Management Response and Action Plan

Name of Evaluation Report:	Evaluation of the ROMACTED Phase II Programme - "Promoting good governance and Roma empowerment at				
	local level"				
	Implemented in Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, North Macedonia, Serbia, and Turkey				
Date of Evaluation Report:	16 December 2024	Date of Action Plan:	20 March 2025		

Overall management response to the evaluation:

Some of recommendations of the evaluation were addressed prior to the end of ROMACTED Programme on 31 December 2024. Given that no continuation of the Programme is foreseen, the recommendations for the financial and technical management in design, monitoring and implementation of the Programme will not be possible to address directly at Programme level. However, the evaluation recommendations will be particularly valuable for the adjustment of the current and design of future actions/projects within the Roma and Travellers Division.

[FOR DECENTRALISED EVALUATIONS] Dissemination plan for the evaluation: please briefly explain how the report will be shared (internally, other CoE entities, donors, beneficiaries etc.), methods (email, events, website etc.), resources, timeframe and person responsible.

The report was shared within the Division and with the European Commission counterparts (donor). The findings of the evaluation were also shared with the stakeholders from all 7 beneficiary countries which included high level Ministerial, local and regional level representation; a presentation on the findings and recommendations of the evaluation was made during the ROMACTED Final Conference held in Istanbul / Türkiye in December 2024.

The resources allocated for the management response plan of the evaluation will include human resources within the Roma and Travellers Division. The expected timeframe is, at the latest, until April 2026.

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
	e set values of n	EUROPE: Adopt a more ambitious a umerous indicators for the current Proequired.	• • • • • •	•	•
⊠Accepted ☐ Partially accepted ☐Rejected	Roma and Travellers Division	In the design of future actions/projects within the Division, particular attention will be paid to baselines and target setting based on objective and robust means of assessment of outputs and outcomes.	N/A	Until April 2026	Eleni Tsetsekou, Head of Roma and Travellers Division Ana Oprisan, Cooperation Programmes Manager, Roma and Travellers Division
of relevant partnerships an	nd contacts both of the complexit	lar the long-serving CoE Project Office at the national and local levels which ies and challenges at the Beneficiary le s.	represent significar	nt institutional l	knowledge of the CoE. With
☑Accepted ☐ Partially accepted ☐Rejected	Roma and Travellers Division	Efforts have been made and will continue for retaining the staff of the project, either in the Roma and Travellers Division or other projects implemented through the Field Offices of the Council of Europe. The Project Officer from Turkey has been already engaged in other activities of the Division in Turkey and 3 other Project Officers given good recommendations for being	N/A	Until April 2026	Eleni Tsetsekou, Head of Roma and Travellers Division Ana Oprisan, Cooperation Programmes Manager, Roma and Travellers Division

 $^{^{1}}$ 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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		entities in the Field Offices (e.g. Montenegro, Kosovo and Bosnia and Herzegovina). Our Division recognises their expertise and contribution and will work towards securing new projects in the field.			

Recommendation 3 - TO THE COE PROGRAMME MANAGEMENT TEAM: Ensure the allocated Programme budget is set up in a way that allows straightforward and accurate monitoring and performance oversight. The immediate and planned expenditure against key Programme activities should be visible and easily accessible, e.g. through monthly financial reporting and reprofiling based on planned and implemented actions. The results-based Programme budgeting with clear costs of specific outcomes will provide cost-benefit evidence for decisions on the ongoing Programme implementation. An overview of budgetary resources at the level of Beneficiaries should also be immediately available to Project Officers so that balance of resources is maintained and any underspent/overspent is immediately flagged and reflected in the ongoing Programme implementation.

⊠Accepted	Roma and	The ROMACTED Programme had its	N/A	From	Eleni Tsetsekou, Head of
☐ Partially accepted	Travellers	final closure in December 2024.		January 2025	Roma and Travellers
□Rejected	Division	This recommendation is taken on			Division
		board for future projects of the			
		Division.			Ana Oprisan,
		Budget monitoring and			Cooperation Programmes
		performance oversight measures			Manager, Roma and
		have been addressed by DPC and			Travellers Division
		partly by the Central Division of			
		DGII in terms of linking each			Nedim Vrabac,
		expenditure with key activity			Programme Manager for
		number to allow for tracking the			Finances and
		expenditure for a given activity.			Administration, Roma
		There are also measures in place			and Travellers Division
		regarding setting up projects			
		budgets on a results-based logic as			
		opposed to simple activity costing.			
		The Division will put an emphasis			
		on more regular budget tracking			

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		and monitoring to allow for efficient mitigation measures and reallocation of funds in cases of under and over-expenditure.			

Recommendation 4 - TO THE COE PROGRAMME MANAGEMENT TEAM: To counteract the common risk of failed / discarded small grants' projects, invest more efforts into contracting of the allocated budget to ensure maximum expenditure of the funding available. Subsequently, monitor the ongoing projects' implementation closely so that the unspent resources are promptly allocated to other grantees or a new call for proposals is published.

□Accepted	Roma and	The ROMACTED Programme had its	N/A	From	Ana Oprisan,
☐ Partially accepted	Travellers	final closure in December 2024.		January 2025	Cooperation Programmes
□Rejected	Division	This recommendation is taken on			Manager, Roma and
		board for future projects of the			Travellers Division
		Division.			
		In case of future projects including			Nedim Vrabac,
		small grants, a better assessment			Programme Manager for
		and more precise budgets will be			Finances and
		set, accompanied with capacity			Administration, Roma
		building activities (training and			and Travellers Division
		coaching) for the grantees to			
		ensure full absorption capacity. In			
		case where savings or			
		underspending will be noted,			
		mitigation measures will be applied			
		to readjust the budgets and ensure			
		needed amendments. However,			
		allocating resources to other			
		grantees or issuing new calls for			
		proposal might not be			
		suitable/possible with already			
		existing grantees due to			
		procurement regulations. Issuing			

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		new calls for proposals or identifying new grantees could be considered only if feasible and allowed by the rules of the donor contractual agreements.			

Recommendation 5 - TO THE COE PROGRAMME MANAGEMENT TEAM: Ensure the data reporting is accurate and systematic, and inconsistencies are avoided. For instance, achieved values of output/outcome indicators in the Programme Logframe should align with those reported in any other Programme documentation. Similarly, the tracking system should be conducive to consistency in relation to outputs and outcomes without any language variations.

⊠Accepted	Roma and	Efforts will be made in the Division	From	Ana Oprisan,
☐ Partially accepted	Travellers	to improve the monitoring systems	January 2025	Cooperation Programmes
□Rejected	Division	of new projects and to ensure		Manager, Roma and
		consistency in terms of reporting		Travellers Division
		on output and outcome indicators.		
		This will be done through		
		harmonising the data type		
		collected in different countries and		
		ensuring that disaggregated data is		
		collected in a systematic manner.		
		Data will be centralised and used as		
		a harmonized reference for various		
		project and reporting documents		
		to ensure coherence.		

Recommendation 6 – TO THE COE: Given the critical role of the local facilitators in the Programme, allocate substantially more budgetary resources to their work and related activities. The originally allocated budget of one day's field work per month is significantly undersized and does not reflect their scope of work which often requires repeated efforts in initial mobilisation of the community as well as in maintaining the continuum during any leadership and personnel changes in municipal administration. While the implementation at the local level is instrumental, it is sensitive to any political changes either at the local or national level directly affecting the extent of local facilitators' work; The assigned budgetary resources should reflect this.

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□Accepted		The ROMACTED Programme had its		From	Ana Oprisan,
☑ Partially accepted		final closure in December 2024.		January 2025	Cooperation Programmes
□Rejected		This recommendation is taken on			Manager, Roma and
		board for future projects of the			Travellers Division
		Division which will include field			
		facilitators and similar positions.			
		Future similar actions / projects of			
		the Division will consider proper			
		assessment of type of tasks, daily			
		fees and frequency of work of field			
		facilitators etc. This will be based			
		on examination of local context,			
		specific needs of the beneficiaries			
		and adequate budgetary planning.			
practice that have been pro-	duced and publ	AMME MANAGEMENT TEAM: To main ished within the Programme, their act must of their promotion to ensure their must be active.	ive promotion and b	road dissemina	tion are equally important.
⊠Accepted		ROMACTED Programme website		From	Ana Oprisan,
☐ Partially accepted		was already updated with the		January 2025	Cooperation Programmes
□Rejected		existing materials, including good			Manager, Roma and
		practices. Actions such as sharing			Travellers Division
		the Programme results and			
		practices on social media have			
		been made and will continue. The			
		approach and results of			
		ROMACTED will continue to be			
		shared in presentations to different			
		stakeholders and in relevant			
		communication documents and			
		channels of the Council of Europe.			
		These will be also shared through			

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		the CoE – Roma and Travellers			
		Division and Field Offices' projects			
		and staff to different stakeholders			
		in the member states, depending			
		on the context and opportunity.			
Roma empowerment at the motivational and learning t	e local level. Pro tool. A case stud natically promo	AMME MANAGEMENT TEAM: The Promote them diligently among a wide rady form might be appropriate for this te the results it has achieved in the accuration.	inge of stakeholders . Even though the Pi	as they have porogramme impl	otential to serve as a strong ementation is due to finish
⊠Accepted		Efforts to address this already took		Until April	Ana Oprisan,
☐ Partially accepted		place, including at the final		2026	Cooperation Programmes
☐Rejected		conference of the Programme with			Manager, Roma and
<u> </u>		the participation of the wide range			Travellers Division
		of stakeholders. Further efforts will			
		be made within the Division and			
		through the CoE Field Offices to			
		promote the achievements of the			
		Programme, as specified in			
		Recommendation 7.			
infrastructure investments	to help addre	ok for opportunities to align the fundiess the complex issues the Roma poght limit the positive outcomes of initial	pulation in the Be	neficiaries face	e. The critical state of the
□Accepted		This recommendation would be		Until April	Ana Oprisan,
☑ Partially accepted		suitable for the donors, state		2026	Cooperation Programmes
□Rejected		authorities and other stakeholders			Manager, Roma and
•		in the Beneficiaries. This is because			Travellers Division
		the Council of Europe does not			
		implement directly infrastructure			

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		projects. However, the Council of Europe can and will advocate for such measures with the EU and other relevant entities whenever the opportunity will arise. In its work on other Joint Programmes, like the Roma Integration III, the Roma and Travellers Division will ensure channelling this message to state authorities and donors attending relevant activities in the field.			

Recommendation 10 – TO THE COE PROGRAMME MANAGEMENT TEAM: While the field visits identified numerous positive examples of multiinstitutional co-operation and successful outcomes for local Roma communities that are likely to continue/be sustained albeit in a reduced format, it cannot be expected that all municipalities involved in the Programme have achieved the same level of progress and success. Therefore, an assessment exercise should be undertaken by the respective Project Officers in close collaboration with SOs to determine which municipalities require follow-up activities, for example by providing support in upscaling of successful projects or practical proposal writing etc. This audit of municipalities' end results and progress achieved will be helpful for targeting any future actions more effectively and efficiently.

□Accepted	The ROMACTED Programme had its	Due to the
☐ Partially accepted	final closure in December 2024.	Programme's
⊠Rejected	Except one former ROMACTED	closure, the
,	Project Officer engaged in another	ROMACTED
	project of the Roma and Travellers	Project Officers
	Division, none of the ROMACTED	are no longer
	Project Officers continue to work	employed with
	with the Division in the Field	the Roma and
	Offices.	Travellers
	The Programme sought	Division and the
	consolidation of the commitment	Division does not
	of the authorities during the final	have presently

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		months of implementation, including ad hoc and targeted support, and during the Final Conference. The Programme methodology fosters sustainability and empowerment, combined with the know-how and capacity developed the municipalities can become autonomous in ensuring the process is continued. Audit of municipalities' end results and progress achieved might not be feasible given that the Programme ended.	resources to commit for a further assessment / audit of results in all concerned municipalities of the Programme.		

Recommendation 11 – TO THE COE PROGRAMME MANAGEMENT TEAM: Further to the point above, the auditing exercise could include a snapshot overview of the present status of the political will and commitment of the municipalities and their local institutional partners to continue in Roma integration and empowerment measures in a participatory way without the external impetus of the Programme. The thorough knowledge of local facilitators might be instrumental in this regard. The understanding of the current sense of ownership might be again helpful for planning and implementation of any similar initiatives in the future.

□Accepted	As mentioned above, the	The Roma and	
☐ Partially accepted	methodology developed by the	Traveller Division	
⊠Rejected	Programme supports ownership	does not have	
	and sustainability of the Action at	presently the	
	local level that is dependent on the	necessary	
	commitment and political will of	resources to	
	the municipality. Given that the	commit for a	
	Programme has ended, there are	further	
	no resources to carry out an audit	assessment /	
	of political will and commitment at	snapshot	
	this stage. Such auditing exercise	overview of the	
	can however be implemented in	political will and	

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		the future, should the plans of the Division will include work at	commitment of the municipal		
		municipal level in the same	authorities in the		
		Beneficiaries and the funding would be identified for it.	former municipalities of		
			the Programme		
			closed in December 2024.		