

EVALUATION OF THE COUNCIL OF EUROPE ACTION PLAN FOR AZERBAIJAN 2022-2025



Final report
February 2026

DIO-EVA(2026)01

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Disclaimer

The evaluation was managed by a senior evaluator under the supervision of the Head of Evaluation and the Director of Internal Oversight and implemented by Altair Asesores S.L. The views expressed in this report are those of the evaluation team members from Altair Asesores S.L.

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Table of Contents

Executive Summary	3
Key findings	4
Lessons learned	6
Recommendations	6
1. Introduction	7
1.1. Background and introduction to the Action Plan.....	7
1.2. Purpose, objectives and Scope of the evaluation.....	8
1.3. Evaluation approach and methodology	9
2. Adoption and implementation of the Action Plan	12
3. Key findings.....	13
3.1. Relevance	14
3.2. Coherence	17
3.3. Effectiveness.....	20
3.4. Efficiency.....	25
4. Conclusions	26
4.1. Delivery of an Action Plan that achieved high relevancy in key sectors	27
4.2. Demonstrated results in key reform areas, but uneven elsewhere.....	27
4.3. Signs of cost-conscious and adaptive measures were evident	27
4.4. Institutional synergies occurred but were not systematised	27
4.5. Monitoring weaknesses and learning gaps	27
5. Lessons learned	28
6. Recommendations	29
ANNEX I – TERMS OF REFERENCE.....	31
ANNEX II - LIST OF DOCUMENTS CONSULTED.....	32
ANNEX III - MORE DETAILS ON THE METHODOLOGY, SUCH AS DATA COLLECTION INSTRUMENTS, INCLUDING DETAILS OF THEIR RELIABILITY AND VALIDITY	35
ANNEX IV – EVALUATOR PROFILE.....	38
ANNEX V - EVALUATION MATRIX	39

Abbreviations

AML/CFT	Anti-Money Laundering/Countering Financing of Terrorism
AP	(Council of Europe) Action Plan
CEPEJ	European Commission for the Efficiency of Justice
CoE	Council of Europe
CSO(s)	Civil Society Organisation(s)
CyberSEE	<i>Cybercrime South-East Europe</i> . A joint EU–CoE regional project aimed at strengthening cybercrime and electronic evidence capacities in South-East European countries
CyberEast+	<i>Cybercrime East Plus</i> . A joint EU–CoE project focused on enhancing the capacity of Eastern Partnership countries to combat cybercrime and handle electronic evidence
DGI	Directorate General of Human Rights and Rule of Law (Council of Europe)
DIO	Directorate of Internal Oversight (Council of Europe)
DPC	Directorate of Programme Co-ordination (Council of Europe)
ECRI	European Commission against racism and intolerance
ECtHR	The European Court of Human Rights
EQ(s)	Evaluation Question(s)
EU	European Union
FGD	Focus Group Discussion
GRECO	Group of States Against Corruption
HQ	Headquarters
IMPACT	<i>European Multidisciplinary Platform Against Criminal Threats</i> . An EU framework for structured information exchange and joint operational action to combat serious international and organised crime.
MONEYVAL	Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
OECD DAC	Organisation for Economic Cooperation and Development – Development Assistance Committee
OSCE	Organisation for Security and Cooperation in Europe
PGG	Partnership for Good Governance. A co-operation program for Eastern Partnership Countries funded by the European Union and the Council of Europe, and implemented by the Council of Europe
PMM	Project Management Methodology
SCFWCA	State Committee for Family, Women and Children Affairs of Azerbaijan
ToR	Terms of Reference

List of tables

Table 1: Evaluation questions.....	9
Table 2: Overview of interviewed stakeholders.....	10
Table 3: Summary of Key Findings	13

Executive Summary

- a. **Context of the evaluation.** Country-specific Action Plans, agreed between the Council of Europe and the relevant authorities of the respective member State, are strategic and sectorial programming instruments, which allow for an inclusive and coherent approach to co-operation. The **Council of Europe Action Plan for Azerbaijan 2022-2025**¹ (hereafter “Action Plan”) was approved by the Committee of Ministers on 16 February 2022. It is a strategic programming instrument that aims to bring Azerbaijan’s legislation, institutions and practice further into line with Council of Europe standards in the areas of human rights, the rule of law and democracy. The Action Plan is intended to support the country’s efforts to honour its obligations as a Council of Europe member State.
- b. **Overview of the evaluation objective.** The primary purpose of this evaluation was to provide evidence on the outcomes achieved through the Council of Europe Action Plan for Azerbaijan (2022–2025), with the intention of informing and strengthening future Action Plan. The evaluation assessed whether the Council of Europe’s initiatives were relevant, focusing on how the selection and prioritisation of projects aligned with the needs of stakeholders and the priorities expressed by the beneficiary country in its national policies, legislation, strategies, and practices. In addition to reviewing achieved results, the evaluation aimed to distil key lessons learned and identify examples of good practice. It also aimed to provide practical recommendations for enhancing the design and implementation of future projects, including suggestions for mitigation measures where appropriate.
- c. **Evaluation’s intended audience and use.** The evaluation is intended for use by the Council of Europe management, programme and project teams, and field offices to guide operational and strategic decisions. It will support adjustments to ongoing implementation, provide input for the design of the next Action Plan for Azerbaijan, and contribute to institutional learning across other Action Plans.
- d. **Evaluation methodology and process.** The evaluation employed a mixed-methods approach, utilising both qualitative data collection and analysis (key informant interviews, focus group discussions, and document review) and quantitative analysis. Triangulation was undertaken to ensure validity and contextual accuracy.
- e. As part of the evaluation of the Council of Europe’s Action Plan for Azerbaijan (2022–2025), online and in-person data collection was conducted in April and May 2025, including a field mission, through a combination of interviews, focus group discussions, and document reviews. The data collection involved contributions from a broad range of stakeholders through both remote and in-person modalities. These included representatives of national participating institutions, civil society organisations, and the EU Delegation to Azerbaijan, as well as staff members of the Council of Europe Office in Baku and relevant EU officials based at headquarters in Brussels. In total, 73 individuals participated in the evaluation, through 33 Key Informant Interviews (KIIs) and two Focus Group Discussions (FGD), as well as a document review consisting of over 60 documents.

1. <https://rm.coe.int/action-plan-azerbaijan-2022-2025-eng/1680a59aa3>.

f. **Limitations.** This evaluation was conducted within a compressed timeframe and on a limited budget to ensure that the findings were available in time to inform the development of the subsequent Action Plan². As a mitigation measure, the number of evaluation questions was reduced and prioritised. Those findings which are supported by an adequate level of evidence and validated through stakeholder consultations have been prioritised for inclusion in the report, those findings that were not able to be triangulated across data sources were not included or are subject to appropriate caveats in the evaluation report.

Key findings

g. **The evaluation found that the Council of Europe's Action Plan for Azerbaijan (2022–2025) delivered strong results in several areas of strategic importance, particularly where enabling conditions such as long-standing institutional partnerships, technical continuity, and political buy-in were present.** Further strategic coherence and national ownership has the potential to increase the likelihood of sustainable outcomes in future programming cycles.

Relevance

h. The Action Plan was broadly aligned with Azerbaijan's national reform priorities and international obligations, including the *Azerbaijan 2030: National Priorities for Socio-Economic Development*, the *Strategy for Socio-Economic Development for 2022–2026*, and the *National Action Plan to Combat Domestic Violence for 2020–2023*. Thematic areas such as judicial reform, cybercrime, anti-discrimination, anti-corruption and anti-money laundering (AML) sectors and gender equality were informed through the Council of Europe's relevant monitoring bodies³, thus they were well-chosen, and they effectively addressed declared national strategies and long-standing legislative gaps. However, the evaluator found little concrete evidence of structured consultations with national stakeholders for the design process thus limiting full national ownership.

Coherence

i. The Action Plan's design documents did not explicitly set out mechanisms to ensure coherence across sectors or projects, such as formal requirements for joint planning, shared outcomes, or integrated monitoring frameworks. A few isolated instances of coordinated implementations were reported, but coherence largely depended on the initiative of individual project teams. The Action Plan Steering Committee, although institutionalised, primarily focused on administrative co-ordination and progress reporting, with limited emphasis on cross-project learning, coherence or strategic alignment. Similarly, while the Partnership for Good Governance (PGG) and the Action Plan shared common objectives and thematic focus areas, there was no formal process in place to align their planning and implementation cycles. Although coherence was recognised as important in principle, the lack of clearly defined operational modalities hindered its

2. At the time of commissioning this evaluation, the subsequent Action Plan was planned to commence in January 2026. The emerging findings of the evaluation were presented to the evaluation reference group May 2025 and a draft report July 2025. The budget available for the evaluation only allowed for 30 service days for an external consultant to conduct the evaluation.

3: The European Commission against Racism and Intolerance (ECRI): monitors racism, xenophobia, antisemitism, and intolerance; The Group of States against Corruption (GRECO): evaluates member states' efforts to combat corruption; Conference of the Parties to the Warsaw Convention (Moneyval): evaluates anti-money laundering and counter-terrorism financing measures.

practical implementation, this in turn, reduced opportunities for structured cross-project learning, joint planning, and strategic alignment across different entities.

j. Limited visibility of the Action Plan persisted throughout the implementation period constrained stakeholders' understanding of its objectives, coherence across projects, and broader strategic recognition. Although communication efforts declined notably in 2024 due to decreased activity levels, limited awareness had already been observed in previous Action Plans. This underscores the importance of adopting a more consistent and strategically targeted approach to enhance the awareness and positioning of the Action Plan amongst institutional partners and civil society.

Effectiveness

k. The Action Plan achieved significant results in key areas thanks to strong institutional partnerships. Effectiveness was strongest where the Council of Europe had a sustained technical presence and trusted relationships with national institutions, particularly in the justice and combating economic crime sectors. However, performance was uneven across the Action Plan; areas that lacked national and donor interest—such as human trafficking initiatives—showed limited progress.

l. Stakeholders identified additional domains with strong potential for future cooperation that are currently underrepresented in the Action Plan and this evaluation. These include education, social rights, digital governance, artificial intelligence (AI), and environmental rights. Positive developments were noted in children's rights, youth participation, and anti-discrimination, while anti-corruption was seen as an area that could be strengthened in the next programming cycle.

m. The monitoring and evaluation system under the Action Plan remained underdeveloped. While activities were well reported, there was limited tracking of outcome-level change. The results framework was rarely used as a tool for steering implementation or assessing progress. As a result, opportunities to document, analyse, or leverage behavioural or institutional changes were missed.

n. The Action Plan made valuable technical contributions in areas where the Council of Europe holds long-standing expertise and institutional trust.

Efficiency

o. Delivery was generally efficient despite operational disruptions such as inflation, COVID-19, and the suspension of cooperation with national authorities during 2024. While the Action Plan delivered well in many areas, its operational efficiency was limited by strict budget rules, making it difficult to redirect unspent resources to emerging or underfunded priorities; several thematic areas identified in the Action Plan remained unaddressed (e.g. prison management and prison health care, trafficking in human beings, drug abuse and illicit trafficking). The evaluation found that the decision-making processes behind resource distribution were not perceived as transparent to stakeholders. Although the Action Plan was intended to be flexible, in practice, it could not adapt where funding and political buy-in were missing.

Lessons learned

p. From these findings, the evaluation identifies **lessons learned** that can guide future Action Plans:

- **Sustained success is linked to established presence, alignment, and peer-to-peer engagement.** Programmes perform best when they build on a long-standing presence, align with national priorities, and honour international obligations. High-level peer-to-peer assistance and regional partnerships amplify this impact by strengthening trust and speeding up reforms.
- Several domains were identified with **strong potential for future cooperation** that are currently not included in the Action Plan or are currently not being implemented. These include education, social rights, digital governance, artificial intelligence (AI), and environmental rights. Implementation of Anti-corruption work re-commenced during the evaluation process. These insights point to emerging thematic priorities for the next programming cycle.

Recommendations

Recommendation 1: Strengthen participatory design processes to enhance national ownership and relevance.

Recommendation 2: Ensure usability of the Action Plan logframe and develop a more robust results-based management system focused on outcomes monitoring and reporting.

Recommendation 3: Assess mechanisms for proportionate structured co-ordination and learning to ensure internal coherence.

Recommendation 4: Identify mechanisms and processes that allow for increased resource flexibility to respond to emerging needs and rebalance underfunded areas.

Recommendation 5: Expand communication efforts to improve awareness and strategic positioning of the Action Plan.

1. Introduction

1.1. Background and introduction to the Action Plan

1. The Council of Europe's work is carried out through an integrated model of standard-setting, monitoring, and cooperation ("strategic triangle"). Council of Europe conventions and soft law instruments produced through the work of intergovernmental bodies provide a set of standards. Monitoring bodies assess compliance with these applicable standards, including Council of Europe conventions and other international frameworks, such as the Financial Action Task Force (FATF) Recommendations. They identify gaps in legislation, policy, or practice and propose measures to address them. Cooperation activities, implemented through multi-stakeholder dialogue, provide a platform for awareness-raising, peer-to-peer exchange and sharing of experience and good practices.

2. Country-specific Action Plans, agreed between the Council of Europe and the relevant authorities of the respective member State, are presented as strategic and sectorial programming instruments, and aim to allow for an inclusive and coherent approach to co-operation. The Council of Europe Action Plan for Azerbaijan 2022-2025⁴ (hereafter "Action Plan") was approved by the Committee of Ministers on 16 February 2022. It aims to be a strategic programming instrument to bring Azerbaijan's legislation, institutions and practice further into line with Council of Europe standards in the areas of human rights, the rule of law and democracy. The Action Plan is intended to support the country's efforts to honour its obligations as a Council of Europe member State.

3. The Action Plan aims to support Azerbaijan in advancing strategic reforms in the areas of human rights, the rule of law and democracy. Assistance was envisaged in the fields of effective implementation of the European Convention on Human Rights implementation including promoting media professionalism and freedom of information; equality and human dignity including promoting gender equality and combatting violence against women and domestic violence; children's rights; anti-discrimination, diversity and inclusion; rule of law including independence and efficiency of justice, fight against corruption and anti-money laundering, anti-corruption measures (the initial project phase focused on AML, while the current phase, from March 2023 to February 2026, covers both areas), cybercrime, and democracy including supporting the young people to benefit from quality youth work and non-formal education on environment and climate matters.

4. Under the Action Plan, the Council of Europe and the Azerbaijani authorities identified new areas for cooperation, namely aligning national anti-discrimination legislation and practice with Council of Europe standards, ensuring freedom of expression, artificial intelligence, combating drug abuse and illicit trafficking and combating trafficking in human beings in line with national legislation and international obligations of Azerbaijan. The Action Plan builds on an established trajectory of cooperation that began with the country's accession to the Council of Europe in 2001⁵. Over the years, Azerbaijan has engaged with a broad spectrum of the Council of Europe's conventions, monitoring mechanisms, and expert advisory bodies. These include Group of States

4. <https://rm.coe.int/action-plan-azerbaijan-2022-2025-eng/1680a59aa3>.

5. Azerbaijan has been a member of the Council of Europe since 2001 and has ratified 65 of its conventions.

Against Corruption (GRECO) (anti-corruption)⁶, by Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL)⁷, European Commission against racism and intolerance (ECRI) (anti-discrimination)⁸, and the Venice Commission (constitutional and legal reform)⁹, among others. In addition, the FATF¹⁰ sets international standards assessed by MONEYVAL in the AML/Countering Financing of Terrorism (CFT) area. According to the Action Plan narrative, current cooperation draws on the results and experiences of the two preceding Action Plans, implemented between 2014 and 2021¹¹. The Action Plan states that it is shaped by the lessons and findings of Council of Europe monitoring mechanisms, while also being firmly anchored in Azerbaijan's strategic reform objectives, including its long-term development vision and targeted national action plans¹².

1.2. Purpose, objectives and Scope of the evaluation

5. The Action Plan evaluation supports the Council of Europe's management, the Council of Europe Office in Baku, and relevant project staff in their strategic and operational decision-making, as well as in co-ordination and implementation. The evaluation aims to assess the extent to which the Action Plan, as a strategic programming instrument, is effective, efficient, relevant, and coherent. It assesses whether work carried out by the Council of Europe under the Action Plan is relevant and whether the selected projects and their prioritisation align with the perceived needs of stakeholders. The results of this evaluation will feed into the preparation of the new Action Plan for Azerbaijan as well as other Action Plans, to enhance their relevance, coherence, efficiency and effectiveness.

6. Objectives of the evaluation:

- To assess the outcomes achieved by the projects implemented under the action plan.
- To assess the extent to which the Action Plan is in line with the expressed needs of the beneficiary country, as reflected in national policy, legislation, strategies and practices.
- To draw lessons, identify good practices and provide recommendations related to the design and implementation of projects.
- To assess the resource mobilisation efforts for funding the Action Plan.

7. The scope of the evaluation covered themes and activities conducted under the Action Plan between 2022 and 2025. This includes country-specific and regional projects.

6. Available at <https://www.coe.int/en/web/greco>.

7. Available at <https://www.coe.int/en/web/moneyval>.

8. Available at <https://www.coe.int/en/web/european-commission-against-racism-and-intolerance>.

9. Available at <https://www.venice.coe.int/>.

10. Available at <https://www.fatf-gafi.org>.

11. Council of Europe Action Plans for Azerbaijan: 2014-2017 (ODGProg/Inf(2014)2-rev); 2018-2021 (GR-DEM (2018)15), Strasbourg See also list of outcomes of the previous Action Plans with Azerbaijan 2014-2017 and 2018-2021 available at <https://coe.mfa.gov.az/en/category/cooperation-with-the-council-of-europe>, last visited 21.06.2025.

12. Previous Action Plans resulted in positive developments, such as: Increased training capacities of the Justice Academy; Development of curricula on journalism ethics and freedom of expression; Adoption of gender-sensitive media standards; Approval of a national action plan on domestic violence; Ratification of the Lanzarote Convention; Enhanced court performance based on CEPEJ tools; Improvements in the prison system and access to legal aid; Creation of a civil society anti-discrimination platform. These outcomes inform the design and focus of the current Action Plan (*Council of Europe Action Plan for Azerbaijan 2022-2025*, p. 7-8).

1.3. Evaluation approach and methodology

8. The evaluation of the Council of Europe–Azerbaijan Action Plan (2022–2025) followed a structured, mixed-methods approach grounded in international evaluation standards¹³ and aligned with the Council of Europe’s evaluation policy. It was designed to generate actionable recommendations to inform future programming.

9. The evaluation covered four OECD/DAC criteria: relevance, coherence, efficiency, and effectiveness. The detailed evaluation matrix (see Annex V) sets out the evaluation questions, sub-questions, indicators, and data sources. The main evaluation questions are outlined below:

Table 1: Evaluation questions

RELEVANCE	
Q1. To what extent is the Action Plan for Azerbaijan 2022–2025 consistent with and tailored to the needs and expectations of the Azerbaijani national authorities as the main beneficiaries and partners?	
Sub-questions	a) Were the needs and priorities of Azerbaijani national authorities adequately reflected in the selection, design and implementation of projects?
	b) Were Azerbaijani national authorities adequately consulted during the Action Plan and project design phases?
COHERENCE	
Q2. To what extent are the actions carried out under the Action Plan internally coherent?	
Sub-questions	a) To what extent did the internal consultation process on the Action Plan ensure complementarity and avoid overlaps?
	b) To what extent have the synergies been promoted/achieved between the projects implemented under the Action Plan?
EFFECTIVENESS	
Q3. To what extent has the Action Plan achieved its objectives and outcomes?	
Sub-questions	a) To what extent has the Action Plan supported reforms in Azerbaijan to bring legislation, institutions, and practice further in line with the Council of Europe standards?
	b) Which factors have supported and hindered the effectiveness of the projects implemented under the Action Plan?
EFFICIENCY	
Q4. How efficiently has the Action Plan been managed with regard to the financial and human resources available?	
Sub-question	a) To what extent have the management and implementation processes under the Action Plan ensured its efficient implementation (selection of delivery methods, consideration of alternatives and costing, etc.)?

10. The methodology employed a combination of qualitative and quantitative data collection and analysis techniques. Evidence was gathered through document reviews, interviews (both in-person and online), and statistical and financial analyses. The analysis applied thematic coding to ensure triangulation and contextual interpretation.

11. A total of 73 participants—including national partners, direct beneficiaries, development partners, and project staff—were involved in the evaluation through interviews, focus group

13. OECD Development Assistance Committee, Better Criteria for Better Evaluation: Revised Evaluation Criteria Definitions and Principles for Use (OECD 2019). Available at <https://www.oecd.org/dac/evaluation/revised-evaluation-criteria-dec-2019.pdf>; United Nations Evaluation Group, Norms and Standards for Evaluation (revised edn, UNEG 2020) Available at <https://unevaluation.org/document/detail/2788> accessed 1 August 2025.

discussions, and meetings. The participants included 43 women and 30 men. The field mission to Azerbaijan took place from 5th to 9th May 2025 and was complemented by online interviews and validation meetings with stakeholders. Project-level data served as the empirical foundation for assessing outcomes at the Action Plan level.

12. Three primary data collection tools were used:

Document Review: Over 60 strategic and operational documents were systematically analysed, including project proposals, monitoring reports, and the Steering Committee Minutes, past evaluations, and policy frameworks. This allowed the team to reconstruct the logic of the Action Plan, assess alignment with national and Council of Europe priorities, and verify evidence of implementation and results.

Key Informant interviews were conducted with representatives from the Council of Europe Secretariat, the Directorate of Programme Co-ordination, project teams, national authorities, civil society organisations, and international partners. Interviews followed tailored guides to allow for probing while maintaining consistency across stakeholder groups.

Focus Group Discussions: Two focus group discussions were held, one with civil society actors and one with local staff at the Council of Europe Office in Baku. These provided insights into shared experiences, perceived changes, and the perceived relevance. Although visibility of the Action Plan was not a central focus of the evaluation, participants highlighted it in their reflections, alongside the added value of the Action Plan.

Table 2: Overview of interviewed stakeholders

Stakeholder groups	Number of participants			Number of interviews/focus groups		
	Men	Women	Total	In-person	Online	Total
Council of Europe HQ	5	6	11	0	8	8
Council of Europe Office in Baku	3	10	13	2	1	3
National authorities	18	22	40	18	2	20
International organisations	2	3	5	2	1	3
CSOs	2	2	4	1	0	1
Total	30	43	73	23	12	35

1.3.1. Sampling and data sources

13. The evaluation approach aimed to ensure that the totality of the Action Plan was assessed – this involved looking at the overall design, delivery and results of the Action Plan as a whole, supplemented by a more detailed look at a sample of projects from across the three thematic pillars of the Action Plan to gain a deeper understanding of the relevance, coherence, effectiveness and efficiency of the Action Plan. This multi-level approach ensured that the evaluation combined operational depth with strategic breadth, offering robust findings for both learning and accountability.

14. A synthesis of project results, implementation trends, and stakeholder experiences presents a picture of how well the Action Plan delivered its intended outcomes. The project documentation that was provided was deemed adequate to capture a representative snapshot of implementation dynamics and to generate relevant insights aligned with the evaluation objectives and with a view to capture a broad picture of the Action Plan's implementation.

15. The evaluation report presents insights from both sampled and non-sampled projects to provide a strategic perspective and a higher-level view of the action plan and all funded activities. This approach allows for a more complete presentation of effectiveness by including results were found to have contributed significantly to the implementation of the Action Plan.

16. The Action Plan comprises a total of 24 projects, nine projects were sampled to ensure thematic and geographic representativeness of the Action Plan. Five of these were identified in the Terms of Reference as core projects implemented by the Council of Europe Office in Baku under the Action Plan a further four were added during the inception phase:

- a. P2088 CyberEast – Action on Cybercrime for Cyber Resilience in the Eastern Partnership region (20/06/2019–19/12/2023)
- b. P2341 PGG II: Strengthening anti-money laundering and asset recovery in Azerbaijan (01/01/2019–28/02/2023).
- c. P2857 Support for a better evaluation of the result of judicial reform efforts in the Eastern Partnership ‘Justice Dashboard East
- d. P2914 PGG III: Women Access to Justice – implementing Council of Europe’s gender equality and violence against women standards (01/03/2023–28/02/2026).
- e. P3155 PGG III: Preventing and combating violence against women and domestic violence in Azerbaijan (01/03/2023–28/02/2026).
- f. P3342 PGG III: Preventing and fighting economic crime in Azerbaijan (01/03/2023–28/02/2026).
- g. P3384 Promoting media professionalism and freedom of information in Azerbaijan (PRO-M-FEX) (01/07/2022–31/12/2025).
- h. P3436 PGG III: Fostering mediation in Azerbaijan (01/03/2023–28/02/2026).
- i. P3446 PGG III: Promoting equality in Azerbaijan (01/03/2023–28/02/2026).

1.3.2. *Evaluation limitations*

17. **The constrained timeframe and modest budget allocated for the evaluation:** This evaluation was conducted within a compressed timeframe and on a limited budget. The evaluation will feed into the next Action Plan development, however, by the time the first draft of the evaluation was produced, the timeline of the Action Plan had been extended by a year¹⁴. As a mitigation measure, the number of evaluation questions was reduced and prioritised. On evaluating coherence, the evaluation was restricted to looking at co-ordination process between projects under the Action Plan rather than a more extensive analysis of coherence against the wider aspects of the strategic triangle. The efficiency analysis was limited as results in the framework primarily were quantified but not qualified making it impossible to analyse cost efficiency. Those findings which are supported by an adequate level of evidence and validated through stakeholder consultations have been prioritised for inclusion in the report, those findings that were not able to be triangulated across data sources (due to time and budget pressures) were not included or are subject to appropriate caveats in the report.

18. **Incomplete outcome data:** Many projects under the Action Plan lacked systematic outcome tracking. Output data were available and well documented (examples are the number of

14. At the time of commissioning this evaluation, the subsequent Action Plan was planned to commence in January 2026. The emerging findings of the evaluation were presented to the evaluation reference group in May 2025 and a draft report in July 2025. The budget available for the evaluation only allowed for 30 service days of an external consultant to conduct the evaluation.

capacity building activities, normative documentation translated, etc). Evidence on behavioural or institutional change was scarce, making it difficult to assess intermediate outcomes. Mitigation: triangulated qualitative evidence was used.

19. **Limited use of the results framework and SDG indicators:** The Action Plan's Logical Framework was not actively used by project staff or national partners for monitoring or co-ordination. The inclusion of SDG indicators in the Action Plan provided a valuable alignment with global development priorities. However, none of the reviewed projects explicitly reported on how their achieved results contributed to the specific SDGs referenced in the Plan, limiting the practical utility of these indicators for assessing progress. This hindered the evaluation's ability to assess progress against intended results. *Mitigation:* The evaluation team conducted additional analysis to map project activities against the stated outcomes and reviewed internal planning and donor reporting documents to reconstruct the intended results logic.

20. **Language and logistical constraints:** Some interviews required simultaneous interpretation, which limited the flow of in-depth technical discussions. Mitigation: Interpretation was arranged for technical interviews, and additional interviews were conducted with the Council of Europe Office in Baku to better understand the context of the complex technical issues.

2. Adoption and implementation of the Action Plan

21. According to the Republic of Azerbaijan Ministry of Foreign Affairs website (accessed August 2025), the Council of Europe Action Plan for Azerbaijan (2022–2025) was developed through a collaborative process involving consultations between the Council of Europe Secretariat and the Azerbaijani authorities.¹⁵ The draft Action Plan incorporated inputs and proposed changes from the national side, reflecting jointly identified priorities.¹⁶ Following these consultations, the Committee of Ministers adopted the Action Plan on 16 February 2022.

22. Extra-budgetary resources provided the main source of funding for the Action Plan. They included resources made available by the European Union for the implementation of Joint Programmes, mainly through the Partnership for Good Governance (PGG)¹⁷, as well as through voluntary contributions from Member States. As of 31 December 2024, the Council of Europe Action Plan for Azerbaijan 2022-2025 received a total funding volume of €9.2 million, representing 80% of its total financing needs of €11.5 million.

23. As of 31 December 2024, contributions from the EU (€ 5,467,760) account for 60% of the funding secured, while the Ordinary Budget funding (€ 2,481,526) represents 27%. Voluntary contributions from Member States and other donors (€ 1,235,964) account for 13% of the funding secured. Donors to the Action Plan (in descending order according to their financial contributions)

15. Republic of Azerbaijan, Ministry of Foreign Affairs, *Relations between Azerbaijan and the Council of Europe (CoE)* (<https://mfa.gov.az/en/category/regional-organisations/relations-between-azerbaijan-and-the-council-of-europe-coe>) accessed 8 August 2025.

16. Council of Europe (2025), Council of Europe Action Plan for Azerbaijan 2022–2025: Funding Status on 15 May 2025, Strasbourg.

17. <https://pjp-eu.coe.int/en/web/partnership-governance/about-partnership-good-governance>, last visited 21.06.2025.

are the EU, Germany, the Human Rights Trust Fund (HRTF)¹⁸, Belgium, Liechtenstein, Lithuania and Romania.

24. In 2024, there was a gap in terms of active support to national authorities following the Parliamentary Assembly's decision not to ratify the credentials of the Azerbaijani delegation, followed by the authorities' decision not to participate in co-operation activities. However, the Council of Europe continued implementing the Action Plan with activities that did not require the active involvement of the authorities, primarily engaging civil society organisations (CSOs), journalists, lawyers and young people until November 2024. In November 2024, the Azerbaijani authorities confirmed their resumption of technical co-operation, and the Council of Europe put into action all postponed activities¹⁹.

3. Key findings

25. This following section presents the key findings responding to evaluation questions:

Table 3: Summary of Key Findings

RELEVANCE
<p>EQ 1. To what extent is the Action Plan for Azerbaijan 2022-2025 consistent with and tailored to the needs and expectations of the Azerbaijani national authorities as the main beneficiaries and partners?"</p> <p><u>Key finding 1:</u> The Action Plan was generally aligned with national reform priorities and institutional requirements.</p> <p><u>Key finding 2:</u> Although many projects under the Action Plan aligned with national priorities during implementation, the overall design process lacked meaningful consultation with Azerbaijani authorities. Input from national partners was limited, often informal, and did not involve structured needs assessments.</p>
COHERENCE
<p>EQ.2 To what extent are the actions carried out under the Action Plan internally coherent?</p> <p><u>Key finding 3:</u> The Action Plan exhibited selective thematic co-ordination and achieved synergies in certain areas; however, these instances were largely ad hoc and reliant on the initiative of individual project teams rather than being directed by a strategic or institutionalised co-ordination mechanism.</p> <p><u>Key finding 4:</u> The absence of operational mechanisms for cross-project learning and strategic co-ordination likely undermined the Action Plan's internal coherence and diminished its overall visibility.</p>
EFFECTIVENESS
<p>EQ 3. To what extent has the Action Plan achieved its objectives and outcomes?</p> <p><u>Key finding 5:</u> The Action Plan contributed to some core reform areas, and some projects triggered legal and institutional shifts.</p> <p><u>Key Finding 6:</u> The effectiveness of the Action Plan was strongest in areas where the Council of Europe holds recognised technical expertise and was able to scale up support through long-term institutional partnerships and structured programming. Overall achievement of results was challenged by the operational context.</p> <p><u>Key Finding 7:</u> Monitoring systems remained output-focused, with limited tracking of long-term behavioural or institutional change. As a result, awareness of the Action Plan and its results framework was low among key institutions, and it was rarely used to guide or monitor progress.</p>

18. The Human Rights Trust Fund (HRTF) brings together eight contributors – Finland, Germany, Ireland, Luxembourg, the Netherlands, Norway, Switzerland and the United Kingdom.

19. Council of Europe, *Action Plan for Azerbaijan 2022–2025, Action Plan-level Annual Report for Donors, 1 January 2024 to 31 December 2024* (internal document, Council of Europe 2025).

EFFICIENCY

EQ 4. How efficiently have the projects under the Action Plan been managed concerning the financial and human resources available?

Key finding 8: Projects under the Action Plan were implemented in a timely manner given the financial and human resources available, despite several cross-cutting constraints, including those outside of the control of the Council of Europe.

3.1. Relevance

26. The evaluation examined to what extent the Action Plan is consistent with and tailored to the beneficiaries and partners' needs and expectations, additionally the evaluation assesses whether the needs and priorities of the Azerbaijani national authorities are adequately reflected in the selection, design and implementation of projects.

Key finding 1: The Action Plan was generally aligned with national reform priorities and institutional requirements.

27. The Action Plan priorities encompassed decisions, resolutions, recommendations, conclusions of reports, and opinions of the Council of Europe's decision-making, standard-setting, and monitoring bodies. It also took into account Azerbaijan's national reform agenda, including the strategic document Azerbaijan 2030: National Priorities for Socio-Economic Development / the Strategy for Socio-Economic Development in 2021- 2025²⁰ the National Action Plan to Combat Domestic Violence 2020–2023 the National Action Plan for 2020- 2024 on Combating Trafficking in Human Beings in the Republic of Azerbaijan and the National Action Plan for the Promotion of Open Government 2020-2022 which prioritised improved institutional capacity, anti-corruption measures and public sector modernisation.

28. Adaptability was a planned as central feature of the Plan, reflecting the need for operational flexibility following the COVID-19 pandemic, which led to an increased reliance on digital tools and remote engagement. It was also designed to support Azerbaijan's contribution to selected Sustainable Development Goals, with a focus on gender equality, reducing inequalities, and building just, inclusive institutions. This adaptability was evident during the temporary suspension of cooperation activities by Azerbaijani state institutions, when the programme maintained its presence by supporting other relevant actors. This included capacity building for civil society organisations and the development of durable outputs—such as toolkits, online courses, and standard-setting documents—that continued to provide value beyond the lifespan of individual projects.

29. **Strategic Alignment with National Priorities.** The Action Plan demonstrates overall relevance by aligning with Azerbaijan's declared reform priorities, notably in areas such as mediation, cybercrime, anti-corruption and AML, anti-discrimination, freedom of expression and the execution of ECtHR judgments. To this end, the Action Plan was relevant to Azerbaijan's ongoing legal and institutional reforms within Azerbaijan 2030: National Priorities for Socio-Economic Development, the Strategy for Socio-Economic Development in 2022-2026, and the National Action Plan to combat domestic violence for 2020-2023, National Action Plan for the Promotion of Open

20. Council of Europe (2022), *Action Plan for Azerbaijan 2022–2025*, CM (2022)21, Strasbourg, pp. 13, 18, 22 pp 13, 18, 22.

Government 2020-2022, as well as GRECO and MONEYVAL recommendations. The Action Plan priorities encompassed decisions, resolutions, recommendations, conclusions of reports, and opinions of the Council of Europe's decision-making, standard-setting, and monitoring bodies, which emphasised a strong social policy, a fair society, and inclusive development. This was operationalised through projects that enhanced access to justice for women and vulnerable groups, promoted e-justice and judicial transparency, and addressed violence against women and domestic violence²¹.

30. The Action Plan was closely aligned with the National Action Plan to Combat Domestic Violence 2020–2023, contributing to planned reforms, including 2024 amendments to the Law on Preventing Domestic Violence, the Family Code, the Criminal Code and the Code of Administrative Offences²². The proposed support included capacity building for the development of protection measures, provision of state-funded legal aid, training of justice sector actors on gender-based violence, and advocacy for legislative reform, including the removal of the marriage age exception.

31. Similarly, the Action Plan aimed to support the Strategy for Socio-Economic Development 2022–2026, which prioritised improved institutional capacity, anti-corruption measures, and public sector modernisation. To this end, the Plan envisaged contributions through compliance tools and risk-based approaches in the anti-corruption field²³ (extensive capacity development for law enforcement and oversight bodies). Its engagement with key national institutions such as the Ministry of Justice, the Prosecutor General's Office, Financial Monitoring Service, Commission on Combating Corruption and the Constitutional Court further reinforced this institutional modernisation agenda²⁴.

32. Across all projects, legal and institutional reforms were supported in direct response to government priorities or in areas where Azerbaijani institutions expressed readiness to engage. For instance, Mediation initiatives were aligned with the 2019 Mediation Law and national justice reform priorities. They supported the development of a unified data collection system, strengthened the capacity of the national mediation training institution and trainers, and increased awareness among stakeholders to promote the use of mediation and share good practices²⁵.

33. The regional cybercrime cooperation projects were relevant and advanced legal reforms in all participating countries, except for Azerbaijan, where a legal framework was developed with the project's efforts, but no significant progress has been made in this regard²⁶. However, the government's interest in enhancing national cybersecurity capabilities under the Budapest Convention was addressed through the establishment of a specialised Department for Combating Cybercrime within the Ministry of Internal Affairs in 2023.

34. The Action Plan responded to critical national needs by **addressing long-standing legislative gaps in the prevention of violence against women and domestic violence**. The intervention was informed by a *Gap Analysis* of Azerbaijan's legal and policy framework, which

21. Council of Europe (2022), *Action Plan for Azerbaijan 2022–2025*, CM(2022)21, Strasbourg pp 13, 18, 22.

22. *Ibid*, p. 19.

23. *Ibid*, pp. 14 and 15.

24. *Ibid*, pp. 9–10.

25. Project No 3436 – *PGG III: Fostering Mediation in Azerbaijan*, Annual Report for the period of 01/03/23-29/02/2024.

26. Project No 2088-CyberEast - Action on Cybercrime for Cyber Resilience in the Eastern Partnership region, Final Report – 20 June 2019 to 19 December 2023, p. 10.

aligned the country's domestic legislation with the Council of Europe and other international standards²⁷. The government's adoption of these recommendations indicates that the Action Plan was well aligned with reform priorities in this thematic area, particularly concerning the protection of women's and children's rights.

35. **Responsiveness to Beneficiary Needs.** The Action Plan demonstrated responsiveness in its engagement with key state stakeholders, including the Ministry of Justice, the Supreme Court, the Mediation Council, the Justice Academy, and the Office of the Ombudsperson. For example, the two phases of the project *Support for the Improvement of the Execution of the European Court judgments by Azerbaijan*, were tailored to address specific institutional gaps, including the analytical capacity at the Supreme Court and the development of procedural tools, such as the action plan for national execution of judgments stakeholders. To this end, the project directly addressed Azerbaijan's backlog of ECtHR cases and supported the authorities by providing recommendations about Protocol 16, as well as translated relevant European Court documents on this matter.

36. Another example was found in the field of anti-discrimination, where the Promoting Equality in Azerbaijan project indirectly responded to the institutional needs of the Ombudsperson's Office, enabling the expansion of its legal equality mandate and capacity building. Additionally, the *Fostering Mediation in Azerbaijan* project effectively supported national institutions with tangible outcomes, including a mediation handbook, training strategies, and regional service expansion. Some specific examples include addressing the needs for legislative amendments to the Ombudsperson Law, which expanded the institution's mandate to cover the rights of persons with disabilities and children.

37. In addition to the reform areas assessed in detail, stakeholders identified several domains with **strong potential for future cooperation** that are currently not included in the Action Plan or are currently not being implemented. These include education, social rights, digital governance, artificial intelligence (AI), and environmental rights. Furthermore, anti-corruption was mentioned as a relevant domain, suggesting that future programming could consider renewed implementation in this area. These insights point to emerging thematic priorities for the next programming cycle.

Key finding 2: Although many projects under the Action Plan aligned with national priorities during implementation, the overall design process lacked meaningful consultation with Azerbaijani authorities. Input from national partners was limited, often informal, and did not involve structured needs assessments.

38. **Limited national ownership due to the top-down design of the Action Plan.** The Council of Europe took the lead in designing the Action Plan for Azerbaijan (2022–2025), including its results framework (Logical Framework), with input from national partners. The preparation of the Council of Europe Action Plan for Azerbaijan 2022–2025 began in 2021 and involved discussions with the Azerbaijani authorities. International partners, especially the European Union²⁸. The Council of

27. Evans, J. and Hermosilla Sierra, M. (2022), *Gap Analysis of the Legislative and Policy Framework in the Field of Violence Against Women and Domestic Violence in Azerbaijan in Line with Council of Europe and Other International Standards: Raising Awareness of the Istanbul Convention and Other Gender Equality Standards in Azerbaijan*, Partnership for Good Governance II (2019–2022), June 2022, Strasbourg. Conducted under the previous Council of Europe project "Raising Awareness of the Istanbul Convention and Other Gender Equality Standards in Azerbaijan" implemented within the framework of the Partnership for Good Governance II (2019–2022).

28. Council of Europe (2022), *Action Plan for Azerbaijan 2022–2025*, CM (2022)21, Strasbourg, p. 8, para. "Consultation Process".

Europe's Committee of Ministers reviewed the final report from the previous Action Plan (2018–2021), considered its results, and approved the new Action Plan in February 2022²⁹.

39. While formal consultations were held, they were not sufficient to create full national ownership of the Action plan and its results framework. Subsequently, in some instances, there is low awareness and limited use and understanding of the Action Plan's strategic framework among Azerbaijani institutions.

40. **The evaluation found insufficient evidence that the design of the Action Plan was anchored in systemic needs and gap analyses and mapping of the stakeholders and similar interventions by other development partners, lessons learned across all the pillars and sub-pillars included in the framework.** Apart from the Gap Analysis on violence against women and domestic violence³⁰, no further analyses were found. The Action Plan could have been better tailored to emerging national priorities (for example, regional forensic capabilities and cyber incident response readiness, which were mentioned in the Cyber Barometer study conducted under the CyberEast project).

41. Several national stakeholders were not familiar with the Action Plan's results matrix, and it was unclear at what stage of the implementation the logframe is used as a monitoring tool to assess the monitoring progress against it, as they were not meaningfully engaged in its development. As a result, the Action Plan was often perceived as externally driven and insufficiently tailored to the national context.

42. Civil society organisations (CSOs) were engaged as beneficiaries (especially in the anti-discrimination and media projects), with only a limited role in project design. Collaboration with the CSO partners expanded significantly in 2024, particularly as engagement with some of the state authorities was limited during that period.

3.2. Coherence

43. The evaluation assessed to what extent the actions carried out under the Action Plan are internally coherent. Specifically, the evaluation assessed how and whether the internal consultation process on the Action Plan ensured complementarity and avoided overlaps. It also aimed to uncover whether synergies have been promoted or achieved between the projects implemented under the Action Plan.

Key finding 3: The Action Plan demonstrated selective thematic co-ordination and achieved synergies in certain areas; however, these instances were largely ad hoc and dependent on individual project teams rather than guided by a strategic or institutional mechanism.

44. **While the Action Plan for Azerbaijan 2022–2025 claims structural alignment with the Council of Europe's Programme and Budget and its biennial cycles to enhance coherence, this alignment primarily reflects procedural synchronisation at the institutional level.**³¹ The available documentation does not provide sufficient evidence that the internal consultation process

29. Council of Europe (2022), *Action Plan for Azerbaijan 2022–2025*, CM (2022)21, Strasbourg.

30. Conducted under the previous Council of Europe project "Raising Awareness of the Istanbul Convention and Other Gender Equality Standards in Azerbaijan" implemented within the framework of the Partnership for Good Governance II (2019–2022).

31. Council of Europe (2022), *Action Plan for Azerbaijan 2022–2025*, CM(2022)21, Strasbourg, p. 32, para. 3.4 (Funding).

during the planning and design phase of the Action Plan was used to ensure complementarity systematically or to prevent thematic or operational overlaps across interventions³². The absence of a detailed account of internal co-ordination mechanisms, stakeholder engagement, or cross-sectoral validation suggests that coherence in implementation may not have been fully operationalised through internal consultations.

45. **Some projects under the Action Plan worked well together by linking similar topics** and sharing resources. Some projects integrated training and shared methodologies. For example, the teams of Project 2088 *CyberEast – Action on Cybercrime for Cyber Resilience in the Eastern Partnership Region* and Project 3342 *PGG III: Preventing and Fighting Economic Crime in Azerbaijan* collaborated, ensuring complementarity and synergies in these areas between these two projects on virtual currencies and darknet investigations.

46. An example of internally coherent implementation within the Action Plan is the *Promoting Equality in Azerbaijan* project, which created synergies with *Promoting Media Professionalism and Freedom of Information in Azerbaijan* on the intersection of hate speech and freedom of speech, the Gender Equality project, primarily around gender-based hate speech (not gender-based violence). Collaboration with other sectors has been informal but practical, including shared beneficiaries, cross-referrals, and joint participation in events.

47. The *Fostering Mediation in Azerbaijan* project under PGG III, although implemented as a stand-alone activity, showed good potential for working in harmony with other Action Plan's initiatives. Institutional partners such as the Ministry of Justice, the Justice Academy, and the Mediation Council were involved in other Council of Europe-supported justice reforms, which reinforced continuity and policy alignment. Furthermore, the project contributed to coherence by sharing tools of CEPEJ, including the Evaluation and Review Platform Dashboard and joint data collection methodologies, which are used across several Council of Europe projects.

48. **Co-ordinated efforts were observed at the regional level, where projects tapped into existing networks and initiatives.** Azerbaijan demonstrated strong regional cooperation through its participation in the December 2024 Regional Cybercrime Cooperation Exercise in Tirana, organised under the joint EU–Council of Europe projects *CyberSEE* and *CyberEast+*. Five delegates from key national institutions enhanced their skills, reflecting effective complementarities and alignment **with broader regional efforts on cybercrime**³³.

49. These examples demonstrate that effective collaboration between projects is possible when teams take the initiative. However, such cooperation was not embedded in the Action Plan's mode of working and relied heavily on individual efforts. There were missed opportunities to highlight synergies and adaptive practices in Steering Committee meetings.

Key finding 4: The absence of institutionalised mechanisms for cross-project learning and strategic co-ordination likely undermined the Action Plan's internal coherence and diminished its overall visibility.

32. To respond to the evaluation question, the evaluation consultant only looked for processes to avoid potential overlaps.

33. Council of Europe (2023), *CyberSEE, CyberEast, Octopus Project: Regional cybercrime exercise boosts interagency cooperation across East, South-East Europe and Türkiye*, 22 November 2023. Available at: www.coe.int/cybercrime/cybersee-cybereast-octopus, accessed 24 June 2025.

50. **Although the Action Plan included multiple country-specific and regional projects, most of which were under the EU and the Council of Europe joint programme Partnership for Good Governance (PGG), no formal mechanism was established to facilitate structured cross-project learning or promote joint planning.** Co-ordination platforms, such as the Action Plan Steering Committee and the PGG steering committee meetings, were operational but primarily focused on the progress of initiatives and best practices, rather than strategic alignment across initiatives.

51. **The Steering Committee lacks a clear mechanism to enhance co-ordination across projects.** There are no Terms of Reference (ToR) defining the Steering Committee's role in aligning strategies, co-ordinating activities, or facilitating joint planning across the Action Plan portfolio. Therefore, while it provides a platform for sharing updates, it is not used to align strategies, co-ordinate activities, or promote joint planning between different parts of the Action Plan. In the absence of such a framework, the Committee functions primarily as an information-sharing platform, rather than as a mechanism for strategic coherence and programme integration. This structural gap limits its capacity to promote synergies or ensure a harmonised approach across different interventions. As a result, the potential of the Committee to improve synergies and ensure a more connected programme remains largely untapped. However, the extent to which increased co-ordination would enhance Action Plan delivery in Azerbaijan at this point remains unclear.

52. The Action Plan and the PGG Steering Committee meetings were often held in Baku on the same day and covered similar content. While this approach was found to be cost-efficient, participation in both formats felt duplicative, with overlapping agendas and limited space for joint reflection or forward-looking planning.

53. **The awareness of the Action Plan as a strategic co-operation framework remained limited.** The visibility of the Action Plan matters because it helps everyone involved and the final beneficiaries to understand what the Plan is trying to achieve and how different projects fit together. To this end, the awareness of the Action Plan was limited among donor institutions working on related implementation frameworks, such as the Partnership for Good Governance (PGG). As reported by some informants, the communication efforts around the Action Plan decreased sharply in 2024 following the Parliamentary Assembly's decision not to ratify the Azerbaijani delegation's credentials and the subsequent suspension of technical cooperation activities with national authorities. However, the limited visibility of the Action Plan cannot be attributed solely to external circumstances. A similar observation regarding limited awareness and outreach was made in 2022, as noted in the final report on the previous Action Plan: "More awareness-raising is needed among civil society representatives and the public at large about the nature and value of technical co-operation work in connection with the Action Plan in Azerbaijan"³⁴.

54. A review of the Council of Europe's website and the website of its Office in Baku confirms that, although the Action Plan is publicly available in both English and Azerbaijani, project updates published on these platforms do not consistently refer to the Action Plan as their strategic framework. However, none of the reviewed posts referenced the fact that these initiatives—whether national or regional under the Partnership for Good Governance (PGG)—were part of the Action

34. Council of Europe, *GR-DEM(2022)3 – Final Report on the Council of Europe Action Plan for Azerbaijan 2018–2021*, p. 14.

Plan. As a result, the link between individual project activities and their strategic origin in the Action Plan remained unknown to outside audiences.

3.3. Effectiveness

55. The evaluation assessed to what extent the Action Plan achieved its objectives and outcomes, specifically whether the Action Plan supported reforms in Azerbaijan to bring legislation, institutions, and practice further in line with the Council of Europe standards.

56. The projects that were analysed allowed the evaluation to capture illustrative evidence from across the Action Plan's three pillars: Human Rights, Rule of Law, and Democracy, while ensuring evaluability and complementarity. However, as the scope of this evaluation focused on the Action Plan as a whole, rather than individual project performance, its ability to assess outcome-level achievements across thematic areas was limited.

Key finding 5: The Action Plan contributed to some core reform areas, and some projects triggered legal and institutional shifts.

57. Based on the analysis of the 2022–2024 annual implementation reports, the Action Plan interventions sought to support Azerbaijan in aligning national legislation, institutions, and practices with European standards across seven priority areas: effective implementation of the European Convention on Human Rights including freedom of media, justice system reform, fight against corruption and countering economic crime, gender equality and combating violence against women and domestic violence, children's rights, and anti-discrimination and inclusion³⁵. Targets included institutional strengthening, legislative reform, increased access to justice, and enhanced capacities of public institutions and civil society actors. The ambition was to address long-standing rule of law and human rights challenges and to support national reforms through 26 planned country-specific and regional projects between 2022 and 2025, some of which are ongoing to date. A stocktaking of selected results achieved under these themes, as reported in the annual implementation reports from 2022 to 2024 and verified during the data collection phase of this evaluation, is provided below.

58. **The Action Plan for Azerbaijan achieved tangible progress in selected reform areas, particularly under the pillars of the judiciary, cybercrime and cybersecurity, anti-discrimination and freedom of expression and legal education.** Its overall effectiveness was uneven, as gains were concentrated in areas identified as priorities for the national authorities and technical cooperation.

59. **Judiciary and Execution of Court Judgments.** The Action Plan contributed to concrete progress in supporting the execution of ECtHR judgments. In 2024, 70 cases were closed, marking the highest number in a decade. This success was attributed mainly to technical continuity and long-standing partnerships with justice institutions, including the Justice Academy and Supreme Court, which enabled the integration of ECtHR case law into training curricula and fostered reforms in enforcement mechanisms. Moreover, according to the interviewed stakeholders and project

35. Council of Europe (2022–2024), *Azerbaijan: Council of Europe Action Plan 2022–2025 – Annual Implementation Reports, Years 2022, 2023, and 2024*, Strasbourg.

documents, approximately 70% of courts in Azerbaijan reportedly use CEPEJ methodologies, including performance evaluations and data management tools—an indicator of institutional uptake and alignment with European standards.

60. **Cybercrime.** The CyberEast+ and Cybercrime EaP projects under the Action Plan made measurable contributions to the 2023–2027 National Cybersecurity Strategy, which includes a dedicated chapter on cybercrime aligned with Council of Europe standards. Key outcomes included:

- The country’s first Cyber Barometer survey, which shaped national cybersecurity priorities.
- Extensive training for hundreds of law enforcement officers, prosecutors, and judges on digital forensics, darknet investigations, and private-sector cooperation.
- Institutionalisation of technical materials (forensic guides, training content) into national academies and training centres.
- *Enhanced cooperation* with private service providers through non-legislative Memorandums of Understanding (MoUs) and participation in the Budapest Convention Committee regional mechanisms.

61. *Preventing and Fighting **Economic Crime** in Azerbaijan and Strengthening Anti-Money Laundering and Asset Recovery in Azerbaijan* projects addressed, among other priorities, the enhancement of the anti-money laundering and countering the financing of terrorism (AML/CFT) regime, a key area identified during the fourth evaluation round of MONEYVAL. The initiatives within the Action Plan were effective in supporting Azerbaijan’s efforts to strengthen its legal, strategic, and operational frameworks for combating money laundering, terrorist financing, and recovering proceeds of crime³⁶. It contributed directly to the adoption of key legislation, including the AML/CFT Law, the Law on Targeted Financial Sanctions, and amendments to the Criminal Procedure Code. These legislative developments were grounded in project-supported legal opinions and technical advice, demonstrating a clear link between project inputs and national reforms.

62. The effectiveness of these mentioned projects within the PGG II is further evidenced by the completion of Azerbaijan’s second National Risk Assessment (NRA) and the adoption of the new National Action Plan (2023–2025), both of which incorporated project recommendations. These strategic documents have improved the ability of Azerbaijani institutions to identify risks, prioritise interventions, and allocate resources effectively.

63. **Substantial capacity-building efforts enhanced the operational readiness of a wide range of stakeholders.** A critical mass - over 600 professionals from law enforcement, the judiciary, financial institutions, and supervisory bodies were trained, laying the foundation for wider institutional uptake in areas such as risk-based compliance, beneficial ownership, virtual assets, open-source intelligence, and mutual legal assistance. The inclusion of practical tools, such as Standard Operating Procedures for mutual legal assistance requests and case-based workshops on asset tracing and confiscation, further reinforced institutional effectiveness. While long-term effects of these actions remain to be seen, the potential for uptake has been confirmed by stakeholders.

64. However, this external evaluation confirms that the *Strengthening Anti-Money Laundering and Asset Recovery in Azerbaijan* project made a meaningful contribution to the objectives of the

36. Council of Europe and European Union (2022), *Partnership for Good Governance – Phase II: Final Report 2019–2022*, Strasbourg.

Council of Europe Azerbaijan Action Plan, in line with the broader findings of the PGG II programme-level evaluation. According to consultation data collected for that evaluation, **stakeholders in Azerbaijan considered the PGG II Programme to have effectively supported national reform processes, with 50% indicating that it contributed “to a great extent” and another 50% “to some extent”³⁷**. This reflects a broadly positive perception of the Programme’s relevance and effectiveness across Eastern Partnership countries and reinforced the conclusion that the AML/CFT and asset recovery project was well-aligned with national reform needs and priorities.

65. **In the area of asset recovery, the project played a catalytic role in introducing non-conviction-based confiscation and parallel financial investigations into national legislative drafts.** These reforms, once adopted, are expected to significantly strengthen the country’s ability to detect and recover illicit assets.

66. **Anti-discrimination and Human Rights.** The project Promoting equality in Azerbaijan within the Partnership for Good Governance (PGG) III³⁸ led to legal reforms that expanded the Ombudsperson’s mandate and established thematic monitoring groups on disability and children’s rights. However, in Phase III of the mentioned project, the implementation of certain capacity development sessions involving the Office of the Ombudsperson had to be postponed following the temporary suspension of co-operation activities with national authorities following the adoption of the PACE resolution on the non-ratification of the Azerbaijani delegation’s credentials. The project’s reach remained constrained due to limited staffing (only one part-time officer in Baku and a regional assistant in Georgia), restricted civil society space, and a lack of donor interest in thematic areas such as equality or freedom of expression.

67. **The Action Plan contributed directly to the enactment of gender equality legal reforms in 2024.** This included amendments to the Law on Preventing Domestic Violence and to the Family Code, Criminal Code, and Code of Administrative Offences. Eight recommendations from the Gap Analysis produced under the previous Council of Europe project³⁹ were incorporated, resulting in tangible improvements, including the introduction of stronger protection orders, expanded access to legal aid for victims, and enhanced legal provisions on family relations and gender equality in education. Notably, the removal of the legal exception that allowed marriage under the age of 18 strengthened safeguards against early marriage. These changes, which came into effect on 1 July 2025, represent measurable progress in line with the Action Plan’s objectives.

68. **Media professionalism and freedom of information.** The project *Promoting Media Professionalism and Freedom of Information in Azerbaijan (PRO-M-FEX) Phase I*, was implemented, and the Action Plan achieved output-level results in advancing media freedom and legal education. Four university curricula were revised, incorporating the Council of Europe's media standards. Training programmes reached 180 journalists and 100 lawyers, contributing to capacity-building on freedom of expression and the safety of journalists. Azerbaijan was the first Council of Europe member state to train journalists in environmental investigative reporting, known as "Green Journalism".

37. Council of Europe, *Final Evaluation of the European Union/Council of Europe Partnership for Good Governance Programme Phase II (PGG II)*, 15 February 2023, p. 33.

38. Project No3446 – PGG III *Promoting equality in Azerbaijan (01/03/2023–28/02/2026)*.

39. Conducted under the previous Council of Europe project *“Raising Awareness of the Istanbul Convention and Other Gender Equality Standards in Azerbaijan”* implemented within the framework of the Partnership for Good Governance II (2019–2022).

Factors supporting and hindering the effectiveness of the Action Plan

69. As part of the evaluating effectiveness efforts, a key line of enquiry was to identify which factors supported and hindered the effectiveness of projects, these insights aim to inform ongoing and future implementation and design of activities.

Key Finding 6: The effectiveness of the Action Plan was strongest in areas where the Council of Europe holds recognised technical expertise and was able to scale up support through long-term institutional partnerships and structured programming, but it was also weakened by political factors beyond technical co-operation and limited civil society engagement, and donor retreats in sensitive areas.

70. In terms of contributing factors to effectiveness of the projects, the Action Plan achieved significant results in key areas where **strong institutional partnerships** existed. A few examples are provided hereunder:

- a. **Justice Reform and Legal Training:** Cooperation with the Justice Academy and the Supreme Court enabled the sustained delivery of training programmes and legal reforms. In particular, the alignment with the Convention in training curricula and judicial practice was achieved through co-designed materials and consistent dialogue. The reports from 2022 to 2024 highlight continued engagement on judicial ethics, professional standards, and the implementation of the Rule of Law Checklist.⁴⁰
- b. **Mediation Services:** The expansion of mediation services was supported through strategic collaboration with the Mediation Council, focusing on both institutional development and practitioner training. By 2024, the reports noted tangible improvements, including increased awareness among legal professionals, greater case uptake, and a broader geographic reach of mediation mechanisms.⁴¹
- c. **Anti-Corruption and countering economic crime:** Council of Europe-supported projects based on the MONEYVAL framework and GRECO corruption risk assessment and management practices strengthened national capacities in asset recovery, financial investigations, and anti-money laundering compliance. Reports point to enhanced cooperation between the Prosecutor General's Office and the Financial Monitoring Service and Commission on Combating Corruption, linking project results to broader policy shifts, including in environmental crime.⁴²

71. **National ownership was another key enabling factor.** Initiatives in access to justice, cybercrime, and financial transparency received strong backing from institutions and were embedded into national strategies and legal frameworks. Stakeholders also noted positive developments in relatively new areas of cooperation, such as children's rights, youth engagement, and anti-discrimination.

72. Limited funding and shifting priorities of donors and national stakeholders led to parts of the Action Plan not being implemented. Social rights, prisons and police, trafficking in human

40. Azerbaijan – Action Plan Level Report – Year 2022, pp. 2–4; Year 2023, pp. 3–5; Year 2024, pp. 3–5.

41. Council of Europe, Azerbaijan – Action Plan Implementation Report – 2022 (internal document), p. 3; see also 2023 report, p. 4, and 2024 report, p. 3.

42. Council of Europe, Azerbaijan – Action Plan Implementation Report – 2023, pp. 5–6; see also 2024 report, p. 5.

beings, constitutional justice, drug abuse and illicit trafficking, electoral issues, education and intercultural dialogue did not progress during the Action Plan.

73. Despite the non-participation of authorities in technical co-operation activities between January and November 2024, sustained technical presence and engagement helped maintain momentum for reform in several areas. **However, this resulted in delayed implementation of some of the planned activities of the projects.** Although most engagement in these circumstances focused on collaboration with civil society, the reduced space for such organisations also diminished the project's ability to respond effectively. In areas such as media freedom and equality, CSO participation in implementation was minimal. In parallel, the Council of Europe was often the only actor remaining in certain areas, as other donors disengaged, further limiting co-ordination and shared ownership.

Key Finding 7: Monitoring systems remained output-focused, with limited tracking of long-term behavioural or institutional change. As a result, awareness of the Action Plan and its results framework was low among key institutions, and it was rarely used to guide or monitor progress

74. **Monitoring and evaluation under the Action Plan lacked the necessary orientation toward outcomes and long-term change.** While a formal results framework was established for the Action Plan, it was not operationalised in a way that allowed systematic performance tracking or adaptive management. Indicators remained largely output-based, with no baselines, targets, or mechanisms to assess whether interventions led to sustained behavioural or institutional improvements. **The purpose and practical use of the Logical Framework within the Action Plan remain unclear.** While it is formally included in the documentation, its role in guiding implementation, monitoring, or decision-making was not evident to many stakeholders interviewed, raising questions about its operational relevance. This gap was evident even in areas where the Action Plan supported substantial legal and institutional reforms. The same observations were shared by the evaluation of projects within the Action Plan⁴³.

75. However, legislative changes were adopted, and hundreds of professionals were trained. The success of the training was not systematically monitored and there was no system in place to assess whether reforms translated into more effective enforcement or improved institutional performance. Similarly, in the justice sector, CEPEJ tools were applied, and digitalisation advanced. Yet, there was no structured effort to monitor how these changes affected service delivery or access to justice over time.

76. **The lack of decentralised evaluations and limited project-level outcome reporting further constrained the ability to assess the Action Plan's contribution to institutional strengthening.** Beyond one ROM review, one evaluation⁴⁴, and a number of projects progress reports there is little aggregated evidence on whether reforms sustainably influenced practice or policy. As a result, while activity reporting was relatively strong, the absence of a functioning results-

43. Council of Europe, *DIO-EVA – Evaluation of PGG II – Final Report*, p. 42, noting that in the AML/CFT and asset recovery project, the absence of baselines and reliance on output-level indicators limited the ability to assess outcomes and long-term change; ROM Review European Union/Council of Europe Partnership for Good Governance for Eastern Partnership countries – Phase III.2025.

44. Final Evaluation of the Project *Raising Awareness of the Istanbul Convention and other Gender Equality Standards in Azerbaijan*, 27 February 2023, Strasbourg.

based system made it difficult for the Council of Europe or its national counterparts to demonstrate higher level results achieved.

3.4. Efficiency

77. The evaluation assessed one aspect of efficiency, namely, how efficiently the projects under the Action Plan have been managed with respect to the available financial and human resources. This was assessed through an examination of the management and implementation processes under the Action Plan, it looked at the adequacy of human and financial resource allocation, timeliness and responsiveness and the extent to which there is a consideration of alternative delivery modalities.

Key finding 8: Projects under the Action Plan were implemented in a timely manner despite several cross-cutting constraints, including those outside of the control of the Council of Europe

Implementation and distribution of resources

78. Project-level financial reports and disbursement data reviewed by the evaluation team show that **between 2022 and 2024, the Action Plan for Azerbaijan 2022-2025 progressively expanded its activities and funding base.** In 2022, it launched seven country-specific projects with a total budget of €3.4 million. By the end of 2023, funding had increased to €4.9 million, and the number of country-specific projects had risen to 13. Regional projects remained constant at 6, but their scope expanded.

79. Based on the 2024 Action Plan Level Report and triangulated with data from the 2022–2023 annual reports, the Action Plan for Azerbaijan delivered technical cooperation through 11 country-specific projects and 6 regional projects during the period from 2022 to 2024.

80. The European Union provided 60 per cent of the funding, while Germany, the Human Rights Trust Fund, Belgium, Liechtenstein, Lithuania, and Romania also contributed. By 31 December 2024, the Action Plan had received €9.2 million out of a total financing need of €11.5 million—80% of the planned amount. €300K set initially aside for Azerbaijan in 2024 was redirected to projects in Ukraine⁴⁵ and the number of projects increased to 11.

81. Annual implementation reports state that while some areas had project proposals or prior programming foundations, implementation was not possible⁴⁶. Areas which typically require highly technical standards, specialised investigative or regulatory mechanisms, such as cybercrime and anti-money laundering, were found to be more easily funded than less technical sectors such as judicial reform, anti-corruption, or freedom of expression.

82. Collaboration between Action Plan projects resulted in efficiencies. The use of regional exercises (e.g., in Bucharest, the Azerbaijani delegates took part in election interference simulation training) optimised resource utilisation and fostered peer learning. For example, the PGG supported regional media conferences in the Republic of Moldova and in Georgia and held training on legal

45. Council of Europe, *1534th Meeting of the Ministers' Deputies, Programme and Budget 2024–2027 – Mid-term Review*, Item 11.1(a), 9 July 2025, to be considered by the GR-PBA, Strasbourg, 1 July 2025.

46. Council of Europe, *Action Plan for Azerbaijan 2022–2025: Annual Report 2024*, p. 10,

attacks against journalists (anti-SLAPP) in Tbilisi for participants from Azerbaijan, Georgia, Republic of Moldova, and Ukraine. The Council of Europe also collaborated with organisations such as Article 19 and European experts through its Safety of Journalists platform.

Overcoming internal and external challenges to ensure efficiency in delivery and timeliness

83. While some projects maintained timely delivery, others were constrained by staffing gaps, and thematic underfunding. For example, *Strengthening Mediation in Azerbaijan* maintained timely implementation of planned activities due to established institutional cooperation with the MoJ and the Mediation Council.

84. **The Organisation was able to adapt to the challenges of COVID-19 and inflation.** COVID-19 restrictions limited in-person engagement and required some activities to shift to online or hybrid formats⁴⁷. However, it is unclear if the training results are similar to the in-person training. Whilst the Organisation demonstrated adaptability it nonetheless led to implementation delays. In 2023, although restrictions eased, the after-effects, such as delays in previously planned activities and limited access to some partners, challenged timely implementation⁴⁸. In 2022, high inflation of 13.9%⁴⁹ in Azerbaijan and the wider region increased the cost of logistics, travel, and events, placing pressure on project budgets.⁵⁰ Despite these constraints, projects showed adaptability to inflation and continued to deliver without significant delays through adjustments of delivery methods, including the use of digital tools, civil society engagement, and remote work.

85. **Targets such as minimised administrative overheads were met.** The review of the Action Plan documents indicates that a total of €1,870,242.81 was spent or committed, with 68% allocated to staff costs, 26% to operational activities, and 6% to administrative expenses in the 2024 financial year. The budget remained within the Council of Europe's financial compliance limits, with administrative costs capped at 7% of direct costs. The reliance on staff resources reflected a strategic shift toward desk-based work, civil society engagement, and remote delivery in response to political changes.

86. **Human resources were limited but strategically deployed.** Interviews with national stakeholders and analysis of project documentation confirmed that by December 2024, the Council of Europe Office in Baku operated with only 13 staff members managing project implementation, communication, translation, and reporting across all project areas⁵¹. In most cases, this limited team effectively delivered activities. However, a resource constrained operation also constrains the opportunities to scale up where results are being delivered.

4. Conclusions

87. The evaluation of the Council of Europe Action Plan for Azerbaijan (2022–2025) reveals a fairly positive picture of strategic engagement, delivery success, and adaptation to internal and

47. Council of Europe (2022), Council of Europe Action Plan for Azerbaijan – *Annual Report 2023*, Section: COVID-19 Recovery.

48. Council of Europe Action Plan for Azerbaijan – *Annual Report 2024*, Sections: Political Context, Programme Management.

49. World Bank (2022), *Consumer Price Inflation (annual percentage): Azerbaijan (2022)*, (World Bank Data) Available at <https://data.worldbank.org/country/azerbaijan> accessed 25 June 2025.

50. Council of Europe (2022), Council of Europe Action Plan for Azerbaijan – *Annual Report 2022*, Section: Operational Challenges.

51. Council of Europe Action Plan for Azerbaijan – *Annual Report 2024*, Sections: Political Context, Project Management, Implementation Adaptations.

external constraints. While interventions delivered credible outputs in core reform sectors, the consultation process regarding the Action Plan's design, overall coherence and institutional positioning failed to foster a strong sense of ownership. Below are the conclusions structured around five strategic insights.

4.1. Delivery of an Action Plan that achieved high relevancy in key sectors

88. The Action Plan for Azerbaijan (2022–2025) was broadly relevant to the country's reform efforts. It addressed several key areas of national interest, including mediation, cybercrime, anti-discrimination and the implementation of ECtHR judgments. The Plan was also in line with Azerbaijan's broader development strategies and reflected commitments to international goals such as the Sustainable Development Goals. Many of the supported activities—such as legal reforms on domestic violence, improved access to justice, and institutional capacity-building—responded to real needs expressed by national partners. In several cases, the projects were linked to the priorities of state institutions. However, ownership at the national level was uneven.

4.2. Demonstrated results in key reform areas, but uneven elsewhere

89. The Action Plan produced tangible outputs in select domains such as legal alignment and strengthened capacity. Successes were most evident in areas where the Council of Europe had a long-standing presence, such as justice reform and fighting economic crime. Projects benefited from alignment with national strategies and international obligations, reinforcing their legitimacy and traction. The suspension of formal cooperation with national authorities in late January 2024 impacted on the results delivered and while informal engagement continued in some sectors, the scale and institutional reach of these efforts remained limited.

4.3. Signs of cost-conscious and adaptive measures were evident

90. The Action Plan was delivered with administrative discipline. Costs were reduced through online delivery formats, allowing to reach the number of trainees as planned, resulting in timely implementation. The projects successfully adapted to challenges posed by high inflation, the impact of COVID-19, especially in 2022–2023. Despite these challenges, the Action Plan continued to deliver outputs through flexible adjustments to delivery methods.

4.4. Institutional synergies occurred but were not systematised

91. Where institutional linkages were structured across thematically related projects, particularly in areas such as cybercrime, child protection, and gender equality, and CEPEJ tools, projects achieved synergies. Co-ordination platforms such as the Action Plan and PGG Steering Committee meetings operated primarily as administrative forums with little thematic integration or strategic discussion across projects. The limited visibility of the Action Plan reduced stakeholders' awareness of how individual projects relate to the broader strategic framework.

4.5. Monitoring weaknesses and learning gaps

92. A critical limitation in the Action Plan's implementation and performance monitoring was the lack of a functioning monitoring and evaluation system. The formal Action Plan's results framework was not actively used to assess change or guide the adjustments. Indicators remained

output-oriented, with little tracking of whether reforms led to sustained behavioural or institutional shifts. Many national stakeholders were unaware of the results framework and did not use it for policy drafting, planning or monitoring. As a result, despite the presence of robust activity-level reporting, the overall contribution of the Action Plan to long-term change was difficult to verify across all active themes.

5. Lessons learned

93. The evaluation of the Council of Europe Action Plan for Azerbaijan (2022–2025) generated three key lessons that can help shape future cooperation frameworks and improve delivery.

94. **Sustained success is linked to established presence, alignment, and peer-to-peer engagement.** Projects delivered stronger results when they were built on a long-standing presence in the country, worked in line with national strategies, and supported international commitments. The addition of high-level peer-to-peer technical assistance and the development of long-term regional partnerships enhanced the effectiveness of the work. These elements helped earn trust, strengthen credibility, and speed up reforms, increasing the chances that results would be relevant and sustainable.

95. Several domains were identified with **strong potential for future cooperation** that are currently not included in the Action Plan or are currently not being implemented. These include education, social rights, digital governance, artificial intelligence (AI), and environmental rights. Renewed implementation in Anti-corruption emerged during the evaluation process. These insights point to emerging thematic priorities for the next programming cycle.

6. Recommendations

96. This report makes the following recommendations:

Recommendation 1: Strengthen participatory design processes to enhance national ownership and relevance	
Target Group:	Council of Europe Directorate of Programme Co-ordination and project design teams
Priority:	High
Basis in Findings:	The Action Plan was largely designed at the headquarters level, with insufficient consultation and formal needs assessments. This resulted in weak national ownership and limited awareness of the results framework.
Recommended Action:	Ensure that systematic (and well documented) in-country consultations with government institutions, civil society organisations, and other relevant stakeholders inform future Action Plans. Incorporate formal needs assessments and gap analyses into the design process to ensure a comprehensive approach. Consider organising in-person, inclusive design missions and thematic working groups.
Target Group:	Council of Europe Directorate of Programme Co-ordination and project design teams

Recommendation 2: Ensure usability of the Action Plan logframe and develop a more robust results-based management system focused on outcomes monitoring and reporting	
Target Group:	Council of Europe Results-Based Management Unit and project teams
Priority:	High
Basis in Findings:	The Action Plan lacked a functioning monitoring framework to track intermediate outcomes, behavioural and institutional change. Most indicators were output-focused (lacking quality measures), and progress was not systematically monitored or used for adaptive management.
Recommended Action:	Ensure that the best practices outlined in the Risk Management (RM) strategy are adhered to in the design of the new Activity Plan logframe. This includes establishing clear baselines, targets and indicators for outputs and outcomes. Provide project teams with guidance and tools to monitor progress beyond the completion of activities. Encourage the use of the logframe as a monitoring tool across all themes.
Target Group:	Integrate capacity-building and resources for monitoring and evaluation into project plans. Use Steering Committee meetings to inform partners on the progress against the Action Plan's result Framework.

Recommendation 3: Assess mechanisms for proportionate structured co-ordination and learning to ensure internal coherence.	
Target Group:	Council of Europe Baku Office and regional co-ordination teams
Priority:	Medium
Basis in Findings:	Project-level synergies existed but were informal and ad hoc. Co-ordination structures (e.g. Steering Committees) lacked mechanisms for joint planning and strategic dialogue on internal coherence.

Recommended Action:	Assess the level of cross-project co-ordination. Consider periodic thematic meetings and joint activities across projects. Revisit the format and agenda of Steering Committees.
Target Group:	Develop tools to support cross-project learning, and reporting, joint engagement strategies in harmony with PGG projects.

Recommendation 4: Identify mechanisms and processes that allow for increased resource flexibility to respond to emerging needs and rebalance underfunded areas.

Target Group:	Council of Europe Programme Management, DPC and DPB
Priority:	Medium
Basis in Findings:	Several thematically relevant areas (e.g. combating human trafficking, prison reform, civil society engagement) remained inactive due to rigid funding rules and the inability to reallocate unused funds. Giving programme teams the ability to adjust funding allows them to make contextualised, timely decisions about where resources will have the greatest impact.
Recommended Action:	Advocate with donors for more flexible financial arrangements, including pooled or reserve funds. Build contingency mechanisms to shift resources across sectors based on evolving relevance and political feasibility. Consult DPB on possible proposals to consider a new approach to Action Plan allocations from the pool fund in order to ensure programming and reporting processes at the P&B level are not negatively affected.
Target Group:	Assess the current flexibility modalities of funding allocations for new Action Plan cycles.

Recommendation 5: Expand communication efforts to improve awareness and strategic positioning of the Action Plan.

Target Group:	Council of Europe Baku Office and Communication Teams
Priority:	Medium
Basis in Findings:	Visibility and awareness of the Action Plan as a strategic framework was low, as most communication focused on individual projects. National partners were often unaware of the Action Plan's structure or strategic goals.
Recommended Action:	Develop a unified engagement strategy for the Action Plan that integrates all projects under a shared identity. Promote results through accessible messaging and targeted outreach campaigns that engage state and civil society actors and monitor the visibility of the Action Plan.
Target Group:	Engagement and outreach strategy complemented by strong targeted results reporting.

ANNEX I – TERMS OF REFERENCE

Link to the Terms of Reference: <https://rm.coe.int/eva-tor-evaluation-ap-azerbaijan2022-2025-march2025/4880296459>

ANNEX II - LIST OF DOCUMENTS CONSULTED

Council of Europe Documents

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ANNEX III - MORE DETAILS ON THE METHODOLOGY, SUCH AS DATA COLLECTION INSTRUMENTS, INCLUDING DETAILS OF THEIR RELIABILITY AND VALIDITY

EVALUATION TOOL: INTERVIEW QUESTIONNAIRES AND FOCUS GROUP DISCUSSIONS, AND GUIDE

Standard introduction by the interviewer(s): thanks, self-introduction(s), introduction of evaluation purpose, clarification of quoting policy and data protection considerations.

Thank you for taking the time to meet us. I am an independent consultant hired by the Council of Europe. The other members of the evaluation team include Mr Robert Stryk, Director, Directorate of Internal Oversight, Council of Europe and Ms Teodora Lukovic, Senior Evaluator, Directorate of Internal Oversight, Council of Europe. As a part of an evaluation team, I am conducting the evaluation of Azerbaijan's Action Plan 2022-2025. The purpose of this evaluation is to gain a deeper understanding of how the Action Plan has performed over the period of 2022-2025, assess its relevance, coherence, efficiency, and effectiveness, and determine whether it has been beneficial to its beneficiaries. This exercise is not an audit: we aim to learn from this experience and identify how the Council of Europe's performance as an organisation can be improved in the future. We will be grateful for your open feedback. Our notes will not be shared with the persons who have implemented the program, and unless you authorise us to quote you by name, they will not be quoted in a way that can be attributed to you."

Questions for Council of Europe Project Managers and technical staff

1. Tell us about your role and how you are connected to the AP?
2. Please explain the consultation process for drafting the AP.
3. How well was the AP aligned with Azerbaijan's national reform agenda and international obligations?
4. To what extent have the activities across the AP's priority areas been delivered on time and within budget?
5. Were the AP's operational mechanisms adequate to manage multiple interrelated projects and thematic areas in parallel?
6. How effectively did internal co-ordination take place between the projects implementing the AP? Please provide examples.
7. What mechanisms were used to ensure coherence between the AP and other Council of Europe strategies and sectoral policies?
8. To what extent do lessons from past APs in Azerbaijan inform planning and delivery in this cycle?
9. How was information shared and used for strategic decision-making during implementation across projects and sectors?
10. Were the monitoring, reporting and oversight systems fit for purpose at the AP level (not just individual project level)?

Closing of the interview - "Thank you again for your time and for sharing your opinion with me/us. This is very valuable for us/the Council of Europe, to continue improving its performance. Should you have questions or remember some further information you might not have thought of today, you may reach me/us with the following contact details."

Questions for National Stakeholders, Partners, and Beneficiaries (Relevance and Effectiveness)

(Interviewer: at the start, provide a brief introduction about the aim of the evaluation, ethics and how data will be used, outline confidentiality protocol, obtain permission to take notes, and agree on the time needed for the interview – about 50-60 minutes; introducing each other. While introducing the evaluation, stress that this is an evaluation of the Council of Europe's implementation process of AP and partnership, not of the partner itself). Before each interview, the interviewer is to select a maximum of 7-8 priority questions for each individual interviewee; with some individuals, the evaluation team may need to negotiate more than one session, depending on an understanding of the latter's role and functional expertise.)

1. What is your opinion about the way the Council of Europe conducted the consultation and support in the implementation of the AP?
2. Were national institutions sufficiently consulted during the design and implementation of the AP? What could be done better in the future?
3. To what extent do the AP's thematic priorities reflect the most pressing legal and institutional needs in Azerbaijan? What could be done better?
4. Were you properly consulted, were your needs/opinions taken into account, and at which stages?
5. To what extent did the process of implementing the AP take into consideration the needs of less powerful/disadvantaged stakeholder groups?
6. What, if any, was the competitive advantage/added value of the Council of Europe in implementing projects within the AP?
7. Has the AP helped advance alignment with European standards in areas such as anti-corruption, gender equality, media freedom, or anti-discrimination? What about advances at the national level? What could be done better?
8. Did the AP respond to evolving national priorities?
9. To what extent have Council of Europe interventions supported measurable institutional or legal reforms?
10. Have capacity development efforts (e.g. training, mentoring, legal expertise) under the AP contributed to improved institutional performance or practice? Please provide examples.
11. Did the AP support civil society, legal professionals, media actors or vulnerable groups in a meaningful way?
12. To what extent have public officials and practitioners applied Council of Europe standards and tools in their work as a result of the AP?
13. What aspects of the AP's support would you consider the most valuable, and what areas require further engagement?
14. If you were to advise our Council of Europe colleagues implementing a similar action in another country, what would you tell them? What should they keep in mind?
15. What lessons have you learnt when implementing the AP?

Closing of the interview - "Thank you again for your time and for sharing your opinion with me/us. This is very valuable for us/the Council of Europe, to continue improving its performance. Should you have questions or remember some further information you might not have thought of today, you may reach me/us with the following contact details."

Interview questions for European Union Delegation:

(Interviewer: at the start, provide a brief introduction about the aim of the evaluation, ethics and how data will be used, outline confidentiality protocol, obtain permission to take notes and agree on the time needed for the interview – about 50-60 minutes; introducing each other).

Before jumping to the questions, start by getting an intro into the EUDEL's priorities in the country, the major initiatives it is involved in, and its engagement. Select 5-6 appropriate questions from the list of questions.

1. How is this initiative relevant to the EU's needs?
2. How is this initiative relevant to Azerbaijan's needs as the authorities see it?
3. Can you state any significant result(s)/outcome(s) achieved, supported by any project implemented under the AP, and what evidence can you cite that the achievement was due to the Council of Europe's intervention?
4. What is the status of donor co-ordination in the country?
5. What will the EU delegation continue within their multi-annual indicative programmes? Are there any new areas?
6. What would you recommend be included in the next AP to maximise the support provided by the Council of Europe and EU?

Focus group discussion (FGD) guides and arrangements

Guide: At the start, provide a brief introduction about the aim of the evaluation, ethics and how data will be used, outline confidentiality protocol, obtain permission to take notes and agree on the time needed for the interview – about 50-60 minutes; introducing each other. While introducing the evaluation, stress that this is an evaluation of the Council of Europe's implementation process of AP and partnership, not of the partner itself). Before each interview, the interviewer is to select a maximum of 7-8 priority questions for the discussion.

Confidentiality and informed consent statement: This interview is confidential, and all information received is aggregated and anonymised. No individual will be quoted, nor will the organisation they represent be identified. The data collected will only be used for evaluation purposes. Your participation in the FGD is voluntary, and you may withdraw from it at any time.

Stakeholder group	Number of participants	Facilitator	Note taker	Expected duration and modality
CSOs	10	Team Leader	TBI	90 minutes

ANNEX IV – EVALUATOR PROFILE

Ms. Bunafsha Gulakova, an experienced Team Leader and Evaluation Expert with over 20 years of experience in the development sector, specialising in the Rule of Law, Security Sector Reforms, Counterterrorism, Human Rights, and Gender Mainstreaming. She has led and managed more than 20 strategic evaluation assignments and possesses extensive expertise in planning and evaluating country action plans, national programs, and EU funding mechanisms for technical assistance.

Ms Gulakova has a proven track record in applying evaluation principles and methodologies aligned with UNEG/OECD DAC standards, with over 20 years of experience in bilateral development cooperation projects. Her analytical and communication skills, combined with her expertise in collecting and analysing mixed qualitative and quantitative data, make her a strong leader in multidisciplinary evaluation teams.

She has an extensive experience in providing support to EU Delegations in identifying and formulating EU-funded Rule of Law, Governance, and Human Rights programmes, including Action Documents and Twinning Fiches. Key assignments include the €25M EU Justice and Legal Empowerment Plus (EU JULE+) in Viet Nam (2021), €10M EU Human Rights Programme in Pakistan (2020), €11.5M Justice for All programme in Kyrgyzstan (2018), €15M Good Governance and Rule of Law programme in Jordan (2017), and the Rule of Law Action Document in Iraq (2016).

Her experience spans global and country-level evaluations in Central Asia, the South Caucasus, the Middle East, South Asia Pacific, and West Africa. She has evaluated programs for the European Union, the Independent Evaluation Office of UNDP, United Nations Office for Countering Terrorism, UNODC, OSCE, UNESCO, UNOPS, UNWomen, UNECE, UNFPA, SIDA, USAID, World Bank, among others, covering areas such as justice sector digitalisation, governance, and human rights reforms.

Her achievements are available at LinkedIn: <https://www.linkedin.com/in/bunafshagulakova/>

ANNEX V - EVALUATION MATRIX

Evaluation Criteria	Evaluation Question	Sub-Question	Judgment Criteria	Data Collection Instrument(s)	Data Source(s)	Data Analysis
Relevance	Q1. To what extent is the AP for Azerbaijan 2022-2025 consistent with and tailored to the beneficiaries' and partners' needs and expectations?	a) Were the needs and priorities of Azerbaijani national authorities adequately reflected in the selection, design and implementation of projects?	The degree to which national needs and priorities are reflected in the design and implementation of projects. Extent and quality of consultation with Azerbaijani national authorities.	<ul style="list-style-type: none"> Document analysis (national strategies, AP documents), reports by the Council of Europe monitoring bodies Key informant interviews (national authorities, Council of Europe staff), stakeholder survey. 	<ul style="list-style-type: none"> Azerbaijan 2030: National Priorities for Socio-Economic Development⁵², the Strategy for Socio-Economic Development in 2022-2026, the National AP (NAP) to combat domestic violence for 2020-2023, National authorities, beneficiaries, and civil society. 	Triangulation, content analysis, and stakeholder mapping against strategic and programmatic document priorities.
Coherence	Q2. To what extent are the actions carried out under the AP internally coherent?	<p>a) To what extent did the internal consultation process on the AP ensure complementarity and avoid overlaps?</p> <p>b) To what extent have the synergies been</p>	<p>Evidence of co-ordination and complementarity among projects</p> <p>Measurements are in place to avoid duplication and overlaps</p> <p>Degree of interlinkage and synergies between projects</p>	<ul style="list-style-type: none"> Document review (project plans, co-ordination reports) Interviews with Council of Europe programme 	<ul style="list-style-type: none"> Internal planning and co-ordination documentation Project-level and inter-project communication records. Implementing partners and stakeholders. 	<p>Cross-case comparison.</p> <p>Thematic content analysis.</p> <p>Matrix mapping of complementarities and synergies between the</p>

52. Order of the President of the Republic of Azerbaijan on approval of "Azerbaijan 2030: National Priorities for Socio-Economic Development" » Official website of President of Azerbaijan Republic.

Evaluation Criteria	Evaluation Question	Sub-Question	Judgment Criteria	Data Collection Instrument(s)	Data Source(s)	Data Analysis
		promoted/achieved between the projects implemented under the AP?		and project staff • Focus groups (FGD) with implementation teams and beneficiaries.		sampled 9 projects.
Efficiency	Q3. How efficiently have the projects under the AP been managed in terms of financial and human resources available?	To what extent have the management and implementation processes under the AP ensured its efficient implementation (selection of delivery methods, consideration of alternatives and costing, etc)?	Adequacy of human and financial resource allocation Timeliness and responsiveness in implementation	<ul style="list-style-type: none"> • Budget and expenditure analysis • Interviews with project managers and finance officers • Review of progress and audit reports. 	<ul style="list-style-type: none"> • Financial statements and audit reports • Programme implementation records • Staff and partner • Feedback • The report the Phase II of the EU and the Council of Europe Joint Programme Partnership for Good Governance and the management response • (PGG) ROM report 	<p>Budget variance analysis.</p> <p>Process efficiency review.</p> <p>Timeline and resource utilisation tracking.</p>
Effectiveness	Q4. To what extent has the AP achieved its objectives and outcomes?	a) To what extent has the AP supported reforms in Azerbaijan to bring legislation, institutions, and	Achievement of intended results and outcomes. Identification of enabling and constraining factors.	<ul style="list-style-type: none"> • Review of monitoring and evaluation reports • Key informant interviews 	<ul style="list-style-type: none"> • Project results frameworks and performance indicators 	Contribution analysis Outcome mapping and

Evaluation Criteria	Evaluation Question	Sub-Question	Judgment Criteria	Data Collection Instrument(s)	Data Source(s)	Data Analysis
		practice further in line with the Council of Europe standards?	<p>Evidence of changes in laws, policies, institutional frameworks, or practices aligned with specific Council of Europe (CoE) standards (e.g., GRECO, ECtHR, CEPEJ).</p> <p>National authorities' acknowledgement of the AP's contribution to reforms (e.g., legislative drafting, institutional strengthening, capacity development).</p> <p>Extend the adoption and operationalisation of Council of Europe guidance, tools, or methodologies in national training institutions/higher education systems.</p> <p>Sustainability of changes introduced through AP-supported interventions (e.g., institutionalisation of new practices, integration into national strategies or training systems).</p> <p>Degree of national ownership and leadership in reform processes supported by the AP.</p>	(national and international stakeholders)	<ul style="list-style-type: none"> • Government and Council of Europe reports • Interviews with reform beneficiaries and implementers 	Identification of drivers and barriers to change

Evaluation Criteria	Evaluation Question	Sub-Question	Judgment Criteria	Data Collection Instrument(s)	Data Source(s)	Data Analysis
		b) Which factors have supported and hindered the effectiveness of the projects implemented under the AP?	<p>The extent to which internal (design, management, implementation modalities) and external (political, institutional, socio-economic, contextual) factors influenced project performance.</p> <p>Responsiveness of project management to emerging challenges and opportunities</p> <p>Degree of stakeholder ownership and engagement throughout the project cycle</p> <p>Availability and quality of co-ordination and technical support from the Council of Europe and national partners</p>	<ul style="list-style-type: none"> • Key informant interviews (Council of Europe staff, national authorities, project partners, beneficiaries) • FGD with implementing partners • Review of project progress reports, mid-term and final evaluations 	<ul style="list-style-type: none"> • Internal Council of Europe documents (project designs, risk assessments, monitoring data). • Reports from implementing agencies and national stakeholders • National partners and institutional counterparts • Previous evaluations, monitoring visit reports, and feedback from training/workshop participants 	<p>Thematic analysis to identify recurrent enabling and constraining factors</p> <p>Triangulation of qualitative and quantitative data to validate findings</p> <p>Pattern identification across projects and sectors.</p> <p>Contribution analysis to understand the influence of different factors on observed outcomes</p>

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