

EVALUATION OF THE COUNCIL OF EUROPE ACTION PLAN FOR UKRAINE “RESILIENCE, RECOVERY AND RECONSTRUCTION” 2023-2026



Final report
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DIO-EVA(2026)04

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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 Agulhas Applied Knowledge. The views expressed in this report are those of the evaluation team members from Agulhas Applied Knowledge.

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Table of contents

List of figures, tables and boxes	2
Abbreviations.....	3
Executive Summary	4
Relevance.....	4
Efficiency	4
Effectiveness	5
Recommendations	6
1. Introduction	7
1.1. Purpose, scope and methodology	10
1.2. Limitations of the methodology	13
2. Findings.....	14
2.1. Relevance	14
2.1.1. Alignment with Ukraine’s reform agenda.....	14
2.1.2. Integration of findings from Council of Europe monitoring and advisory bodies	15
2.1.3. Responsiveness to changing national contexts and the needs of affected populations	17
2.1.4. The Council of Europe’s comparative advantage.....	18
2.2. Efficiency.....	19
2.2.1. Use of results-based management.....	19
2.2.2. Adequacy of resource mobilisation and allocation	21
2.2.3. Use of innovative and cost-efficient delivery methods.....	23
2.2.4. Complementarity and coordination with other development partners.....	24
2.3. Effectiveness.....	25
2.3.1. Contribution to changes in legislation, policies and practices.....	25
2.3.2. Contribution to addressing war-related challenges and vulnerabilities	29
2.3.3. Contributions to gender equality and human rights.....	30
2.3.4. Factors enabling and inhibiting effectiveness.....	32
3. Conclusions.....	36
4. Lessons learned	38
Working in wartime requires structured flexibility, rather than ad-hoc adaptation	38
Physical presence is needed in order to build trust, even in a digital environment	38
National expertise is a valuable addition to international expertise, but not a substitute	39
5. Recommendations	40
Appendices	43

List of figures, tables and boxes

Figure 1: Ukraine Action Plan 2023-2026 portfolio budget	9
Figure 2: Number of projects in the Ukraine Action Plan 2023-2026 portfolio.....	9
Figure 3: Budgets and number of projects in the deep dive sample.....	12
Figure 4: Key informant interviews conducted.....	13
Figure 5: Projects launched by year under the Action Plan	22
Figure 6: Number of contributing development partners per theme.....	24
Figure 7: Effectiveness under Wartime Conditions: Causal Pathway.....	35
Table 1: Overview of the Council of Europe Ukraine portfolio.....	8
Table 2: Evaluation questions	11
Table 3: Progress in fundraising for the Action Plan	21
Table 4: Progress towards expected results in the Action Plan	26
Box 1 : Integration of Council of Europe monitoring and advisory outputs	16
Box 2: Some salient outcomes across the thematic deep dives	29

Abbreviations

AML	Anti-Money Laundering
CFT	Countering Financing of Terrorism
CPT	European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment
CSO	Civil Society Organisation(s)
DG I	Directorate General Human Rights and Rule of Law
DG II	Directorate General of Democracy and Human Dignity
DIO	Directorate of Internal Oversight
DPC	Department for Programme Co-ordination (Council of Europe)
ECHR	European Court of Human Rights
EU	European Union
GRECO	Group of States against Corruption
GREVIO	Group of Experts on Action against Violence against Women and Domestic Violence
HELP	Human Rights Education for Legal Professionals
IDP	Internally Displaced People
IOM	International Organization for Migration
KII	Key Informant Interviews
MAE	Major Administrative Entities
MONEYVAL	Committee of Experts on the Evaluation of Anti-Money Laundering Measures
NGO	Non-governmental organisation
QCA	Qualitative Contribution Analysis
QRM	Quick Response Mechanism
RBM	Results-Based Management

Executive Summary

a. The Ukraine Action Plan 2023-2026, titled “Resilience, Recovery, and Reconstruction” and prepared in the months following the February 2022 launch of Russia’s war of aggression against Ukraine, is the Council of Europe’s largest ever single-country action plan. It covers the Council of Europe’s technical cooperation with Ukraine on achieving European standards on the rule of law, democracy and human rights, as well as support with addressing stresses and vulnerabilities caused by the war. It outlined a programme of support with a combined budget of €50 million, which was subsequently raised to €65 million in view of the urgency of Ukraine’s needs. The Action Plan was designed to function as a “living organism”, outlining a wide range of potential activities, with the flexibility to adjust in response to evolving needs and conditions within Ukraine. It has been implemented in the face of extremely challenging conditions for both Council of Europe officials and their Ukrainian counterparts.

b. This evaluation was commissioned by the Council of Europe’s Directorate of Internal Oversight (DIO) and carried out by an external evaluation team. It used mixed methods to collect qualitative and quantitative data from various sources, including Council of Europe monitoring and management data, narrative reports and feedback from Ukrainian counterparts through key informant interviews. The methodology included ‘deep dives’ into eight thematic outcome areas of the Action Plan, covering 20 projects with a combined budget of €22.4 million (47.2% of the total), to enable more detailed assessment of the quality and outcomes of the support. The evaluation explored the criteria of relevance, efficiency and effectiveness. It is intended to serve as a learning tool for the Council of Europe and Member State as they embark on preparing their next cycle of support for Ukraine.

Relevance

c. The evaluation finds that the portfolio demonstrates **strong strategic alignment** with Ukraine’s national priorities and its constitutionally mandated goal of European Union accession. Relevance is reinforced by demand-driven project design and strong relationships with national counterparts. The Action Plan is well anchored in the Council of Europe’s **normative authority and technical expertise**, with explicit links to the findings of Council of Europe monitoring and advisory bodies, which is recognised by Ukrainian stakeholders as key to the Council of Europe’s comparative advantage and legitimacy.

d. **Responsiveness to Ukraine’s wartime needs** has enhanced the relevance of the Action Plan. The evaluation has identified multiple examples of activities adapting flexibly to address urgent needs, in areas including support for displaced and war-affected women and children in particularly vulnerable situations, the development of legal protections from wartime harms, war crimes investigations and the protection of national minorities.

Efficiency

e. The Ukraine Action Plan is supported by a **multilayered results-based management system**, which is actively used for management at both portfolio and project levels. Reporting processes, although at times cumbersome, set out a clear rationale and accountability trail for key management decisions. However, most of the results data is at output level, with **limited measurement of outcomes**. This is partly related to the long-term nature of the reforms that the Council of Europe supports, with limited scope for visible outcomes during a short project cycle. Projects would benefit from clearer theories of change setting

out how their activities are expected to lead to short-term and intermediate results. However, the evaluation finds **good evidence of learning and adaption**, allowing the Action Plan to respond to a dynamic operating environment.

f. The Ukraine Action Plan has been implemented against a backdrop of significant funding deficits. During its first year, only €27.4 million in funding commitments was secured. The Council of Europe demonstrated flexibility in launching many of activities in advance of full funding availability and managed the associated risks appropriately. However, **funding uncertainties and high wartime operating costs** have impacted project efficiency.

g. The portfolio shows many examples of **adaptations in delivery methods** in the difficult operating context, including shifting to online modalities and increased use of national experts, training-of-trainer approaches and digital learning platforms. These adaptations were necessary in the wartime context but entailed **some compromises in the quality of support**. **Coordination with international partners** in a crowded donor landscape was generally strong but often depended on informal arrangements and relationships rather than clear structures.

Effectiveness

h. Many of the reforms supported under the Action Plan are ambitious and long term in nature, and few are yet mature enough to allow for meaningful assessment of outcomes for Ukrainian society. Nonetheless, the evaluation has identified **meaningful results across the three pillars** of human rights, democracy and the rule of law, even if these are incremental contributions to long-term reform outcomes.

i. At this relatively early stage, the Council of Europe's contribution is most visible in areas of **direct support for war-related vulnerability**, where projects have helped develop rights-based protection frameworks with associated operational tools that can be implemented directly by counterpart agencies. Key results were identified by the evaluation in the areas of housing rights for displaced people, access to public services for low-mobility groups, improvements in emergency child protection services, new policies on conflict-related hate speech, improved social support for minorities in frontline areas, and the adaptation of youth support services for displaced, traumatised and marginalised young people.

j. Outcome-level results are less apparent in **complex reform areas** like judicial reform, which depend upon legislative reform and large-scale organisational change. However, even in these more challenging areas, the Council of Europe has made **a meaningful contribution to preventing deterioration against European standards**, given the pressures created by war.

k. Overall, the evaluation finds that the **most effective support** is where Council of Europe standards-based support is matched with strong national demand and effective coordination structures with other international partners, and where support goes beyond advisory inputs to include the translation of European standards into operational tools and mechanisms. However, results are inevitably constrained by war-related volatility, instability within counterpart institutions and other absorption capacity constraints.

Recommendations

I. The evaluation offers the following recommendations, in support of development of the next iteration of the Ukraine Action Plan.

Recommendation 1: The new Action Plan, and activities prepared under it, should incorporate analysis of evolving risks to democracy, rule of law and human rights in Ukraine as the war continues, incorporate options for adaptive and mitigative support, and include these results in narrative reporting.

Recommendation 2: The option of developing operational tools to support the implementation of new laws and policies should be given more explicit consideration in intervention design under the next Action Plan.

Recommendation 3: Project designs under the next Action Plan should incorporate support to partner institutions with developing institutional memory safeguards, such as reform trackers, briefings for newly appointed officials and knowledge handover notes.

Recommendation 4: Project designs under the new Action Plan should incorporate theories of change articulating how interventions will lead to the intended results, with risks and assumptions made explicit. During the annual reporting process, project teams should use these theories of change as the basis for reflection on what is working and why, whether the assumptions and change mechanisms remain plausible, and whether programme adaptations are required.

Recommendation 5: In key activity areas under the Action Plan, the Council of Europe should prepare a 'complementarity map' identifying the main development partners, the Council of Europe's role and comparative advantage, any agreements on division of labour, and opportunities for strategic partnership. These maps should be updated periodically, as part of the annual reporting cycle.

Recommendation 6: The Department of Programme Co-ordination (DPC) should consider developing an Adaptive Programming Guide for Council of Europe operations in war-affected contexts, addressing issues beyond traditional risk management such as flexible programming approaches, decision-making rules, prioritisation of fund allocation, contingency-based budgeting and procurement, communications and fieldwork, and adaptation of monitoring processes.

Recommendation 7: Under the next Action Plan, interventions should further integrate principles of gender equality by shifting from activity-based gender parity metrics to systemic gender mainstreaming. This includes mandatory gender impact assessments at project design stage, integration of gender analysis into all policy goals and institutional protocols, and explicit accountability measures for how each project outcome advances or hinders gender equality, as defined in the Organisation's Gender Equality Strategy 2024-2029.

1. Introduction

1. This evaluation of the Council of Europe Action Plan 2023-2026 for Ukraine “Resilience, Recovery, and Reconstruction” (Action Plan) has been commissioned by the Directorate of Internal Oversight (DIO) and undertaken by an external evaluation team. It covers a subject of considerable strategic importance to the Council of Europe and its Member States. Prepared in the months following the February 2022 launch of the Russian Federation’s war of aggression, the Action Plan has the largest-ever budget for a single-country Council of Europe action plan – originally €50 million, then raised to €65 million – in recognition of the gravity of the threat to Ukraine and to European peace and security. Approved by the Committee of Ministers on 14 December 2022, it was developed in close consultation with Ukrainian authorities and civil society. It is funded through voluntary contributions from member states (64%), contributions from the Council of Europe’s ordinary budget (21%) and EU joint programmes (15%).

2. The Action Plan is described in its preamble as a “living organism”, setting out many potential areas of assistance, but with the flexibility to reprioritise and reshape activities in response to emerging needs and a highly volatile context. Its goal is to assist Ukraine in meeting European standards for democracy, human rights and the rule of law, and to support its constitutionally mandated objective of European Union (EU) accession, following the opening of negotiations in 2023. It supports reforms in areas such as justice (including accountability for war crimes and war-related crimes) and constitutional governance, economic crime, protection of groups in vulnerable situations, gender equality, decentralisation and local government, electoral processes and civic participation. It has also had a strong focus on helping to address the immediate and medium-term consequences of the invasion, including by addressing the needs of groups made vulnerable by the conflict and helping to strengthen Ukraine’s long-term democratic resilience. Key national stakeholders and partners include the Government of Ukraine, parliament, judicial and oversight bodies, local and regional authorities and their associations, independent institutions and civil society organisations.

3. **Table 1: Overview of the Council of Europe Ukraine portfolio** provides an overview of the portfolio, by number of projects, scale of investment, government counterparts and key outcomes areas. At the time of writing, the Action Plan covers 54 active, closed and planned country projects¹ with a combined budget of €52 million (plus 11 regional projects for €1.9 million, which are not in scope of the evaluation), structured across 16 outcome areas (out of 23 initially planned).

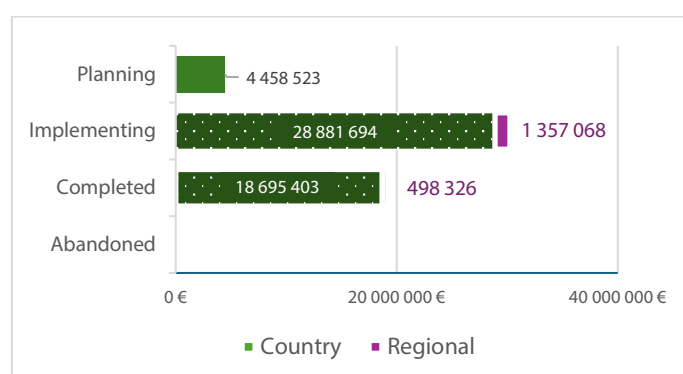
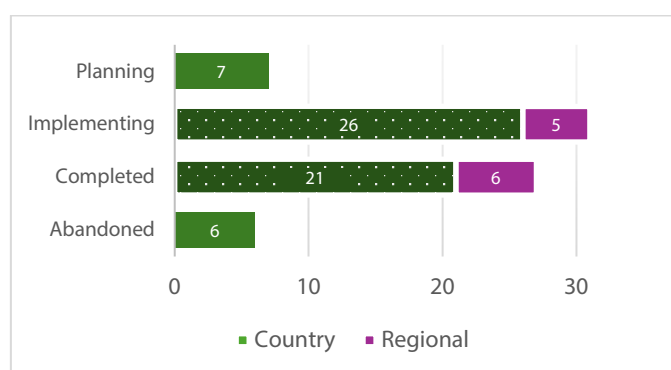
1. Counts of projects are valid for the period up to 1 October 2025, include all closed, implementing and planned country-specific projects and exclude regional and abandoned projects and funds allocated for reserves, general management and quick response mechanism.

Table 1: Overview of the Council of Europe Ukraine portfolio²

Pillar	Size of country portfolio	Key government counterparts	Key outcome areas
Human rights	26 projects budget: €24.6 million	Ombudsperson's Office, Office of the Prosecutor-General, Ministry of Social Policy, Ministry of Education and Science, Government Commissioner for Gender Equality, Ministry of Culture and Strategic Communications, States Service on Ethnic Affairs and Freedom of Conscience, Ministry of Defence	- Support for IDPs Protection of groups in vulnerable situations - Prevention of hate speech, Gender equality, prevention of and combating violence against women Human rights literacy
Rule of law	18 projects budget: €16.2 million	Constitutional Court of Ukraine, Supreme Court, High Council of Justice, High Qualification Commission of Judges, State Bureau of Investigation, Security Service of Ukraine, National Police of Ukraine, Ministry of Justice of Ukraine, State Financial Monitoring Service of Ukraine, Ministry of Finance of Ukraine	- Accountability for war crimes - Judicial independence and efficiency - Cybercrime and electronic evidence - Prison management, Anti-money laundering and economic crime - Alignment of legislation with European Court of Human Rights judgments
Democracy	10 projects budget: €11.2 million	Central Election Commission; Parliament of Ukraine; Ministry of Youth and Sports; Ministry for Communities and Territories Development; National Civil Service Agency; local and regional authorities and their associations	- Post-war election preparation - Local democracy and good governance - Civic participation and volunteering - Cultural and educational engagement - Rights-based local policy - Youth participation
TOTAL	54 projects Budget: €52 million		

4. The evaluation focused on the 47 active and completed country projects with budget of €47.6 million outside of the wider Action Plan structure (see patterned bars in Figure 1: Ukraine Action Plan 2023-2026 portfolio budget and Figure 2: Budgets and number of projects in the deep dive sample). The activities are being delivered in a uniquely complex operating environment, characterised by martial law, volatile security conditions, rapidly evolving vulnerabilities within Ukrainian society and intense pressure on Ukraine's institutions. Working conditions for the staff of Council of Europe's Office in Ukraine and for staff in partner institutions are also extremely challenging. Ukraine is a relatively crowded space for international support, and in each area of the Action Plan Council of Europe projects operate among many other international partners, including bilateral donors, multilateral agencies, foundations and international non-government organisations.

2. The project counts reflect status of Action Plan before October 1, 2025, include implementing, closed, and planned country-specific projects, and exclude regional and abandoned projects, quick response mechanism, reserve, coordination and general management costs. For more information refer to Table 4c in Appendix 4.

Figure 1: Ukraine Action Plan 2023-2026 portfolio budget³**Figure 2: Number of projects in the Ukraine Action Plan 2023-2026 portfolio**

Source: Action Plan list of projects, September 2025

5. Over the Action Plan period, the Council of Europe has sought to adapt its activities to unfolding wartime challenges. Around 5.9 million Ukrainians have left the country since the February 2022 invasion.⁴ As of early 2026, Ukrainian refugees abroad include 43.5% adult women and 30% minors.⁵ Some 3.7 million people have been displaced to other parts of Ukraine (59% adult women and 29% children). Roughly 4.4 million people have returned from displacement, including more than 1 million individuals from abroad. In December 2025, the share of internally displaced persons (IDPs) in the population was 11.9%.⁶ War and protracted displacement have placed immense pressure on communities and households and exacerbated underlying vulnerabilities. The United Nations Children’s Fund (UNICEF) estimates that around 1.5 million children have had their lives severely impacted by the conflict.⁷ Other groups in particularly vulnerable situations include over 3 million people living with disabilities (this figure continues to rise, with the World Health Organization (WHO) estimating that 100,000 amputations⁸ have been carried out as a result of war-related injuries), the Roma population (estimated at between 200,000 and 400,000⁹) and a growing

3. Figure 1 and Figure 2 display allocation of 71 completed, implementing, planned and abandoned projects of Ukraine Action Plan in period 2023–2026, both regional and country specific of total budget 53.9 million Euro. The counts exclude funds for coordination. For more information see Table 4a in Appendix 4.

4. United Nations High Commissioner for Refugees (UNHCR), [Ukraine Refugee Situation, UNHCR Operational Data Portal](#), available at: UNHCR Operational Data Portal. Accessed 11 March 2026.

5. Eurostat, Temporary protection for persons fleeing Ukraine – monthly statistics. Accessed 27 April 2026.

6. International Organization for Migration (IOM), Ukraine Internal Displacement Report: General Population Survey, Round 22, January 2026 (IOM Displacement Tracking Matrix, January 2026).

7. United Nations Children’s Fund (UNICEF), [Humanitarian Action for Children 2025: Ukraine and Refugee Response](#) (ReliefWeb, 5 December 2024), accessed 11 March 2026.

8. World Health Organization (WHO), [Ukraine: WHO Health Emergency Appeal 2026](#), 3 February 2026.

9. Lina Kondur, [Ukraine’s Forgotten Victims: Roma with Disabilities in Wartime](#) (Minority Rights Group, November 2024).

population of war veterans. As the war enters its fourth year, the scale and nature of war-related stresses and vulnerabilities continue to evolve rapidly. Politically, the state continues to operate under martial law, under a “war budget” in which 50-60% of expenditure is dedicated to defence, largely outside of the usual processes for democratic accountability. Russian attacks on energy infrastructure and severe labour shortages have deepened the economic crises.¹⁰ Protracted war has also led to a deepening social and humanitarian crisis. Economic disruption has led to poverty rates of approximately 36% in 2025. Women have taken on expanded roles in the labour force, filling gaps left by mobilisation. Young people have lost educational opportunities, due to prolonged displacement and the impact of unreliable power supply on remote learning.¹¹

1.1. Purpose, scope and methodology

6. The evaluation is intended to provide an objective assessment of results achieved through Council of Europe technical cooperation delivered under the Action Plan, serving both a learning and accountability function. It generates insights into how the Action Plan has functioned as a strategy and cooperation framework, draws lessons learned, identifies good practices and makes recommendations on future support for Ukraine. The evaluation has been undertaken in the penultimate year of the current Action Plan, and will inform the preparation of the next iteration, expected to commence in 2027.

7. The evaluation focuses on projects active for at least 18 months since the launch of the Action Plan, while taking account of the fact that many activities or areas of support commenced under the previous Action Plan. It focuses on technical cooperation under the Action Plan, rather than the other two dimensions of the Council of Europe’s ‘strategic triangle’ (standard setting and monitoring).

8. The Terms of Reference for the evaluation were developed by DIO and approved by a Reference Group comprised of Council of Europe officials involved in the management and delivery of the Action Plan. The evaluation explores the three evaluation criteria of relevance, efficiency and effectiveness. The evaluation questions (see [Table 2: Evaluation questions](#)) were refined during the inception phase and agreed by the Reference Group, with a focus on informing planning for the next action plan.

10. The Ukraine Economy Tracker, [link](#).

11. Human Impact of the War in Ukraine - May 2025, [link](#).

Table 2: Evaluation questions

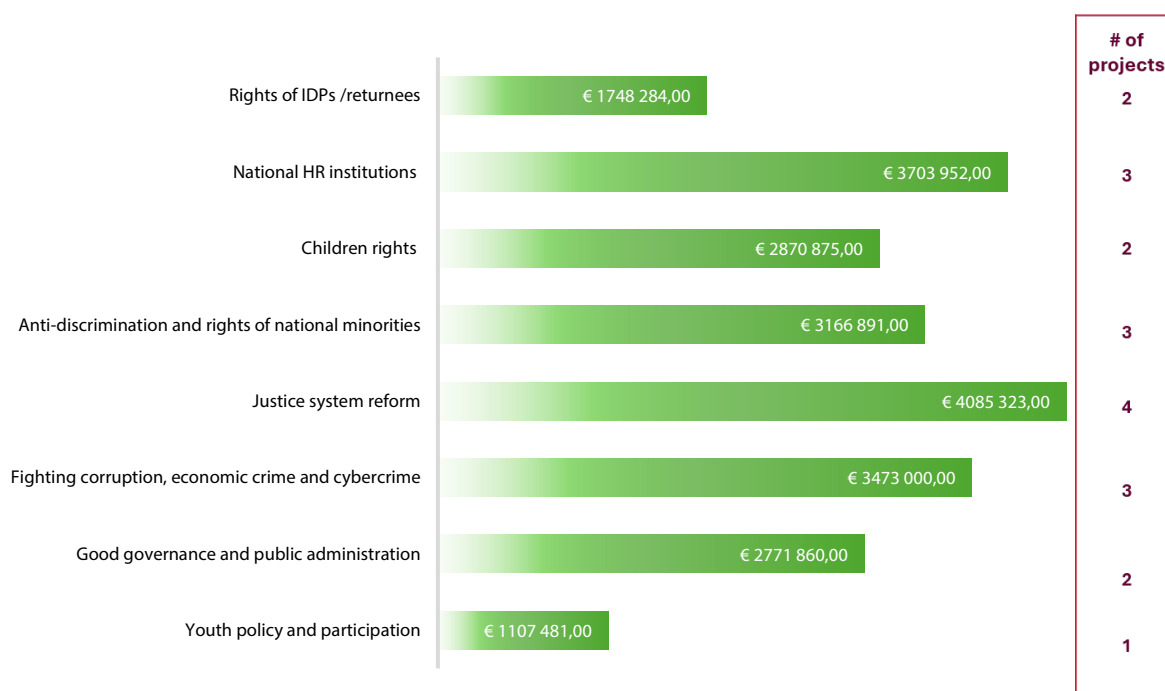
Relevance	
Q1. To what extent is the Council of Europe's Action Plan for Ukraine relevant to the priorities and aspirations of Ukraine and supports its alignment with the Council of Europe standards related to human rights, democracy and the rule of law and its recovery process?	
Sub-questions	a) How well do the objectives of the Action Plan align with Ukraine's national priorities and needs for 2023-2026?
	b) To what extent was the Action Plan informed by and designed to respond to the Council of Europe monitoring and advisory bodies' outputs (recommendations; opinions, reports, judgements)?
	c) To what extent has the Action Plan been designed to ensure preparedness and responsiveness to changes in Ukraine's political, economic, and security contexts and able to address the needs of affected populations (including needs of displaced persons, war-affected communities, etc.)?
	d) Does the Council of Europe appropriately identify its role and comparative advantage alongside other actors?
Efficiency	
Q2. Were resources (financial, human, technical) allocated and used efficiently to implement the Action Plan?	
Sub-questions	a) To what extent does the Organisation generate and use appropriate data to inform its strategic and operational decision-making and make appropriate and timely project adjustments (e.g. use of results-based management approach for performance management and project delivery, efficiency or benefits analysis)?
	b) Adequacy of resource mobilisation and fund allocations in response to evolving funding environment: were the necessary adjustments made in a strategic and timely way to respond to any funding shortfalls and shifts?
	c) Did the Action Plan utilise innovative or cost-efficient methods to achieve its objectives?
	d) Has Council of Europe promoted efficient delivery by engaging with other development partners to promote complementarity and reduce overlap?
Effectiveness	
Q3. To what extent has the Action Plan achieved its objectives and outcomes?	
Sub-questions	a) Did the Action Plan contribute to changes in legislation, policies and practices in the sectors targeted by its interventions, and if so, how?
	b) To what extent has the Action Plan contributed to addressing the newly emerged challenges driven by the conflict?
	c) To what extent has the Action Plan contributed to gender equality or the human rights situation, in particular of vulnerable groups and the war-affected population?
	d) Which factors have supported and hindered the effectiveness of Council of Europe Ukraine projects? Were there variations in effectiveness across different thematic areas or projects? If so, what factors contributed to these differences?

9. The methodology, which is described in full in Appendix 7, employed mixed methods to collect qualitative and quantitative data from a range of sources, including Council of Europe monitoring and management data, narrative reporting and feedback through key informant interviews (KIIs) from partners and stakeholders. The Action Plan was reviewed at portfolio level,¹² and through deep dives into eight thematic areas, covering 20 projects (42.6% of active and closed projects) with a combined budget of €22.9 million (48.2% of the total for country-specific active and closed projects) (see Figure 3: Budgets and number of projects in the deep dive sample). The deep dives were selected through a purposive sampling process, in discussion with the Reference Group, so as to provide balanced representation across the three pillars of the Action Plan, and also a balance of war-related outcomes and long-term accession goals. The deep dives

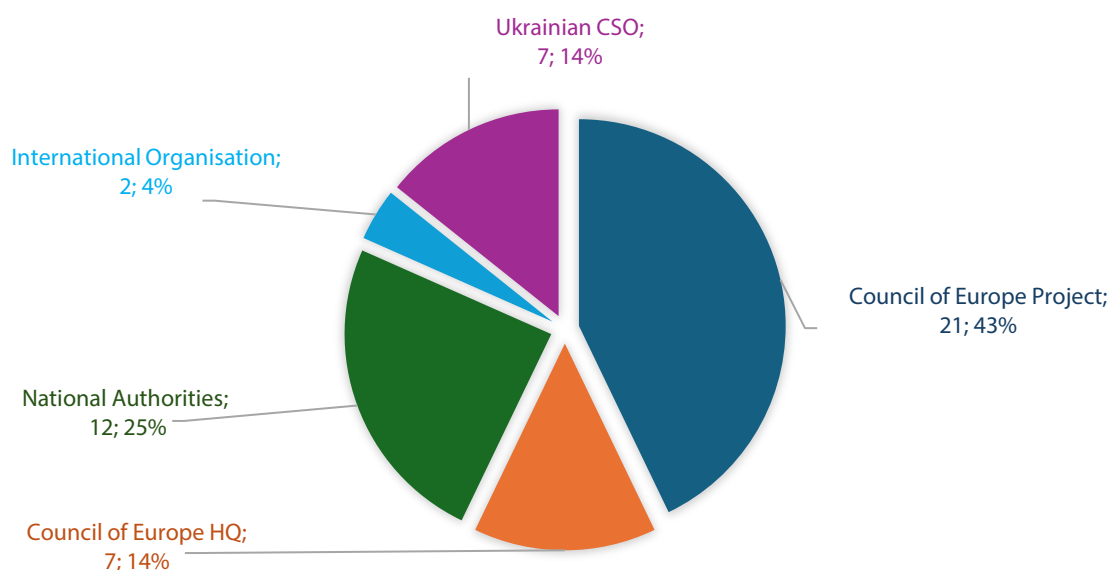
12. Portfolio review covered 47 closed and active country-specific projects, with a total budget of 47.6 million Euro as of October 2025. For more information, see Appendix 4, Table 4a.

provided the opportunity for deeper interaction with project stakeholders, generating qualitative insights into the dynamics, challenges and added value of the Council of Europe's support. Each deep dive explored how clusters of thematically related projects contributed to the outcomes of the Action Plan, in order to gauge the overall effectiveness of the portfolio (the alternative of conducting case studies of individual projects was considered too narrow for this purpose). Qualitative comparative analysis was then undertaken across the deep dives, in order to identify recurring patterns and factors that enabled or inhibited the achievement of the Action Plan's intended results.

Figure 3: Budgets and number of projects in the deep dive sample



10. A total of 57 key informant interviews were held with 80 respondents (53% female), primarily with Council of Europe staff and senior Ukrainian stakeholders (see [Figure 4: Key informant interviews conducted](#)). The data collected was coded against the evaluation questions and key lines of enquiry, to ensure triangulation and identify recurring themes and issues. Emerging findings were presented to the Reference Group, and a workshop on potential recommendations was held with Council of Europe staff involved in planning for the next Action Plan. The draft evaluation report was reviewed by the Reference Group and adjusted by the evaluation to incorporate additional comments.

Figure 4: Key informant interviews conducted

1.2. Limitations of the methodology

11. The methodology had a number of limitations:

- Firstly, the difficult operating conditions in Ukraine, together with high levels of pressure on counterpart institutions, limited the numbers of KIIs that could be conducted. While the data collection period was extended by several weeks and extensive efforts made to secure interviews, a substantial majority of the KIIs were with Council of Europe officials and senior Ukrainian counterparts, with limited representation of civil society and international actors;
- Second, while there is a functional results-based management system for the Action Plan, with results frameworks at both portfolio and project level, limited data has been collected by project teams at outcome level. Evaluation conclusions on effectiveness therefore draw substantially on narrative reporting by the Council of Europe, validated through KIIs with selected project counterparts. To mitigate this limitation, where possible outcome-level results data was triangulated against reputable third-party sources such as EU accession reports;
- Third, the evaluation has been conducted during the third year of a four-year Action Plan, even though many of the reforms supported by the Council of Europe are likely to be long term in nature. As a result, the timing does not allow for all of the results planned under the Action Plan to be assessed.

2. Findings

2.1. Relevance

2.1.1. Alignment with Ukraine's reform agenda

12. The evaluation finds that the Action Plan has been closely aligned with Ukraine's national priorities over the 2023-2025 period. There is strong evidence that the Action Plan has been demand-driven and responsive both to national reform objectives and to urgent needs arising from the war. The Action Plan was developed through a process of structured dialogue and extensive consultation with Ukrainian national partners, involving the Office of the President, the Cabinet of Ministers and various ministries, the Parliament of Ukraine (Verkhovna Rada) and local civil-society organisations (CSOs). The plan was specifically designed to align with the National Recovery Plan of Ukraine and the "Lugano Principles" for recovery, ensuring that proposed measures directly support the country's strategic priorities and its EU accession agenda. It was co-designed with key Ukrainian justice, law enforcement and parliamentary institutions to ensure national ownership and operational relevance. In interviews, officials consistently saw alignment in terms of support for Ukraine's European Union accession requirements, particularly in respect of reforms related to the rule of law, judiciary and fundamental rights. EU accession is both a strategic imperative for Ukraine and a constitutionally mandated objective for all public authorities. Interviewees consistently described the Action Plan as "naturally aligned" with national priorities through its focus on supporting EU accession benchmarks.

13. **The Action Plan's flexible nature enhances its relevance.** The Action Plan is described in its text as a "living document", and "offering the flexibility required to respond to evolving needs in the current volatile context and high-risk environment".¹³ It set out a broad framework of objectives supported by multiple potential actions, with the flexibility to vary sequencing, level of investment and activity design in response to needs. This flexible design proved critical in maintaining relevance and alignment as the war and its consequences unfolded.

14. **At project level, the evaluation finds that activities were demand-driven and responsive.** Project objectives and activity design reflected needs expressed by Ukrainian counterparts through ministerial working groups and sectoral reform platforms. Across the three pillars of the Action Plan, the evaluation noted a strong alignment in the following areas – particularly where project outputs included frameworks for direct application by partner institutions:

- Under the **Human Rights pillar**, the Action Plan incorporated objectives related to the consequences of the ongoing war, such as developing legal frameworks for IDPs and returnees, housing-related compensation, protection mechanisms for war-affected children, conflict-related sexual violence, increased levels of domestic violence and systems for protecting minorities in displacement. There were contributions to the early development of the national register of damage. In the area of minority protection, the adoption of Council of Europe legal standards was paired with support for practical actions such as providing documentation services via mobile units for vulnerable people. In the area of displacement, project activities helped national

13. Action Plan for Ukraine, p. 2, see: <https://search.coe.int/cm?i=0900001680a96440>.

authorities in practical areas such as providing compensation for damaged housing, supporting the most vulnerable IDPs and shifting key public services online to maintain access.

- Under the **Rule of Law pillar**, support for long-term reforms to the judiciary and police were accompanied by measures to protect the functioning of the system during wartime (for example, new safeguards for the delivery of justice under conditions of martial law) and to address war-related challenges such as the investigation, prosecution and adjudication of war crimes.
- Within the **Democracy pillar**, support to local authorities, youth participation structures and subnational governance mechanisms were responsive and aligned with evolving needs at the local level. Stakeholders particularly welcomed the focus on multilevel governance, decentralisation, democratic resilience and continuity of public administration under war constraints. These activities were anchored both in Council of Europe standards (European Charter of Local Self-Government) and adapted to the wartime realities facing public institutions.

15. **Project activities include an appropriate focus on preventing regression of standards during time of war.** The Russian Federation's war of aggression against Ukraine has placed enormous strain on Ukrainian society and institutions, and deterioration of standards in public life is a serious risk. Preventative outcomes, such as protecting the role of the Constitutional Court and High Council of Justice under conditions of martial law and preserving participatory governance at sub-regional level and the irreversibility of the decentralisation reform, are therefore highly relevant.

2.1.2. Integration of findings from Council of Europe monitoring and advisory bodies

16. The Action Plan is well grounded in Council of Europe norms and the outputs of its monitoring and advisory bodies, although with varying levels of specificity. The evaluation identified project activities that respond to findings and recommendations by the European Committee of Social Rights (ECSR) regarding non-conformity with the Revised European Social Charter and to findings of the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) regarding service provision gaps,¹⁴ among other examples (see [Box 1](#)). Projects are anchored in Council of Europe normative standards, with monitoring outputs described by interviewees as "the starting point" and "formal decision base" for the design and prioritisation of the Action Plan. While key informants were generally able to describe reform activities and their objectives, the connection between these activities and specific recommendations of Council of Europe monitoring bodies was not always explicitly identified, particularly by non-specialist stakeholders.

14. ECSR Conclusions 2021; GREVIO reports; Istanbul Convention-related reporting.

Box 1 : Integration of Council of Europe monitoring and advisory outputs

The Action Plan and project documents reviewed for the evaluation make reference to the following outputs by Council of Europe monitoring and advisory bodies:

- **European Court of Human Rights** – judgments on Ukraine
- **Committee of Ministers** – decisions and resolutions, especially on the execution of European Court of Human Rights judgments
- **Parliamentary Assembly of the Council of Europe** – resolutions and recommendations, including from its Monitoring Committee
- **Commissioner for Human Rights** – country reports, memoranda and statements
- **European Commission for Democracy through Law (Venice Commission)** – legal opinions on Ukrainian legislation
- **European Commission against Racism and Intolerance** – country monitoring reports and conclusions
- **European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT)** – visit reports on conditions in detention
- **Group of States against Corruption (GRECO)** – evaluation and compliance reports
- **Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL)** – mutual evaluation and follow-up reports
- **European Committee of Social Rights** – conclusions and decisions
- **Advisory Committee on the Framework Convention for the Protection of National Minorities** – opinions and subsequent Committee of Ministers' resolutions and recommendations
- **Lanzarote Committee** – thematic monitoring reports on the protection of children against sexual exploitation and abuse
- **The Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO)**
- **European Charter for Regional or Minority Languages mechanism** – Committee of Experts' evaluations and *Committee of Ministers'* recommendations
- **Congress of Local and Regional Authorities** – monitoring reports on local democracy and election observation.

17. **There has been disruption to the work of Council of Europe monitoring bodies as a result of the war.** Over the period of the Action Plan, projects have been able to draw on the above outputs to provide the normative grounding for their support. However, many planned monitoring missions have been postponed or conducted remotely, reducing the scope for on-site verification (Appendix 6, Table 10). During 2022-2023, most monitoring activities were conducted remotely, using questionnaires and remote video conferences with government partners. In 2023, the CPT was the first to visit Ukraine. Five others resumed selective monitoring or high-level visits in 2024-2025, mainly to Kyiv or Western regions of country, while other bodies used remote judicial consultations, documentary analysis, remote interviews with the partners or hybrid formats, rather than on-site inspection. A table analysing the modality of the Council of Europe advisory bodies and their latest reports on Ukraine is provided in Table 10. Ukrainian stakeholders emphasised that returning to a full monitoring schedule would strengthen accountability and reform tracking.

18. Across the thematic deep dives, Council of Europe monitoring outputs were found to be substantive inputs shaping the prioritisation, sequencing and content of reforms. For example:

- Anti-money laundering and counter terrorist financing interventions were explicitly structured around MONEYVAL monitoring cycles, and its recommendations informed the prioritisation and sequencing of reforms;

- Governance programming drew extensively on Venice Commission and Congress advisory ecosystems, including the dialogue mechanisms (e.g., the “Strasbourg format”) to guide reform focus;
- Support for the justice system was framed around response to standards and “guardrails” set down by advisory bodies, in areas such as fair trials and the independence of judicial governance bodies.

2.1.3. Responsiveness to changing national contexts and the needs of affected populations

19. The Action Plan and the Ukraine portfolio of assistance demonstrate a high degree of contextual awareness and responsiveness to Ukraine’s wartime environment. Council of Europe documents evidence explicit decisions to build flexibility into the portfolio, periodic adjustments in response to evolving needs, and significant course corrections following major developments such as the opening of EU accession negotiations in 2024.¹⁵ Key informants were readily able to offer many examples of flexibility and responsiveness in the support offered, such as adaptations to justice support under conditions of martial law, policy advice in response to internal displacement, legal remedies for war-affected people, and responses to cyber threats targeting critical infrastructure. In some cases, these adaptations involved revising or cancelling planning activities (for example, psychological support for police was discontinued in favour of increased human rights training), and the merger of overlapping project components to enhance coordination. Projects were adjusted to be more explicitly aligned with EU accession criteria, in particular by prioritising Chapter 23 and 24¹⁶ accession criteria. In the area of justice support, planned activities on the enforcement of outstanding European Court of Human Rights judgments was discontinued in favour of a focus on judicial functioning under war conditions and managing the implications of Ukraine’s derogations from the European Court of Human Rights (ECHR). Some activities were scaled back or refocused because partner institutions were not in a position to absorb the planned support. For example, when one project scheduled to work with the Supreme Court faced major disruption due to senior personnel changes within the Court, it temporarily refocused on other partners (e.g., the Ombudsperson Office and the National School of Judges), while re-establishing working level contacts with the Supreme Court.

20. Adaptions were also made to the modalities for delivering projects in response to changing security conditions and partner capacity constraints. For example, many projects adapted to the volatile security and political situation by transitioning activities to online and hybrid formats, utilising modular agendas (thematic segments that can be delivered independently or in sequence) and recorded sessions to mitigate the impact of restricted movement and infrastructure failures like blackouts. Changes were also made to project timelines and geographical focus (e.g. moving events to the west of Ukraine, which was comparatively secure). Rising security costs and inflationary pressures necessitated multiple adjustments to project budgets. The evaluation identified multiple examples of project budgets that were increased to meet urgent requests from partner institutions or the increased costs of holding events in insecure contexts. Adaptations were also visible to project goals, logical frameworks (‘logframes’) and reporting methodologies. Council of Europe managers reported that logframes were treated as “living documents” and reviewed regularly to ensure that project activities remained realistic in the volatile environment,

15. Council of Europe Ukraine Action Plan 2023–2026; Annual Report 2024.

16. Chapter 23 “Judiciary and Fundamental Rights”; Chapter 24. “Justice, Freedom and Security”.

sometimes informed by additional studies or needs assessments (e.g., a study on ‘Social Rights in times of War’ undertaken in the early stages of the invasion).

21. The Action Plan has a strong focus on responding to needs and challenges arising from the war. Notable examples from the thematic deep dives include:

- **Support for IDPs and returnees**, including clarifying the legal status and rights of refugees and returnees, nationwide property inventory for IDPs, rental subsidies for IDPs, creating legal standards for state support during the conflict;
- **Protection and legal redress for civilians in wartime**, including the “e-Recovery” mechanism for war-damaged housing;
- **Protection of children and youth** in vulnerable situations, including the right to education for young people from Temporarily Occupied Territories, specialised care for war-affected children, training curriculum and programmes on trauma-informed youth work;
- **War crimes investigations**, including the National Police strategy for managing war crimes investigations and judicial practice on legal redress for war crimes;
- **War veterans**, including adaptations to rehabilitation programmes in prisons to address their needs;
- **Protection of minority groups**, including training for police on hate crimes and public communication during the invasion;
- **Adaptation of legal standards to martial law**, including helping Ukraine transition back to standard Civil Code timelines to prevent a “justice backlog”.¹⁷

2.1.4. The Council of Europe’s comparative advantage

22. **The Council of Europe has a clear role and comparative advantage within Ukraine’s crowded donor landscape.** Its comparative advantage is recognised by stakeholders as its normative authority to set European standards and the grounding of its technical assistance in those standards. In interviews, Ukrainian officials characterised the Council of Europe as an “authoritative standards-based actor” and a “trusted legal adviser,” offering a form of partnership that is distinct from development partners using conditionality-based leverage. Within the EU accession process, the European Commission is seen as the “hard negotiating partner”, while the Council of Europe is “a trusted source of advice” on European standards. Many other international development partners refer to Council of Europe standards in their analytical work and programme designs.

23. **There are, however, some limitations to the Council of Europe’s role and positioning in Ukraine.** Stakeholders emphasised its complementarity with other development actors, with the Council of Europe providing the standards-based “blueprint” for public policies and institutions, while other partners fund implementation at scale. This is in many ways a strong position for the Council of Europe to hold,

17. A critical 2025 adaptation was Council of Europe’s advice on the restoration of limitation periods. During 2022-2024, many legal deadlines were suspended; as of Sept 4, 2025, the Council of Europe helped Ukraine transition back to standard Civil Code timelines to prevent a “justice backlog.”

enabling it to shape or influence larger-scale activities by other partners. However, it means that the real-world outcomes of Council of Europe support are often dependent on follow-up actions by others, over which the Council of Europe has limited influence. Another limitation is the Council of Europe's limited funding, relative to the scale of need, which gives its support a niche character. Key informants across various stakeholder groups highlighted the Council of Europe's limited public visibility in Ukraine. This low profile – particularly among regional authorities and non-governmental organisations (NGOs) outside the core human rights, rule of law and democracy sectors and general public – weakens the Council's leverage within partner coordination mechanisms and reduces its influence over legislative adoption and the subsequent implementation of reforms. However, there is also some evidence from the deep dives that this low profile enables the Council of Europe to engage in policy dialogue on sensitive policy reforms.

2.2. Efficiency

2.2.1. Use of results-based management

24. The evaluation finds that the Ukraine Action Plan is supported by a multilayered results-based management (RBM) system, operating at both portfolio and project levels. There is a results framework (logframe) for the Action Plan as a whole, through which key indicators from project logframes are aggregated to support portfolio-level results analysis across thematic pillars. The RBM system is supported by a handbook and an online Project Management Methodology platform (PMM), which is used for reporting project-level activities, risks and results. The evaluation found multiple examples of project logframes being used actively to align activities with intended outcomes and being adapted as projects pivoted in response to changes in need and context. Monitoring information is collected from multiple sources, including Council of Europe and European Commission monitoring reports, official government information, surveys, participant feedback and online viewing statistics. In interviews, some project managers described the RBM system requirements as administratively cumbersome and burdensome, not perceiving a direct connection between ongoing monitoring through the IT platform and the reporting process. This perception is reinforced by gaps in functions that would facilitate the quality assurance process of narrative reports. By contrast, interviewees based in headquarters were more likely to describe the RBM system as a strategic tool. Detailed portfolio-level narrative reports on activities, expenditure and results are produced annually. These vary in depth and quality, but in most cases contain useful qualitative descriptions of progress achieved and analysis of successes and failures. They also set out a clear rationale for key management decisions, creating a clear accountability trail and reporting to donors. Further investment in the project management methodology (PMM) IT platform would help the Organisation to meet the high performance and accountability standards of the sector, and the business needs of internal and external stakeholders.

25. A limitation mentioned by multiple Council of Europe interviewees was lack of integration between the PMM system and the Organisation's financial management platform. This creates an additional administrative burden of uploading documents to multiple platforms, in order to generate routine transactions such as purchase orders. Lack of integration also means that analysis of the cost of achieving results would require complex manual reconciliations of data on different platforms. This has two implications for the evaluation's findings on efficiency. First, there are inefficiencies within the Organisation's management system, which add to the administrative burden on staff. Second, efficiency and cost-effectiveness within technical cooperation activities (i.e., the cost of achieving a given result) are

not tracked within the RBM system. While the evaluation found many examples of projects being required to identify efficiencies and savings in response to budgetary constraints, this was not linked specifically to the RBM system. However, these efficiency measures were implemented alongside efforts to safeguard the quality and impact of project outcomes, rather than at the expense of achieving results.

26. While the Action Plan RBM system is broadly functional, most of the reporting and results data is at output level, and limited measurement of outcomes had been attempted by the time of the evaluation. There are a number of reasons for this. Outcome indicators are often formulated at too high a level, reflecting major changes in institutional practices and performance that cannot plausibly be achieved within a two- or three-year project cycle. Such indicators are therefore not routinely monitored, at either project or portfolio level. As noted above under 'relevance', the Council of Europe's standards-based technical inputs often depend for their implementation on long-term national reform programmes and funding from other international actors, which can result in long time lags between projects and their outcomes. The Organisation currently lacks adequate metrics of short-term results, such as changes in awareness, capacity and behaviour within counterpart institutions. According to interviewees, there are plans to address this gap in the coming period by drawing on social and behaviour change measurement methodologies. Project proposals also lack explicit theories of change articulating the causal chains between project activities and intended results. While narrative reporting captures whether expected intermediate outcomes (such as policy and legislative changes) have occurred, there is limited consideration in reports of how project activities should be adjusted in response.

27. Despite some limitations in the RBM system, there is good evidence of learning and adaptation at both project and portfolio levels. Projects and partners make good use of the outputs of Council of Europe monitoring bodies and EU accession progress reports to identify priorities and bottlenecks. Learning within projects is reinforced by continuity of local staff in project management positions, and by active sharing of knowledge and information by project managers through both formal and informal channels. The evaluation notes that experienced local staff make an important contribution to flexible implementation, owing to their strong relationships with counterparts and their deep understanding of the evolving delivery context. Local staff are given substantial autonomy by management, allowing them to adapt logframes, budgets and activities without excessive approval requirements from headquarters. In the governance area, the evaluation noted that some projects were undertaking quarterly context and capacity assessments, in order to align activities with partners' needs and capacity to engage, given the unfolding conflict. The evidence base for projects' learning relies on a diverse array of evaluative tools, including systematic field surveys and continuous stakeholder feedback. These are complemented by established governance mechanisms, such as projects' semi-annual steering committees, and inclusive engagement platforms like 'open days' that involve both peers from the Council of Europe and external donors. Project adaptations are often based on evidence of Ukraine's progress towards European standards in relevant areas, rather than evidence of outcomes specifically attributable to Council of Europe activities. This is a pragmatic approach, given the long-term nature of the Council of Europe's objectives in Ukraine and the presence of so many other actors, but it does make it more difficult for the Organisation to evidence its contribution to specific outcomes.

28. **Action Plan and project-level governance arrangements provide useful forums for learning and adaptation.** The Action Plan Steering Committee meets annually, bringing together Council of Europe officials, national institutions and civil society organisations and member country representatives in Kyiv.

These meetings serve multiple purposes, including informing stakeholders about progress, exchanging best practices and lessons learned, discussion of needs and priorities in the changing context, and agreeing priorities for the coming year. Each project also has a steering committee, which meets at least annually, for in-depth discussions on specific reforms. These meetings play both coordination and learning roles across the portfolio.

2.2.2. Adequacy of resource mobilisation and allocation

29. **The Action Plan has been implemented against a background of significant and persistent funding deficits.** The Action Plan was initially designed against initial needs of €50 million, which was later increased to €65 million in response to escalating need. During the first year of implementation, only €27.4 million in funding commitments was secured, of which €17.2 million had been paid, leaving a funding deficit of 45% (see Table 3). In subsequent years, this deficit gradually reduced through additional fundraising efforts, reaching 17.5% by the end of 2025. In interviews, a range of stakeholders mentioned the discrepancy between the strong political commitment to Ukraine demonstrated by member countries and their willingness to provide funding.

Table 3: Progress in fundraising for the Action Plan¹⁸

Financial Year	Total Estimated Budget (€)	Funding Secured / Received (€)	Funding Deficit (€)	Funding Deficit (%)
2023	50,000,000	27,400,00 secured 17,157,654 received	22,600,000	45%
2024	65,000,000 (revised)	39,000,000 secured	26,000,000	40%
2025 (as of 29 April)	65,000,000	40,900,000 secured	24,100,000	37%
2025 (as of 31 December)	65,000,000	53,600,000 secured	11,400,000	17.5%

30. The sustained funding shortfall has had direct and tangible implications for efficient implementation of the Action Plan, forcing the Organisation to make strategic trade-offs. These have included the abandonment or withdrawal of several planned initiatives—particularly within the Human Rights and Democracy pillars—and delay in launching projects under multiple outcome areas until late 2024.

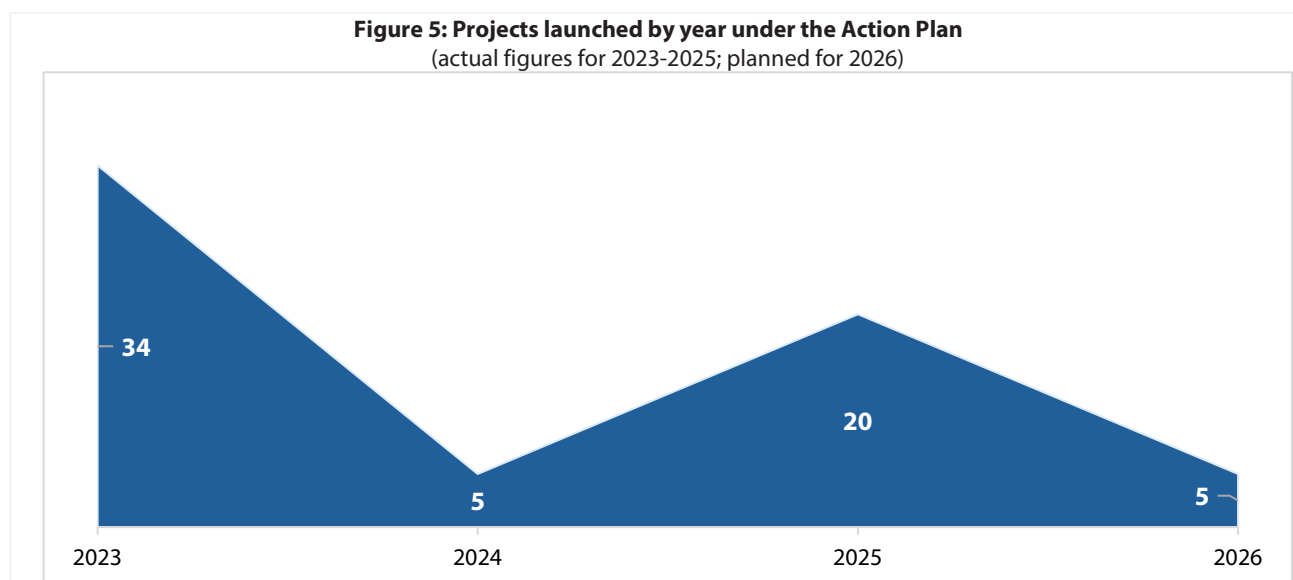
31. **The Organisation demonstrated flexibility in launching activities before the funding had been secured.** Figure 5 shows the number of projects launched under each year of the Action Plan as of September 2025. Council of Europe rules specified that projects can be authorised to begin in advance of funding provided that there is a high probability of the funding being secured and a plan is in place for adjusting budgets downwards, in the event of a funding shortfall.¹⁹ The Council of Europe drew on this principle substantially for the Ukraine portfolio, launching 34 projects in 2023²⁰, exceeding the available

18. Table 3 reflects the Action Plan's total funding that includes budgets of all closed, implementing and planned projects, both country and regional, as well as general management costs, reserves, QRM and coordination relevant to the Action Plan implementation.

19. 2023 Audit Report Action Plan Ukraine 2023-2026.

20. Counts include both country and regional Action Plan projects that have been launched every year, and include general management costs, coordination, reserves and QRM. The same for Figure 5.

funding by €5.3 million. The decision by the Council of Ministers to provide financial support to all Action Plans by relocating Council of Europe ordinary budget was strategically used to fill the gaps in voluntary contributions in 2024-2025, with €2.3 million in 2024 and €4.5 million in 2025 allocated to help cover the shortfall. This helped sustain project implementation and facilitated the launch of new projects over the period of funding deficit, while waiting for external contributions. The Organisation also scaled up its fundraising activities in 2025, with increased outreach to key donors.



32. While this flexibility was justified given the strategic imperatives driving the Ukraine response, it created considerable uncertainty around the planning and delivery of the portfolio, posing risks to the timeliness and effectiveness of AP implementation. The Organisation took a number of measures to mitigate these risks. It developed explicit criteria for deciding which projects could launch in advance of funding, to ensure that only high-value activities proceeded. It also prioritised and sequenced activities within projects in accordance with the available funding, retaining the flexibility to scale back if the funding was not forthcoming. At the time of writing, the Organisation has secured €53.6 million of its total Action Plan budget. Importantly, this is sufficient funding to implement all active projects in full by the end of 2026. This suggests that, at the portfolio level, the risks associated with early launch were well managed. There were, however, consequences for the efficiency of fund utilisation at the project level, with many projects reporting delayed and cancelled activities, as well as unexpected increases in project costs, due to high inflation and the wartime operating context.

33. **The insecure environment significantly raised operating costs.** Costs such as war-risk insurance for staff and international experts visiting Ukraine were inevitably high, and routine costs such as travel, interpretation services and venue hire also become more expensive in war conditions. The Organisation was required to invest in some 'hard' security items, including personal protective equipment and second-hand armoured vehicles. It is likely that the Organisation's unfamiliarity with working in insecure contexts and its lack of relationships with suppliers of related goods and services resulted in higher costs. In addition, the need to hold key events and activities outside Ukraine due to the security conditions added significantly to operational costs.

34. **There were also many examples where funds were reallocated flexibly to adapt to changing conditions.** For example, savings realised when international experts were unable to travel to Ukraine were reallocated to fund local experts, higher venue costs or travel of local partners abroad. In some cases, projects reallocated funds towards critical partner needs – such as IT or video equipment, software licenses and power generators – to enable them to continue operating. The latter was particularly the case for projects involving investigating and documenting war-crimes, the HELP-based learning environment, digital participation for local governments. Local expertise was applied for IDP and compensation mechanisms development, justice reform, war crimes documentation and good governance and local reform initiatives. Council of Europe training was also integrated into existing national mechanisms, such as the judges' school, prosecutors' academy and local governance training system.

2.2.3. Use of innovative and cost-efficient delivery methods

35. The Ukraine portfolio contains many examples of adaptations to delivery methods to reflect the challenging operating conditions. Many of these adaptations were imposed by hard security constraints; some also proved to be cost-saving, either for the projects or to meet efficiency needs of their national counterparts. Examples across the portfolio include:

- Shift to online or hybrid modalities;
- Increased use of national rather than international expertise – particularly in areas where greater scale was needed, such as training of legal workers and local government officials – leading to savings on fees, travel and interpretation costs;
- Reduced international travel;
- Using partner-provided venues Optimisation of the Ukraine government resources for war-crime investigations by supply and training on use of drones to collect evidence for war crimes investigations;
- Training-of-trainer approaches, to facilitate scaling;
- Establishment of digital learning platforms, in place of traditional training activities.

36. **Projects across the portfolio adopted a range of intentional cost-efficiency measures.** These included moving large public events for youth from Kyiv to Lviv, where costs were much lower, or making use of partner venues for events, rather than hotels. The law enforcement reform project involved experts from Ukrainian CSOs acting *pro bono* in response to funding constraints. According to the project manager, "Ukrainian experts are not just consultants; they are stakeholders in the country's future. Their motivation often goes beyond remuneration, reflecting a deep personal investment in reform."

37. **While there is evidence of cost savings, the evidence on cost-effectiveness or value for money is mixed.** Stakeholder feedback suggests that some of these adaptations – especially reduced travel of international experts to Ukraine and the shift to online modalities – entailed some compromise to the quality and effectiveness of the support. Key informants from counterpart institutions expressed a strong preference for a resumption of face-to-face training and advisory support, and stressed the importance of international experts visiting Ukraine in order to build an understanding of the operating realities facing partner institutions – such as limitations imposed by security conditions, power cuts, military conscription

of staff, shortages of qualified personnel, and the complexities of the national political context. While these choices may continue to be dictated by security considerations, this feedback on trade-offs for quality of support is an important learning point.

2.2.4. Complementarity and coordination with other development partners

38. **The Action Plan is being implemented in a crowded donor landscape.** Across its eight thematic deep dives, the evaluation identified between seven and 30 other international partners per thematic area (see Figure 6), including bilateral donors, multilateral agencies, foundations and international NGOs. Those included international donor and embassies programmes in related sectors (e.g. rights of minorities, children, internally displaced persons, court reform, anti-corruption, good governance), EU missions and EU-linked programs, international legal and accountability bodies and research institutions. This dense landscape makes it important to minimise duplication and overlap across externally funded interventions. In this climate, there was clear evidence that time invested in ensuring complementarity and coordination adds to efficiency.

Figure 6: Number of contributing development partners per theme



39. The Council of Europe is active in a wide range of coordination processes with other development partners, at both headquarters and country levels. These take varied forms, including development partner coordination meetings, thematic sectoral working groups, programme steering committees, strategic alignment with international frameworks and joint programmes. The Council of Europe holds regular steering committee meetings for the Action Plan and individual projects, with international donors and embassies invited to participate. There are also informal communications with other development partners and participation in government-led working groups and events. Longstanding personal relationships play an important role. National project managers and experts contribute significantly, often bringing their networks with government officials and the staff of other development partners. Overall, interviewed stakeholders were in agreement that coordination is an area of strength for the Council of Europe.

40. **Coordination from the government side focuses on matching organisational needs with international partner priorities.** Ukrainian authorities lead or co-chair both national and international coordination groups. In some thematic areas, national counterparts identify their own needs and approach

specific donors for help based on thematic interests and areas of specialism. Projects' and AP steering committees also serve as coordination mechanisms, helping the Council of Europe to understand other donors' contributions and identify where it can add value. This form of coordination minimises duplication but does not necessarily generate coherence at the strategic level. However, in the thematic areas where the Council of Europe works, European norms and the requirements of the EU accession process provide an overarching framework for most development partner assistance, ensuring a level of overall coherence.

41. As noted above under 'relevance', the second modality gives the Council of Europe scope to use relatively small investments to influence often much large assistance programmes by other development partners. Compared to running separate, niche projects, this offers a strong value-for-money proposition. However, it also leaves the achievement of objectives dependent on progress with other activities over which the Council of Europe has limited influence.

2.3. Effectiveness

2.3.1. Contribution to changes in legislation, policies and practices

42. **The reform objectives in the Action Plan are long term in nature.** The alignment of Ukraine's relatively young democracy with European standards for democracy, human rights and the rule of law is a generational project, requiring sweeping changes in institutions, sometimes in the face of strong vested interests in the status quo. The Russian Federation's war of aggression against Ukraine has made integration with the EU and European norms a strategic imperative for Ukraine, while creating increased political momentum for reforms that may previously have been more difficult to advance. At the same time, it has created exceptionally challenging conditions for Ukrainian institutions, diverting state resources to the war effort and reducing the bandwidth for major policy and institutional changes. The war has also placed immense pressure on Ukrainian society and public institutions, creating real and immediate risks to the rule of law and human rights. Following the launch of the war of aggression by the Russian Federation in February 2022, Ukraine submitted a notice of derogation from some of the protections under the European Convention on Human Rights, and elections remain suspended under conditions of martial law. War and mass displacement have caused new social fractures and vulnerabilities. In this environment, preventing deterioration in human rights and the rule of law is also an important objective. These important contextual factors – the long-term nature of change processes and the real risk of reversion – underlie the evaluation's assessment of the effectiveness of Council of Europe support.

43. **Against this background, the Action Plan has achieved meaningful results across the majority of reform areas.** However, most of these changes are not yet mature enough to have impacted on Ukrainian citizens. Some of the key results reported under the Action Plan include legislative change implementing Venice Commission recommendations in areas such as judicial reform, minority protection and media law reforms, legislation on anti-money laundering, and implementation of the Istanbul Convention on violence against women. Council of Europe support has enabled the introduction of support services in response to wartime vulnerabilities and new mechanisms for the participation of young people and minority groups in governance processes. In interviews, key stakeholders confirmed that these have been important contributions to EU accession and wartime institutional adaptation, but framed them as elements in broader reform trajectories, rather than as standalone outcomes. The evaluation set out to test whether changes to laws, policies and institutions resulting from Council of Europe support had led to shifts

in institutional practice and, in turn, to concrete benefits for Ukrainian citizens. In practice, the reforms are not yet mature enough for an assessment of real-world outcomes to be meaningful, even though there has been progress in adapting legislation and introducing institutional changes in most of the themes analysed.

44. While there is narrative reporting of progress under the Action Plan, the monitoring and reporting system is not set up to support quantitative analysis of results at the portfolio level. The Action Plan logframe includes impact and intermediate outcome indicators, with baselines and targets. However, as noted above under the discussion of results-based management, these indicators are at a high level (e.g., changes in the effectiveness of partner institutions) and the results are not monitored on an annual basis. There is therefore no quantitative data available at this stage on aggregate achievements against the Action Plan logframe.

45. **The evaluation therefore undertook its own analysis of outcomes in eight thematic areas.** In each area, an assessment was made of progress towards immediate and intermediate outcomes in the Action Plan. Results were extracted from Council of Europe project reporting, validated through interviews and triangulated against authoritative third-party assessments, such as the EU accession reports. The evaluation team used a custom-made, six-point scoring scale to assess progress towards the objectives in the Action Plan and the Ukraine's EU accession roadmap.

46. **Table 4 presents the results for each thematic area sampled for deep dives.**²¹ It should be noted that the assessment covers only the first two-and-a-half years of the four-year Action Plan. Further results may eventuate in later years. The readers should also consider that the assessment scores reflect the progress made toward expected results rather than level of efforts applied by the Council of Europe projects, as the progress depended on the national partners in most cases. The facilitating and inhibiting factors that have caused the presented scores are better explained in section d. Factors enabling and inhibiting effectiveness and Tables 6.c and 6.e.

Table 4: Progress towards expected results in the Action Plan

Thematic area	Progress toward AP expected results		Progress triangulated to EU accession report	
	Score	Interpretation	Score	Interpretation
Rights of displaced persons and returnees	4	Consistent progress with high uptake; some gaps remain	4	Very good progress
National human rights institutions & mechanisms	3	Solid but incomplete progress	3	Good progress
Children's rights – war/post-war	4	Very strong, responsive progress	4	Very good progress
Anti-discrimination & minorities	3	Meaningful, uneven progress	3	Good progress
Justice system	2.5	Mixed / constrained progress. Meaningful advances alongside some clear limitations	2.5	Some / good progress (mixed but meaningful)

21. Twenty projects in 8 thematic areas have been selected for the deep dive analysis described here. For the sample approach, please refer to Appendix 5.

Corruption, economic crime & cybercrime ²²	4	One of the strongest areas ²³	3	Good progress
Good governance & PA reform	3	Steady but uneven progress	3	Good progress
Youth policy & participation	4	High uptake and relevance	3	Good progress

Scoring key:

5 – Outstanding progress: Expectations largely achieved; strong evidence of institutionalised change and uptake.

4 – Very good progress: Clear, consistent progress with high uptake; some gaps remain.

3 – Good progress: Solid progress against expectations; reforms advanced but not fully consolidated.

2 – Some progress: Partial delivery; outputs achieved, outcomes uneven or early-stage.

1 – Limited progress: Isolated achievements; expectations largely unmet.

0 – No progress: No credible evidence of movement.

47. Across its thematic deep dives, the evaluation identified 46 legislative and policy changes developed through Council of Europe standards. These are described in detailed in Table 5 in the appendices. Some of the most significant reforms, drawn from across the pillars of the Action Plan, are summarised in Box 2.

48. Triangulation of Council of Europe narrative reporting with Ukraine's progress on EU accession confirms that the Council of Europe has helped close the gap with European standards. While the EU accession process is broader than the Action Plan, it is closely aligned in many thematic areas. The 2025 European Commission assessment²⁴ of Ukraine's progress across relevant chapters of the EU *acquis* provides the most authoritative evidence on Ukraine's reform progress. It identifies areas of progress, major gaps and systemic barriers to progress (such as governance bottlenecks, politicisation risks, vested interests and resource constraints). In the areas relevant to the Council of Europe's work, the team analysed the Council of Europe's contribution to reported results.

- **Areas of strong progress (score 4):** In two of the thematic areas, rights of IDPs/returnees and children's rights, the Council of Europe has made a decisive contribution. That is, its support has addressed gaps identified by the European Commission in a systematic way, and there is evidence of meaningful institutional changes as a result.
- **Areas of good progress (score 3):** In five areas – national human rights institutions, minority protection, anti-money laundering (AML) and cybercrime, good governance/public administration and youth policy²⁵ – Council of Europe support has addressed some of the gaps identified in the European Commission assessment, but key structural, political or resource-related constraints on

22. The evaluation focused on the period 2023-2025, when Council of Europe anti-corruption interventions focused exclusively on anti-money laundering, counterterrorism and enhancing cyber security in Ukraine. Support for national anti-corruption institutions was scheduled to start in 2026.

23. While aware of the volatile context marked by high-profile anti-corruption investigations in 2025, the evaluation made the progress assessment in relation to the expected results of the AP. At the same time, the EU Accession report highlights the instability of Ukrainian government institutions fighting corruption, which lowered the effectiveness score for this thematic area.

24. [The European Commission Staff Working Document "Ukraine 2025 Report" \(SWD\(2025\) 759 final](https://enlargement.ec.europa.eu/ukraine-report-2025_en), 4 Nov 2025, https://enlargement.ec.europa.eu/ukraine-report-2025_en.

25. The Council of Europe programming on youth participation supports the European Commission's broader democracy objectives (civic participation, volunteering, inclusion). The European Commission analysis does not define a youth-specific "roadmap benchmark" or explicit Commission youth-policy milestones.

progress have not been addressed. In these areas, Council of Europe outputs can be described as enabling but not sufficient to close the gap with European standards.

- **Areas of some, but limited progress (score 2.5):** In the area of judicial reform, the Council of Europe contribution is more modest, contributing to some improvements in partner capacity but not directly addressing the critical gaps identified by the European Commission. This is a complex reform where the Council of Europe contributes in areas of justice strategy and legislative streamlining measures, awareness and competence building, introduction of new mechanisms on war-related harms, and improved accountability. However, these contributions do not directly address the European Commission's central structural concerns (institutional bottlenecks and political-economy constraints).

More detailed analysis on AP contribution to EU accession in 8 thematic areas is provided in Appendix 6 / Table 7.

49. **This reflects a pattern of meaningful results across the portfolio.** Four of the eight thematic areas examined (rights of displaced persons and returnees, children's rights, AML and cybercrime, and youth participation) show strong progress in promoting reforms toward the Action Plan expected results, scoring four on the rating scale. This reflects evidence of substantial uptake of advisory inputs by counterpart institutions across a majority of the areas of engagement. The results are at the immediate outcome level: that is, they represent steps in the reform process, even though further reforms or implementation processes are needed in order to achieve the intended changes in institutional performance. The remaining four areas (national human rights institutions, anti-discrimination and minorities, justice reform, and good governance and public administration reform) show constrained or moderate progress, indicating limitations on the uptake of Council of Europe inputs. In the justice area, for example, there has proved to be limited scope to undertake larger institutional reforms in the wartime context. The results have therefore been primarily preventative in nature – for example, protecting the integrity of judicial processes under conditions of martial law. These preventative results are nonetheless important results in the Ukrainian context.

50. Overall, the Council of Europe's contribution is strongest in the area of social services and protection, where practical support for national partners can deliver meaningful results in the wartime context. This is particularly the case where Council of Europe provides directly applicable tools (e.g., protocols and guidance) and mechanisms to put them into practice (new performance management and accountability systems). By contrast, in areas requiring large-scale institutional changes (such as justice and public administration reform), the evaluation found fewer visible changes in institutional practices or performance resulting from the Council of Europe's efforts. There is a positive pattern of results indicating that, within a short period of time, the Action Plan has reduced the gap to European standards in several thematic areas. However, it also shows that Council of Europe support is not sufficient to overcome major political and structural bottlenecks.

Box 2: Some salient outcomes across the thematic deep dives

- National strategy on IDPs, services and integration of IDPs in host communities, the "Prykhystok" platform
- Early design of the Register of Damage Caused by the Aggression of the Russian Federation Against Ukraine (documenting harm)
- HELP online learning platform for legal professionals (utilisation continues to grow)
- Aligned national legislation on Anti-Money Laundering with the Financial Action Task Force (FATF) and MONEYVAL standards
- SSU In-Service Training Portal: uninterrupted professional development for staff during the war
- Piloting qualitative performance evaluation system for State Bureau of Investigations personnel
- Continued progress on decentralisation, integration of HR standards (re IDPs, veterans, vulnerable groups), civic hubs
- Enhanced capacity for local authorities, Citizens' Assemblies; support for 70 de-occupied communities

Upgraded youth national policy with professional standards for youth workers, integrated youth leaders into European youth movements.

2.3.2. Contribution to addressing war-related challenges and vulnerabilities

51. The evaluation finds that the Action Plan has made a substantial contribution to addressing war-related needs and vulnerabilities across a range of thematic areas. Key areas have included advisory support and capacity building for partner institutions on how to identify and support groups in vulnerable situations, including IDPs, war veterans, and war-affected women and children. There was support to government on combatting war-related social pressures,²⁶ such as mass displacement and housing insecurity, challenges in social protection, conflict-related sexual violence, affecting both women and men. Judicial support pivoted to help preserve the rule of law and the quality of justice under martial law. Support was given to prosecutorial and law enforcement agencies on the investigation and prosecution of war crimes, including the use of electronic surveillance and open-source intelligence. Expert support was provided on protecting critical infrastructure against cyber threats. In the governance sector, Council of Europe support helped to build the capacity of local authorities in war-affected areas and those liberated from occupation, and to incorporate citizen participation and human rights principles into their governance frameworks. Overall, this reflects a strong focus on practical support for addressing war-related challenges.

52. Across the Action Plan portfolio, there was a clear focus on addressing wartime vulnerabilities and challenges, with a wide range of immediate outcomes. Some of the key results are as follows:

- **IDPs and returnees:** development of a compensation mechanisms for destroyed housing; a nationwide rental subsidy scheme; an online platform to match IDPs with host families; the creation of a unified database of IDPs to support needs identification and targeting of support services; and policy measures to improve access to services for low-mobility groups;
- **National human rights mechanisms:** development of remedies for survivors of war crimes, including conflict-related sexual violence, and their families; development of standard operating procedures for process war-related complaints; procedures for classifying and rating 'war-related harms'; online platforms for raising awareness of rights; and adaptations to rehabilitation programmes in prisons to account for the needs of war veterans;

26. [Social rights in Ukraine in times of war](#), European Social Charter, December 2022.

- **Children's rights:** the development of policy measures for emergency child protection, prevention of trafficking, psychosocial support, emergency legal assistance, reintegration of vulnerable displaced children, including those orphaned or living with disabilities;
- **Protection of minorities:** new legislation and policies on conflict-driven hate speech; integration of new categories of vulnerability into welfare planning; development of flexible social support mechanisms for minorities living nearby or in frontline areas;
- **The justice system:** adaptations to support judicial functioning and standards under conditions of martial law; procedures for the investigation and prosecution of war crimes and gross human rights violations; standards on the use of open-source intelligence and technology-enabled investigations;
- **Economic crime and cybercrime:** legislative/policy changes in sanctions, virtual assets, beneficial ownership verification, money-laundering offence alignment; proliferation financing indicators; enhanced legal framework and technical capacity to handle electronic evidence/OSINT admissibility and capacity to handle e-evidence, including in the context of war crimes;
- **Good governance and public administration:** Support to local authorities in de-occupied and frontline communities (e.g., recovery governance tools; measures to protect continuity of public administration functions); integrating needs of IDPs, returnees and veterans into local governance and budgeting; measures to promote civil participation in local governance under conditions of martial law;
- **Youth policy and participation:** Development of support services for displaced, trauma-affected and young people at risk or in vulnerable situations; development of a trauma-informed youth work toolkit; mobile youth work in de-occupied and frontline areas.

These war-related adaptations and associated results are described in more detail in Table 8 in the appendices.

2.3.3. Contributions to gender equality and human rights

53. Council of Europe reporting suggests significant progress toward implementing the Council of Europe Convention on preventing and combating violence against women and domestic violence (also known as “the Istanbul Convention”), which Ukraine ratified in 2022. While this area of work was not selected for a detailed deep dive in this evaluation, available project data suggests that the Action Plan has contributed meaningfully to strengthening national capacity and expertise in preventing and combating domestic violence. Interviews situated the Council of Europe’s support in the sharp rise in violence against women that followed the full-scale invasion, creating a complex set of prevention and accountability challenges. Council of Europe contributions include:

- New guidelines and tools on supporting victims of conflict-related sexual violence for key professional groups, including prosecutors and mental health and emergency response professionals, in line with Istanbul Convention standards;
- Training of 906 professionals, including frontline service providers, police, legal professionals and civil servants, on how to apply victim-centred approaches;

- Production of practitioner guides for police officers on combating violence against women and domestic violence during wartime;
- Support for Ukraine's ratification and implementation of the Istanbul Convention, including high-level meetings, and development of awareness raising materials;
- Support for prevention through education, including tools aligned with Article 14 of the Istanbul Convention on preventing violence through formal and informal education;
- Support for women's rights NGOs to raise awareness on the Istanbul Convention.

54. Council of Europe reported that gender equality was mainstreamed across the portfolio through the implementation of the Gender Mainstreaming Toolkit and the deployment of specialized advisors. This integrated a gender dimension into all cooperation activities, including legislative expertise and analytical outputs. Furthermore, the Council of Europe provided essential training and guidance to field staff and national partners to ensure gender-responsive project management.

55. While GREVIO's baseline assessment of Ukraine's progress is ongoing, Council of Europe and NGO shadow reports²⁷ suggests that there are persistent and systemic barriers to effective implementation of the Istanbul Convention, including low response rates by police to complaints of domestic violence, underfunding of specialist services and discriminatory attitudes within public justice institutions, alongside weak data availability. There is therefore limited evidence at this stage of higher-level outcomes despite the solid efforts in capacity building of responsible agencies.

56. **Across the thematic deep dives, contributions to gender equality were mainly in the form of rights-based protection frameworks.** Contribution to gender equality was strongest in activities that promoted direct support for groups in vulnerable situations. For example, activities on IDPs and returnees helped to develop access pathways for women facing vulnerabilities due to intersectional discrimination (e.g. Roma women) or displacement. In governance projects, there was consideration given to addressing mobility barriers for women with disabilities, while youth programming included activities to support decision-makers and professionals to design better gender-sensitive youth policies addressing the needs of young women in vulnerable situations. In projects working towards wider institutional changes, the intended results were defined at a high level, and the sampled projects did not include gender-specific activities or attempt to monitor gender-specific outcomes. Gender mainstreaming across projects mostly consisted of gender-disaggregated monitoring and tracking of women's participation in project activities (e.g. training of female law enforcement staff, conference participants).

57. The evaluation finds a strong contribution to the promotion of human rights, with a focus on supporting groups made more vulnerable as a result of the war. Across the deep dives, there is clear evidence of projects engaging in analytical work to identify war-related vulnerabilities and pivoting their activities in response. These responses have been strongly anchored in European human rights standards and the findings of Council of Europe monitoring and advisory bodies. There is consistent evidence of the Action Plan supporting the most vulnerable IDPs and returnees, children affected by war, minority groups exposed to discrimination and hate speech, and war-affected communities. There is a consistent focus on developing rights-based standards and safeguards, targeting of social support, and strengthening national

27. [‘Shadow report on Chapter 23 “Justice and fundamental rights” and Chapter 24 “Justice, Freedom and Security” of the European Commission’s Report on Ukraine’s Progress under the 2024 EU Enlargement Package’](#), Agency for Legislative Initiatives at al., 2025.

human rights mechanisms and access to justice. The work on anti-discrimination and minority rights included detailed analysis of war-related risks and vulnerabilities, to support the targeting of interventions. The support for national human rights mechanisms included practical tools in areas such as updated detention safeguards to protect groups such as veterans and collaborators. Awareness of human rights standards across the legal profession has been promoted through the online Human Rights Education for Legal Professionals (HELP) platform. The anti-money laundering project prevented undue application of Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) instruments to hamper the legitimate activity of NGOs, helping maintain the transparency of their operations and secure funding for future reconstruction efforts.

2.3.4. Factors enabling and inhibiting effectiveness

58. The evaluation was asked to identify factors that either contributed to or inhibited the effectiveness of Council of Europe activities in Ukraine. Across the deep dives, the evaluation identified factors that appear to have enabled or inhibited the delivery of meaningful results and conducted pattern analysis to identify whether conditions were necessary or sufficient, and which combinations of factors have proved decisive in different circumstances. Factors were further categorised as internal (related to project design and delivery, or organisational features within the Council of Europe) and external (relating to features of partner institutions or the operating environment). As discussed at the beginning of this section, the analysis is based on progress over the past two-and-a-half years towards reform objectives that are long-term in nature. The analysis therefore necessarily focuses on factors that contribute to early results, rather than the prospects for long-term outcomes. The detail of the analysis is set out in Appendix 6, fragment e.

59. Across the deep dives, the projects most likely to deliver results are those where Council of Europe inputs (e.g., technical expertise, advisory support and standards-based guidance) lead directly to changes in the practices and performance of partner institutions. By contrast, short-term progress is hardest to observe where meaningful change requires major organisational reform, large investments in infrastructure, or resource-intensive implementation processes. In such cases, outcomes are dependent upon resource availability and the decisions of multiple other actors, over which the Council of Europe has no direct influence. To put it another way, projects with high prospects of short-term success are those with relatively short causal chains between Council of Europe activities and changed organisational practices, and fewer assumptions relating to support from other actors. This is not to suggest that the Council of Europe should only work on simpler interventions. As noted above, where Council of Europe activities seek to shape long-term reform processes and larger investments by other development partners, they have the prospect of contributing to much larger and more structural changes including institutional support to the government partners in elaboration of country-specific procedural tools and mechanisms to change the partner's delivery models and implement the adopted laws in practice. The potential value for money is therefore high. However, the trade-off is that measurable results will take longer and be less certain.

60. A number of other enabling factors recurred across the deep dives:

- Projects grounded in clear national demand and ownership, linked to Ukraine's strategic objectives, benefited from stronger uptake and engagement;

- Structured coordination process – such as steering committees, inter-institutional working groups, task forces and structured dialogue formats – were repeatedly cited as facilitating coherence, reducing duplication and facilitating smooth implementation;
- Projects anchored in the Council of Europe’s expertise and authority as the custodian of Europe norms enjoyed the strongest influence with partner institutions;
- Council of Europe staff – especially national staff – with strong networks and trusted relationships with staff in partner institutions were key to the quality of support;
- Projects taking an adaptive management approach, with the flexibility to reprioritise or re-sequence activities and expenditure in response to change in partner needs or the external context, were more likely to achieve measurable results;
- Effectiveness is clearest where projects translate Council of Europe standards into practical, implementable tools and operational mechanisms. By contrast, programmes relying solely on policy dialogue or training were less likely to lead to visible changes in organisational practice;

Factors cited as hindering the pace and depth of reforms included:

- High security-related operating costs, diverting budgets away from core activities;
- Constraints on international staff and experts travelling to Ukraine and across the country, security constraints to attend territories neighbouring to contact line;
- Security conditions leading to the cancellation or delay of activities (sometimes linked to ‘do no harm’ considerations);
- Infrastructure disruptions, including power outages;
- Delays in securing funding for the Action Plan, leading to planned activities being delayed or scaled back;
- Frequent leadership changes, organisational restructuring and staff turnover within counterpart institutions, leading to low absorption capacity and in some cases to complete loss in institutional memory;
- Political or political economy constraints that make reforms sensitive or vulnerable to disruption from vested interests.

61. **Overall, the following pattern emerges.** Where Council of Europe standards-based support is matched with strong national demand and effective coordination structures, reforms tend to progress. Conversely, in the face of war-related volatility, institutional turnover and limited administrative bandwidth, reform processes advance more cautiously and at a slower pace. This pattern is particular to the wartime conditions facing Ukraine and the high levels of stress it places on partner institutions. The pattern can be set out more formally, as follows.

- **Necessary Foundations.** Across all thematic areas where measurable progress occurred, three foundational conditions were consistently present:
 - Strong national demand and institutional ownership;

- Support activities grounded in the Council of Europe’s normative legitimacy and standards-based expertise;
- Adaptive delivery capacity enabling continuity under circumstances of wartime disruption.

These conditions appear necessary, but not sufficient on their own.

- **Translational Layer: From Standards to Practice.** Where stronger reform progress was observed, a second layer of conditions was present:

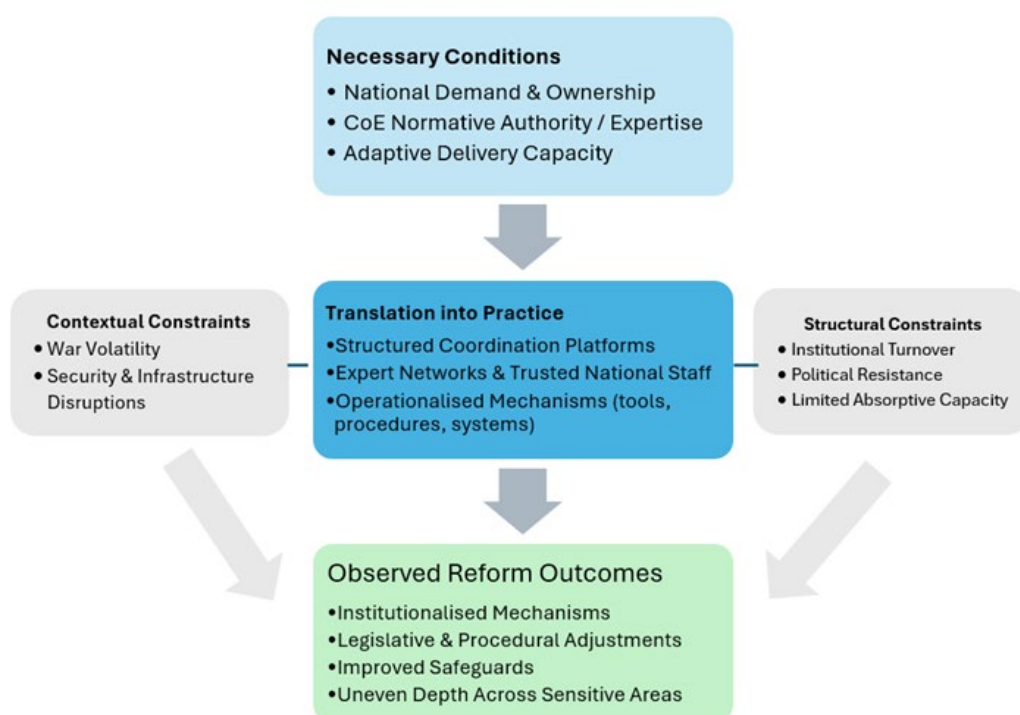
- Effective coordination structures to organise inputs of different actors;
- Access to specialised expert networks and trusted national staff;
- Translation of standards into operational mechanisms (procedures, tools, systems).

In these cases, normative guidance moved beyond advisory dialogue and began to influence institutional practice and performance.

- **Moderating Constraints.** Effectiveness was moderated by structural and contextual pressures, including:

- War-related volatility and security constraints;
- High institutional turnover and constant reorganisation;
- Political economy resistance in sensitive reform areas;
- Limited absorptive capacity among counterparts.

Where these constraints were acute and sustained, reform depth was limited, even when other success factors were present. This pattern is represented graphically in [Figure 7](#).

Figure 7: Effectiveness under Wartime Conditions: Causal Pathway

62. The Qualitative Contribution Analysis (QCA) leads to the conclusion that progress towards outcomes depended not just on the Council of Europe's expertise and adaptive delivery, but also on a number of supporting factors, including relationships of trust with national partners and effective coordination with other international actors. Stronger reform progress was observed where technical assistance moved beyond advisory work and included the operational tools designed to strengthen administrative and investigative (for law enforcement agencies) practice. In areas where key contextual or structural constraints were strongest – particularly in justice sector reform – reform depth was limited despite strong normative engagement.

3. Conclusions

63. **The Action Plan demonstrates strong strategic alignment with Ukraine's reform priorities and EU accession trajectory.** Across the eight thematic areas analysed, interventions consistently align with Ukraine's national reform agenda and EU accession roadmap priorities. This alignment is strongest where programming addresses high-stakes areas under wartime pressure (AML/CFT, cybercrime, IDP protection, youth participation). Relevance is reinforced by demand-driven project design and clear institutional ownership, avoiding externally imposed reform agendas.

64. **The Action Plan is grounded in the Council of Europe's comparative advantage.** Its programmes make good use of the Organisation's normative authority, monitoring mechanisms and advisory capacity. The Council of Europe's role as a neutral standards-based actor enhances legitimacy in politically sensitive areas where other actors may face credibility or mandate limitations.

65. **Wartime responsiveness strengthened strategic relevance.** Rather than diverting reforms, the war context reshaped programming in ways that reinforced relevance - particularly in areas such as e-evidence, measures to prevent money laundering and financing of terrorism, local governance resilience, child protection and rights of people in displacement. The Action Plan demonstrated capacity to adapt to emerging needs while preserving long-term reform objectives.

66. **Adaptive delivery modalities ensured continuity but affected depth of transformation.** The widespread shift to online and hybrid delivery ensured programme continuity under wartime conditions and allowed cost containment. However, it may also have limited behavioural change, coalition-building and trust-building in some reform areas.

67. **Resource constraints influenced scale rather than strategic direction.** Funding limitations and delayed resource flows affected the breadth and coverage of certain interventions (notably cybercrime and minority rights programming). However, there is no evidence that financial constraints fundamentally altered strategic priorities; rather, they moderated ambition and geographic reach.

68. Results-based management processes are in place and actively used for portfolio management but generate some administrative inefficiencies. These processes were at times described as burdensome, given the changeable operating environment and the need for frequent adjustment of interventions. The existence of parallel RBM and financial management systems leads to some duplicative processes and makes it difficult to track costs by results area. Nonetheless, the RBM system helped keep a large portfolio aligned with the strategic outcomes of the Action Plan.

69. **Effectiveness is strongest where standards are translated into operational mechanisms.** Across thematic areas, reform progress is most visible where normative guidance was converted into concrete, usable mechanisms such as housing compensation procedures, e-evidence management practices, deliberative democracy tools or mobile documentation services. In contrast, areas relying primarily on advisory dialogue without operationalisation show more incremental outcomes.

70. **National ownership is a necessary condition for reform uptake.** Where institutional demand and ownership were clearly present, reforms' outputs were more likely to translate into procedural or legislative changes. Conversely, in politically sensitive or institutionally unstable areas - notably justice reform - progress was more constrained despite strong technical expertise and normative alignment.

71. **War volatility is the dominant moderating factor affecting reform depth and pace.** Security risks, institutional turnover, infrastructure disruptions and constrained administrative bandwidth significantly shaped the depth and speed of implementation of reforms. These constraints did not prevent progress but explain variation across thematic areas, particularly in structurally sensitive reforms.

72. **Structured coordination architectures amplify effectiveness.** The presence of steering committees, task forces, dialogue platforms, and coordination mechanisms consistently correlates with stronger reform coherence and reduced duplication. Where coordination is institutionalised, rather than informal, standards are more likely to be integrated into decision-making cycles.

4. Lessons learned

73. In this section, we draw out a number of lessons that may be helpful in informing the development of the next Action Plan, and potentially also future Council of Europe activities in war-affected contexts.

Working in wartime requires structured flexibility, rather than ad-hoc adaptation

74. The evaluation confirms that adaptability was essential for operating effectively under wartime conditions. However, flexibility often depended on informal managerial discretion rather than structured processes for learning and adaptation. Action Plan projects functioned most effectively when they:

- Developed workplans that permitted rapid reallocation of resources;
- Developed backup implementation scenarios agreed in advance with partners;
- Used modular agendas and pre-recorded materials to mitigate electricity and internet disruptions;
- Shifted rapidly from in-person to hybrid formats when security conditions changed.

75. In contrast, adaptations without flexible project designs can be administratively burdensome, requiring formal amendments to logframes and workplans.

76. Formal risk assessments are integrated in the PMM at the Action Plan and project management level, include mitigation plans for operational and security risks, updated annually or whenever changes occur. Additional risk-management measures include quick response mechanism (QRM)²⁸, ranking metrics for projects and security policies. However, beyond risk management and ad hoc adjustments, the evaluation did not find a clear organisational approach to flexible and adaptive delivery in volatile and high-risk environments.

Lesson 1: Adaptive management works best when it is anticipated and systematised. Future interventions would benefit from the formalisation of contingency planning and flexibility mechanisms at design stage.

Physical presence is needed in order to build trust, even in a digital environment

77. While the widespread shift to online modalities was made necessary by the difficult security conditions, stakeholders were in agreement that it is not a full substitute for the on-site presence of Council of Europe advisers. While online delivery is cost-efficient, it does not to the same extent generate trust or behavioural change. Interviewees stressed:

- The importance of maintaining a national team in Kyiv to “read national signals”;
- The limits of online training for all categories of partners, but especially for law enforcement, judges and senior officials;
- The value of closed-door, in-person discussions for complex or politically sensitive topics.

²⁸ The Quick Response Mechanism (QRM) is a strategic tool designed to provide flexible, rapid legal and policy expertise to member states during critical reform periods. The QRM functions within the framework of the European Union/Council of Europe Partnership for Good Governance (PGG). The Venice Commission is the primary provider of this expertise, alongside other Council of Europe specialised bodies.

Lesson 2: Hybrid delivery increases reach and efficiency, but reform depth still depends on trust-based engagement. When security allows, strategic in-person interaction may be a more appropriate choice for sensitive reforms.

National expertise is a valuable addition to international expertise, but not a substitute

78. Given the difficulties of bringing international experts into Ukraine, the use of Ukrainian national expertise for certain roles proved important. At the same time, international expertise remains essential for standards alignment and comparative perspective. Evidence shows that:

- National experts often possess the most relevant operational knowledge for wartime implementation;
- A balanced combination of national and international expertise produces the strongest results in complex legal reform;
- Step-by-step contracting and quality control mechanisms improve technical output.

79. The decision of headquarters to direct local staff to return to their duty stations in Ukraine despite the active conflict was a difficult one for the Organisation, and undoubtedly challenging for the staff involved. Many of those who returned after a lengthy absence found it very difficult to adapt to wartime conditions. Nonetheless, it proved to be a sound strategic decision, with a positive effect on delivery of the Action Plan. It contributed to better coordination and increased trust between projects and national partners, improved operational effectiveness and helped align activities to the changing country context and needs.

Lesson 3: The Organisation's effectiveness in Ukraine has drawn both on its international normative authority and its context-specific national expertise. The latter was sometimes treated as an emergency 'workaround', given restrictions on travel into Ukraine by international experts, but in fact proved pivotal to successful deliver of the Action Plan. Future Action Plans would benefit from explicit consideration to achieving a suitable balance between international and field-based national expertise.

5. Recommendations

Issue: Preventive results - that is, avoidance of deterioration in human rights, democracy and rule of law – are strategic objectives in a war context but are not made explicit in the current Action Plan, project designs or reporting.

Recommendation 1: The new Action Plan, and projects prepared under it, should incorporate an analysis of evolving threats to democracy, the rule of law and human rights in Ukraine as the war continues, incorporate options for adaptive and mitigative support, and report on achieved results in narrative reporting.

Addressed to: DPC at AP level and operational Major Administrative Entities (MAEs) at project level); **high priority; immediate implementation**

Issue: Outcomes are strongest where Council of Europe standards are translated into operational mechanisms (e.g., procedural tools, institutional protocols, decision-making templates etc.) that support the implementation of new laws and policies.

Recommendation 2: The option of developing operational tools to support the implementation of new laws and policies should be given more explicit consideration in intervention design under the next Action Plan.

Addressed to: operational MAEs; **high priority; immediate implementation**

Issue: High turnover of staff and loss of institutional memory within partner institutions is a significant barrier to the achievement and sustainability of results.

Recommendation 3: Project designs under the next Action Plan should incorporate support to partner institutions with developing institutional memory safeguards, such as reform trackers, briefings for newly appointed officials and knowledge handover notes.

Addressed to: operational MAEs; **high priority; immediate implementation**

Issue: Individual interventions under the Action Plan lack explicit theories of change, setting out the causal links and assumptions between Council of Europe activities and the intended outcomes. Explicit theories of change would help guide the selection of intermediate indicators and provide a basis for periodic reflection on whether activities need to be adjusted. Where intended results depend upon action by others, this should be explicit in the theory of change, and there should be periodic reflection on whether this remains a reasonable assumption.

Recommendation 4: Project designs under the new Action Plan should incorporate theories of change articulating how interventions will lead to the intended results, with risks and assumptions made explicit. During the annual reporting process, project teams should use these theories of change as the basis for reflection on what is working and why, whether the assumptions and change mechanisms remain plausible, and whether programme adaptations are required.

Addressed to: DPC (for project proposal template) and operational MAEs; medium priority; medium implementation

Issue: Coordination with other development partners emerges as a key condition of success but is often informal rather than institutionalised. Some projects have undertaken a more formal mapping of the partner landscape, but this is not a standard element of in project management.

Recommendation 5: In key activity areas under the Action Plan, the Council of Europe should prepare a 'complementarity map' identifying the main development partners, the Council of Europe's role and comparative advantage, any agreements on division of labour, and opportunities for strategic partnership. These maps should be updated periodically, as part of the annual reporting cycle.

Addressed to: DPC; medium priority; medium implementation

Issue: Adaptability has been a key element in the implementation of the Action Plan but has often taken the form of ad hoc changes and frequent activity redesign, rather than the incorporation of flexible elements into programme designs and management systems. Adaptive management approaches reduce the cost of incremental adjustments in an uncertain context by treating project design as a continuous process, and allowing for flexibility in activities, sequencing and resource allocation in pursuit of project goals. This makes adaptation a continuous learning process rather than a series of reactive adjustments. There may also be other adjustments that are appropriate for war-affected contexts, such as changes in levels of delegated authority, lighter procurement processes and simplified reporting requirements. There is an opportunity to draw on the Ukraine experience for future Council of Europe operations in war-affected contexts.

Recommendation 6: DPC should consider developing an Adaptive Programming Guide for Council of Europe operations in war-affected contexts, addressing issues beyond traditional risk management such as flexible programming approaches, decision-making rules, prioritisation of fund allocation, contingency-based budgeting and procurement, communications and maintaining secure fieldwork, and adaptation of monitoring processes.

Addressed to: DPC; medium priority; medium-term implementation

Issue: Council of Europe applies a comprehensive Gender Mainstreaming Toolkit for Co-operation Projects that provides practical guidance for applying a gender dimension to all co-operation activities. It includes production of analytical outputs and legislative expertise across all projects. However, evaluation evidence showed that most projects' implementation mostly included gender-disaggregated monitoring and tracking of women's participation in project activities, while the gender analysis for draft laws, potential impact of reforms on women and other important aspects of gender equality were omitted, especially by technocratic and national partners' capacity building programming.

Recommendation 7: Under the next Action Plan, interventions should further integrate principles of gender equality by shifting from activity-based gender parity metrics to systemic gender mainstreaming. This includes mandatory gender impact assessments at project design stage, integration of gender analysis into all policy goals and institutional protocols, and explicit accountability measures for how each project outcome advances or hinders gender equality, as defined in the Organisation's Gender Equality Strategy 2024-2029.

Addressed to: operational MAEs; medium priority; medium-term implementation.

Appendices

Link to the document: <https://rm.coe.int/48802bf4d3>

www.coe.int

The Council of Europe is the continent's leading human rights organisation. It comprises 46 member states, including all members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.