
1556th meeting, 8 April 2026

11 Programme, Budget and Administration

11.3 Directorate of Internal Oversight

Annual report 2025

Item to be considered by the GR-PBA at its meeting on 26 March 2026

¹ This document has been classified restricted until examination by the Committee of Ministers.

Introduction

1. The annual report of the Directorate of Internal Oversight (DIO) is submitted pursuant to Section VI paragraph 41 of the DIO Charter.² It presents an overview of the key activities carried out by the DIO in 2025.
2. The DIO work programme for the period 2024-2027³ is aligned with the Programme and Budget 2024-2027.⁴ The work programme takes a holistic approach to oversight while recognising the respective contributions of the DIO's three divisions: Internal Audit Division, Evaluation Division and the Investigation Division.

Highlights

3. As in the previous year, the Internal Audit Division was able to issue an overall audit opinion in 2025. The Evaluation Division was able to absorb the additional work of managing the action plan evaluations while continuing to implement its work programme. The Investigation Division faced capacity constraints in the first half of the year that led to process simplifications; it was, nevertheless, able to make progress on items that had been pending for some time (fraud risk assessments, the external review of the function and the whistle-blower tool).
4. At the start of the year, the DIO moved from its previous location in the D building to the Palais. This process was anticipated but organised at relatively short notice during an exceptionally busy period, causing operational disruptions. Working in a new office set up, split across two floors, in a significantly smaller space, with shared offices and no allocated places, took some time to adjust to, and experimentation to find working arrangements that allowed staff to be productive. Challenges remain, and issues regarding arrangements for working on confidential matters are still not fully resolved, but the DIO has since gained access to a meeting room that is suitable for interviews.
5. The Internal Audit Division was able to deliver its work programme for 2025. At the end of the year, while carrying forward four assignments, the work remaining on each of the assignments is less than it had been in 2024. The integration of IT components in audits was continued. The audits on the governance and use of Artificial Intelligence (AI) and recharged services (translation and pre-press) were particularly impactful as they triggered discussions on how to improve the way the Council of Europe approaches these issues. In 2025, the DIO was also tasked by the Committee of Ministers to conduct an audit of the implementation by the Organisation of Resolution Res(2000)2 on the Council of Europe's Information Strategy and Resolution Res(2001)6 on access to Council of Europe documents⁵. In addition to the work programme, the Audit function was able to add a substantive amount of work on benchmarking of the governance of internal Audit functions to their planned work schedule.
6. The Evaluation Division delivered more work than was originally foreseen in the work programme: two procurement processes were completed, the strategic, transversal and sub-programme evaluations managed, support provided for decentralised evaluations and the management of action plan evaluations was added to the work of the Evaluation Division in 2025. The division continued to innovate the way evaluations are managed and implemented as well as moved forward on process improvements such as developing guidelines for the responsible use of AI by evaluators. The evaluation of the Implementation of the Reykjavík Declaration featured in the budget deliberations for the 2026-2027 budget.
7. During the year, the Investigation Division operated under capacity constraints, which triggered simplification of processes in the beginning of the year followed by additional optimisation and streamlining of procedures in the second part of the year. In June, the function initiated a transition towards a hybrid delivery model where the investigation phase of the process is being outsourced. 2025 was marked by the completion of the first-ever external review of the Investigation Division by a panel of senior experts, alongside a sustained caseload and implementation of operational reforms. The function adjusted *inter alia* investigative processes to address emerging challenges, continued fraud-awareness-raising activities, revised the fraud-risk assessment methodology to address the need for high-level assessments at major-administrative-entity level, and carried out two Fraud Risk Assessments (at the Registry of the Court and the EDQM).

² Cf. CM(2022)87.

³ Cf. GR-PBA(2024)5.

⁴ Cf. CM(2025)1.

⁵ Cf. CM/Del/Dec(2025)134/3.

Vision and purpose

8. The DIO provides independent oversight through internal audit, evaluation, and investigation to support informed decision-making, strengthen the Council of Europe's integrity framework, improve the Council of Europe's operations, and help it accomplish its objectives. The DIO promotes a culture of accountability, transparency, and organisational learning.

Figure 1: Purpose, mission and standards of the DIO

Purpose	The purpose of the DIO is to provide independent and objective assurance, advisory and other services designed to add value and improve the Council of Europe's operations and help it accomplish its objectives. It contributes to evidence-based decision making and organisational learning, and aims to strengthen the Organisation's integrity, transparency, and accountability framework. To this end, it provides independent and objective audit, evaluation, investigation, and advisory services.	
DIO Function	Mission	Standards
Internal Audit	To enhance and protect organisational value by providing risk-based and objective assurance, advice, and insight, and by bringing a systematic, disciplined approach to assessing and improving the effectiveness of risk management, internal control and governance processes.	The Internal Audit function is governed by adherence to the new Global Internal Audit Standards (GIAS) of the Institute of Internal Auditors (IIA), which entered into force in 2025.
Evaluation	To provide systematic and impartial assessments of activities, projects, programmes, strategies, policies, topics, themes, sectors, operational areas or institutional performance, to help the Council of Europe enhance its capacity, assess its performance and demonstrate its comparative advantage and value.	The Evaluation function is governed by the Organisation's Evaluation Policy, which takes inspiration from the norms and standards for evaluation established by the United Nations Evaluation Group and the Development Assistance Committee of the Organisation for Economic Co-operation and Development (OECD DAC).
Investigation	To help the Council of Europe to ensure the proper use of its funds and resources, prevent and investigate fraud and corruption, and other wrongdoings, and protect its reputation and interests, by carrying out inter alia preliminary assessments and investigations in line with the Organisation's legal framework.	The Investigation function is governed by adherence to the Organisation's legal framework and aims to follow common principles, guidelines and best practices for investigations, such as the ones enshrined in the Uniform Principles and Guidelines for Investigations and complementing guidelines adopted by the Conference of International Investigators and those set out in the case-law of the Court, where applicable.

DIO resources

Staffing



The DIO has 19 jobs



32% are men and 68% are women⁶

Figure 2: Number of jobs per division in 2025 (including split by A & B-grade)

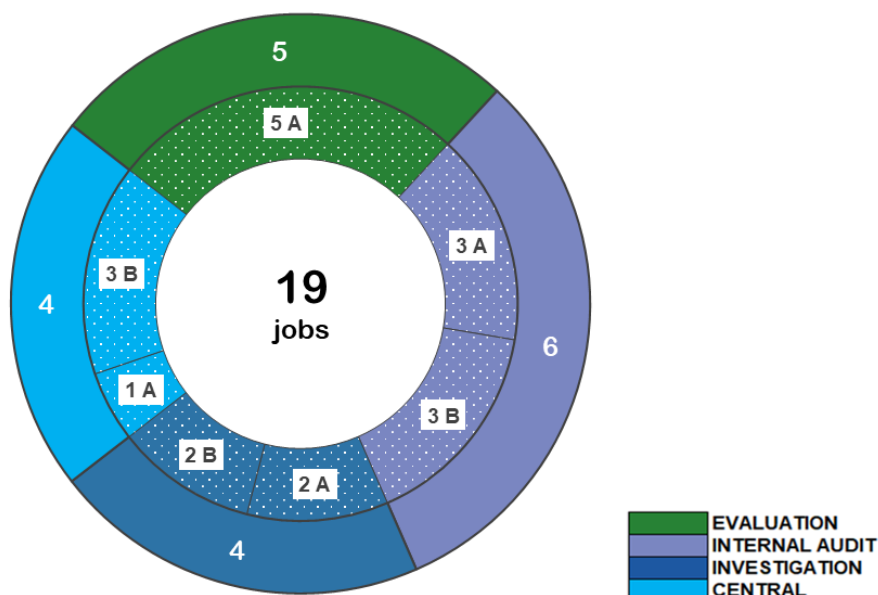
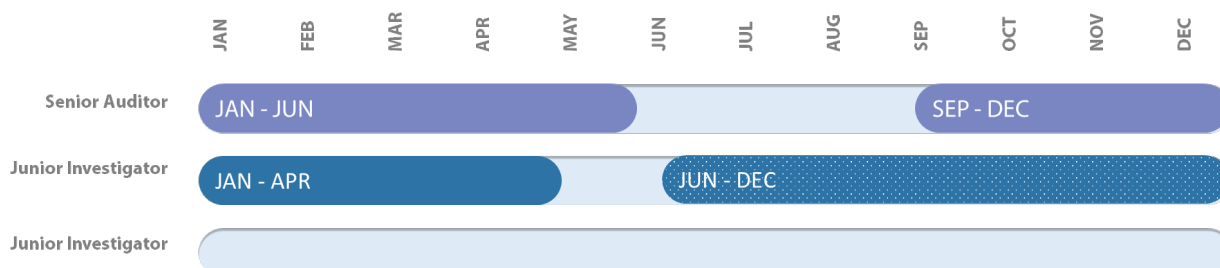


Figure 3: Jobs with vacancies (in grey) in 2025



9. While in 2025, the staffing situation at the DIO was notably improved compared to previous years regarding the vacancies, overall, the absences were at a similar level to the previous year. The position of Senior Auditor was vacant for a period of three months, but recruitment efforts ensured that this gap was effectively managed. The Audit Trainee was retained as a temporary staff member to support ongoing audit activities. As of January, a new Head of Evaluation was appointed, addressing a vacancy that persisted for 2024. One of the Junior Investigator positions became vacant on 1 May. This position as well as the other position of Junior Investigator were not filled during the year in anticipation of the external review to avoid having a staffing structure that might not match eventual recommendations made in the external review of the function.

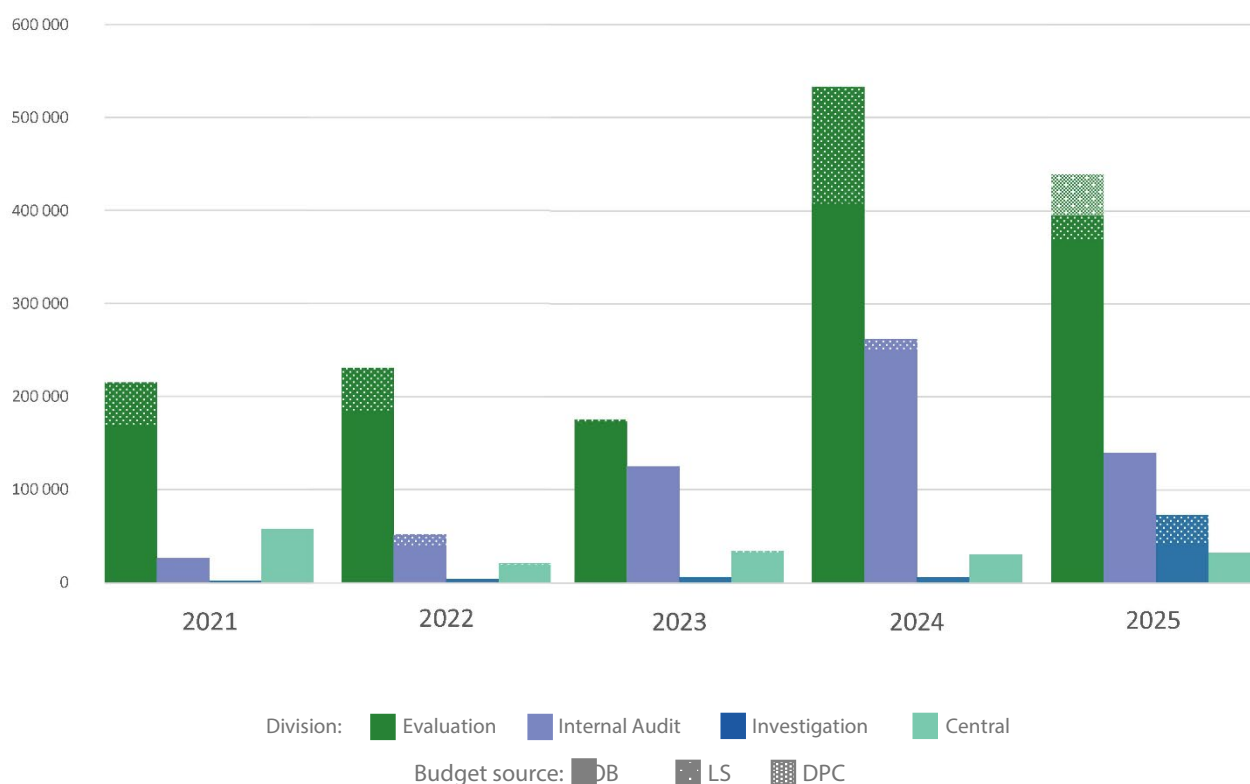
⁶ The data was calculated using the incumbent gender for the position regardless of the number of months of vacancy during the year.

10. The Investigation function did experience challenges due to staff absences affecting the available resources as from April. A temporary staff was hired to support the Director in managing the Investigation function during the spring-summer period and was kept on until the end of the year. The challenges in staffing necessitated additional flexibility and redistribution of responsibilities among team members to ensure coverage of high-priority tasks.

Operational Budget

11. The financial resources available for operational activities were slightly lower in 2025 as compared to 2024 given a lower number of vacancies as compared to 2024. However, in 2025 the financial situation was characterised by uncertainty, as the effects of long-term absences made it difficult to forecast available funding. On the investigation side, the DIO had expected to spend funding on the whistle-blower tool, which did not materialise, as the DIT could not identify a provider. Since the summer period, investigation work (investigation phase) was outsourced. The Directorate experienced some delays of items that consultants were supposed to deliver resulting in lower-than-expected levels of expenditure. The DIO added an evaluation synthesis report to the work programme as funding was available but remained cost conscious and did not initiate lower priority work.

Figure 4: DIO operational expenditure by division over the last five years (in Euros)



Continuous Talent Development

12. During 2025, DIO staff continued to develop professional skills through starting, maintaining or completing professional examinations/studies (CIA – Certified Internal Audit qualification, CFE – Certified Fraud Examiner training), attending subject-specific trainings as well as trainings offered by the Directorate of Human Resources.

Work Programme

13. The DIO implemented the 2025 parts of the 2024-2027 risk-based work programme. The work programme had been developed in 2023 and was shared with the Oversight Advisory Committee (OAC) and the External Auditor. It took into consideration contributions from senior management, discussions of the Ministers' Deputies, the relevant ongoing reform measures and the Organisation's organisational risk register. It was endorsed by the Secretary General and taken note of by the GR-PBA.

14. All key elements of the 2025 work programme were completed. The DIO was able to conduct sufficient work to issue an overall audit opinion on governance, risk management and internal control. In addition to the work programme, the Audit function was able to add a substantive amount of work on benchmarking of the governance of internal Audit functions to their planned work schedule.

15. The challenges with consultant availability and at times the challenges to ensure quality of work from consultants did delay some processes.

16. Of the items postponed from 2024, the majority of the work on the fraud risk assessments was conducted and the external review of the Investigation function was completed.

17. The Evaluation function has implemented key evaluations and successfully absorbed the additional work of managing the action plan evaluations in 2025 as well as adding work on a synthesis report on evaluations conducted in the last two years.

Statement of Independence

18. In accordance with the DIO Charter, adopted by the Committee of Ministers, the DIO enjoys operational independence. This independence is essential to carry out its mandate, as the DIO provides independent and objective audit, evaluation, investigation, and advisory services, contributes to evidence-based decision-making and organisational learning, and aims to strengthen the Organisation's integrity, transparency, and accountability framework. As stated in paragraph 20 of the DIO Charter, the Director of Internal Oversight shall make an annual statement to the Committee of Ministers on whether the independence of the function has been maintained. In 2025, the autonomy of the DIO remained intact. Challenges encountered during the year were on an operational level and solutions were found to address them.

Oversight Advisory Committee

19. The DIO acts as secretariat of the Oversight Advisory Committee (OAC).⁷ The Oversight Advisory Committee met four times in 2025.

⁷ The Oversight Advisory Committee provides an independent advisory function to the Committee of Ministers and the Secretary General on the governance, risk management and control systems of the Council of Europe. It is governed by its Terms of Reference (Resolution CM/Res(2022)4).

Internal Audit

Internal Audit function

20. The Internal Audit function aims to provide independent assurance, advice and insight to enhance and protect organisational value, inform evidence-based decision making, and promote organisational learning, transparency, integrity and accountability. This is achieved through the conduct of risk-based audits and the provision of advisory services to management upon request.

21. Audits focus not only on compliance with rules and regulations; they also assess performance (efficiency, effectiveness and value for money). Given the integral role of IT in business processes and the nature, level of exposure and velocity of IT risks, audits regularly include an IT component. Data protection compliance is also increasingly reviewed.

22. Best practice is followed for internal control and risk management engagements by using internationally recognised models such as the COSO (Committee of Sponsoring Organisations of the Treadway Commission) Internal Control – Integrated Framework and the COSO Enterprise Risk Management Framework, as the basis for audit work. For IT audits, practices are checked against the Council of Europe's own policies and regulations. In the field of information security, these are inspired by ISO standard 27002 on information security, cybersecurity and privacy protection – information security controls. With regard to data protection, the focus is on compliance with the Council of Europe's own Regulations on the Protection of Personal Data.

Audits carried out in 2025 and their results

23. The Internal Audit's 2025 work programme originally included seven audits, with an extra four audits being carried over from 2024. During the year, the following changes were made to the work programme: an audit on recharged services (translation and pre-press) was performed at the request of management, the DIO was tasked by the Committee of Ministers with an audit on Information Policy and Document transparency,⁸ and the audit of the Tunis office was prioritised.

24. Audit engagements are typically divided into three stages: preliminary work (which usually accounts for 20% of the allocated time), field work (which represents roughly 50%), and communication (which makes up the remaining 30%, of which 25% is allocated to the draft audit report and 5% to the final audit report).⁹ Regarding the implementation rate of the 2025 work programme (see figure 5), a satisfactory rate of 84% was achieved. This result should be considered in the context of the carryover from the 2024 work programme (which represented an additional 2%) and other activities undertaken such as the work on compliance with the GIAS.

Figure 5: Internal Audit work programme implementation rate (2025 and 2024 carryover)



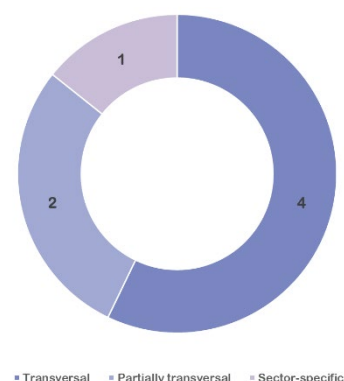
25. As at 31 December 2025, seven engagements were completed with audit reports being issued, and four being finalised. The list of internal audit outputs for 2025 appears in figure 7 and a summary of the key elements of each audit appears in Appendix A.

⁸ CM/Del/Dec(2025)134/3.

⁹ For more information, please see the audit process map which appears in Appendix B.

26. As can be seen in figure 6, four of the seven completed engagements were transversal (i.e. covered the whole Organisation: governance and use of AI, travel management, performance management, recharged services), two were partially transversal (in the sense that two projects were audited yet the recommendation related to the overall management of co-operation activities at the Council of Europe) and one was sector-specific (Eurimages). Four included an IT or data protection component.

Figure 6: Nature of audit engagements



27. An additional audit output was produced in 2025 with the results of the staff survey on performance management being shared with management.

28. In the second half of the year, the Audit function conducted a self-assessment and benchmarking exercise at the request of the OAC to establish to what extent the new GIAS have affected the governance structure of internal Audit functions in multilateral organisations.

29. In addition, Internal Audit followed up on the implementation of its recommendations in March and September 2025. For more information, see section on the implementation of agreed management actions.

Figure 7: Internal Audit outputs for 2025

Audit reports	Reference	IT and/or data protection component	Status as at 31/12/2025
2024 work programme (carried over)			
Travel Management	DIO-Audit(2025)02	✓	Completed
EU/CoE Joint Project "Inclusive Schools: Making a difference for Roma children 3 (INSCHOOL 3)"	DIO-Audit(2025)03		Completed
VC-funded project "Enhancing Diversity and Equality in the Republic of Moldova"	DIO-Audit(2025)04		Completed
Governance and use of Artificial Intelligence (AI) within the Council of Europe	DIO-Audit(2025)05	✓	Completed
2025 work programme			
Recharged services (translation and pre-press)	DIO-Audit(2025)06		Completed
Performance management	DIO-Audit(2025)07	✓	Completed
PMM platform: risk management and IT	DIO-Audit(2025)08	✓	Draft report issued
Internal control framework of the Secretariat of Eurimages	DIO-Audit(2025)09	✓	Completed
Information Policy and Document transparency			External service provider report submitted week 52 (2025)
Council of Europe Office in Tunis		✓	On-site visit conducted week 49 (2025) Field work underway
Internal control framework of the Directorate General of Democracy and Human Dignity (DGII)			Field work underway
TOTAL INTERNAL AUDIT REPORTS 2025			7 completed + 4 underway
Additional outputs			
Performance management – staff survey results	DIO-Review(2025)02		✓
Follow-up of Internal Audit recommendations (as part of DIO report) – March 2025			✓
Follow-up of Internal Audit recommendations (as part of DIO report) – September 2025			✓
GIAS – Domain III – Principle 7: self-assessment and benchmark			✓
TOTAL INTERNAL AUDIT OUTPUTS 2025			11

30. The audit work on individual engagements results in an audit conclusion for that specific engagement. In certain instances, two separate conclusions are provided: one on compliance and one on performance. When and where room for improvement or issues requiring corrective action were identified, Internal Audit worked with management to agree on appropriate and timely measures to address them. In certain cases, decisions on the allocation or prioritisation of resources are required.

Innovation and Lessons learned

31. In 2025, the Internal Audit function continued to work towards compliance with the new GIAS, which entered into force on 9 January 2025. The internal audit community of multilateral organisations has identified challenges in their application, and a collective effort is being made to try and address them in consultation with the IIA. The Internal Audit function has reached out for advice from IFACI (*Institut français de l'audit et du contrôle internes*), the French branch of the IIA, and will allocate time for this task in its work programme for 2026 and 2027. The GIAS foresee a more prominent role for “the Board” i.e. the Organisation’s decision-making body, and the Secretariat will liaise with the GR-PBA in due course on this matter. The next external quality assessment of the Internal Audit function is scheduled for 2027.

32. Given the integral role of IT in business processes and the nature, level of exposure and velocity of IT risks, Internal Audit pursued its partnership with an external service provider for the provision of IT audit services for a second consecutive year. This course of action proved to be largely effective even though there were instances where the service provider was not as available or responsive as may have been required. The two-year experience will be used to inform the drafting of the terms of reference for an international call for tenders for the provision of IT audit services, to be launched early 2026.

33. Following an external audit recommendation,¹⁰ internal audit reports were published on the Intranet and shared with delegations as from 1 January 2025. In order to make them available in the two official languages of the Council of Europe, the Internal Audit function tested the use of machine translation (DeepL). It will aim to take stock of this experience, notably in the light of the audit it conducted in 2025 on recharged services (translation and prepress).

34. In order to adapt to a broader audience, the Audit function experimented with different report formats, including an executive summary with at-a-glance information.

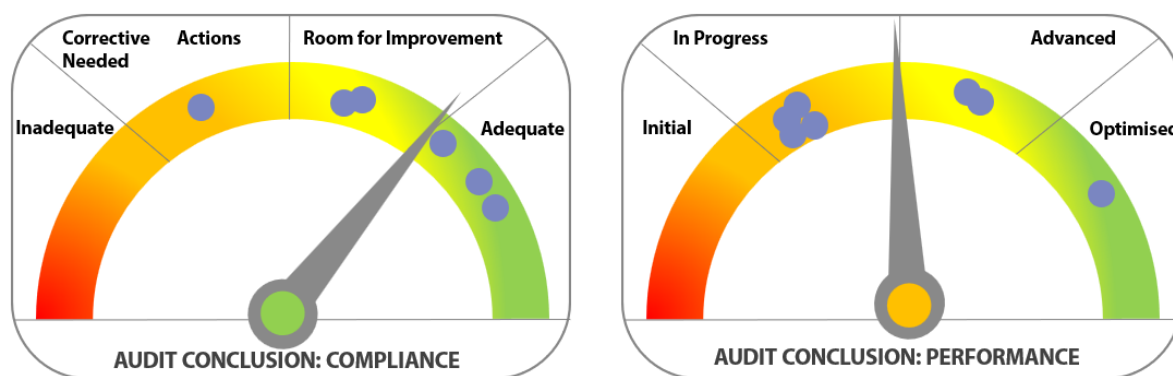
35. The auditee feedback process was reviewed in 2025: face-to-face interviews were systematically organised between the Director of Internal Oversight and the main auditee (as opposed to them receiving a survey to complete). This helped ensure lessons were learned from the process and contributed to the Internal Audit function’s continuous improvement. For example, opening meetings will now be organised as a matter of course to clarify auditee expectations and explain in what way audits and/or advisories can meet those expectations.

Overall audit opinion on governance, risk management and internal control

36. Enough work was performed in 2025 to allow the Internal Audit function to formulate an overall opinion on the adequacy and effectiveness of governance, risk management and internal control at the Council of Europe. In giving this opinion, it should be noted that assurance can never be absolute and that the most that the Internal Audit function can provide is reasonable assurance.

37. This opinion is informed by the results of its various assignments (see figure 8) as well as the work of the External Auditor, the DIO work on investigation and evaluation, second line assurance providers (internal control, risk management, ethics, data protection), other work of the DIO, the input from the recommendation follow-up process, and from the opportunity to observe the discussions in several of the Organisation’s governance structures.

¹⁰ Ext(2024)2 - Audit report on internal governance - Recommendation 18: The External Auditor recommends “that all audit reports, whether from DIO or the External Auditor, be distributed to the Committee of Ministers and that it be proposed to the Committee Chairs and GR-PBA that one or two audit or evaluation reports, chosen by them in liaison with the Private Office of the Secretary General, be included on the agenda each year.”

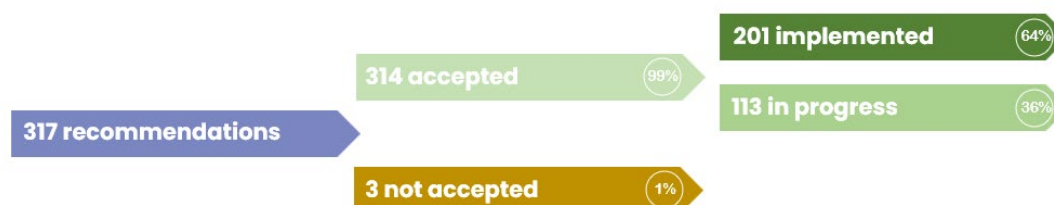
Figure 8: Conclusions of 2025 audits – compliance and performance

38. Based on the work performed, the Internal Audit function is of the opinion that the Council of Europe has an adequate and generally effective governance, risk management and internal control framework. As can be seen hereafter, management has accepted audit recommendations to address any issues identified and is committed to implementing corrective actions within agreed timelines.

Implementation of agreed management actions

39. In accordance with the GIAS and the DIO Charter, the Internal Audit function reports on the implementation of recommendations. The DIO follow-up exercise focuses on the implementation of recommendations over a five-year rolling period.

40. As at 9 October 2025, 317 recommendations were made, 314 accepted and three not.¹¹ Out of the 314 recommendations accepted, 201 have been implemented, giving an implementation rate of 64% (see figure 9). This rate is acceptable given that the 113 recommendations in progress included 45 recent ones (aged less than 6 months). The Internal Audit function continues to encourage management to set more realistic target dates for the implementation of recommendations.

Figure 9: Internal Audit recommendation implementation rate as at 9 October 2025

Source: TeamMate

¹¹ 1) Activate mandatory encryption or read only mode on all storage devices, 2) consider transforming the Programme Office in Podgorica into a fully-fledged office with a core team present in the field and 3) segregation of information security duties from operational IT duties (this last recommendation was superseded by a new audit and set of recommendations).

41. The recommendations implemented in 2025 helped address different risk categories/areas. Examples include:

INFORMATION TECHNOLOGY

- IT Governance Board recommendation to make IT security awareness training mandatory for all staff
- Application of the principle of least privilege to administrator accesses, implementation of strong authentication methods (two-factor authentication) for all privileged accesses, deployment of a solution to identify and access security management and updating of related procedures
- Quality monitoring and incident management related to the E-procurement tool
- Finalisation of Data Protection Impact Assessments for the AI platform selected and the electronic signature tool in use at the Council of Europe

PROJECT / PROGRAMME DELIVERY

- Contract amendment with the provider of audiovisual and multimedia services in the Assembly Chamber to monitor the quality of services provided during Parliamentary Assembly and Congress sessions (broadcasting, video/audio, voting, general) to include Service Level Agreements, penalties in the event of non-compliance and provision of activity reports

HUMAN RESOURCES MANAGEMENT

- Regular provision of statistics to Major Administrative Entities (MAEs) on staff absences to help identify trends and root causes
- Proactive and targeted communication on support and advice available to staff and well-being initiatives

COMMUNICATION / REPUTATION

- Updating of the Council of Europe Procurement Guide and related training materials to include the risks of conflicts of interest with regard to gifts and hospitality and helping ensure a single and reliable point of reference on these issues
- Potential use of an external service provider to assess suppliers' compliance with the exclusion criteria set out in the Council of Europe's procurement procedures

SUSTAINABLE DEVELOPMENT

- Updating of payroll procedures, digitalisation and enhanced document management (payroll of daily interpreters) and reduction of printouts (pension entitlement calculations)
- More widespread use of electronic signatures to help reduce paper consumption and move towards a Zero Paper Policy in the Organisation

PROCUREMENT

- Setting up of a network of staff trained in procurement performance and of E-procurement superusers tool to act as relays throughout the Council of Europe with quarterly sessions to share updates and good practices
- More detailed tracking of the Procurement Unit's interventions and systematic satisfaction surveys to assess service quality
- New supplier database integrated with E-procurement, to be enriched with data from the contract management database with new features
- Enhanced controls at supplier onboarding as well as an annual review to ensure the quality and reliability of the supplier database
- Timeline to move towards mandatory use of E-Procurement.

Evaluation

Evaluation function

42. The Evaluation Division promotes accountability, informed decision-making and learning by a systematic and impartial assessment of an activity, project, programme, strategy, policy, topic, theme, sector, operational area or of institutional performance. It is guided by pre-defined criteria – relevance, coherence, efficiency, effectiveness, impact and sustainability – established by the OECD DAC.¹² Evaluation in the Council of Europe follows the United Nations Evaluation Group (UNEG) norms and standards.

43. The Evaluation Policy,¹³ approved by the Committee of Ministers in November 2019, reflects international norms and standards, in particular as regards the independence, credibility and utility of the Evaluation function and the transparency of evaluation results. It demands that evaluations are conducted with the highest standards of integrity and contribute to the enhancement of human rights, gender equality and respect for diversity.

44. The term ‘Evaluation function’ refers not only to evaluations managed or conducted by the DIO Evaluation Division, but also to evaluations managed by other entities that most commonly assess projects. Throughout 2025, the DIO Evaluation Division provided guidance, technical assistance and support to Major Administrative Entities (MAEs) on matters such as the selection of consultants, drafting of terms of reference, quality checking draft evaluation reports and supporting the follow-up to evaluation recommendations.

Delivery against the 2024-2027 work programme during 2025

45. While the DIO Evaluation Division did not complete all evaluations planned for 2025, it delivered significantly more work than foreseen in the work programme (114%). This high percentage is due to the new additional responsibility for managing Action Plan evaluations. Activities and results delivered under the work programme included management and production of DIO evaluations, supporting decentralised evaluations, participating in evaluation professional development and training, and monitoring and reporting on the implementation of recommendations. The 2024–2027 work programme will be replaced by the new 2026–2029 rolling work programme.

46. The 2024–2027 evaluation work programme included an update of the evaluation guidelines. The quality assurance guidelines for evaluation terms of reference, inception reports, and final evaluation reports were reviewed against international best practice, norms and standards and new scoring checklists developed. Further revision of the guidelines was put on hold while the DIO led discussions with representatives from the Major Administrative Entities on decentralised evaluations in the Council of Europe and the most appropriate framework for making strategic choices of what to evaluate and mechanisms for ensuring quality and utility.

47. During 2025, the Evaluation Division managed two complementary evaluation consultancy procurement frameworks. These frameworks were made available to all MAEs with updated guidance on engaging of consultants. A survey of the suppliers was undertaken at the end of the year to collect the most up-to-date information on the skills and expertise available under the frameworks.

Strategic and corporate evaluations led by the DIO

48. Six evaluations were finalised and six new evaluations launched in 2025, four of which are scheduled for completion in 2026. Table 1 sets out the 12 evaluations that were led by DIO in 2025. In addition, a synthesis report and an evaluative assessment were completed.

¹² Development Assistance Committee of the Organisation for Economic Co-operation and Development.

¹³ Cf. CM(2018)159-final.

49. Following an External Auditor's recommendation in the audit report on decentralisation, as well as a 2024 OAC recommendation,^{14 15} the DIO assumed responsibility for conducting Action Plan evaluations as of 2025. In line with its new mandate, the DIO completed the evaluation of the Azerbaijan Action Plan and initiated the evaluations of the Ukraine and Armenia Action Plans.

Figure 10: DIO led evaluations 2025

Title	Work Programme	Status	Type of evaluation
1. Evaluation of the Building Trust in Public Institutions programme	2024	Finalised	Strategic Programme Evaluation
2. Evaluation of the integration of a youth perspective in Council of Europe work	2024	Finalised	Transversal thematic evaluation
3. Evaluation of the European Social Charter	2024	Finalised	Sub Programme evaluation
4. Evaluation of the Implementation of the Reykjavík Declaration	2025	Finalised	Strategic evaluation
5. Azerbaijan Action Plan (2022-2025)	Not in work programme	Finalised	Action Plan evaluation
6. Evaluation of the Council of Europe Sub-programme on Children's Rights	2025	Finalised	Sub Programme evaluation
7. Meta-evaluation on the national implementation of the European Convention on Human Rights	2024	To finalise Q1 2026	Meta Evaluation
8. Evaluation of the Council of Europe's Work on Artificial Intelligence	2025	Launched (to finalise Q1 2026)	Transversal thematic evaluation
9. Anti-money laundering (2025)	2025	Launched (to finalise Q3 2026)	Sub Programme evaluation
10. Council of Europe Action Plan for Ukraine (2023-2026)	Not in work programme	Launched (to finalise Q2 2026)	Action Plan evaluation
11. Armenia Action Plan (2023-2026)	Not in work programme	Launched (to finalise Q3 2026)	Action Plan evaluation

50. The evaluation of the Council of Europe's work on education for democracy was commissioned in 2023 as a full evaluation of Citizenship Education in formal education systems over the period 2018-2023. The evaluation was carried out during 2023, with the final report completed at the end of that year. However, the report did not meet the quality standards set by the DIO Director and given the significant time that elapsed since the evaluation's original design, data collection, and report preparation, the decision was taken in 2025 to reclassify the report as an evaluative assessment. This adjustment reflects the fact that the findings, while still offering valuable insights, may no longer fully capture current realities.

51. A synthesis was conducted at the end of 2025, analysing 25 evaluations completed in 2024 and 2025. It provides valuable insights into patterns of results, areas of stronger and weaker performance and what factors enable or constrain achievement of results. Appendix A sets out the findings of the Synthesis in brief.

52. The tables in Appendix A provide details of the DIO-led evaluations' findings and recommendations. Figure 11 below includes links to newly published evaluation reports in 2025.

¹⁴ Recommendation No. 13, Audit report on decentralisation policy by the External Auditor, 18 June 2024, ExtAud(2024)1.

¹⁵ OAC recommendation No. 4 (2024) Part A.

Figure 11: Publications in 2025

	Evaluation Reports	Infographics	News
Evaluation of integration of a youth perspective in Council of Europe work	- Full report - Management Response and Action Plan	Facts & Figures	News item
Evaluation of the European Social Charter	- Full report - Management Response and Action Plan	Facts & Figures	
Evaluation of the implementation of the Reykjavik Declaration	- Full report - Management Response and Action Plan	Facts & Figures	
Evaluation of the Programme Building Trust in Public Institutions	- Full report - Management Response and Action Plan	Facts & Figures	

Innovation and lessons learnt

53. In 2024, the DIO made a deliberate effort to diversify both the types of evaluations conducted and the associated management arrangements. This continued into 2025 including hybrid evaluation approaches, in which a DIO Senior Evaluator leads the evaluation with support from thematic experts (as applied in the Artificial Intelligence evaluation). This model enables the DIO to carry out evaluations at substantially lower cost compared with relying on consultancy firms, while also ensuring that Senior Evaluators continue to strengthen and maintain their technical evaluation skills and maximise organisational learning.

54. The introduction of strategic, programme-level evaluations in 2024 marked a shift towards more ambitious exercises requiring methodologies capable of capturing higher-level, aggregated results and synthesis. The first two programme evaluation *Building Trust in Public Institutions* and the *Evaluation of the Implementation of the Reykjavik Declaration* were completed and issued in 2025. Evaluating at this programmatic level provided an opportunity to analyse and understand how individual sub-programmes and activities work in synergy to drive change across member States.

55. The DIO has continued to advance the responsible and effective use of Artificial Intelligence (AI) across its evaluation work. This includes the introduction of clear guidelines governing the use of AI in DIO-led evaluations, ensuring consistency, transparency, and adherence to ethical standards. Oversight has also been strengthened for consultant-led evaluations, with enhanced guidance on appropriate AI use and a new requirement for consultants to include an annex in their inception reports outlining how AI will be applied within the evaluation. In parallel, the DIO has begun piloting the use of in-house AI tools to support quality assurance of terms of reference, helping to streamline processes and reinforce methodological rigour.

56. During the transition year, the budgets for the Action Plan evaluations continued to be held and managed by the Directorate of Programme Co-ordination (DPC), while the DIO served as the evaluation manager. This financial management arrangement creates an administrative burden and will require further streamlining or a new financial model to ensure efficiency.

Decentralised evaluations

57. Since 2021, the DIO Evaluation Division has supported the implementation of MAE-led evaluations, most often project evaluations through formalised quality assurance processes and technical support. The Evaluation Division helps to improve the quality of action plan and project evaluations and to subsequently collect lessons learnt and improve organisational learning.

58. In 2025, the DIO provided support to 15 action plans¹⁶ and project evaluations, nine of which were initiated in 2024 and finalised in 2025, two were initiated and finalised in 2025 but not yet published, and four project evaluations are still ongoing (one initiated in 2024 and three in 2025). The support entailed quality checks of Terms of Reference (ToR) and draft inception and evaluation reports, as well as the provision of consultants under the DIO's framework contract for evaluation services. In some cases, technical advice was provided on other issues, including on timeliness, evaluability and data collection methodologies.

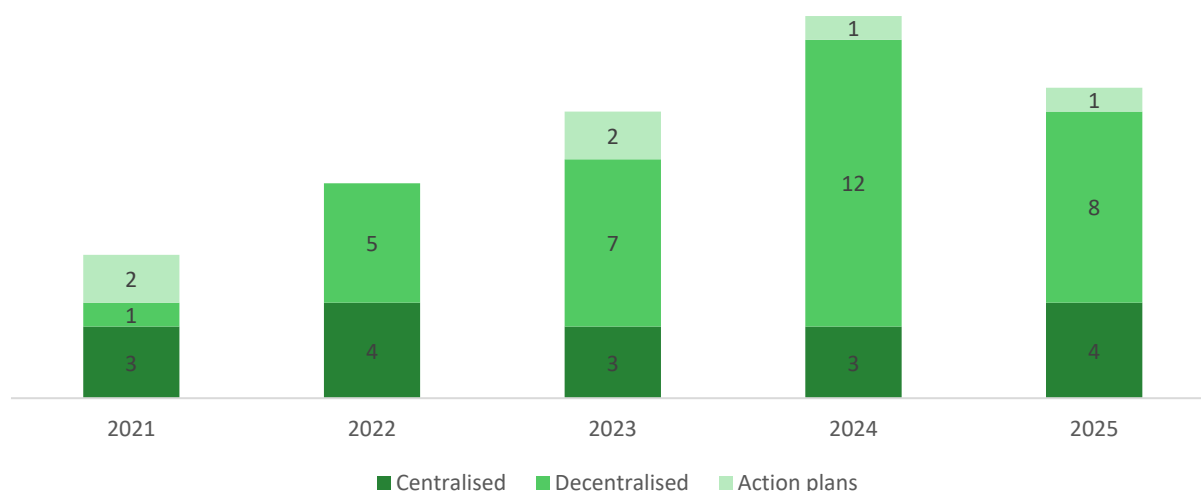
Figure 12: Evaluation budget per country



59. In 2025, the DIO published on its website 9 decentralised evaluation reports, including their management response and action plans, these are listed with their hyperlinks below. Figure 15 illustrates that there has been a reduction in the overall number of finalised decentralised evaluations with 13 published in 2024 and 9 in 2025.

- [Evaluation of the EndOCSEA@Europe project](#)
- [Evaluation of the European Roma Institute for Arts and Culture \(ERIAC\)](#)
- [Evaluation of the "Project against Economic Crime in Kosovo"](#)
- [Evaluation of the Council of Europe Action Plan for Bosnia and Herzegovina 2022-2025](#)
- [Evaluation of the project "Promoting Alternative Dispute Resolution \(ADR\) in Türkiye"](#)
- [Evaluation of the Joint Programme "Horizontal Facility for the Western Balkans and Türkiye – Phase III"](#)
- [Evaluation of the Programme ROMACTED - Phase II](#)
- [Evaluation of the project "Improving International Judicial Co-operation in Criminal Matters in Türkiye"](#)
- [Evaluation of the project: EU-CoE Human Rights Education for Legal Professionals in the European Union III](#)

¹⁶ The evaluation of the Action Plan for Bosnia and Herzegovina 2022-2025 was treated as a decentralised evaluation as the evaluation was initiated in 2024, prior to the transfer of Action Plan evaluation from DPC to DIO.

Figure 13: Evaluations published 2020 – 2025

Source: TeamMate+

DIO and decentralised evaluation recommendations

60. The Evaluation Policy foresees a management response and action plan following the finalisation of the evaluation reports. The Secretary General is responsible for the implementation of action plans to address recommendations, and the Committee of Ministers follows their implementation. The recommendations are followed up for five years. The DIO reports biannually on their implementation.

61. During the period 2021-2025, 56 DIO-led and decentralised evaluations issued 375 recommendations.

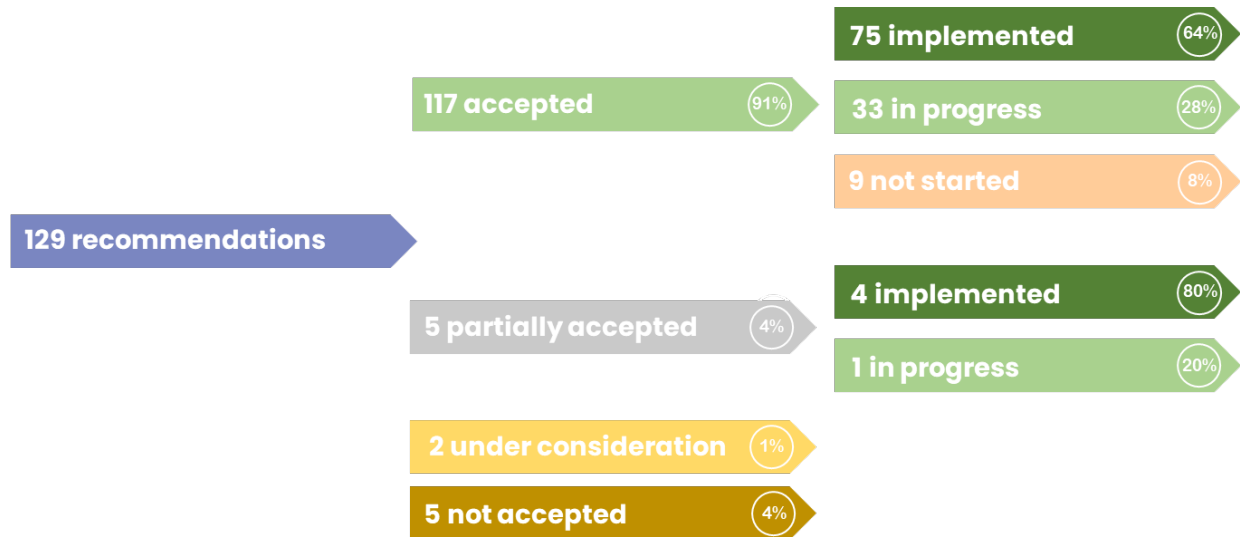
DIO evaluations – recommendations, management response and follow up

62. During the period 2021-2025, 17 evaluation reports were issued by the DIO (see figure 13).

63. Progress on implementation is reflected in figure 14, which presents data as of 9 October 2025 and covers 16 evaluation reports.¹⁷ A total of 129 recommendations were issued; of these, 91% were accepted, 4% were partially accepted, 1% is under consideration, and 4% were rejected.¹⁸ At that time, of the accepted recommendations, 64% had been implemented, 28% were in progress, 8% had not yet started, and no recommendations were considered obsolete. The acceptance and the progress in the implementation of evaluation recommendations can be considered satisfactory for the relevant reporting periods and the implementation of recommendations has contributed to positive impact.

¹⁷ One additional evaluation report, [Evaluation of the Programme Building Trust in Public Institutions](#), was published after the recommendations follow-up report from 9 October 2025 and before the end of the year; its recommendations are not included in figure 14.

¹⁸ [2022 Evaluation of the support to member States in addressing challenges related to the Covid-19 pandemic](#): Include the possibility of "exceptional monitoring" in crisis preparedness and checklist to adapt crisis responses agilely as they evolve (Rec.5).
[2022 Evaluation of the Council of Europe's monitoring mechanisms](#): Develop a secure, user-friendly online platform for sharing public resources, guided by a study on business and technical requirements (Rec.8).
[2023 Evaluation of Action against Crime](#): Analyse and report on the feasibility of the present assessment model in cybercrime and consult with States parties and observers to identify areas for modifications or merging of work and outputs (Rec.7).
[2023 Evaluation of Civil Society](#): Include resources for support to civil society in all country and thematic action plans and develop concrete measures to increase synergies among CSOs in countries where co-operation activities take place (Rec.6 and 7).

Figure 14: Evaluation recommendation implementation rate as at 9 October 2025

Source: TeamMate+

Decentralised evaluations – recommendations, management response and follow up

64. During the period 2021-2025,¹⁹ 39 decentralised evaluation reports were issued, with a total of 219 recommendations as of 9 October 2025. Of these, 81% were accepted, 11% were partially accepted, 1% is under consideration and 7% have been rejected.²⁰

65. Out of the accepted recommendations, 56% were implemented, 26% are in progress, 13% have not yet started and 5% are obsolete (for details see figure 15). The acceptance and the progress in the implementation of evaluation recommendations can be considered satisfactory for the relevant reporting periods and the implementation of recommendations has contributed to positive impact.

¹⁹ No data available for 2020.

²⁰ 2022 Evaluation of the Council of Europe project: "Education for Democracy in the Republic of Moldova" (Rec. 6)

2022 Evaluation of the Intercultural Cities programme's services and tools (Rec. 3, 11 and 16)

2022 Final Evaluation of the project "The Path towards Armenia's Ratification of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (2019 – 2022)" (Rec. 4)

2023 Evaluation of Joint European Union and Council of Europe Programme "Building Capacity for Inclusion in Education – INCLUDE" (Rec. 10)

2023 Evaluation of the Project: Horizontal Facility II "HELP in the Western Balkans" (Rec. 5)

2023 Final Evaluation of the Project "Strengthening National Child Participation Frameworks and Action in Europe (CP4Europe)" (Rec. 5)

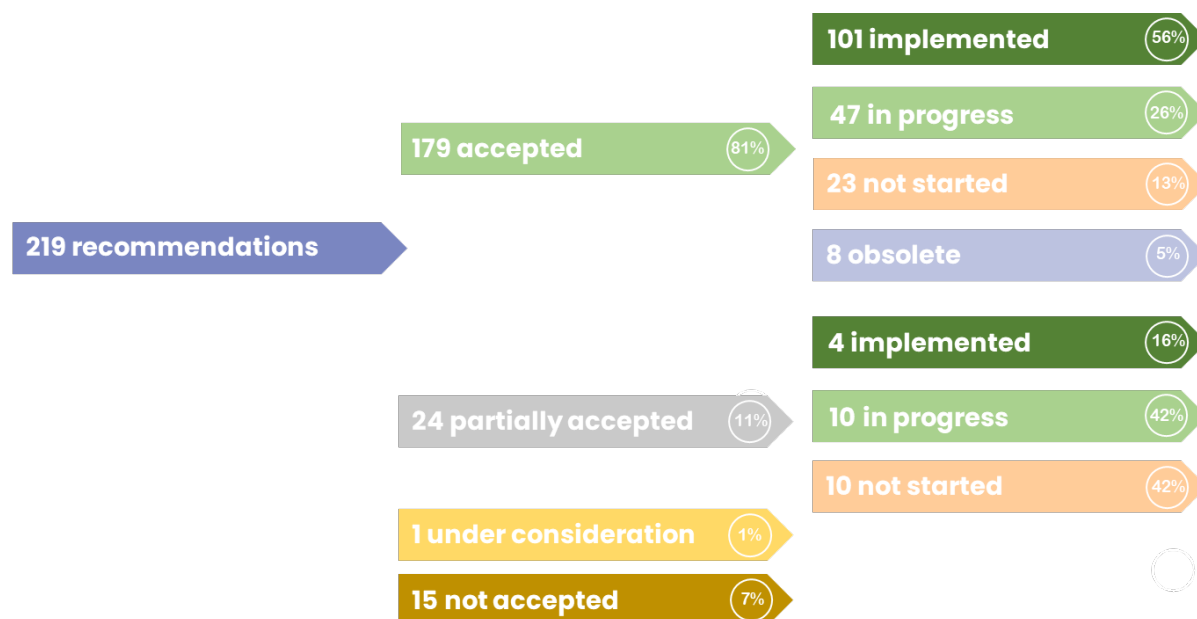
2023 Final Evaluation Report of the Council of Europe project "Democracy Starts in Schools – Engaging School Children in Decision Making Processes in Schools and Communities in Georgia" (Rec. 7, 8 and 9)

2024 Final Evaluation of the project 'Promoting Alternative Dispute Resolution (ADR) in Turkey' (Rec. 7)

2025 Evaluation of the ROMACTED Phase II Programme - "Promoting good governance and Roma empowerment at local level" (Rec. 10 and 11)

2025 Final Evaluation of the project "Improving International Judicial Co-operation in Criminal Matters in Türkiye" (Rec. 5)

Figure 15: Project and action plan evaluation recommendation implementation rate as at 9 October 2025



Source: TeamMate+

66. Highlights from management actions stemming from evaluation recommendations issued by the DIO and implemented in 2025:

- Evaluation of the Implementation of the Reykjavík Declaration (2025): The actions taken in response to the evaluation have begun to shape meaningful change across several strategic areas of the Council of Europe's work. In response to recommendation No. 4, the Intergovernmental Negotiation Committee on an International Treaty to establish a Claims Commission for Ukraine has been transformed into a Council of Europe Ad hoc Committee on the Establishment of an International Claims Commission for Ukraine. The Committee finalised its work on 12 September 2025, and the Convention establishing the Claims Commission opened for signature in December 2025. In response to recommendation No. 5, the Organisation established a new media department which will contribute to targeted communications with diverse stakeholders and improve visibility.
- Evaluation of the Institution of the Commissioner for Human Rights (2024): The Office of the Commissioner implemented Recommendation No. 1 of the evaluation by establishing an internal Strategic Planning Unit to help define higher-level objectives and indicators to deliver on the Commissioner's priorities. The Office organised strategic planning training and held numerous meetings with individual Advisers, Heads of Divisions and the entire staff to support the development of strategies focused on the Commissioner's priorities. These efforts resulted in eleven thematic strategies. The staff now actively defines strategies, selects intervention areas, identifies stakeholders and determines how best to contribute to change. Following Recommendation No. 2, the Office conducted an internal functional analysis to align its organisation structure with the priorities of the new Commissioner. In response to Recommendation No. 3, the Office initiated structured dialogue with the Private Office of the Secretary General, these meetings now include the Parliamentary Assembly, the Congress, the Committee of Ministers and the Council of Europe Development Bank and they effectively circulate information on planned initiatives, promote joined up thinking and prevent unnecessary overlaps.

67. Highlights from management actions stemming from action plan and project evaluation recommendations implemented in 2025:

- Improving International Judicial Co-operation in Criminal Matters in Türkiye (2025): In response to recommendations Nos. 6 and 7, the Economic Crime and Co-operation Division (ECCD) refined its working methods. The Division updated their Guidelines to include clear protocols for organising study visits and immediately implemented them across teams. It also applied lessons learned about using staff resources efficiently to the design of every project and launched them in 2025, with a strong focus on preventing excessive workloads during the final project phase.

- Protection of Human Rights in Biomedicine (2024): In line with recommendation No. 1, the project supported legislators and policymakers in building the case for Armenia's ratification of the Oviedo Convention. It provided expert guidance on drafting legislative revisions, which ultimately led to its ratification. This constitutes a major systemic shift, aligning Armenia's legal framework on biomedicine with European human rights standards.

Investigation

Investigation function

68. The Investigation Division provides the Organisation with the capacity to investigate allegations of wrongdoing relating to the Organisation's activities in an independent, professional, and objective manner. It is an essential component of the Organisation's risk management and accountability framework and carries out various activities around prevention, detection, and investigation of wrongdoing and aims to follow internationally accepted common principles, guidelines and best practices for investigations, such as those enshrined in the Uniform Principles and Guidelines for Investigations and complementing guidelines, adopted by the Conference of International Investigators, and those set out in the case-law of the European Court of Human Rights, where applicable.

69. The DIO addresses allegations and/or suspicions of "*wrongdoing affecting the public interest*" – a notion covering a wide range of behaviour that could adversely affect the Organisation's activities, staff and resources. Allegations and/or suspicions of wrongdoing may be reported by anyone (Secretariat members and third-parties external to the Organisation), in an anonymous or non-anonymous way and may concern various categories of persons involved in the Organisation's activities.²¹ However, investigations into alleged harassment (with some exceptions)²² are currently being carried out by DHR, resorting to external investigators.²³

70. The DIO new working arrangements raised concerns for the Investigation function's ability to meet its statutory obligations to ensure confidentiality of operations and a safe work environment for those carrying out investigations. To uphold statutory confidentiality obligations in investigations, mitigation measures were implemented to limit the risks (e.g. using designated rooms for sensitive activities and reinforcing need-to-know protocols).

71. In 2025, the Investigation Division had funding for four positions: two A-grade roles (Head of Investigation and Senior Investigator, both held by experienced staff with Certified Fraud Examiner qualifications) and two B-grade roles, including one new position. During the year, staffing levels were affected by absences and vacancies. The onboarding of the new B-grade position was deferred as the anticipated transfer of harassment cases did not occur and to prevent locking in a staffing structure before the external review. The existing B level staff was absent in April and the position became vacant in May. The senior investigator was absent from the end of April and the Head of the Investigation Division was absent from beginning of April to June. Additionally, the absence of certified staff from the Directorate of Information Technology temporarily impacted access to digital forensic expertise.

72. The DIO's Director, supported by the Central Division and temporary staff, ensured operational continuity. Procedures were simplified and key tasks prioritised. The collaborative efforts of the Directorate of Human Resources and the Private Office enabled access to a framework contract with an external service provider for harassment investigations. Using this contract the Investigation function has outsourced the investigation phase of the work to the external service provider. This transition presented some initial challenges but allowed the Investigation function to fulfil its mandate

²¹ More precisely: current and former Secretariat members of the Council of Europe; members of its organs, bodies, committees and working groups; persons involved with the Organisation's activities; consultants and other contractors.

²² In the event that a person considers that they have been harassed by the Secretary General, Deputy Secretary General, Director General of Administration or the Director of Human Resources, the appropriate reporting channel is to the Directorate of Internal Oversight, rather than the Director of Human Resources, as set out in Speak Up: Council of Europe Policy on reporting wrongdoing and protection from retaliation.

²³ Recommendations relating to the transfer of harassment cases to the DIO has been made by the External Auditor, the Oversight Advisory Committee, and the experts carrying out the external review of the Council of Europe's Investigation function.

73. The external review was postponed enabling the Head of Investigation's participation and was subsequently conducted in the autumn of 2025. The review panel undertook a comprehensive assessment of the function and issued a number of recommendations to the Organisation. The function has begun to address relevant findings and is engaging with stakeholders to develop a co-ordinated management response to the review.

74. In 2025, the investigation function completed the development of a methodology for Fraud Risk Assessments at MAE level. The principal work on two fraud risk assessments, intended to pilot the new model, was finalised, with the reports awaiting communication. Towards the end of the year, the function made progress, in collaboration with the Directorate of Information Technology, on implementing a sustainable whistleblowing tool aligned with international best practice.

75. It is worth noting that while 2025 has posed significant challenges for the Investigation function and the case work, several key processes that had been pending for several years were addressed.²⁴ Nonetheless, the challenges underscored the risks of having an Investigation Division with limited capacity as it makes responding to challenges more difficult when options to reallocate tasks are limited. In response to the external review the DIO will engage in dialogue with all relevant stakeholders to ensure that the Investigation Division is able to fulfil the needs in accordance with the Organisation's risk appetite and interests.

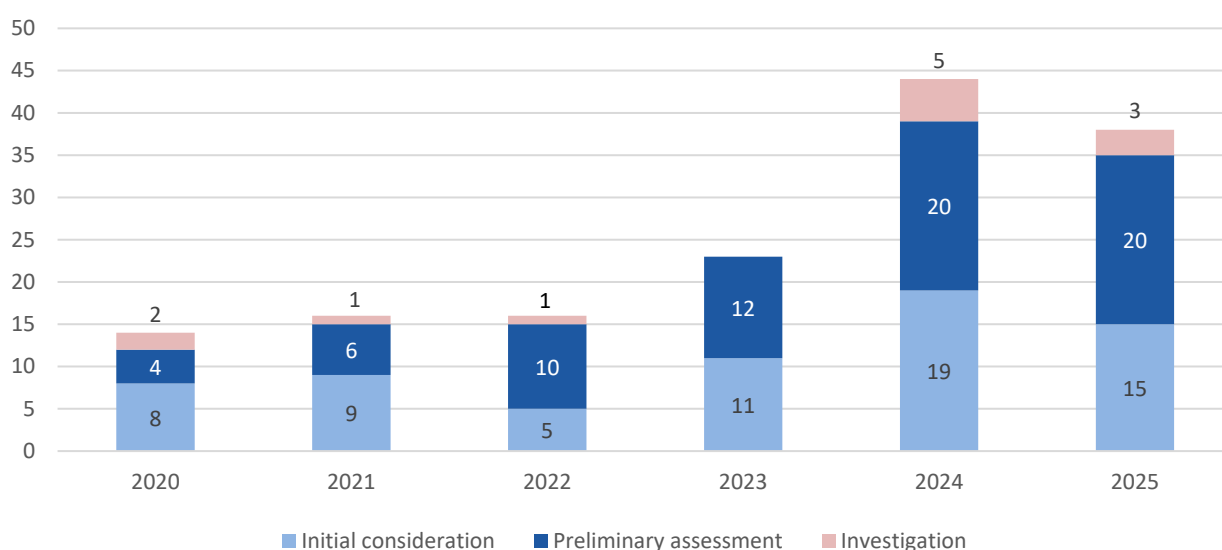
Detection and investigation

76. The number of cases registered in 2025 (38) remains significantly elevated compared to previous years, following a peak of 44 cases last year. The function sees the sustained high number of reported cases as a positive signal that awareness-raising initiatives regarding wrongdoing have been successful, suggesting that reporting parties are more alert and willing to raise concerns rather than indicating a rise in the actual number of instances of wrongdoing affecting the public interest.

77. The rise in the number of cases in the last years combined with the small size of the team and challenges experienced in 2025 has left limited capacity for the function to timely adapt its working methods to cope with the additional workload. This has led *inter alia* to operational challenges and delays of some investigative processes. During 2025, the DIO could not complete the ongoing investigations (investigation phase) within the prescribed timeframe of six months. The timeframe for completion of two investigations had to be extended for periods of one and two months respectively; the deadline for completing another investigation, pending at the end of the year, was extended for four months.

78. The figures below show the number of new cases registered per year, status and categories of cases, as well as general case-management activity illustrating the caseload and number of ongoing cases as at 31 December 2025.

Figure 1: Number of new cases per year of reporting and their evolution (2020-2025)



²⁴ External review of the investigation function, fraud risk assessments of EDQM and the Court, whistle-blower tool according to international best practice.

Figure 17: Categorisation and evolution of cases (2021-2025)

Case Category/ Year reported	2021	2022	2023	2024	2025	Total
Confidentiality breaches	0	0	1	1 1	1 1	5
Corruption	1 1	0	0	0	1 1	4
Disrespectful behaviour	0	0	0	2	1 3 1	7
Fraud in grants	1 1	0	0	2 3	0	7
Fraud in procurement	0	2	2	1	1 2	8
Fraud in recruitment	0	2	1	1 5	2	11
Grievances & disagreement with decisions	0	0	1	4	0	5
Malitious reporting	0	0	1	0	0	1
Other fraudulent acts	1 4 1	1 5 1	2	1 1 1	2 5	25
Other breaches (including irregularities)	2	1 1	3 6	2 8 1	1 4 1	30
Out of DIO's mandate (transfer to other function)	3	2	1	6	10	22
Out of DIO's mandate (not to be processed further)	1	1	3	4	0	9
Retaliation	0	0	0	0	1	1
Secondary activities	0	0	1 1	0	0	2
Total of cases per year	16	16	23	44	38	137

Colour coding: Initial consideration, Preliminary assessment, Investigation

Figure 18: Categorisation and status of cases received in 2025 (as of 31 December 2025)

Category	Total	In initial consideration	Closed after initial consideration (transferred)	Closed after initial consideration (not transferred and not warranting a preliminary assessment)	In preliminary assessment	Closed after a preliminary assessment (transferred)	Closed after preliminary assessment (not transferred and not warranting an investigation)	In investigation phase	Closed after an investigation (investigation report/closure report)
Confidentiality breaches	2	0	0	0	0	0	1	1	0
Corruption	2	0	0	1	1	0	0	0	0
Disrespectful behaviour	5	0	0	1	2	0	1	1	0
Fraud in grants	0	0	0	0	0	0	0	0	0
Fraud in procurement	3	0	0	1	1	0	1	0	0
Fraud in recruitment	2	0	0	0	2	0	0	0	0
Grievances & disagreement with decisions	0	0	0	0	0	0	0	0	0
Malitious reporting	0	0	0	0	0	0	0	0	0
Other fraudulent acts	7	0	0	2	3	0	2	0	0
Other breaches (including irregularities)	6	0	0	0	4	0	1	1	0
Out of DIO's mandate (transfer to other function)	10	1	9	0	0	0	0	0	0
Out of DIO's mandate (not to be processed further)	0	0	0	0	0	0	0	0	0
Retaliation	1	0	0	0	1	0	0	0	0
Secondary activities	0	0	0	0	0	0	0	0	0
TOTAL	38	1	9	5	14	0	6	3	0

Figure 19: Case management activity and status (as of 31 December 2025)

CASE MANAGEMENT ACTIVITY			
		2024	2025
Cases carried forward from prior year(s)		13	17
Complaints received in current year		44	38
Total caseload during the year		57	55
Cases closed:			
After initial consideration & preliminary assessment		38	26
Of which	Referred outside DIO	6	10
	Not warranting an investigation	32	16
After investigation		2	2
Total cases closed		40	28
Cases carried forward to the following year:		17	27
Of which	In initial consideration or preliminary assessment	16	23
	In investigation	1	4

Innovation and lessons learned

79. In 2025, the Investigation Division reviewed and optimised its processes to adapt them to emerging challenges. The Division's operational experience demonstrated the value—as well as the limits and challenges—of digital tools and external consultancy deployment for managing investigative workload. It showed that the function needs to liaise with internal and external stakeholders and build systems ensuring the necessary capacity and quality of services provided by internal and external stakeholders, to ensure continued compliance with professional standards.

80. As the external review found that DIO's working methods and processes are robust, but identified areas for further operational innovation, more flexible staffing, greater process standardisation, and a more proactive, service-oriented engagement with the Organisation subject to availability of resources, the Investigation Division revised some of its operational tools and will address recommendations from the external review in the coming period.

81. In the second half of the year, the function liaised actively with the DIT and progress was made regarding the development of a new Whistle-blowing tool (Speak Up platform) compatible with international whistleblowing practices and standards. The new tool is expected to replace the current online Wrongdoing-Reporting Form and allow for two-way communication while maintaining anonymity of the reporting persons, possibly improving the quality of information and increasing the effectiveness of investigative processes.

82. The Division will strive to build on the lessons learned when implementing the external review's recommendations, which combined with the recommended exclusion/sanctioning function and transfer of harassment investigations, is expected to ensure a modern, agile, and trusted oversight function vital to the Council of Europe's mission and reputation.

Other activities of the Investigation function

83. As foreseen in the DIO's Work Programme for 2024-2027, during the year in question, the Investigation Division continued its work on promotion and awareness-raising on fraud, corruption and other wrongdoing affecting the Organisation's interests (e.g. through news items, participation in induction training for newcomers, and review of the fraud-risk-assessment methodology with the view to assist managers in carrying out fraud risk assessments), limiting the scope of this work though to address the function's other priorities.

84. Following the procurement for consultancy services relating to the revision of the fraud-risk-assessment framework previously developed by the function, in the first half of 2025, the DIO completed its work on the development of the new framework aiming to address fraud risks at MAE level, and tested it by carrying out such exercises at the Registry of the European Court of Human Rights (the Registry) and at the European Directorate for the Quality of Medicines & HealthCare (EDQM). As a result of the fraud-risk assessments (FRAs) using the newly developed FRA tool and methodology, comprehensive risk mappings were completed for both entities, covering strategic and governance, operational, financial, compliance, and IT-related domains. Across both MAEs, most residual risks after existing controls were in the moderate to low range, with critical vulnerabilities identified primarily in IT/cybersecurity and persistent moderate risks in procurement processes, staff onboarding/offboarding, and compliance procedures. The methodology, grounded in the COSO framework, was found to be practical, scalable, and credible, enabling consistent assessment and risk prioritisation across entities. However, several systemic challenges were detected, for instance: persistent IT/data integration gaps hindering effective data analytics and risk monitoring; lack of structured exit interviews and reference-checking in HR representing ongoing vulnerabilities; and procurement risks considered being insufficiently mitigated at both entities. The communication of the respective results of the assessments along with the respective follow up remain to be done in the following months.

85. The Investigation Division provided contribution for the development of the new e-learning on “*Ethics*” developed by the Ethics Officer, planned to be launched in the first half of 2026 to replace the one developed by the DIO several years ago (being outdated following the adoption of the Organisation’s new Staff Regulations and secondary legislation). It could not, however, update the content of the e-learning on “*Fraud Awareness and prevention*” (as foreseen in the Work Programme), due to the above-mentioned challenges.

86. In November 2025, the Investigation Division developed website content for the International Fraud Awareness Week to raise awareness about the risk of fraud in procurement, grants and recruitment.

External review of the Investigation function

87. In the second half of 2025, the DIO commissioned an independent external review of the Investigation function, this included its working methods as well as the legislative framework. This was the first review of the function since the Investigation Division was established in the DIO.²⁵ Best international practice requires for the Investigation functions of multilateral organisations to be subject to independent external reviews every five years to provide assurance to the function’s stakeholders that it is working in the manner expected, and in accordance with relevant standards and benchmarks. The Uniform Principles and Guidelines for Investigations issued by the Conference of International Investigators acknowledge the need for Investigative Offices to periodically undergo an external review in order to ascertain their conformity with the Organisation’s legal framework and generally accepted investigation standards and to promote continuous enhancement of the Investigation function.²⁶

88. The work was conducted between August and October 2025 by a panel consisting of two senior reviewers from peer organisations and a consultant with prior experience in managing Investigation functions, to assess effectiveness, efficiency and conformity of the Investigation function. A draft report was issued in the end of October 2025 and communicated to key stakeholders in the Organisation for consideration and management response. The final report will be presented to the GR-PBA in March 2026. It touches upon *inter alia* the scope of activities, structure and reporting lines, adequacy and appropriateness of policy work, resources, fraud awareness and response landscape, confidentiality and data protection, investigation activities, value and relevance, and the legal framework. The DIO notes that the main positive findings in the report relate to adherence of investigation processes to international principles and guidelines adopted by the Conference of International Investigators (CII), reporting channels and accessibility, as well as the Organisation’s general governance and accountability framework. The main challenges appear to be related to timelines, process streamlining, lack of sufficient standard operating procedures, access clauses, lack of proactive investigation procedures, ambiguity and gaps in policy definitions, mandate coverage, and follow up procedures.

89. The reviewers acknowledged that implementing accepted recommendations will require high-level support and stakeholder involvement across multiple entities.

Implementation of agreed management actions (follow up of recommendations)

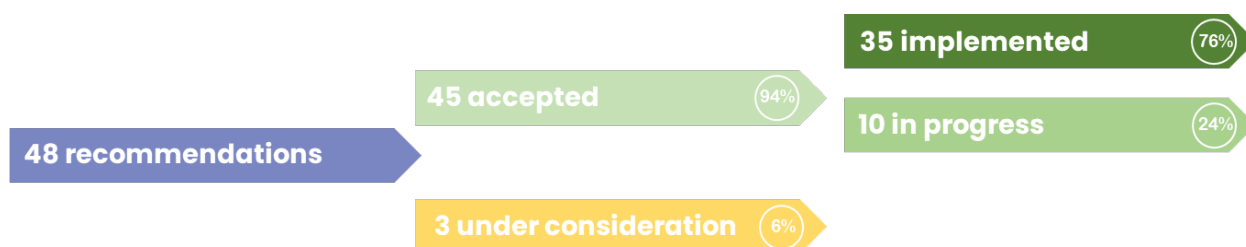
90. The Investigation function issues disciplinary, administrative, financial, and judicial recommendations at the end of preliminary assessments, investigations, or following other activities (e.g. ad hoc reports and fraud risk assessments).

91. The follow up of recommendations issued by the Investigation function is integrated in the DIO follow-up process. During the reporting reference period covered in the latest Follow Up Report, namely from 1 October 2020 – 9 October 2025, 48 recommendations were made (45 were accepted, and three were under consideration in October 2025). Out of the 45 accepted recommendations, 35 were implemented, giving an implementation rate of 76%. This rate is acceptable given that some of the recommendations under consideration were used less than 6 months before the issuance of the report.

92. The figure below shows the number of recommendations issued by the Investigation Division in the period from 1 October 2020 to 9 October 2025 and their status.

²⁵ Investigations into harassment allegations carried out by the DHR were not included in the mandate.

²⁶ Conducted by external experts in line with the General Principles for Reviews of CII Investigation Offices (<https://www.ciiinvestigators.org/cii-guidelines/>).

Figure 20: Status of implementation of investigation recommendations as at 9 October 2025

Source: TeamMate+

93. In terms of impact, between 1 April 2025 and 9 October 2025, the Organisation implemented six recommendations issued following investigative processes, resulting in improvements in project delivery, financial management, and ethical awareness, namely:

- steps were taken to address the issue of ineligible expense: following a reassessment of eligibility of costs, the concerned entity applied reductions to amounts due under a grant, effectively reinforcing compliance with applicable financial rules;
- the project management methodology, guidance, and platform were reviewed and adjusted to ensure donor requirements are accurately transmitted to any implementing partners of the Organisation before the commencement of project activities. A new feature was introduced in the project-management platform, assigned to funding co-ordinators, allowing for automatic generation of notifications to project teams during the implementing phase, thereby increasing clarity and accountability;
- in co-ordination with the Ethics Officer, targeted awareness-raising material was prepared and circulated to offices to promote understanding of conflict-of-interest risks (including perceived interest) and related mitigation measures;
- following recommendations for awareness-raising, the competent service liaised with the Ethics Officer to produce an infographic, which was then published online to reach staff across the Organisation;
- actions were taken to ensure compliance with contractual obligations concerning donor funding.

94. Collectively, these actions demonstrate sustained commitment to addressing investigative findings promptly and to embedding stronger safeguards into the Organisation's operational and ethical framework.

Appendix A – Summary of audits and evaluations

2025 Audits

Audit: Travel management

Audit Objectives

Check compliance of official journeys undertaken by staff members, government experts and all other persons travelling at the expense of the Organisation's budgets

Analyse the effectiveness, efficiency and cost-benefit ratio of travel management procedures, particularly with regard to subsistence allowances

Review the travel management tool (GDD) to check compliance with the Regulations on the Protection of Personal Data

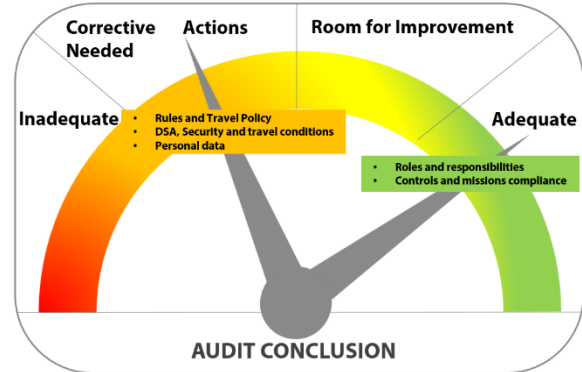
Audit conclusion, Strengths, Recommendations

Audit conclusion

In terms of **compliance**, an '**adequate**' conclusion was given. Although some minor non-compliances were identified, they were not substantial enough to warrant issuing recommendations.

Nevertheless, corrective actions are needed to ensure that travel management complies with the Regulations on the Protection of Personal Data. Consequently, the audit conclusion '**Corrective actions needed**' was issued in respect of data protection.

In terms of **effectiveness and efficiency**, the expertise of the main audited areas and the ongoing initiatives support the Secretariat's efforts to increase efficiency, transparency and simplification. However, further efforts are needed to achieve greater optimisation, particularly through the revision of the travel policy and related rules/regulations.



Strengths

- Ongoing analysis of the travel management process and tool.
- Good level of co-operation between internal stakeholders.

Recommendations

- Update the travel policy, consider including subsistence, clarify the Secretariat's responsibility in prioritising policy objectives (safely, reliability, convenience, budget, comfort), update related rules for staff and regulations for experts.
- Finalise the implementation of the action plan relating to the recommendation from the External Auditor "to study the introduction of differentiated daily rates for experts depending on the country and locality of the travel destination".
- Take stock of application of rules governing overtime and compensatory leave and integrate all types of compensatory leave into the leave workflow.
- Review controls as part of review of travel management tool.
- Implement a comprehensive data management system to address issues identified.

Organisational learning

The audit highlighted:

- The need to ensure equal treatment and well-being of travelling staff and create an environment which is conducive to efficient performance during official journeys.

Audit: Joint Programme - Inclusive Schools: Making a difference for Roma²⁷ children 3 (INSCHOOL 3)

Audit Objectives

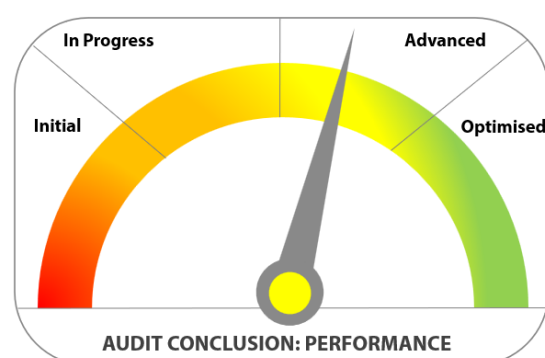
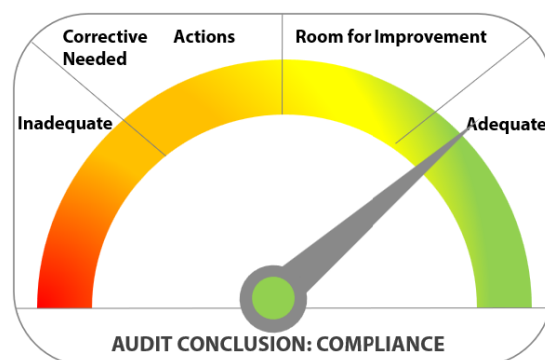
Analyse the compliance, adequacy, effectiveness, and efficiency of the financial and administrative management of the INSCHOOL 3 project

Audit conclusion, Strengths, Recommendations

Audit conclusion

In terms of **compliance**, an **'adequate'** conclusion was given. Although some minor non-compliances were identified, they were not substantial enough to warrant issuing recommendations, nor did they call into question the overall compliance of the administrative and financial management of the INSCHOOL 3 project.

In terms of **performance**, an **'advanced'** conclusion was given, highlighting the team's ability to achieve impactful results despite the challenges encountered, yet noting the underspend on the budget, revealing untapped opportunities, partly related to difficulties in planning and monitoring resources.



Strengths

- **Financial management:** adjustment to a smaller budget than originally foreseen, compliance with financial rules.
- **Administrative management:** coherent team structure, agile turnover management, and effective mobilisation of staff resources from within the Roma and Travellers Division to ensure the project's implementation and success.

Recommendation

In order to mitigate the risks identified (project management, financial management and administrative management), which are linked to insufficient resources to manage co-operation projects, particularly those not covered by country action plans, the Directorate of Programme Co-operation to propose measures, in co-operation with the Directorate of Programme and Budget and all the MAEs concerned, to improve the alignment between the number of projects implemented and the overall management of these projects.

Organisational learning

The audit highlighted:

- Similar findings between the audit and the decentralised evaluation of the project.
- The added value of having Ordinary Budget resources to call upon, where necessary, to support the implementation of co-operation projects.
- The importance of budget planning and close budget monitoring to ensure the achievement of project objectives.

²⁷ The term "Roma and Travellers" is used at the Council of Europe to encompass the wide diversity of the groups covered by the work of the Council of Europe in this field: on the one hand a) Roma, Sinti/Manush, Calé, Kaale, Romanichals, Boyash/Rudari; b) Balkan Egyptians (Egyptians and Ashkali); c) Eastern groups (Dom, Lom and Abdal); and, on the other hand, groups such as Travellers, Yenish, and the populations designated under the administrative term "Gens du voyage", as well as persons who identify themselves as Gypsies. The present is an explanatory footnote, not a definition of Roma and/or Travellers.

Audit: VC-funded project – Enhancing diversity and equality in the Republic of Moldova

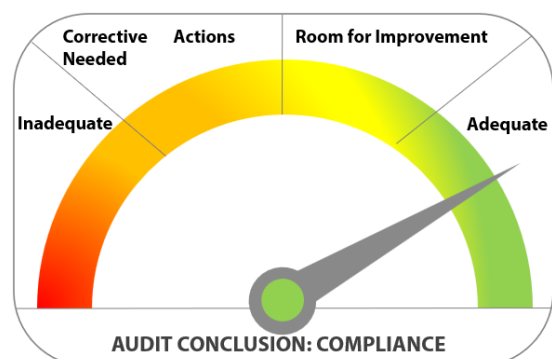
Audit Objectives

Analyse the compliance, adequacy, effectiveness, and efficiency of the financial and administrative management of the project "Strengthening diversity and equality in the Republic of Moldova" (VC 2925)

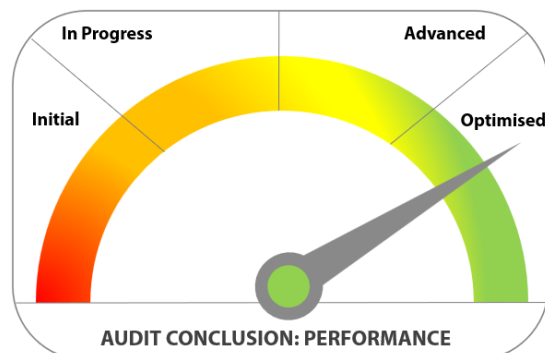
Audit conclusion, Strengths, Recommendations

Audit conclusion

In terms of **compliance**, an '**adequate**' conclusion was given. Although some minor non-compliances were identified, they were not substantial enough to warrant issuing recommendations, nor did they call into question the overall compliance of the administrative and financial management of the VC 2925 project.



In terms of **performance**, an '**optimised**' conclusion was given, highlighting the team's ability to achieve the objectives set within the deadlines and to stay within the allocated budget, while taking full advantage of the PMM platform's features for effective project management.



Strengths

- **Financial management:** optimal use of the project budget, proactive management of expenses, compliance with internal rules.
- **Administrative management:** coherent team structure, adequate skills set, turnover management.

Recommendation (same as the one for the INSCHOOL 3 project)

In order to mitigate the risks identified (project management, financial management and administrative management), which are linked to insufficient resources to manage co-operation projects, particularly those not covered by country action plans, the Directorate of Programme Co-operation to propose measures, in co-operation with the Directorate of Programme and Budget and all the MAEs concerned, to improve the alignment between the number of projects implemented and the overall management of these projects.

Organisational learning

The audit highlighted:

- The local team's ability to manage the project effectively despite a limited budget.
- Good co-ordination between staff in the field and headquarters.

Audit: Governance and use of Artificial Intelligence (AI) with the Council of Europe

Audit Objectives

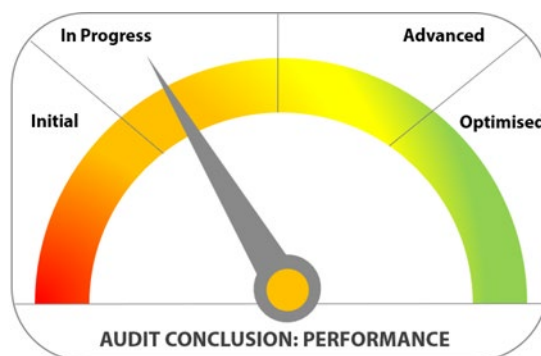
Assess whether:

- An appropriate AI governance framework and strategy is in place and functioning effectively.
- The AI framework allows for enhanced performance of the Organisation's operations.
- Risks related to AI are being properly identified, assessed, mitigated and are in line with the Organisation's risk appetite.
- Controls over AI systems and processes are well-designed and operating as intended.

Audit conclusion, Strengths, Recommendations

Audit conclusion

An '**in progress**' conclusion was given to highlight the fact that if the Council of Europe wants to use AI to support its mission and objectives and enhance its productivity and effectiveness then it needs to consolidate its efforts and back these efforts with the necessary resources.



Strengths

- Governance in place but needs to evolve to reflect the fact that AI extends beyond the realm of IT and will ultimately change the way staff work.
- Small team of dedicated professionals to support experimentation and roll-out of an AI solution for the Council of Europe.
- Staff interest in AI tools.
- Adoption of AI TRiSM (AI Trust, Risk and Security Management), a comprehensive framework developed to address the challenges associated with the development and governance of AI systems.

Main recommendations

- Draw up a position paper outlining a clear vision on the use of AI at the Council of Europe.
- Adopt an AI strategy building on those of DIT, EDQM and the Court.
- Entrust a governance structure to oversee the implementation of this strategy across the whole Organisation.
- Invest the necessary operational resources and secure the necessary staff competencies.
- Take concrete and timely steps to address 'Shadow AI' by providing AI tools based on tested use cases, raising staff awareness of risks and opportunities involved, and providing training on the responsible and effective use of AI.

Organisational learning

The audit highlighted:

- The value of a concerted effort between DIT, EDQM and the Court.
- The need to think in terms of organisational risk appetite.

Audit: Recharged services (translation and prepress)

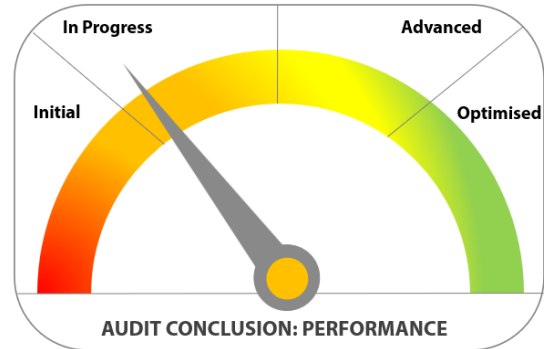
Audit Objectives

Analyse the effectiveness, efficiency, and cost-quality ratio of the translation and pre-press services by an in-depth review of their processes, business model, and human and technological resources.

Audit conclusion, Strengths, Recommendations

Audit conclusion

An '**in progress**' conclusion was given to reflect the fact that optimisation and continuous improvement initiatives were limited in a context of upcoming transformations that will profoundly affect the professions concerned.



Strengths

- Increasing integration of new technologies to assist with translation, editorial proofreading and graphic design.
- Working group on language policy.

Main recommendations

- Develop a catalogue of services, determine SLAs, systematise customer satisfaction monitoring and implement KPIs.
- Ensure the guidelines on the implementation of the language policy include a responsibility matrix aligned with associated services.
- Study the feasibility of adopting a common process approach based on a one-stop shop and a common tool.
- Review organisational structures in the light of a workforce planning exercise and establish a clear training plan to anticipate emerging needs related to new technologies.
- Move towards a new business model for the 2028-2031 Programme and Budget.

Organisational learning

The audit highlighted:

- The need to adopt a proactive stance towards change.
- The importance of change management in the light of technological disruptions.

Audit: Performance management

Audit Objectives

To analyse the effectiveness and efficiency of performance management at the Council of Europe, through the performance evaluation framework and process, as well as the management of personal data

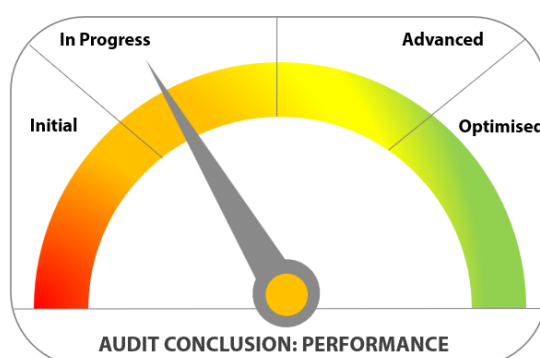
Audit conclusion, Strengths, Recommendations

Audit conclusion

In terms of **compliance**, a '**room for improvement**' conclusion was given. Greater use of the Panorama tool could contribute to better compliance with the Staff Regulations and Staff Rules, and related operational procedures. Regarding the protection of personal data, compliance measures still need to be implemented.



In terms of **performance**, an '**in progress**' conclusion was given, reflecting the lack of clear vision on the purpose of performance management at the Council of Europe, the uneven use of Panorama tool functionalities, a regulatory and budgetary environment limiting performance management initiatives and an organisational culture which reflects a certain level of apprehension vis-à-vis the performance assessment exercise.



Strengths

- **Performance assessment framework:** a solid framework in place which draws on established expertise and knowledge of all stakeholders involved.
- **Panorama tool:** tool effective for conducting the annual assessment exercise.

Main recommendations

- **Strategy and governance:** decide on the need for a specific performance management strategy, adapt the structure and mandates of committees involved accordingly, and clarify the roles and responsibilities of all stakeholders to ensure effective and transparent governance.
- **Procedure for managing unsatisfactory performance:** clarify the terms and conditions for its activation and scope of application, the role of the Appointments Review Committee and links with the disciplinary regime and the ethical framework.
- **Optimisation and automation of Panorama:** reduce the administrative burden by automating Panorama settings using existing HR data, regularly adapt and evaluate the tool's functionalities and consider alternatives where necessary.
- **Compliance and control of the assessment process:** integrate preventive and detective controls in Panorama to ensure compliance with process deadlines and requirements and to limit manual tasks.
- **Personal data management:** implement a comprehensive data management system: processing register, appropriate retention periods, information to staff, strict limitation of data collected, and automated deletion or anonymisation mechanisms.

Audit: Performance management**Organisational learning**

In terms of organisational learning, this audit highlighted:

- The importance of a clear and consistent performance management strategy to ensure alignment with organisational objectives.
- The need to support changes to the organisational culture and encourage dialogue, continuous feedback, transparency and buy-in.
- The need to optimise tools and processes by automating and securing data management to enhance efficiency and compliance.

Audit: Internal control framework of the Secretariat of Eurimages

Audit Objectives

To analyse the effectiveness and efficiency of internal control activities relating to the operations of the co-production support programme

Audit Opinion, Strengths, Recommendations

Audit Opinion

In terms of compliance, a two-fold conclusion was given:

- **'corrective action needed'** when it comes to information systems;
- **'adequate'** when it comes to controls over the operational process of the co-production support programme.

In terms of performance, an 'in progress' conclusion was given. This is based on the potential for streamlining the co-production support workflow and the associated risks to operational efficiency and business continuity given that no overhaul project has been undertaken to date.

Strengths

- **Segregation of duties:** appropriate preventive controls and cross-validation at each key stage of the process.
- **Staff:** competent, experienced, and empowered staff to carry out controls in a timely manner.
- **Documentation:** structured documentation with updated rules and detailed procedures to govern co-production support activities.

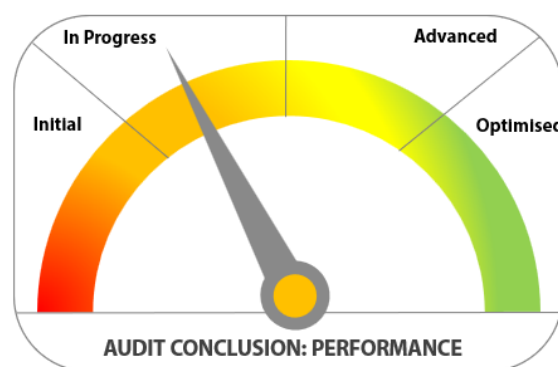
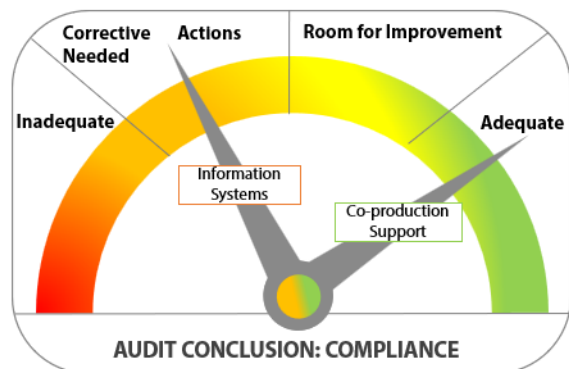
Main recommendations

- Include the risk associated with the complexity of IT tools and the co-production support process in the operational risk register of the Secretariat of Eurimages with appropriate mitigation measures.
- Formalise key controls: integrate them into the new workflow with blocking steps, document their implementation, and study their automation.
- Establish, in collaboration with the DIT, an action plan to correct IT non-compliance considering security requirements, risks, and the necessary technical support.
- Centralise and structure documentation (checklists, guidelines, templates), highlight key controls in procedures, and facilitate access to information.
- Redefine IT governance, appoint a project manager for the overhaul of co-production support, update the expression of needs, and submit the workflow overhaul plan to the Board of Management of Eurimages for approval.

Organisational learning

This audit highlighted:

- the importance of better exploiting the potential for pooling and synergy within the Organisation, so that risks, particularly those related to IT, are shared with internal expert stakeholders and can be addressed appropriately.



2025 Evaluations

Insights and conclusions from the synthesis of 2024 and 2025 evaluations

The synthesis examined 25 Council of Europe evaluations completed in 2024 and 2025 and provides valuable insights into patterns of results, areas of stronger and weaker performance and what factors enable or constrain achievement of results.

- Overall, the 25 evaluations show that the Council of Europe is helping its member States to deliver meaningful change.** They show a broad range of policy, legislative and institutional change across many thematic areas, including equality and non-discrimination, judicial reform, access to justice, human rights in prisons, minority participation in local governance, inclusive education, protection of violence against women, and anti-corruption and other economic crimes. The Organisation has trained many thousands of national officials, legal professionals, journalists and civil society activists in European human rights standards, with consistently strong feedback on the quality of its training. These changes are helping to lay the groundwork for the realisation of European standards on human rights, democracy and the rule of law.
- The evaluations suggest that the Council of Europe's technical co-operation work rests on some clear areas of comparative advantage:** its mandate to promote European standards, its technical expertise and the grounding of its support in the findings of its monitoring bodies, which gives the work its objective and apolitical character. Other key strengths include its ability to align with national reform priorities and EU accession processes, its longstanding relationships with key counterparts, and its deep knowledge of country contexts. Adaptability in dynamic settings is repeatedly cited as an area of strength. The Organisation shows a good level of coherence and collaboration with international partners, especially the European Union, although this is not always well institutionalised.
- The evaluations also point to some constraints on the Organisation's effectiveness.** While the Organisation partners closely with State institutions, more systematic engagement with a wider range of stakeholders would enable it to tailor its interventions to their needs and priorities. The impact of its training activities on institutional performance is often held back by high staff turnover within counterpart institutions. The Organisation has a good record in supporting policy and legal reforms but often struggles to sustain momentum into the implementation phase. It is widely commended for the skills of its staff, combining thematic expertise from its Strasbourg centre with in-country teams, who offer deep contextual knowledge and relationships. However, its efficiency is at times constrained by heavy administrative, financial management and reporting processes. The Organisation has set itself an ambitious range of cross-cutting policy commitments, but the depth of integration across projects is variable.
- The synthesis analysis also reveals some shortcomings in the Council of Europe's capacity for results-based management, which constrains its ability to trace its contribution to complex, long-term change processes.** Project designs would benefit from more systematic use of theories of change, outlining the causal pathways through which activities lead to their intended results. There is a tendency for projects to set outcomes that are too high-level and long-term. Introducing more immediate and intermediate outcomes into results frameworks would help focus monitoring efforts on information that can inform real-time learning.

Synopsis of DIO Evaluations published in 2025

Evaluation of the Council of Europe Programme “Building Trust in Public Institutions” (BTPI)

This evaluation explores how the BTPI programme helped strengthen public confidence in democratic systems. It focused on Democracy through law-Venice Commission, Independence and Efficiency of justice, and Prison, Police and Deprivation of liberty. Together, these three sub-programmes, operating through the change mechanisms of standard-setting, monitoring and co-operation, aim to support efforts to build genuine democratic institutions, transparent in their functioning, independent and impartial. This, in turn, is expected to ensure equal treatment before the law and the effective enjoyment of rights and freedoms for all.

Evaluation objective

Spanning the years 2020 to 2024, the evaluation assessed relevance, efficiency, effectiveness and impact. It surfaced key lessons and best practice which are recommended for continued use and wider adoption.

Conclusions and recommendations

The evaluation determined that the BTPI programme is credible and effectively addresses the reform needs of member States regarding the rule of law, justice, and human rights. Key findings include:

- **Tangible results and meaningful contribution:** The evaluation identified over 200 examples of change at the member State level, including constitutional reforms, new regulatory frameworks, and improved practices in detention safeguards and judicial codes. The significant contribution of the programme to legal and policy changes was confirmed in 14 selected cases across 10 member States, particularly where political will and institutional capacity were present.
- **Synergy and impact:** The impact was greatest when different parts of the Council of Europe's programmes were applied together and synergised with national institutions, civil society organisations (CSOs), and development partners.
- **Barriers to progress:** Evidence of progress remains uneven because the politicisation of reforms and resistance to change among affected groups often hindered the implementation of institutional frameworks.
- **Financial discipline:** The programme operates under strict budgetary discipline, though financial reporting is perceived as "heavy".

The evaluation credits the programme's success to a combination of technical expertise, soft diplomacy, and strategic partnerships with civil society and national institutions. Moving forward, the evaluation makes four recommendations concerning the BTPI's programme's conceptual design, management and operations. In response to the evaluation, a management response accepting or partially accepting all recommendations and an action plan were prepared that will further enhance the work of the Programme across member States.

Evaluation of the implementation of the Reykjavík Declaration

The Reykjavík Declaration is a major political statement adopted by the heads of State and government of the Council of Europe during their 4th Summit on 16-17 May 2023. It was the first summit held by the Organisation in 17 years and was primarily motivated by the need to respond to the Russian Federation's full-scale war of aggression against Ukraine. This evaluation assesses how the Council of Europe has operationalised the 2023 Reykjavík Declaration through to December 2024.

Evaluation objective

The primary objective of the evaluation was to assess the steps taken by the Council of Europe to operationalise the Reykjavík Declaration and to identify the key factors that influenced this process. The evaluation was designed to provide a holistic understanding of the effects of the Declaration across all areas of work. Its results were intended for use by the Committee of Ministers during budgetary discussions and by the Council of Europe's Secretariat to refine their future response to the Declaration.

Conclusions and recommendations

The Council of Europe has actively engaged in implementing the Reykjavík Declaration, most notably through the successful translation of its political priorities into a restructured 2024-2027 Programme and Budget that resulted in a rare real-terms funding increase. Despite this progress, the evaluation concludes that current funding levels remain likely insufficient to meet the Declaration's high ambitions, and much of the work to date represents a continuation of existing activities rather than a transformative shift. Implementation has been most efficient in areas with concrete definitions and united political will, such as Ukraine-related initiatives, while progress has been slower in areas lacking consensus, such as the environment. Furthermore, achieving goals related to external outreach, decentralisation, and the inclusion of youth and civil society may require fundamental paradigm shifts in the Organisation's functioning. Ultimately, the Declaration has successfully reinforced the Organisation's values and purpose, though its tangible impact depends significantly on member States taking timely, substantive actions at the national level to honour their political commitments. The evaluation takes stock of the role that the Declaration has played in providing guidance, facilitating discussions and rallying around values. It provides a timely reminder that the Organisation should ensure (a) continuous engagement around its values and work, (b) that key issues of the Declaration are addressed to achieve the expected outcomes and impacts, and (c) that stakeholders' expectations regarding the Declaration are managed. Five recommendations to strengthen future implementation of the Declaration are presented to address these three areas and a management response and action plan has been committed to by the Organisation.

Evaluation of the European Social Charter

This report provides a comprehensive evaluation of the European Social Charter, a treaty system established by the Council of Europe to protect fundamental socio-economic rights.

Evaluation objectives

The evaluation explored the Charter's role within the broader human rights framework to identify specific areas for improvement regarding its relevance, coherence, efficiency, and effectiveness. The document assesses the framework's relevance and effectiveness in areas like employment, health, and social protection, while analysing a 2022 reform package intended to modernise monitoring procedures.

Conclusions and recommendations

Key findings highlight that while the Charter offers a unique human-centred approach, it suffers from low public visibility and lacks the strong enforcement mechanisms found in EU law. The evaluation concluded that while the Charter remains highly relevant for safeguarding social rights against contemporary challenges like economic instability and social inequality, its overall impact is diminished by low visibility and structural inefficiencies. Although the 2022 reform successfully reduced administrative burdens and improved the quality of monitoring through thematic reporting, significant delays and backlogs persist within the collective complaints procedure, which remains underutilised and creates an uneven playing field for smaller civil society organisations. Furthermore, the Charter's effectiveness is often constrained by a mismatch between available resources and the heavy workload of monitoring bodies, as well as a lack of enforceability and national ownership compared to other international standards. To maximise future impact, the evaluation stresses the need for holistic strategies that empower civil society, foster better contextual dialogue with member States, and prioritise the ratification of the Revised Charter and collective complaints procedure to ensure stronger conformity across the region.

The evaluation provided eight key recommendations aimed at increasing the Charter's visibility through targeted outreach to parliaments and legal professionals, and enhancing dialogue between monitoring bodies—specifically the ECSR and the Governmental Committee—to ensure better contextual understanding of member States. It also advised promoting the collective complaints procedure as an efficient alternative to traditional reporting, reviewing the value of ad hoc reports to address emerging social issues, and decreasing the turnaround time between receiving reports and publishing conclusions to increase the Charter's impact. Finally, the evaluation stressed the need to advocate for civil society's involvement in holding governments accountable, integrate parliaments and NGOs into follow-up efforts for implementing recommendations, and strengthen Charter implementation by linking it more closely to broader Council of Europe co-operation activities. The evaluation findings and recommendations were well received by the Social Rights Department and led to a management response that will further develop the use of the Charter across member States.

Evaluation of the integration of a youth perspective in Council of Europe work

The January 2025 Evaluation Report provides a comprehensive assessment of how a youth perspective is integrated across the Council of Europe's diverse functions and institutions. The evaluation covered the period from 2020 to August 2024 and examined the Council's core functions, including standard setting, monitoring, and co-operation. Crucially, while the Youth Department serves as a hub for expertise, the evaluation focused on institutional bodies and processes beyond the youth sector to see how the wider Organisation is performing

Evaluation objectives

The evaluation had three main goals: to examine the current level of youth perspective integration across all relevant areas of the Council of Europe's work, to identify opportunities and challenges, to evaluate the different factors that either facilitate or hinder the integration of youth perspectives, and to identify good practices.

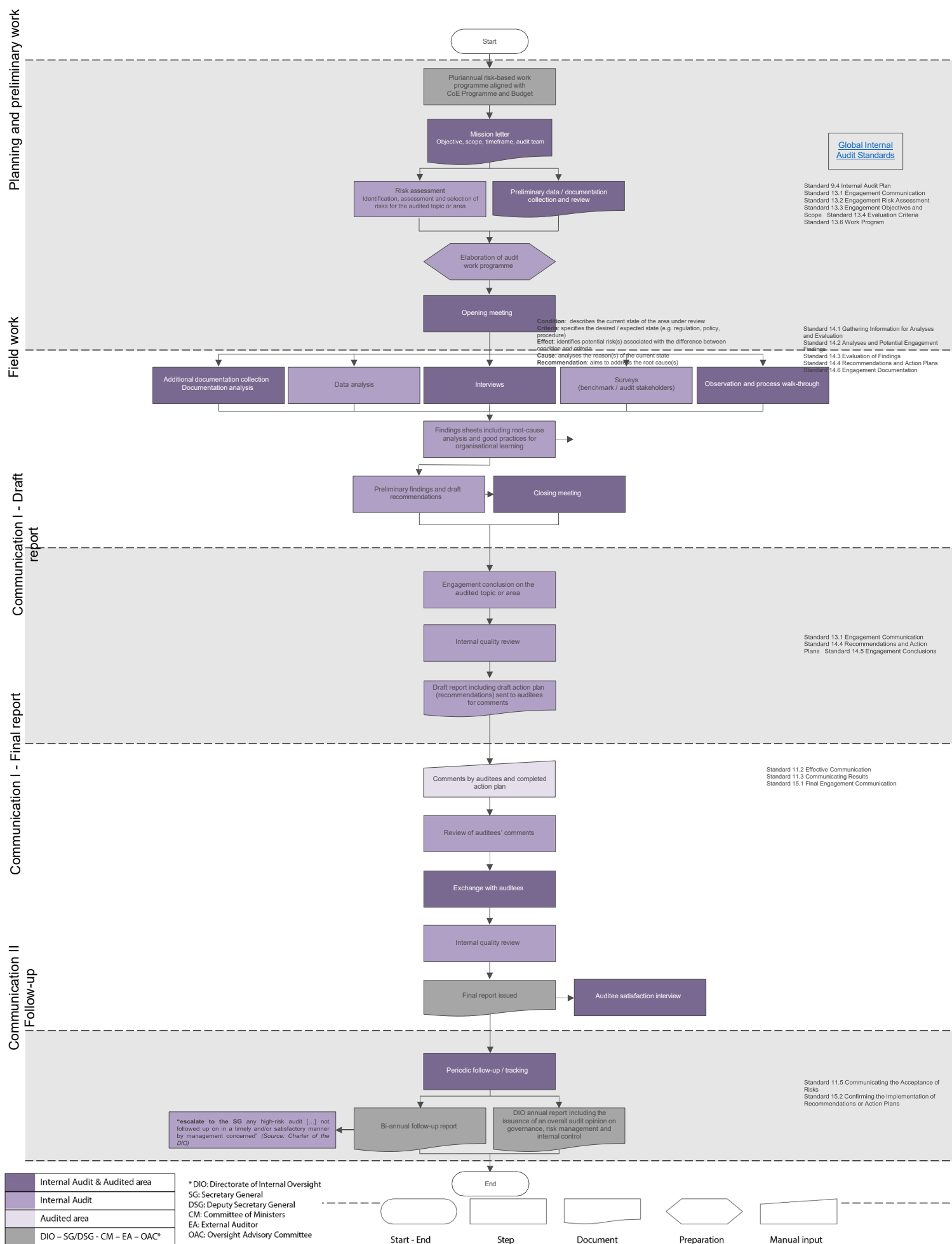
Conclusions and recommendations

Following the Reykjavík Declaration, the evaluation assesses the transition from isolated youth initiatives to a more systematic, Organisation-wide strategy for youth mainstreaming. It highlights successful engagement models, such as the co-management system and youth delegates, while identifying barriers like technical complexity and a lack of formal feedback loops. The evaluation concludes that while the Council of Europe possesses exemplary models of youth engagement, these initiatives have historically functioned in parallel and without a systematic, Organisation-wide approach. The Reykjavík Declaration and the subsequent development of a reference framework mark a significant shift toward a unified strategy, yet its success depends on a phased implementation that respects the diverse technical and legal mandates of different committees. To be effective, this integration must move beyond the Youth Department to involve a broad-based coalition of institutions – including PACE and the Congress – while leveraging mutual learning between staff and youth to debunk assumptions about youth competency.

The evaluation outlines six key recommendations, beginning with the adoption of an overarching strategic approach to be implemented via a reference framework to unify youth integration efforts across the Council. It calls for fostering mutual learning through non-formal exchanges and grass-roots links, alongside strengthening quality assurance and the availability of supporting tools-utilising the Youth Department's expertise to guide various sectors and prevent tokenism. To ensure accountability, the report recommends establishing 360-degree feedback loops where youth representatives can share their participation experiences and the Organisation can communicate the specific outcomes of their input. Additionally, the Council should prioritise an evidence-based approach to reach diverse and marginalised youth, explicitly linking these efforts to existing gender mainstreaming and human rights-based strategies. Finally, the evaluation advises developing a sustainable action plan with clearly agreed roles and responsibilities to ensure a phased, realistic, and Organisation-wide implementation of these priorities.

Appendix B – Process Flowcharts

Internal Audit



Evaluation

Planning and preliminary work

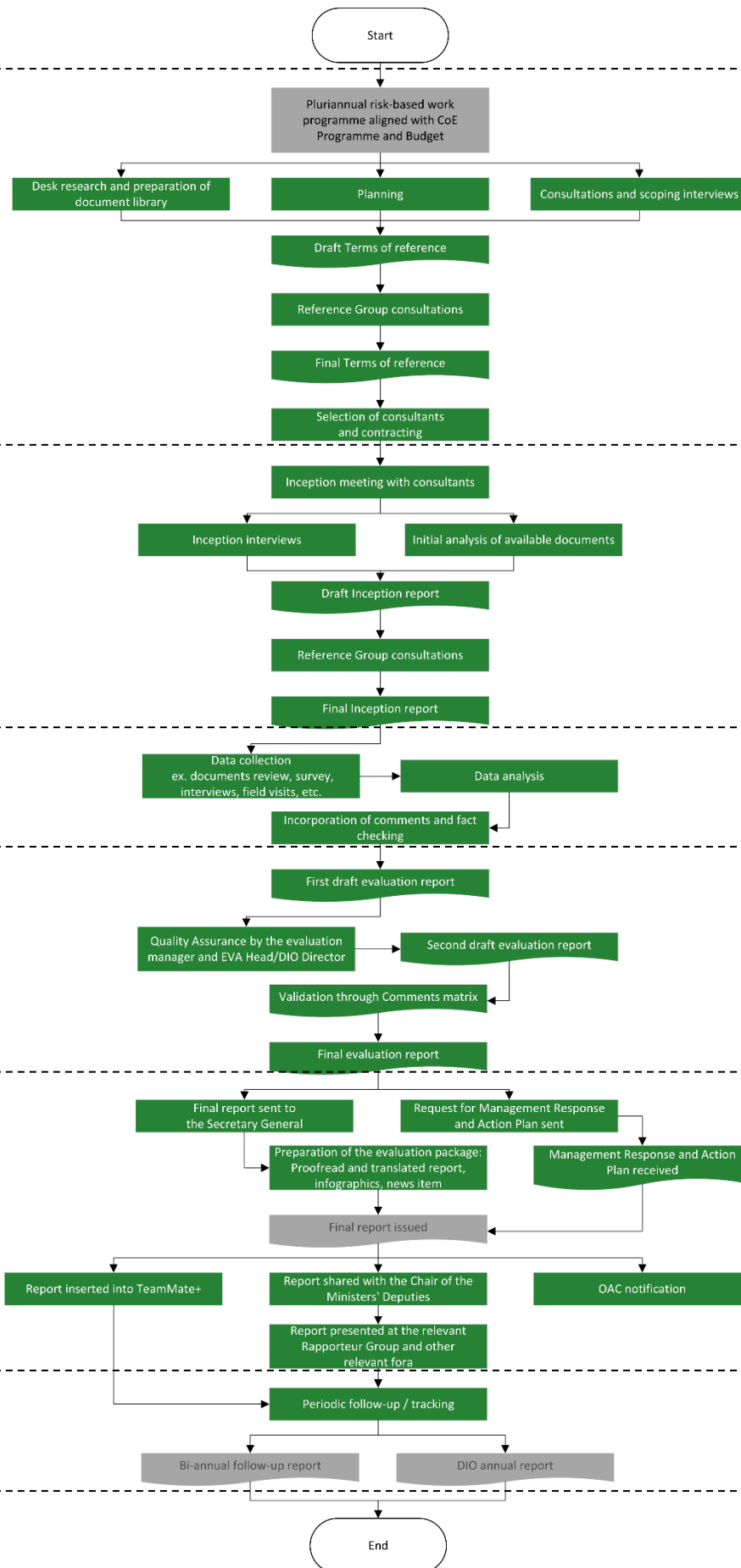
Inception phase

Data collection

Report phase

Communication

Follow-up

OECD DAC
Quality
Standards for
Development
EvaluationUNEG Norms
and Standards

Evaluation Division

DIO – SG/DSG – CM – OAC*

* DIO: Directorate of Internal Oversight
 SG: Secretary General
 DSG: Deputy Secretary General
 CM: Committee of Ministers
 RG: Reference Group
 OAC: Oversight Advisory Committee

Start - End

Step

Document

Investigation

