evaluation Report:	Evaluation of the Council of Europe Action Plan for Bosnia and Herzegovina 2022-2025		
Date of Evaluation Report:	30 May 2025	Date of Action Plan:	1 September 2025

Overall management response to the evaluation:

The Directorate of Programme Co-ordination (DPC) of the Council of Europe considers the evaluation report to be an overall fair and useful assessment of the implementation of the Council of Europe Action Plan for Bosnia and Herzegovina 2022-2025 and agrees with most conclusions and recommendations.

Accepted recommendations and findings of the evaluation will feed into the preparation of the following Action Plan for Bosnia and Herzegovina (2026-2029).

Dissemination plan for the evaluation

The final evaluation report was shared by email with the members of the Reference Group, representing all relevant MAEs, as well as the Council of Europe Office in Sarajevo. The report will also be sent to member States and partners that contributed to the Action Plan. The report and the Management Response will be published on the dedicated [webpage](#) of the Directorate of Internal Oversight (DIO).

Management Decision ¹	Entity in Charge	Planned Actions ² (determined by Entity)	Justification ³ for Non-Acceptance	Target Date for Action	Person Responsible for Action
Recommendation 1: 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. <u>Response:</u> Unlike other Action Plans of the Council of Europe, the present Action Plan does not foresee a Steering Committee, due to the complex governance structure of Bosnia and Herzegovina. Nevertheless, co-ordination of the Action Plan is ensured through various co-ordinating mechanisms, including semi-annual project Steering Committee Meetings, regular communication with major donors in the country, and participation of the Council of Europe in co-ordination meetings covering different thematic areas (as outlined in the evaluation report). In the implementation of the projects across all thematic areas, emphasis is equally placed on the co-operation between the two entities (Federation of Bosnia and Herzegovina and Republika Srpska) therefore also contributing to the co-operation on the country level. Representatives from civil society, non-profit organisations and local institutions are included in project Steering Committees and other co-ordination meetings where possible/appropriate. Co-operation activities of the Council of Europe are tailored to the priorities of the beneficiaries, and therefore their evolving needs are discussed throughout the project implementation. Consequently, the Directorate of Programme Co-ordination believes that the objectives of the recommendation are already largely achieved through the modalities and mechanisms for co-ordination in place.					
☐ Accepted ☒ Partially accepted ☐ Rejected	DPC, MAEs, with coordination support from the CoE Office in Sarajevo.		- The Council of Europe will continue participating in and supporting the existing co-ordination mechanisms across all thematic areas. - Representatives of CSOs and local institutions will	- Continuous action - Target date: by 31 January 2028	Marjan JANSSENS (Country Advisor for South-East Europe and Türkiye, DPC)

¹ The management decision is in relation to the Recommendation (Accepted, Partially accepted, Rejected).

² For implementing accepted recommendations.

³ For recommendations that are partially accepted or rejected.

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			continue to be included in the project Steering Committees where possible/appropriate.		
Recommendation 2: 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. Response: The importance of co-ordination is recognised as an essential element of effective implementation of the Action Plan. The Council of Europe ensures that the programming phase of the Action Plan already involves structured consultations with national stakeholders and key implementing partners to identify priority areas, define the scope of engagement, and map potential contributions and respective responsibilities. To this end, a draft Action Plan is consulted with the authorities in Bosnia and Herzegovina before it is officially presented for the endorsement by the Committee of Ministers of the Council of Europe (CM). Moreover, in line with the new practice introduced for Action Plans, an informal meeting of the CM Rapporteur Group on Democracy (GR-DEM) was organised in June 2025 to provide an opportunity to the member States to comment on the draft Action Plan for Bosnia and Herzegovina (2026-2029). During the inception phase of each project implemented under the Action Plan, the roles of key implementing partners are formalised in project documents, Terms of Reference of project Steering Committees, and other operational tools that support project implementation. The development of such frameworks facilitates a common understanding of respective responsibilities and ensures accountability for results beyond activity-level delivery. Institutional ownership and long-term engagement are further reinforced through regular engagement with duty bearers throughout the project cycle, including through co-chairing arrangements in project Steering Committees. Accountability is further strengthened through result-based monitoring and regular reporting on progress, allowing for timely adjustments and sustained engagement by all stakeholders concerned.					
☒ Accepted ☐ Partially accepted ☐ Rejected	MAEs, in consultation with DPC and project teams (Senior Project Officer, Project Manager)	- The Council of Europe will continue fostering an inclusive and co-ordinated approach that encourages active stakeholder participation and reinforces mutual accountability across all levels of project implementation.		- Continuous action - January 2026 onwards (implementation of the new Action Plan for	Marjan JANSSENS (Country Advisor for South-East Europe and Türkiye, DPC)

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		- The Council of Europe will explore possibilities for further defining and streamlining the distribution of tasks of key implementing partners (for example by providing more detailed descriptions in the project documents).		Bosnia and Herzegovina 2026-2029) - Target date: by 31 January 2028	
Recommendation 3: 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. Response: The Council of Europe consistently applies a participatory and inclusive approach to project design and delivery, which includes extensive stakeholder consultations at the central, entity and local levels, and across sectors. In line with the Council of Europe Human Rights Approach, particular attention is paid to identifying and working with actors who represent diverse perspectives. Throughout the lifecycle of the Action Plan and related projects, consultations are conducted in the broadest possible way, including with relevant local institutions, community-based organisations, and other actors who play a key role in navigating complex or politically sensitive contexts. For example, two projects implemented under the Action Plan⁴ jointly established partnerships with religious leaders in Bosnia and Herzegovina, to strengthen interreligious dialogue and co-operation. Given their prominent role in the society, religious leaders have a vital opportunity to promote a language of peace, non-violence, and respect for human dignity. Building on the findings of the European Commission against Racism and Intolerance (ECRI) 2024 Report on Bosnia and Herzegovina, these projects organised a series of discussion forums involving almost 50 representatives from the Islamic, Roman Catholic, Orthodox Christian, Evangelical Christian, and Jewish communities. The religious leaders simultaneously developed their skills to act as multipliers of tolerance within their respective communities. Another example is the local partnership established under the project “<i>Strengthening democratic innovations and promoting human rights at local level in Bosnia and Herzegovina</i>” with the Association of Municipalities and Cities of the Federation of Bosnia and Herzegovina and the Association of Municipalities and Cities of Republika Srpska. The sustainability of the processes initiated by the project was formalised through a Memorandum of Understanding (MoU) signed between the Council of Europe Congress of Local and Regional Authorities and the two Associations, followed by two grant agreements. Partnership development and visibility are further enhanced through communication and outreach efforts embedded in the implementation of the Action Plan. To this end, a results-oriented and grassroots communication approach is favoured to amplify the outreach to different target groups. Diverse communication channels					

⁴ “Towards an equal, inclusive and tolerant Bosnia and Herzegovina”, implemented under the EU/Council of Europe Joint Programme “Horizontal Facility for the Western Balkans and Türkiye”, and the Council of Europe project “Combating discrimination, hatred and racism in Bosnia and Herzegovina”, funded through voluntary contributions.

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are used to reach a wider audience (e.g. the social media is used as a direct channel of communication with the general public). For the new Action Plan 2026-2029, a dedicated communication strategy/roadmap could be developed during its first year of implementation to further enhance its visibility and outreach efforts.					
☒ Accepted ☐ Partially accepted ☐ Rejected	MAEs, with facilitation from project staff in the CoE Office in Sarajevo and supported by the field-based Project Officers.	- The Council of Europe will further strengthen engagement with community actors and institutions that have demonstrated leadership in politically sensitive areas. - The results achieved in partnership with the local authorities and community-based organisations will continue to be promoted via relevant communication channels. - The Council of Europe will further ensure partnership development and visibility by developing a dedicated communication Strategy in the context of the next Action Plan 2026-2029.		- Continuous action - January onwards (implementation of the new Action Plan 2026-2029) - Overall target date: by 31 January 2028 - As regards the development of a dedicated communication strategy for the Action Plan 2026-2029: by 30 June 2026	Marjan JANSSENS (Country Advisor for South-East Europe and Türkiye, DPC)
Recommendation 4: 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.					
Response: The Council of Europe recognises the importance of sustained and strategic engagement with donors, international partners, civil society organisations, and other stakeholders to ensure coherence, complementarity and the broad dissemination of results and knowledge generated through its technical co-operation work. To this end, the Council of Europe proactively conducts a mapping of donor-funded projects and sectoral interventions relevant to the thematic areas of the Action Plan. This exercise serves to identify potential synergies, avoid duplication, and inform strategic planning at both Action Plan and project levels. Furthermore, the Council of Europe co-ordinates closely with relevant international partners, notably the EU, and in particular the EU Delegation to Bosnia and Herzegovina.					

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Beyond bilateral co-ordination efforts, the Council of Europe actively participates in externally convened donor co-ordination platforms, thematic working groups and other co-ordination mechanisms, as appropriate to each sector. These participatory mechanisms offer a valuable opportunity to contribute to the broader reform process in Bosnia and Herzegovina in co-operation with national authorities and other partners. Engagement in such platforms also helps ensure the continuing relevance of the Council of Europe's co-operation activities within an evolving landscape of donor interventions. Public outputs, tools, and learning materials of the projects implemented under the Action Plan are systematically disseminated through the Organisation's websites and social media channels. To maximise accessibility, materials are regularly translated into local languages and made available in user-friendly formats.					
☒ Accepted ☐ Partially accepted ☐ Rejected	DPC and CoE Office in Sarajevo, in coordination with project teams and external donors.	- The Council of Europe Office in Sarajevo will continue actively participating in thematic co-ordination groups / formats. - The Council of Europe will continue mapping donor activities to avoid overlaps and ensure synergies. - Public outputs and learning materials resulting from the Council of Europe's co-operation activities will continue to be widely disseminated.		- Continuous action - Target date: by 31 January 2028	Marjan JANSSENS (Country Advisor for South-East Europe and Türkiye, DPC)
Recommendation 5: 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. Response: The Committee of Ministers evaluates the effectiveness of the Action Plan through its Rapporteur Group on Democracy (GR-DEM). The latter ensures that adjustments are made based on realities on the ground, involving civil society and non-state actors. The Project Management Methodology (PMM) of the Council of Europe provides overarching guidance for all co-operation activities. It includes standardised approaches to the monitoring of progress and results related data collection, and results-based reporting across the project cycle. In line with this methodology, efforts are being made to further develop and harmonise indicator frameworks at both project and Action Plan level.					

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Data is consolidated as much as possible across projects to feed into strategic monitoring exercises, including Action Plan mid-term reviews and annual reports, as well as evaluations. Oversight of such processes is ensured by the Directorate of Programme Co-ordination in co-operation with the Council of Europe Offices, whose co-ordination and support functions play a key role in maintaining regular updates and ensuring consistency across reporting exercises. Moreover, logframes of the Action Plans contain thematic outcomes and related indicators. In the Action Plan-level annual reports to donors, references are made to relevant objectives/expected outcomes of the logframe of the Action Plan during the given reporting period. With a view to further strengthening the monitoring of the implementation of different country Action Plans, the Council of Europe further developed the logical frameworks in recent Action Plans, including the next Action Plan for Bosnia and Herzegovina (2026-2029), refining its intervention logic by enhancing the indicators for each expected outcome and incorporating relevant sources and means of verification.					
☐ Accepted ☒ Partially accepted ☐ Rejected	DPC with technical input from the CoE Office in Sarajevo, supported by MAEs.		- The Council of Europe will continue to strengthen its results-based management (RBM) framework, as well as to provide regular updates on the progress and outcomes achieved by the Action Plan. - The Council of Europe will continue improving internal capacities for project management through regular PMM training and guidance provided to project teams.	- Continuous action - January 2026 onwards (implementation of the new Action Plan for Bosnia and Herzegovina 2026-2029) - Target date: by 31 January 2028	Marjan JANSSENS (Country Advisor for South-East Europe and Türkiye, DPC)

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Recommendation 6: 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. Response: Sustainability considerations are systematically integrated into the design and implementation of Council of Europe co-operation activities, in line with the Organisation’s Project Management Methodology (PMM). The Council of Europe’s interventions are developed based on the findings of its monitoring bodies as part of its unique strategic triangle of standard-setting, monitoring and co-operation. They aim to support institutional reform, capacity development, and the long-term embedding of standards in national practice. Sustainability is pursued through a combination of measures aimed at institutionalising knowledge and reinforcing local ownership. Sustainability is ensured <i>inter alia</i> through the support to the establishment of national training programmes, integration of tools and resources into institutional curricula, capacity building and certification of trainers, and partnerships with academic or professional institutions. These elements are reflected in project planning documents such as the Description of Action (DoA). Activities are regularly assessed and the feedback from the beneficiaries remains essential, as a basis for concrete adjustments in the implementation of the Action Plan and its projects. The Council of Europe consistently emphasises the sustainability of capacity-building activities, via training-of-trainers (ToTs) and cascade training sessions which are perceived as a strategic and timely exit plan. In this respect, building local capacities remains a key element of the reform processes in Bosnia and Herzegovina. For example, the resource manual “Human rights of persons deprived of liberty in police custody”⁵ was included in the annual training programme of Canton Sarajevo Ministry of Interior, Canton Tuzla Ministry of Interior, Central Bosnia Canton Ministry of Interior, the Court Police of the Federation of Bosnia and Herzegovina, the Court Police of Republika Srpska, Zenica-Doboj Canton Ministry of Interior and West Herzegovina Canton Ministry of Interior. The Council of Europe systematically applies a human rights approach (HRA) in its work, including in the implementation of its Action Plans, with a view of further advancing human rights for all and achieving better and more sustainable results in projects. To this end, civil society is systematically included in all stages of technical co-operation to strengthen their role in the implementation of reforms and to build an empowered civil society. Civil society representatives are included in the implementation of the Action Plan whenever possible, including through their participation in project Steering Committees, thematic consultations, and capacity building activities. To illustrate, representatives of CSOs working in the field of combating human trafficking enhanced their capacities in a Training of Trainers on victim-centred interviewing for anti-trafficking actors. In addition the awareness of various non-profit organisations (NPOs) from Bosnia and Herzegovina was raised with regards to terrorism financing risks and mitigation measures.					

⁵ Prepared with the support of the action “*Strengthening human rights treatment of detained persons based on European standards and best practices in Bosnia and Herzegovina*”, in the framework of the EU/Council of Europe Joint Programme “Horizontal Facility for the Western Balkans and Turkey (2019-2022).”

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Robust and broad institutional support remains crucial to ensure long-term sustainability of the project results. The Council of Europe will look into the possibility to undertake additional measures to strengthen sustainability of results, such as outlining handover strategies and long-term engagement pathways, considering that lasting impact will rely on reinforced institutional engagement, ownership of partner institutions and other external factors, such as a stable and favourable political environment.					
☒ Accepted ☐ Partially accepted ☐ Rejected	Project teams (Project Managers/Coordinators, Senior Project Officers, Project Assistants), in collaboration with local CSOs and MAEs.	- The Council of Europe will explore practical steps to advance sustainability of results, such as reinforcing the sustainability sections of the project proposals/DoA. - The Council of Europe will strengthen the application of feedback mechanisms, such as post-project questionnaires, interviews or focus groups, to assess the long-term application of knowledge and tools delivered through project activities. - The Council of Europe will explore ways to strengthen partnerships with local CSOs (e.g. in their capacity as grantees of projects, or by proposing more involvement in the Steering Committees of the projects when possible).		- Continuous action - Target date: by 31 January 2028	Marjan JANSSENS (Country Advisor for South-East Europe and Türkiye, DPC)

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Recommendation 7: 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. Response: The flexibility of the Council of Europe Action Plans lies in their broad design and objectives. Action Plans are used as strategic tools for resource mobilisation and adaptive planning. Namely, the implementation of the Action Plans allows for adjustments in response to evolving needs of the beneficiaries. This approach of enhanced flexibility is illustrated by recent examples under other Council of Europe Action Plans. For instance, Action Plans for Armenia and Georgia were adapted on the project level, by introducing new projects or adjusting the existing ones. Where the circumstances so require, it is possible to also stop project implementation. The Council of Europe applies a proactive resource mobilisation strategy and continuously promotes longer-term framework agreements with donors. As a result, the volume and predictability of extra budgetary resources is increasing. In addition, building on the “Reykjavík Declaration – United around our values”⁶, which recognises the importance of the Council of Europe’s co-operation dimension, the Committee of Ministers of the Council of Europe included, for the first time, a dedicated contribution in the Ordinary Budget 2024-2027,. Providing a more stable and predictable source of funding for co-operation activities ensures a more effective and efficient implementation of Action Plans. However, it should be noted that the financing of co-operation activities does not fall entirely within the Council of Europe’s control, as it depends largely on extra budgetary resources which enable the Council of Europe to implement technical co-operation. Consequently, the degree of flexibility in the allocation and disbursement of funds is sometimes subject to donor requirements, earmarking practices, and the timing of contributions. In addition, inflationary pressures and currency fluctuations in recent years have constrained available resources and reduced purchasing power in several contexts. These developments have, at times, affected the implementation of planned activities and required mitigation measures, including budgetary adjustments.					
☐ Accepted ☒ Partially accepted ☐ Rejected	DPC, in coordination with CoE financial and operational units.		- The Council of Europe will continue to place emphasis on unearmarked contributions in communication with current and potential donors, given that	- Continuous action - Target date: by 31 January 2028	Marjan JANSSENS (Country Advisor for South-Est Europe and Türkiye, DPC)

⁶ Adopted at the 4th Summit of Heads of State and Government of the Council of Europe (16-17 May 2023).

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			they enable responsiveness to emerging opportunities and changing circumstances.		
Recommendation 8: 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. <u>Response:</u> This recommendation can be accepted only in part, as certain aspects do not take into consideration the institutional context nor its funding mechanisms. The Committee of Ministers of the Council of Europe has already taken measures to ensure financial stability, including by introducing the possibility for funding the Action Plans from the organisation's ordinary budget, and further enhancing the documents' flexibility.⁷ However, technical co-operation is still largely dependent on extra budgetary resources. Against this background, human resource planning remains a key component of the effective and timely delivery of technical co-operation activities. The Directorate of Programme Co-ordination (DPC), in line with established procedures, systematically reviews all project proposals and budgets during the formulation phase, with particular focus on ensuring that human resource allocations are adequate and commensurate with the operational complexity and scope of activities. This includes an analysis of the staffing needs in relation to project timelines and deliverables. The constitution of reserve lists in the context of competitions allows for a quick and flexible expansion of staffing capacity in case new needs are identified. In parallel, the Organisation continues to streamline the project implementation processes. The use of standardised tools, templates and guidance documents has facilitated improved delivery mechanisms across different thematic areas and beneficiary contexts. With a view to harmonising the management of its co-operation activities, the Council of Europe has developed its Project Management Methodology (PMM) along with capacity building for operational staff on various PMM aspects. The PMM methodology is further supported by a manual containing templates, an IT tool and a guidance website, as well as through informal knowledge-sharing practices.					

⁷ For further details please see the response to recommendation 7.

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The Council of Europe also promotes cross-project learning, including through informal exchanges, joint planning exercises, and shared support functions at field office level. An example is the Regional School of Human Rights, which has been held regularly over the past years by several projects implemented under the Action Plan for Bosnia and Herzegovina⁸. The Council of Europe's People Strategy 2024–2027 further supports this dynamic by promoting staff mobility, flexible deployment, and ongoing professional development. In addition, the ongoing review of Rule No. 1234 on the recruitment and conditions of locally recruited staff, conducted by the Directorate of Human Resources in consultation with relevant entities including DPC, will inform future adjustments to field staffing models to better reflect operational realities.					
☐ Accepted ☒ Partially accepted ☐ Rejected	Council of Europe Office in Sarajevo (Head and Deputy Head of Office), with support from DPC and project managers.		- The Council of Europe will continue assessing the staffing needs as part of the broader planning and implementation framework of the Action Plan. - The Council of Europe will continue promoting collaboration between the projects under the Action	- Continuous action - Target date: by 31 January 2028	Marjan JANSSENS (Country Advisor for South-East Europe and Türkiye, DPC)

⁸ The Regional School of Human Rights was organised as part of the Council of Europe project Support to a coherent national implementation of the European Convention on Human Rights and facilitating the execution of judgements of the European Court of Human Rights in Bosnia and Herzegovina, funded under the Action plan for Bosnia and Herzegovina for the period 2022-2025, in co-operation with actions implemented under the EU/Council of Europe Joint Programme "Horizontal Facility for Western Balkans and Türkiye": "Towards a consolidated and more efficient free legal aid system in North Macedonia", "Strengthening human rights protection in Serbia", "Strengthening accountability of the judicial system and enhancing protection of victims' rights in Montenegro", "Improving the protection of the right to property and facilitating execution of ECtHR judgments" in Albania, as well as the Council of Europe regional project "Human Rights and Sustainable Environment in South-East Europe" and the project "Support to the Constitutional Court in applying and disseminating European human rights standards – phase II" in Kosovo*.

* All references to Kosovo, whether the territory, institutions or population, in this text shall be understood in full compliance with United Nations' Security Council Resolution 1244 and without prejudice to the status of Kosovo.

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			Plan, as well as with projects implemented by other organisations in the thematic areas of the Action Plan. - The Council of Europe will explore opportunities for outsourcing technical tasks where relevant.		