

## Management Response and Action Plan

<b>Name of Evaluation Report:</b>	<b>Mid-Term Evaluation of the European Union/Council of Europe Joint Programme “Horizontal Facility for the Western Balkans and Türkiye – Phase III”</b>		
<b>Date of Evaluation Report:</b>	<b>17 March 2025</b>	<b>Date of Action Plan:</b>	<b>22 May 2025</b>

### Overall management response to the evaluation:

The Directorate of Programme Co-ordination (DPC) of the Council of Europe considers the evaluation report to be an overall fair and useful assessment of the implementation of the European Union/Council of Europe Joint Programme “Horizontal Facility for the Western Balkans and Türkiye – Phase III” in the period covered by the evaluation and agrees with most conclusions and recommendations. While the majority of recommendations are addressed to both the Council of Europe and the European Union, this management response is the one of the Council of Europe.

Accepted recommendations and findings of the evaluation will feed into the preparation of the fourth phase of the Horizontal Facility Programme.

### Dissemination plan for the evaluation

The final evaluation report was shared by email with the members of the Reference Group, representing all MAEs, the Council of Europe Offices in South-East Europe and Türkiye, as well as the donor (EU). The report together with the Management Response will also be published on the Horizontal Facility [website](#) as well as on the dedicated [webpage](#) of the DIO. The person responsible for the dissemination plan is Marie-Angèle Orihuela, the Horizontal Facility Co-ordinator.

Management Decision <sup>1</sup>	Entity in Charge	Planned Actions <sup>2</sup> (determined by Entity)	Justification <sup>3</sup> for Non-Acceptance	Target Date for Action	Person Responsible for Action
<p><b>Recommendation 1: The current strong focus on Council of Europe legal norms/best practice and EU acquis standards should be complemented with more explicit focus on other relevant international law obligations and more visible linkages between support to duty-bearers and the priorities of rights-holders.</b></p> <p><u>Response:</u> The intervention logic of all Council of Europe co-operation activities is based on its strategic triangle (standard setting- monitoring- technical co-operation). This has also been the case for the Horizontal Facility programme since its inception in 2016, whereby the Council of Europe standards are complemented by the EU <i>acquis</i>. Complementarity with other relevant international law obligations and best practices is relevant for areas in which they complement the Council of Europe norms. The EU acquis and the Council of Europe standards are a rather comprehensive set of norms already, and therefore they should remain the focus also under the next phase of the Horizontal Facility programme.</p> <p>The linkages between support to duty-bearers and the priorities of rights-holders are ingrained in the design of the HF programme. Namely, following a human rights approach, HF considers beneficiaries as active subjects or rights-holders, rather than passive recipients and duty-bearers as those who have the obligation to respect, protect and fulfil rights and before whom claims may be brought. The programme supports the capacity of rights-holders to know, claim and seek redress for their rights, and for duty-bearers to fulfil their human rights obligations. For example, <i>HF2 Improving the protection of the right to property and facilitating execution of ECtHR judgments in Albania</i> continuously reaches out to vulnerable groups, including Roma and Egyptian communities, to navigate complex legal processes related to property compensation and registration, ensuring better access to legal remedies. To this end, in collaboration with the Tirana Legal Aid Society a series of informative sessions on property compensation and registration were organised in Tirana, Shkozë, Durrës, and Shkodër, providing individuals with information on compensation processes, financial evaluation methods, and recent legal changes.</p> <p>The linkages between support to duty-bearers and the priorities of rights-holders were taken into consideration in the preparation of HF III actions as well as the HF III programme logframe. Avenues for further strengthening these linkages will be explored in the preparation of HF IV logframe.</p>					
<input type="checkbox"/> Accepted <input checked="" type="checkbox"/> Partially accepted <input type="checkbox"/> Rejected	Council of Europe (DPC and MAEs) and EU		In the programming of the next phase of the Horizontal Facility: - The project proposals will	- April 2025 onwards (preparations of the Horizontal Facility – phase IV)	

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

<sup>2</sup> For implementing accepted recommendations.

<sup>3</sup> For recommendations that are partially accepted or rejected.

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			<p>continue to incorporate the standards of the Council of Europe monitoring and advisory bodies and the EU <i>acquis</i>.</p> <ul style="list-style-type: none"> <li>- The Beneficiary-specific Tri-annual Plans of Action (TAPAs) will continue to be used as the main programming tool to plan and operationalise the Horizontal Facility.</li> <li>- Other relevant international standards (such as UN SDGs) will continued to be taken into consideration to the extend they complement the Council of Europe standards and the EU <i>acquis</i>.</li> </ul>		

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<p><b>Recommendation 2: Good levels of coherence should be enhanced by EU and Council of Europe encouraging and supporting Beneficiaries to take more leadership of sector/thematic co-ordination of international technical co-operation.</b></p> <p><u>Response:</u> This recommendation can be accepted only on the level of encouragement to the Beneficiaries to take more leadership in the sector/thematic co-ordination of international technical co-operation. Provision of targeted support and capacity building of the Beneficiaries for co-ordinating the overall technical co-operation goes beyond the scope of the Horizontal Facility.</p> <p>Moreover, such co-ordination mechanisms vary from one Beneficiary to the other, and differences exist also between different sectors/themes. For example, in Bosnia and Herzegovina the Council of Europe participates in the co-ordination meetings on justice reform regularly organised by the Ministry of Justice and the High Judicial and Prosecutorial Council. Similarly, in the field of prisons, specifically with regards to violent extremist prisoners the Ministry of Security in Bosnia and Herzegovina is generally co-ordinating the meetings to which the Council of Europe is always invited. In addition, over the years the Council of Europe Office in Pristina continued contributing to various co-ordination meetings chaired by other international organisations or local institutions, in particular the Security and Gender Group, chaired by UN Women, the Interministerial Co-ordination Group on Human Rights, chaired by the Office of Good Governance and the member States, and the Co-ordination Meeting on Human Rights Issues, led by the Representative of the UN High Commissioner for Human Rights in Kosovo. Similarly, the Council of Europe Office in Tirana is represented by the Head or Deputy Head of Office at larger co-ordination meetings of all the donors.</p>					
<input type="checkbox"/> Accepted <input checked="" type="checkbox"/> Partially accepted <input type="checkbox"/> Rejected	Council of Europe (DPC and MAEs) and EU		<p>The Council of Europe will continue participating and supporting the existing donor co-ordination mechanisms.</p> <p>- In the planning of HF IV, the Council of Europe will maintain awareness of projects implemented by</p>	- Continuous action	

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			other organisations to avoid overlaps. - The Beneficiaries' role in ensuring coherence between the different international technical co-operation initiatives remains essential.		
<p><b>Recommendation 3: Planning of HF IV should be taken as an opportunity to revisit the current portfolio of 43 actions and the volume of activities/outputs, to reduce time spent on administration/organising of activities, and to allow more in-depth follow-up on a reduced number of selected priorities.</b></p> <p><u>Response:</u> The evaluation report recommends revisiting the ratio of regional to Beneficiary-specific actions as a means of rationalising the portfolio. Several elements should be taken into account when considering this recommendation. Namely, the legal context, structure and progress made in the reform processes vary from one Beneficiary to the other. In this respect, the different stages reached in the enlargement process by the respective Beneficiaries, should be taken into consideration. Moreover, at the core of the design of HF actions is their support to the Beneficiaries in addressing the recommendations of the monitoring and advisory bodies of the Council of Europe, which are Beneficiary-specific. Against this background, in some sectors/thematic areas the continuation of bilateral support would be crucial to sustain the results achieved. For example, it is important to continue with bilateral tailored support under CEPEJ actions to best address the needs and provide relevant support in the Council of Europe field of expertise which is concrete and limited to judicial statistics, efficiency and quality of justice.</p> <p>The regional actions should remain key platforms for exchanging best practices between the Beneficiaries (such as the web-platform covering various aspects of countering violent extremism and radicalisation in prisons created under the regional action HF15 <b><i>Enhancing co-operation in the Western Balkans in managing violent extremism in prisons and preventing further radicalisation after release.</i></b>) The <a href="#">platform</a> is intended for the professionals, stakeholders and key actors in the field of penitentiary and probation in South-East Europe, but also the general public with interest in the field. In addition, regional actions are also essential for the creation of and co-operation with regional networks, such as the Young European Ambassadors<sup>4</sup>. Joint activities implemented by HF actions and the Young European Ambassadors network also contributed to cross-regional co-operation between the stakeholders in South-East Europe and Eastern Partnership region.</p>					

<sup>4</sup> A regional initiative of the EU, managed by the EC.

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<p>The reduction of the number of selected priorities is also in line with the recommendation of the Results Oriented Monitoring (ROM) report of HF III<sup>5</sup>, which highlighted that the future programming should focus on prioritising fewer but higher-impact actions, ensuring that resources are allocated strategically rather than spread too thinly across multiple initiatives. To this end, in the planning of HF IV the intention is to present to the extent possible, larger thematic actions. An example of this approach could be a larger/regional action in the field of anti-discrimination, with bilateral components.</p> <p>In this respect, should more regional actions be introduced and/or privileged as the main format for HF IV, they should have strong bilateral components per Beneficiary, with sufficient human and financial resources to ensure adequate implementation.</p> <p>The ROM also found that “longer timelines and expanded funding are essential for addressing systemic challenges and delivering meaningful, lasting results”. These findings provide a strong basis for the continuation of the programme.</p> <p>With a view of reducing the time spent on the organisation of activities and against the background of <b>the budgetary challenges</b> faced during the implementation of HFIII, the actions focused on rationalising the resources. For example, activities were organised back-to-back, while some events were held online.</p> <p>The administrative procedures ensure the Council of Europe remains accountable of the use of funds. They are in line with the provisions applying to pillar-assessed organisations, such as the Council of Europe. Pillar-assessment, carried out by independent auditors, aims at verifying whether a partner Organisation demonstrates a level of financial management and protection of the financial interest of the European Union equivalent to that of the European Commission. When successfully passed, it confirms that the principles of Sound Financial Management, transparency and non-discrimination are fully integrated in the Organisation’s rules and procedures. In the performance of the activities, the Organisation shall: Apply its own rules and procedures for the award and management of Procurement Contracts which have been assessed in the Ex-ante Pillar Assessment. The funding provided under HFIII shall not be made available, directly or indirectly to, or for the benefit of entities, individuals or groups of individuals designated by the EU as subject to restrictive measures. In this respect, a tool was put in place internally, to facilitate/accelerate the screening which project teams have to perform to ensure that no financial resources are made available to third parties (individuals/entities etc.) designated by the EU under restrictive measures.</p> <p>Moreover, the necessary tools, framework contracts/agreements were put in place to facilitate the time spent on administration/organising of activities (e.g. for event management exist in almost all HF Beneficiaries). Project teams have put in place, to the extent possible given the foreseeable needs, framework contracts/agreements/call offs to facilitate swift contracting of technical expertise (i.e. consultants etc). This significantly contributes to the swift contracting of expertise. In addition, a lot of procurement was done offline which may have contributed to efficiency challenges, however with the new e-procurement platform, such challenges are expected to be alleviated.</p>					

<sup>5</sup> Commissioned by the European Commission in parallel with the HF III mid-term evaluation.

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It should also be underlined that the Council of Europe has already taken steps to reduce time spent on administration, by putting into practice the Memorandum on the simplification of the financial visa routes in the co-operation sector of the Council of Europe as from 1 May 2024.					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Partially accepted <input type="checkbox"/> Rejected	Council of Europe (DPC and MAEs) and EU	<ul style="list-style-type: none"> <li>- Prioritisation of thematic areas/sectors and specific actions for HF IV to be jointly defined by DG ENEST<sup>6</sup> and the Council of Europe<sup>7</sup> in line with the recommendations of the HFIII mid-term evaluation and ROM exercise.</li> <li>- Proposals will be made by the Council of Europe to DG ENEST to take into account the possibility to reinforce the number of regional actions (still with important strategic bilateral parts).</li> </ul>		- April 2025 onwards (preparations of the Horizontal Facility – phase IV)	
<b>Recommendation 4: The number of actions and volume of small, ‘stand-alone’ activities should be consolidated/reduced to facilitate more in-depth, adequately resourced capacity-building and mentored follow-up on awareness raised; capacity built; and laws/policies, curricula, tools developed.</b>					
<p><u>Response:</u> This response should be read in conjunction with the response provided under Recommendation 3.</p> <p>In addition, numerous examples can be highlighted under the ongoing phase of HF with regards to follow-up on awareness raised, capacity built, and laws/policies, curricula and tools developed. One such example is an external public opinion <a href="#">survey</a> which showed that as a follow-up to the numerous awareness-raising activities provided by <i>HF10 Strengthening the capacities of the penitentiary system in North Macedonia</i>, the External Oversight Mechanism (EOM) had a positive role in improving the professionalism of the police. Rights-holders were more familiar with the EOM in February 2024 (17%), compared to December 2022 (13% of respondents). The overall impression of the role of this Mechanism in improving the professionalism of the police increased from 1,1% to 6% in the indicated period.</p>					

<sup>6</sup> As of 1 February 2025; formerly DG NEAR.

<sup>7</sup> Including the participation of EUDs/EUO, DPC Headquarters, the Council of Europe Offices and operational entities.

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Furthermore, <i>HF32 Quality education for all – Serbia</i> established a pool of trainers and mentors on the Council of Europe Reference Framework of Competences for Democratic Culture (RFCDC). Namely, 36 mentor schools reached and raised the capacities of 180 new schools with thousands of teachers and students. Mentor schools and mentees continued implementing education for democracy and human rights and the principles of RFCDC in their everyday work in and outside of the classroom. As a follow up, the Ministry of Education established a network of advisors for democratic culture in schools with the support of the action, and re-appointed 20 advisors funded by the Ministry.					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Partially accepted <input type="checkbox"/> Rejected	Council of Europe (DPC and MAEs) and EU	- Prioritisation of thematic areas/sectors and specific actions for HF IV to be jointly defined by DG ENEST and the Council of Europe <sup>8</sup> in line with the recommendations of the HFIII mid-term evaluation and ROM exercise.		- Continuous action - April 2025 onwards (preparations of the Horizontal Facility – phase IV)	
<p><b>Recommendation 5: Effectiveness should be enhanced by more focus (time/resources) on monitoring of results and enhancing capacity of action teams and partners to measure progress towards impact, as well as networking of substantive experts.</b></p> <p><u>Response:</u> While this recommendation is beyond the scope of this evaluation which, as a mid-term evaluation, did not envisage addressing the impact, it has been accepted. However, it is important to underline that in the context of the Council of Europe, monitoring largely relates to the work of the organisation’s monitoring bodies, and that confusion with the monitoring performed as part of the technical co-operation needs to be avoided.</p> <p>Against this background, it is to be noted that the effectiveness of HF actions is ensured with results-based monitoring and continuous data collection on the change delivered. Within the scope of the HF, the monitoring of the progress towards impact is presented in particular in annual progress reports and in the final report. In addition, the action Steering Committees are responsible for overseeing and guiding the implementation of the related action, and as also noted in the evaluation report, “active engagement from many partners, including through well-functioning Action Steering Committees is also evident”.</p> <p>When it comes to capacity-building, specific training on the PMM Methodology and PMM IT tool is provided to newly recruited HF staff, with a view of providing them with the necessary knowledge on the Council of Europe’s “Theory of Change” and the results towards which the organisation’s co-operation initiatives</p>					

<sup>8</sup> Including the participation of EUDs/EUO, DPC Headquarters, the Council of Europe Offices and operational entities.



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<p>contribute. In addition, results-based reporting training is held, with the aim to reinforce the capacities of Council of Europe staff to develop detailed and logical reasoning chains from impact to activity; use quantitative and qualitative evidence in project design and reporting and devise efficient and balanced reports and assessments which include outcomes formulation and key figures. Guidance on the Council of Europe's PMM is also regularly provided through informal discussions, such as the "PMM Café" organised on a monthly basis, and through regular exchanges between HF Co-ordination Team and action teams especially in the preparation and follow up to the progress reports. An online course on the introduction to evaluation is also available for the Council of Europe staff.</p> <p>Compared to the previous phase of the programme, monitoring was reinforced under HFIII with the introduction of a more simplified logframe on the programme level. This approach was jointly agreed between DG ENEST and the Council of Europe, and the logframe is recognised by the partners as a useful monitoring tool of the overall programme. Furthermore, the methodological guidance was developed for the MAEs to better link action and programme levels. In addition, with a view of achieving complementarity of the Council of Europe and EU monitoring systems, the HFIII logframe also cross-references the IPA II Monitoring Framework Indicators. In the planning of the next phase of HF, further efforts will be made to strengthen impact measurement, through more consistent baseline data and progress indicators and a more effective integration of qualitative measures.</p> <p>While cross-referrals and sharing of experts between different HF actions and with other intergovernmental organisations already take place, further avenues to enhance the networking of substantive experts engaged under HF will be explored.</p>					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Partially accepted <input type="checkbox"/> Rejected	Council of Europe (DPC and MAEs) and EU	<ul style="list-style-type: none"> <li>- Continuous PMM training for the action teams.</li> <li>- Guidance continuously provided to HF action teams on monitoring and reporting.</li> <li>- Consultations between DG ENEST and CoE on the development of the logframe and indicators of HF IV taking into account the recommendations of the HFIII mid-term evaluation and ROM exercise.</li> </ul>		<ul style="list-style-type: none"> <li>- Continuous action</li> <li>- April 2025 onwards (preparations of the Horizontal Facility – phase IV)</li> </ul>	
<b>Recommendation 6: As part of a visible Council of Europe 'step-back' strategy, more focus, resources and time are required for action teams and partners to make concrete and realistic sustainability plans. This should include more detailed 'sustainability of results' sections in Description of Actions (DoAs), elaborated by all partners and revised as actions progress and more support to the monitoring/accountability role of CSOs.</b>					

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<p><u>Response:</u> Effective implementation and lasting co-operation rely on consistent, long-term strategic planning. The technical assistance provided across subsequent phases of the Horizontal Facility should be seen as a long-term investment that facilitates the achievement of sustainable results. As an example, the sustainability of efforts to align local legal framework on freedom of expression with ECtHR standards was ensured in Kosovo* with the formal inclusion of freedom of expression training in the 2025 curriculum of the Academy of Justice. This key development stems from the continuous support provided under <i>HF39 Protecting freedom of expression and of the media to the capacity building of legal professionals in Kosovo</i>.</p> <p>The fourth phase of HF will build on the achievements made under the previous phases of the programme while placing a focus on the phasing out of the actions. Increasing emphasis is continuously placed on the sustainability of capacity-building activities, particularly through the organisation of training-of-trainers (ToTs) and cascade training sessions which are perceived as a secure and timely exit strategy. In this respect, building local capacities remains a key element of the reform processes in the Beneficiaries. In addition, a regular assessment of activities and collection of feedback and opinion from the beneficiaries remains key, as it allows for concrete adjustments and improvements in the implementation of the actions. It is also crucial to integrate the local perspective during capacity-building exercises to complement international experiences, standards, and practices and render them more accessible at the local level. Furthermore, collaborations with universities, civil society, and international partners have broadened the impact and sustainability of project outcomes.</p> <p>Nonetheless, a strong and broad institutional support is essential to ensure long-term sustainability of results in the Beneficiaries. While further efforts could be undertaken to pursue concrete measures, such as reinforcing the ‘sustainability of results’ sections in Description of Actions (DoAs) and further aligning project outputs with national strategies to ensure lasting and meaningful progress, the sustainability will ultimately require a reinforced institutional backing and strengthened institutional ownership.</p> <p>When it comes to the monitoring/accountability role of the CSOs, their active involvement should be noted in the Beneficiary Steering Committee meetings, seminars and consultations as participants, facilitators and expert speakers. CSOs are also members of some action Steering Committees. For additional elements please also refer to the response to the Recommendation 7 below.</p>					
<input type="checkbox"/> Accepted <input checked="" type="checkbox"/> Partially accepted <input type="checkbox"/> Rejected	Council of Europe (DPC and MAEs)		- Practical steps to advance sustainability of results could be	- Continuous action	

\* This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

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			explored such as including a more detailed 'sustainability of results' sections in project proposals. In addition, a specific emphasis on the phase out of actions will be placed in the design of HF IV. These measures can help reinforce ownership and promote lasting impact, but are reliant on strong and sustained institutional support in the Beneficiaries.		
<p><b>Recommendation 7: Partners' knowledge of, and action teams' practical capacity to apply, the full HRA framework needs to be enhanced, (ideally via designated visible responsibility for HRA) including CSO participation in all actions and more specific HF focus on CSOs' role in monitoring the implementation/impact of action results.</b></p> <p><u>Response:</u> As a leading human rights organisation, the Council of Europe applies a human rights approach (HRA) in its work, including in HF III. Its main objective is to further advance human rights for all and achieve better and more sustainable results in projects. Its main principles are participation and inclusion, equality and non-discrimination, accountability, transparency and access to information.</p> <p>The HRA has a focus on rights-holders and duty-bearers by recognising end beneficiaries of HF actions as active subjects. It also considers duty-bearers as those who have the obligation to respect, protect and fulfil the rights of rights-holders and before whom claims may be brought. In this regard, efforts are systematically</p>					

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		<p>made by HF III to involve civil society in all stages of technical co-operation to strengthen their role in the implementation of reforms and to build an empowered civil society. More concretely, the meaningful participation and inclusion of all stakeholders, with a focus on vulnerable groups, is consistently ensured. Civil society representatives are included whenever possible, as members of steering committees and/or implementing partners or beneficiaries of HF III actions. When relevant, they are also involved in the legislation drafting. For example, HF25 <b><i>Combating discrimination and hatred</i></b> facilitated the workshops of the Working Group for amending the Law on Protecting from Discrimination, which included the CSOs in Kosovo. The suggestions and proposals from CSOs were integrated in the new draft Law.</p> <p>Regarding the recommendation to enhance partners' and action teams' practical capacity to apply the full HRA framework, it is to be noted that under HF II, a position of HRA Advisor was seconded for the period from June 2019 to June 2021. This fixed-term position was specifically established to create guidance materials and checklists on the HRA aimed at facilitating co-operation activities. To this end, the <a href="#">Council of Europe Human Rights Approach Practical Guide for Co-operation Projects</a> was devised and made available on the PMM website.</p> <p>In addition, the HF project teams were trained on the HRA and provided with sessions on the reporting on HRA under HF. Finally, activities previously performed by the HRA Advisor, such as the reporting on HRA and the provision of support on a needed basis, are being ensured by the HF Co-ordination team.</p> <p>In addition, the PMM Handbook is currently being revised, and one of the updates is related to enhancing the guidance for the Council of Europe staff on the application of HRA in all stages of the project management. Throughout this process, the Council of Europe liaised with various international organisations on the good practices in the application of HRA, drawing lessons for the ongoing update. For example, a workshop on sharing experience and good practices related to the HRA in international co-operation was organised between the Council of Europe and Norwegian Agency for International Development Aid (NORAD). <b>As a follow up</b>, the Council of Europe is looking internally how to better integrate principles of HRA in all project management stages, with particular focus on enhancing project effectiveness via HRA indicators and communication with different stakeholders. Following the update of the PMM Handbook, the PMM training will also be finetuned accordingly.</p> <p>Against this background, efforts are already being deployed with the view of strengthening accountability of duty-bearers towards rights-holders. For example, in Montenegro, capacity-building activities under HF7 <i>Strengthening accountability of the judicial system and enhancing protection of victims' rights</i> on judicial ethics and communication further enhanced professionalism and accountability across the judiciary.</p> <p>The role of the civil society in the monitoring of the implementation of action results is currently primarily realised in their capacity as grantees of various HF actions. For example, the Union of Turkish Bar Associations, a grantee of HF33 <i>Fostering women's access to justice in Türkiye</i>, provided regular reports on the provision of accessible, gender-sensitive, and victim-centred legal aid and services for women in vulnerable situations in eight provinces in Türkiye. Opportunities</p>			

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to enhance the role of CSOs in monitoring the implementation of actions will be explored, for example by providing a specific training to grantees on monitoring and reporting on the implementation of the grant.					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Partially accepted <input type="checkbox"/> Rejected	Council of Europe (DPC and MAEs) and EU	<ul style="list-style-type: none"> <li>- The position of HRA Advisor was created with a specific objective to prepare a set of guidance documents on HRA, which was completed. Assigning designated responsibility for HRA to HF staff would allow some limited time to be devoted to HRA as this is not part of their job description.</li> <li>- Ways to strengthen the monitoring role of the CSOs will be examined in their capacity as grantees of HF actions and proposing more involvement in the Steering Committees of the actions when possible.</li> </ul>		<ul style="list-style-type: none"> <li>- Continuous action</li> <li>- April 2025 onwards (preparations of the Horizontal Facility – phase IV)</li> </ul>	
<b>Recommendation 8: Gender mainstreaming should be enhanced, to ensure more in-depth and systematic coverage across all action reporting; Steering Committee discussions; in all expert contracts; and more harmonised gender analyses.</b>					
<p><u>Response:</u> As part of the HRA, a gender perspective is integrated transversally and at all stages and levels of the programme's implementation. Gender analyses gender impact assessment and other intersectional tools are being used at the different stages of programme management. This approach aligns with the <a href="#">Council of Europe Gender Equality Strategy 2024-2029</a><sup>9</sup>, contributing to all of its strategic objectives. The programme contributes to the <a href="#">EU's Action Plan on Gender Equality and Women's Empowerment in External Action</a> 2021–2025 (GAP III), particularly in the key areas of ensuring freedom from all forms of gender-based violence and strengthening economic and social rights and the empowerment of girls and women, as well as advancing equal participation and leadership. Where relevant, actions contribute to the implementation of gender equality strategies and action plans of the Beneficiaries.</p>					

<sup>9</sup> As well as with the previous Council of Europe [Gender Equality Strategy 2018-2023](#).

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<p>The <a href="#">Council of Europe Gender Mainstreaming Toolkit for Co-operation Projects</a> acts as a reference for ensuring a structured approach to gender mainstreaming for all actions. Attention is also paid to gender-sensitive communication and visibility and the use of gender-inclusive language. Moreover, actions collect sex-disaggregated data and prioritise gender-balanced representation in activities and decision-making structures, such as Steering Committees. This commitment is particularly significant in fields traditionally dominated by men such as law enforcement, where efforts are made to ensure greater participation of women, especially in senior positions. Additionally, gender mainstreaming acknowledges that women and men face distinct challenges, opportunities, and barriers influenced by factors such as age, ethnicity, disability, economic status, sexual orientation, and gender identity.</p> <p>Gender mainstreaming is included in all contractual reports of the HF (i.e. annual, quarterly, final and inception reports). Similarly, it has been addressed in almost all Beneficiary Steering Committee meetings and Steering Boards, and in the related conclusions.</p> <p>Against this background, further steps will be taken to address this recommendation in line with the planned actions below.</p>					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Partially accepted <input type="checkbox"/> Rejected	Council of Europe (DPC and MAEs) and EU	<ul style="list-style-type: none"> <li>- CoE to develop gender markers for HF IV, taking into account the recommendations of the HFIII mid-term evaluation and ROM exercise.</li> <li>- Setting clear targets for gender sensitive objectives in the preparation of the HF IV programme and actions' logframes and indicators.</li> <li>- Guidance to be prepared on the collection and analysis of sex-disaggregated data.</li> <li>- Guidance to be prepared for action teams on better integration of completed gender analysis findings in HF IV action proposals.</li> <li>- Continuous capacity building on gender mainstreaming for action teams.</li> </ul>		<ul style="list-style-type: none"> <li>- Continuous action</li> <li>- April 2025 onwards (preparations of the Horizontal Facility – phase IV)</li> </ul>	

Management Decision <sup>1</sup>	Entity in Charge	Planned Actions <sup>2</sup> (determined by Entity)	Justification <sup>3</sup> for Non-Acceptance	Target Date for Action	Person Responsible for Action
<b>Recommendation 9: More HF resources should be allocated to help revitalise and make more visible the Office Gender Focal Points via earmarked time on this shared Council of Europe/EU priority, including networking with the new regional gender advisor and the Council of Europe network of Gender Equality Rapporteurs etc.</b> <b>Response:</b> Strengthening the role and visibility of Office Gender Focal Points extends beyond HF, especially given that gender mainstreaming is a wider reaching priority of the Council of Europe and of the EU. Although HF actions make up a significant portion of activities of the Council of Europe Offices in South-East Europe and in Türkiye, limited funding under HF reduces the feasibility of implementing this recommendation. The CoE therefore can accept the recommendation to revitalise and make more visible the Gender Focal Points, but it will not so do by allocating its own instead of more HF resources.					
<input type="checkbox"/> Accepted <input checked="" type="checkbox"/> Partially accepted <input type="checkbox"/> Rejected	Council of Europe (DPC) and EU		- Ways to reinforce the Gender Focal Points in CoE Offices will be examined in consultation with the regional gender advisor for South-East Europe and Türkiye.	- May 2025 onwards	
<b>Recommendation 10: The added value of the Council of Europe as a technical cooperation partner (including its IGO status, its ‘strategic triangle’) should be enhanced by ongoing efforts to build action teams’ programming skills, and more networking and co-ordination of the pool of contracted substantive experts.</b> <b>Response:</b> To manage its co-operation activities in a coherent manner, the Council of Europe has developed its Project Management Methodology (PMM) with capacity building for operational staff related to different aspects of the PMM. The PMM methodology is further promoted through a manual with templates, an IT tool and a guidance website, as well as through informal means of knowledge-sharing, such as the “PMM Café” and as of recent also “HF Café”. Different aspects of programming are discussed during these informal cafés, and joint sessions with the project teams of the EU/Council of Europe Joint Programme “ <a href="#">Partnership for Good Governance</a> ” <sup>10</sup> on common issues are also planned.					

<sup>10</sup> Implemented in the Eastern Partnership region.

Management Decision <sup>1</sup>	Entity in Charge	Planned Actions <sup>2</sup> (determined by Entity)	Justification <sup>3</sup> for Non-Acceptance	Target Date for Action	Person Responsible for Action
<p>Moreover, under the ongoing and previous phases of the HF, the action teams have been successfully linking the technical co-operation activities to the recommendations of the Council of Europe monitoring and advisory bodies as well as those from the European Commission annual reports on South-East Europe and Türkiye. The recommendations serve as the basis for all programmatic interventions that are further identified, prioritised and agreed with the European Commission. As a result, the Quadrennial Action Plans (QAPAs) were prepared for each Beneficiary, as the main tool to plan and operationalise the Horizontal Facility. The action teams review the QAPAs annually, re-confirming and fine-tuning them in light of strategic common objectives and progress achieved.</p> <p>Since this recommendation partly overlaps with Recommendation 5, for further details please refer to the response thereby provided.</p>					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Partially accepted <input type="checkbox"/> Rejected	Council of Europe (DPC and MAEs)	- Continuous guidance on programming provided to the action teams, both via the PMM trainings and informal capacity building sessions.		- Continuous - April 2025 onwards (preparations of the Horizontal Facility – phase IV)	