

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

Management response and action plan



August 2026

DIO-EVA(2026)04

Management Response and Action Plan

Name of Evaluation Report:	Evaluation of the Council of Europe Action Plan for Ukraine “Resilience, Recovery and Reconstruction” 2023-2026		
Date of Evaluation Report:	29 May 2026	Date of Action Plan:	31 August 2026

Overall management response to the evaluation:

The Directorate of Programme Co-ordination (DPC) of the Council of Europe thanks the evaluators for an insightful report that raises a number of valid and relevant points which provide valuable guidance to DPC in further improving its respective processes. DPC considers that the report provides a fair assessment of the implementation of the Council of Europe Action Plan for Ukraine 2023-2026 and agrees with its conclusions and recommendations. The recommendations of the Evaluation will be taken into account in the process of development and validation of new programmes/project proposals and their implementation and reporting. The recommendations of the Evaluation have also been taken on board in drafting a new Council of Europe Action Plan “Democratic Security for Ukraine” 2027-2030 and will guide the drafting of other action plans in the future.

Action plan

Management decision ¹	Entity in charge ²	Planned actions ³ (determined by entity)	Justification for non-acceptance ⁴	Target date for action	Person responsible for action
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. (High⁵)					
Response:					
The recommendation is highly relevant, underlining the importance of further improving and adjusting current Council of Europe practice. Owing to the nature of its mandate, the Council of Europe operates in complex and unstable environments that expose it to risks. This is, in particular, true for the forthcoming Action Plan “Democratic Security for Ukraine” 2027-2030. Taking into consideration this recommendation, the Action Plan has been developed paying particular attention to the challenges and risks posed by the ongoing Russian Federation's war of aggression against Ukraine and its profound impact on human rights, the rule of law and democracy. In line with the Council of Europe's Project Management Methodology (PMM), risk analysis and possible mitigation strategies are embedded at all stages of Action Plan design and implementation, covering evolving risks to human rights, democracy, and the rule of law, including risks related to the political environment, programme/project delivery including institutional capacity challenges and communication. The risk analysis of the Action Plan and possible mitigation strategies are developed on the basis of the Council of Europe's Risk Management Policy⁶ and Risk Management Guidelines. The risks identified within the co-operation activities feed into the organisational risk register, which is periodically brought to the attention of the Secretary General and the Senior Management Group of the Council of Europe. Internal audit, external audit and the Oversight Advisory Committee will be analysing the results. In addition, the Directorate of Programme Co-ordination also ensures that all integrated programmes/projects implemented within the Action Plan have their own risk assessment and mitigation strategies in the Action Plan. These processes will be further developed and refined in light of the findings and recommendations of the Evaluation. In particular, the Council of Europe's Risk Assessment Matrix, prepared in line with the PMM guidelines about risk management, which is constantly reviewed, co-ordinated and discussed both internally within the Council of Europe and in close co-operation with Ukrainian authorities and relevant stakeholders will be reviewed in light of the Evaluation. PACE reports on Ukraine and the parliamentary monitoring process will also be considered as part of the risk analysis under the forthcoming Action Plan, reflecting the importance of the parliamentary dimension in assessing evolving risks to democracy, rule of law and human rights. In the event that any activities under the Action Plan are delayed or disrupted due to security concerns, logistical constraints or political developments, the Directorate of Programme Co-ordination in co-ordination with the Security Management Team and the Council of Europe Office in Ukraine, will proactively communicate with all relevant Council of Europe entities and Ukrainian partners to assess the situation, understand the					

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

² Initial suggestion – to be defined/updated by management.

³ For implementing accepted recommendations.

⁴ For recommendations that are partially accepted or rejected.

⁵ Recommendations have been classified as either “high” or “medium” in terms of the assessment of their importance following the evaluation.

⁶ The revised Risk Management Policy was adopted by the Secretary General of the Council of Europe on 15 December 2023 and came into force immediately. To foster a pragmatic, consistent and transparent approach to risk management at the Council of Europe, this version updates the provisions of the previous policy (adopted in 2016) by: placing risk management in a wider institutional perspective; ensuring complementarity with the other components of the Organisation's governance system (such as internal control, data protection, ethics, crisis management and business continuity); implementing recommendations from the Directorate of Internal Oversight and the Oversight Advisory Committee of the Council of Europe; and clarifying roles and responsibilities throughout the Organisation. By contributing to a greater maturity in managing risks that may affect the Council of Europe, the revised policy will also strengthen the Organisation's governance system.

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implications, and collaboratively identify alternative solutions to maintain progress. Directorate of Programme Co-ordination also ensures that all programmes/projects implemented within the Action Plan have their own risk assessment and mitigation strategies at the design phase. Regarding the recommended adaptive approach, DPC will pay particular attention to the Action Plan which is implemented under particular dynamic circumstances. Action Plans are strategic frameworks which allow for a flexible and evolving technical co-operation. Respectively, timely adjustments to both programmes/projects and activity design will be made in response to emerging needs and challenges. During the implementation of the forthcoming Action Plan, where security concerns, logistical constraints or political developments affect implementation, the Council of Europe will proactively adapt its thematic priorities, activity design and implementation approaches to ensure continued relevance and effectiveness. Adaptability is also built into the design of integrated programmes and stand-alone projects under the Action Plan, allowing for rapid response to deteriorating or shifting conditions. In accordance with the Council of Europe's results-based management and reporting practices, narrative reporting at both Action Plan and project levels will reflect evolving risks to human rights, democracy, and the rule of law, documenting how identified risks have affected activity design, implementation and adaptive responses. Reporting will include not only results achieved but also contextual challenges, mitigation measures applied, and any adjustments made to priorities or implementation modalities. This will ensure transparency, accountability and learning throughout the implementation of the Action Plan.					
☒ Accepted ☐ Partially accepted ☐ Rejected	DPC at AP level and operational Major Administrative Entities (MAEs) at project level)	In the forthcoming Action Plan “Democratic Security for Ukraine” 2027-2030 DPC will further develop and refine the analysis of evolving risks and possible mitigation measures including adaptive and mitigative support options in risk management part with an appendix of risk register, to be constantly reviewed and reflect these in narrative reporting. Under the forthcoming Action Plan the Congress will continue co-facilitating the High-Level Dialogue on good democratic governance and carry out its sessions on a regular basis with the aim to reach a broad agreement among Ukrainian stakeholders on the improvement of the legal framework in the area in light of European standards, the new Democratic Pact for Europe, good practices and Ukraine’s EU candidate status.		January 2027	DPC: Çağrı ÇAKIR Country advisor for Ukraine and the Republic of Moldova DG I: Mustafa FERATI, Head of Central Division DG II: Regina JENS DOTIR, Advisor on Strategy and Work Co-ordination Congress: Head of the Centre of Expertise for Multilevel Governance at the Congress PACE: Louise BARTON, Director of Committees

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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. (High)					
Response: The recommendation is a welcome reminder of the need to further develop and improve current Council of Europe practices in this area. The development of operational tools to support the implementation of newly adopted laws and policies is widely recognised as an important element of effective institutional reform. Council of Europe standards and monitoring mechanisms have consistently highlighted that the effectiveness of legal reforms depends not only on the adoption of normative frameworks, but also on the availability of practical instruments that facilitate their application. Such operational tools may include implementation guidelines, standard operating procedures, training materials, monitoring frameworks, digital systems and inter-institutional co-ordination mechanisms. Within the framework of the forthcoming Action Plan, the integration of practical operational tools will be considered systematically during the intervention design phase, ensuring that legislative and policy reforms are accompanied by adequate practical and administrative support measures from the outset. Strengthening the operational dimension of Council of Europe's assistance under the Action Plan will contribute to improved institutional capacity, greater consistency in implementation and enhanced sustainability of reforms. It will also support national partners in translating legislative commitments into measurable outcomes in line with Council of Europe standards. The role of the Parliament of Ukraine in supporting the implementation of legislation and policies will also be taken into account in the design of operational tools under the forthcoming Action Plan, recognising the importance of the parliamentary dimension in translating legislative commitments into practice. The Directorate of Programme Co-ordination will ensure that programme/project design processes under the forthcoming Action Plan explicitly address the need for practical tools, in close consultation with Ukrainian authorities and relevant stakeholders, to maximise the practical impact of technical co-operation.					
☒ Accepted ☐ Partially accepted ☐ Rejected	operational MAEs	The Council of Europe will focus on further improving the development and use of operational tools that facilitate the application of new policies and law depending on the specific areas of intervention and the stages of reform, in order to ensure the effective and sustainable implementation of legislative and policy reforms. Under the forthcoming Action Plan, the Congress will support the implementation of the Decentralisation Reform Concept in view of its planned milestones and indicators and, upon request of central authorities (government or parliament), will contribute to developing guidance on implementation of new laws and policies		January 2027	DG I: Mustafa FERATI, Head of Central Division DG II: Regina JENSDOTTIR, Advisor on Strategy and Work Co-ordination Congress: Head of the Centre of Expertise for Multilevel Governance at the Congress PACE: Louise BARTON, Director of Committees

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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. (High)					
Response: The Council of Europe will give greater and more systematic consideration to strengthening institutional memory within partner institutions, as part of broader efforts to enhance sustainability and continuity of reforms during the design phase of programmes and projects under the forthcoming Action Plan. In line with the Council of Europe's results-based and capacity-development approaches, support will be embedded to help institutions better preserve, structure and transfer knowledge in contexts characterised by administrative turnover and ongoing reform processes. Where relevant, interventions will include the development or improvement of practical institutional memory tools such as structured handover notes on reforms, briefing materials for newly appointed officials, and other knowledge management instruments adapted to the needs and capacities of beneficiary institutions. These measures will aim to ensure continuity of reform processes, reduce information loss linked to staff rotation, and strengthen institutional resilience and effectiveness over time. The design of such support will be based on close consultation with partner institutions to ensure ownership and usability and will be integrated into broader capacity-building activities. This approach will contribute to improving institutional learning and ensuring that progress achieved under the Action Plan is documented, accessible and effectively transmitted within and across institutions. Programme/ project-level Steering Committees serve as tools to support partner institutions with developing institutional memory safeguards, as these meetings include progress reports, plans for the upcoming six months and minutes of what was agreed. In usual practice, the project staff brief newly appointed officials in partner institutions as soon as possible.					
☒ Accepted ☐ Partially accepted ☐ Rejected	operational MAEs	Support to partner institutions with developing institutional memory safeguards, including measures that contribute to continuity and the retention of knowledge generated through activities, will be embedded, where relevant and feasible, into the design of relevant programmes and projects under the forthcoming Action Plan, tailored to the specific needs and capacities of beneficiary institutions, and developed in close consultation with national partners to ensure ownership and sustainability. Within the forthcoming Action Plan, the Congress will support strengthening institutional capacity of national associations of local and regional authorities and, upon request of central authorities (government or parliament), will contribute to developing institutional memory safeguards via consultancy support within dedicated expert and/or working groups		September 2026	DG I: Mustafa FERATI, Head of Central Division DG II: Regina JENSDOTTIR, Advisor on Strategy and Work Co-ordination Congress: Head of the Centre of Expertise for Multilevel Governance at the Congress PACE: Louise BARTON, Director of Committees

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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. (Medium) Response: In line with the Council of Europe's Project Management Methodology (PMM) and results-based management, theories of change will be embedded as a core element of programmes and projects' design under the forthcoming Action Plan. The programmes/projects under the new Action Plan will clearly articulate the causal pathways linking planned activities to expected outcomes, while explicitly identifying underlying assumptions and key risks. This will enhance the coherence, transparency and strategic focus of interventions from the outset. Theory of change will also serve as a practical management and learning tool throughout implementation, at both the Action Plan level and the programme and project level. During annual and periodic reporting cycles, project teams will use it as a structured reference framework for critical reflection on progress, including whether intended change pathways remain valid, whether assumptions continue to hold, and whether the evolving contexts affect the plausibility of expected outcomes. This will support more systematic analysis of what is working, why, and under what conditions. This reflection process will enable adaptive management, including potential adjustments to implementation where necessary. This approach will further strengthen the Council of Europe's commitment to learning-oriented programming, ensuring that Action Plan interventions remain relevant, responsive and results-focused throughout the implementation period.					
☒ Accepted ☐ Partially accepted ☐ Rejected	DPC (for project proposal template) and operational MAEs	The Directorate of Programme Co-ordination will continue to support project teams at all stages of implementation and the project cycles, especially during planning, monitoring and reporting through the PMM and results-based reporting training activities. The Council of Europe will give particular attention to further incorporating theories of change to ensure interventions are effective and results are clear.		September 2026	DPC: Çağrı ÇAKIR Country advisor for Ukraine and the Republic of Moldova DG I: Mustafa FERATI, Head of Central Division DG II: Regina JENSDOTTIR, Advisor on Strategy and Work Co-ordination Congress: Head of the Centre of Expertise for Multilevel Governance at the Congress PACE: Louise BARTON, Director of Committees

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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. (Medium)					
Response: The Council of Europe will develop a “complementary map” based on the existing close co-ordination with key international and national partners active in Ukraine, including the European Union and its Delegation to Ukraine, the United Nations agencies, the OSCE, member and observer States’ development agencies. A donor mapping exercise, is in place and regularly updated to track existing activities on the ground, in co-operation with the Council of Europe Office in Ukraine, and will feed into the development of this map. This co-ordination ensures that Council of Europe action is complementary to the work of other actors active in the field, and is consistently directed towards areas where it brings clear added value. In addition, the Directorate of Programme Co-ordination will prepare the fundraising strategy for the forthcoming Action Plan. The donor mapping exercise identifies the main development partners’ interventions, which highlights the gaps where the Council of Europe’s specific role could provide its added value and comparative advantage, any existing or prospective agreements on division of labour, and opportunities for strategic partnership. Under the new Action Plan, further attention will be given to ensuring strategic complementarity and co-ordination with other international and national actors active in relevant thematic areas Donor mapping will continue to be reviewed and updated periodically, reflecting changes in the partner landscape, new co-ordination arrangements and evolving thematic priorities. This will ensure that the Council of Europe’s positioning remains strategically relevant and responsive throughout the implementation period, and that complementarity considerations are systematically embedded in programme management and learning processes. In line with the Council of Europe’s co-operation policy and results-based management framework, intervention design will be informed by structured analysis of the wider support landscape in order to position Council of Europe action where it brings clear added value.					
☒ Accepted ☐ Partially accepted ☐ Rejected	DPC	The Directorate of Programme Co-ordination will develop a complementary map based on its co-ordination with international partners and on an update of its existing donor mapping exercise to fully identify the main development partners, the Council of Europe’s role and comparative advantage, any agreements on division of labour, and opportunities for strategic partnership in the field.		December 2026	DPC: Matthew BARR, Head of the RMDR Department
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. (Medium)					
Response: Developing an Adaptive Programming Guide will be considered as a future action to further systematise best practices and provide clear guidance for effective implementation in these challenging contexts, taking into account financial and human resources for this effort. The Council of Europe is committed to ensuring that its co-operation activities remain effective, responsive and resilient in complex and rapidly evolving environments, including war-affected contexts. The Organisation continuously develops and refines its Project Management Methodology and related operational guidance to strengthen adaptive management, risk-informed decision-making and results-based implementation across its					

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field operations. The Directorate of Programme Co-ordination recognises that effective programming in war-affected contexts requires operational guidance that goes beyond traditional risk management frameworks and acknowledges the intent behind this recommendation. Developing a comprehensive Adaptive Programming Guide will be considered with the caveat that such a guide, while incorporating lessons learned from the experience of working under war conditions in Ukraine 2022-2026, should not result in overly detailed instructions that would risk constraining the very flexibility that adaptive programming seeks to achieve. Furthermore, adaptive responses are, by their nature, context-specific and cannot always be anticipated or codified in advance. In practice, adaptive programming in war-affected contexts as well as in complex and politically sensitive environments is already carried out through continuous co-ordination and risk analysis, regular exchanges between headquarters, field offices and key stakeholders, and ongoing dialogue with national partners and beneficiaries. Existing programme management and risk management tools already provide an adequate operational framework for adapting interventions as contexts evolve. That said, the Directorate of Programme Co-ordination will consider developing such an Adaptive Programming Guide as targeted and practical operational guidance, in the form of a concise reference resource rather than a prescriptive guide, addressing specific operational challenges in war-affected contexts. Such guidance would complement and build on existing tools and would be developed in consultation with relevant Council of Europe entities and field offices to ensure practical relevance and usability.					
☒ Accepted ☐ Partially accepted ☐ Rejected	DPC	The Council of Europe ensures that its co-operation activities are effective and resilient in rapidly changing, war-affected environments by continuously strengthening adaptive management and operational guidance. Developing an Adaptive Programming Guide will be considered as a future action to further systematise best practices and provide clear guidance for effective implementation in these challenging contexts, taking into account financial and human resources for this effort.		2028	DPC: Fred HOLM, Head a.i. EPCS Department
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. (Medium) Response: Under the next Action Plan, the Council of Europe will further strengthen the integration of gender equality as a cross-cutting priority, in line with the Council of Europe Gender Equality Strategy 2024-2029. This will build existing commitments to gender mainstreaming by placing greater emphasis on systemic integration throughout the full project cycle, from design through to implementation, monitoring and evaluation. The Council of Europe Gender Mainstreaming Toolkit for Co-operation Projects acts as a reference for ensuring a structured approach to gender mainstreaming for all actions. Attention is also paid to gender-sensitive communication and visibility and the use of gender-inclusive language. Moreover, projects under the current Action Plan have been collecting sex-disaggregated data and prioritised gender-balanced representation in activities and decision-making structures, such as Steering Committees. This commitment is					

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particularly significant in fields traditionally dominated by men such as military personnel and law enforcement, where efforts are made to ensure greater participation of women, especially in senior positions. Additionally, gender mainstreaming acknowledges that women and men face distinct challenges, opportunities, and barriers influenced by factors such as age, ethnicity, disability, economic status, sexual orientation, and gender identity. The preparation of the next Action Plan is also supported by two gender advisors, who will ensure that gender mainstreaming is incorporated in the Action Plan. This will be done in line with the Council of Europe acquis in the field of gender equality and building on the Council of Europe Gender Equality Strategy's dual approach to advancing gender equality. The next Action Plan will advance gender equality through specific, targeted action addressing gender equality, including positive action where appropriate, gender mainstreaming across all activities and gender equality related policy dialogue. During the co-creation workshops oriented to develop programmes towards the implementation of the forthcoming Action Plan, the Directorate of Programme Co-ordination strengthened attention to gender mainstreaming as an integral part of programme planning for the Council of Europe's work in Ukraine and as an area of focus across the Organisation. Participants across the Organisation had the opportunity to think through gender equality considerations with the Gender Equality and Gender Mainstreaming Policy Advisor and the discussions helped identify concrete entry points for integrating gender equality more meaningfully across the programmes. The workshops also generated preliminary ideas on gender mainstreaming, to be refined to ensure that terminology and approaches are aligned with the Council of Europe Gender Equality Strategy 2024-2029 and Gender Equality Marker (GEM) guidance, with support from the gender advisers. By promoting a structured and comparable way of assessing gender equality efforts, the Council of Europe-GEM enhances transparency and accountability, improves data collection for internal monitoring and reporting, and supports more strategic resource allocation. Furthermore, it acts as a communication tool towards donors, that demonstrates Council of Europe's concrete efforts to integrate gender equality and provides measurable evidence of gender mainstreaming across co-operation projects. The GEM guidance for project teams includes practical advice on how to design and assess projects in line with gender equality marker criteria, and how to ensure gender equality considerations are meaningfully integrated from the outset. In particular, intervention design will increasingly incorporate structured gender equality analysis to ensure that gender-specific needs, risks and inequalities are identified and addressed across all thematic areas. This will allow the Directorate of Programme Co-ordination to provide gender equality markers at the programme/project design stage, helping to ensure that planned interventions are informed by a clear understanding of how proposed activities may affect gender equality outcomes, both positively and negatively. Gender equality considerations will be systematically embedded in all programmes/ projects under the Action Plan. This includes the articulation of expected results that explicitly reflect gender equality and intersectional dimensions and the use of indicators capable of capturing progress in reducing gender inequalities. Explicit accountability measures will be established to assess how each project outcome advances or hinders gender equality, in line with the Organisation's Gender Equality Strategy 2024-2029. Project performance will be assessed against gender equality objectives through dedicated monitoring and reporting arrangements, ensuring transparency and evidence-based learning. Progress on gender mainstreaming will be reported consistently throughout the implementation period, reinforcing coherence with the Organisation's strategic framework and ensuring that gender equality remains a measurable and accountable dimension of all co-operation activities.					
☒ Accepted ☐ Partially accepted ☐ Rejected	DPC Human Dignity and Gender Equality Department /DGII	The Directorate of Programme Co-ordination in cooperation and co-ordination with the Human Dignity and Gender Equality Department (DGII) will develop gender equality markers to be assigned to programme/project proposals in the Project Management Methodology (PMM), which will be self-declared by the MAEs in the PMM platform. The forthcoming Action Plan will be developed in line with the Council of Europe Gender Equality Strategy 2024-2029 and will integrate gender mainstreaming throughout its design and		January 2027	DPC: Jana NAGITSCHENKO, Regional DPC Gender Advisor for Eastern Europe and the South Caucasus. DG-II: Krista ORAMA, Gender Equality Policy Adviser,

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		implementation. The Regional Gender Mainstreaming Adviser for Eastern Europe and the South Caucasus and the Gender Equality Policy Adviser in the Human Dignity and Gender Equality Department (HDGED) will ensure that gender mainstreaming is consistently incorporated across the planning and implementation of the Action Plan. Progress reporting will include monitoring of gender mainstreaming to ensure that it is applied consistently and effectively throughout the implementation period.			Human Dignity and Gender Equality Department (DGII).

Abbreviations	
AP	Action Plan
DPC	Directorate of Programme Co-ordination
MAE	Major Administrative Entity