

## Management Response and Action Plan

Name of Evaluation Report:	Evaluation of the Intercultural Cities programme's services and tools		
Date of Evaluation Report:	16/12/2022	Date of Action Plan:	15/05/2023

### Overall management response to the evaluation:

The evaluation was commissioned by the Council of Europe's ICC Unit and covers the period from 2016 to mid-2022. It is primarily a formative evaluation launched by the ICC Unit with an emphasis on identifying areas for enhancement and fine-tuning of the programme, rather than assessment of achievements and successes. The evaluation results are intended to be used by the ICC Unit to update the programme, taking into account the growing and diverse membership, available financial and human resources and the introduction of a multilevel governance approach<sup>1</sup>, with the view to contributing to the intergovernmental work carried out by the Committee of Experts on Intercultural Integration of Migrants (ADI-INT) under the Steering Committee on Anti-Discrimination, Diversity and Inclusion (CDADI).

The management welcomes the findings of the evaluation, many of which reflect observations already made by the team during the programme implementation. The management also notes that the evaluation's findings are not always supported by sufficient, appropriate or consistent data for the conclusions to be representative, which is a difficulty already encountered by the ICC Unit in responding to the growing diversity of needs of its members.

A total of 19 strategic and operational recommendations have been included in the evaluation report.

The initial findings of the evaluation report and selected recommendations, in particular recommendation 1, were discussed with members of the ICC programme during the annual meeting of ICC coordinators in November 2022. These discussions, and additional feedback gathered through the annual survey sent to member cities in December 2022, have been taken into account in the elaboration of the Action Plan.

While not all recommendations seem feasible with available resources, many of them are pertinent and seem to have the potential of further increasing the impact and relevance of the ICC programme, including its contribution to the intergovernmental work carried out by the CDADI through the ADI-INT. For this reason, the management decided to keep them under consideration. Other recommendations are kept under consideration as they will be considered by the programme's Advisory Group to be set up in implementation of recommendation 1.

The actions for the implementation of the accepted recommendations are set out in the Action Plan below. The management would like to highlight that success in implementing some of the recommendations will also depend on factors outside of its control, such as the cities'

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<sup>1</sup> "Multilevel governance" is a model of governance which embraces central, regional and local governments, as well as civil society organisations. The ways in which it is organised may vary greatly from one country to another. Ideally, it includes a bottom-up element and implies the setting up of participatory processes for policy co-creation, co-operation and co-ordination among all relevant public authorities, at all levels of governance, and with all relevant stakeholders, in areas of shared competence or common interest. (Source: Council of Europe, Recommendation [CM/Rec\(2022\)10](#) of the Committee of Ministers to member States on multilevel policies and governance for intercultural integration)

willingness to embrace and implement the proposed changes and the availability of human and financial resources.

**Dissemination plan for the evaluation:**

The final evaluation report and the management response will be published on the website of the Directorate of Internal Oversight (DIO) and shared with the following stakeholders:

- the coordinators of cities member of the international network of Intercultural cities;
- the coordinators of cities member of the national networks of Intercultural cities;
- the coordinators of national networks of Intercultural cities;
- programme experts.

A news article will be published on the Intercultural Cities programme’s website to summarise the key findings of the evaluation report and the plans for the management response to the general public. Both documents will also be shared internally with colleagues interviewed as part of the evaluation and with any other colleagues upon request.

Management Decision <sup>2</sup>	Entity in Charge	Planned Actions <sup>3</sup> (determined by Entity)	Justification <sup>4</sup> for Non-Acceptance	Target Date for Action	Person Responsible for Action
<b>STRATEGIC RECOMMENDATIONS</b>					
<b>ICC programme steering</b>					
Recommendation 1: The ICC Unit in close consultation with the ICC member cities should establish an ICC steering group with clearly defined terms of reference to provide strategic guidance for the programme. This could be composed of CoE staff (ICC Unit and representatives of other CoE entities), ICC experts (in an advisory capacity), and a limited number of international and national ICC member cities. Consideration could also be given to including representatives of one or two other international actors. Member cities could serve on the working group on a rotating basis.					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Under consideration	DGII	An ICC Advisory Group will be set up to provide strategic guidance for the update, implementation and structuring of the ICC programme. It involves the following steps: 1. Drafting of the Terms of Reference		1. April 2023 2. May 2023 3. June 2023	ICC Unit

<sup>2</sup> The management decision is in relation to the Recommendation (Accept, Partially Accept, Reject, Consider).

<sup>3</sup> For implementing accepted recommendations.

<sup>4</sup> For recommendations that are rejected or under consideration.

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		(ToRs). 2. Launching a call for participation and selecting the members. 3. Holding the first meeting.			
<b>Multilevel governance</b>					
Recommendation 2: The CoE should promote and mainstream the programme within the organisation to ensure the programme works through CoE structures in its advocacy, guiding, and influencing work at national level. To this end, one or two questions on ICC principles and practices could be incorporated into the regular monitoring work of relevant CoE monitoring bodies, as is currently done by the ECRI.					
<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input checked="" type="checkbox"/> Under consideration			The recommendation is addressing the Council of Europe at large, and its success depends on elements and decisions that are outside of the control of the secretariat. Nonetheless, the secretariat will contribute to the promotion and mainstreaming of the intercultural integration principles by continuing to regularly reporting and contributing to the ADI-INT and CDADI. In addition, the secretariat will approach relevant Council of Europe bodies/Committees to assess their willingness and capacity to integrate intercultural principles in their work. The implementation of this recommendation is subject available financial and human resources, as well as to the involvement of relevant colleagues. The decision of the Advisory Group on the level of prioritisation of this recommendation	Feasibility will be assessed by June 2024.	

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			may influence its acceptance.		
<p>Recommendation 3: The ICC Unit should expand its work with (i) existing formal and informal city networks and clusters within countries at national and sub-national levels, where these exist (active ICC members can provide a point of entry to these networks), (ii) organisations that engage regularly with relevant national authorities (these could be, for example, relevant UN agencies or national NGOs), (iii) strategic partners to strengthen its presence in several CoE member states, (iv) EU institutions and agencies to promote application of ICC principles and practices, which are important for ensuring continuing solidarity within the EU in view of large-scale arrivals of migrants and refugees into the EU in recent years.</p>					
<input type="checkbox"/> Accepted <input checked="" type="checkbox"/> Rejected <input type="checkbox"/> Under consideration			Existing co-operation will be either maintained or refocused (e.g. AER, UNHCR, ANVITA, OSCE, ODIHR). However, human and financial resources are currently insufficient in order to further expand work or collaborations. It should also be noted that the ICC programme does not have any legal or administrative capacity to sign partnerships with any organisation or to influence the work of EU institutions and agencies.		
<b>Tools and services</b>					
<p>Recommendation 4: The ICC Unit should prioritise services and tools that directly support implementation of strategies and recommendations emerging from the indexing process. There should be more expert support for cities after the indexing process to help them set priorities, implement their strategies and contextualize the services and tools in their city.</p>					
<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input checked="" type="checkbox"/> Under consideration	DGII		The services and tools to be prioritised will be defined jointly with the ICC Advisory Group. Providing expert support to cities after the indexing process is subject to the availability of adequate resources and the priority allocated to	This recommendation will be assessed by December 2024.	ICC Unit and ICC Advisory Group

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			this recommendation. The ICC Advisory Group will take available resources into account when planning or prioritising.		
Recommendation 5: The ICC Unit could introduce an alternative simplified assessment mechanism to enable cities to gain experience before working with the full index. This could also be used for interim self-assessments between full indexing processes.					
<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input checked="" type="checkbox"/> Under consideration	DGII		The secretariat will assess the needs and interest of ICC members in a simplified assessment mechanism. If this interest is confirmed and the elaboration of such a new mechanism is considered to be technically and financially viable, the ICC Advisory Group will evaluate within which timeline this can be accomplished and which resources can be allocated to this project.	This recommendation will be assessed by December 2024.	ICC Unit and ICC Advisory Group
<b>National networks</b>					
Recommendation 6: The ICC Unit should periodically review the viability of existing and new potential networks according to established criteria. Based on this review, the ICC Unit should allocate resources (i.e. financial resources, capacity building, institutional support) to viable networks reflecting the work performed and the work to continue to be performed.					
<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input checked="" type="checkbox"/> Under consideration			Coordination meetings on national networks management and development have been regularly organised since 2011. The programme's beneficiaries have pointed out that national networks need a certain level of flexibility to be able to work efficiently and at their own pace so to adapt to political and contextual changes in member states.	This recommendation will be assessed on an annual basis at the end of each calendar year.	

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			Therefore, the management considers that it is not desirable to adopt a too strict review system based solely on performance, regardless of specific contexts. Furthermore, the implementation of this recommendation is subject to the availability of adequate funding or to a re-prioritisation of activities towards the national networks rather than the international ones.		
<b>OPERATIONAL RECOMMENDATIONS</b>					
<b>Engagement with cities</b>					
Recommendation 7: Rather than focusing on a single person within member cities, the ICC Unit should systematically engage with small groups comprised of key operational staff and elected decision-makers. This would support commitment and continuity.					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Under consideration	DGII	The mission description for city coordinators will be amended to recommend the appointment of an ICC coordination team rather than a single ICC coordinator. Official letters will be sent to all mayors to present the new mission description and encourage them to reflect it in the job description of the appointed coordinators. The successful implementation of this recommendation will depend on the cities' human and financial capacities, as well as willingness, to embrace the proposed change.		February 2024 When annual letters to Mayors are sent	ICC Unit and ICC member cities
Recommendation 8: The ICC Unit should ensure that capacity building for ICC city coordinators goes beyond understanding ICC procedures, and includes, for example, how to engage key actors in the city to institutionalise ICC concepts.					
<input type="checkbox"/> Accepted	DGII		The Advisory Group will assess the	This	ICC Unit and

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<input type="checkbox"/> Rejected <input checked="" type="checkbox"/> Under consideration			<p>areas in which additional capacity building is needed and propose further trainings to be designed and delivered (frequency and modalities also to be assessed). The implementation of this recommendation is subject to the availability of adequate financial resources or to the level of prioritisation of this need.</p>	<p>recommendation will be assessed by June 2024.</p>	<p>ICC Advisory Group</p>
<b>Communication</b>					
Recommendation 9: The ICC Unit should communicate the objectives of the programme and how it is governed and managed more clearly.					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Under consideration	DGII	<p>This information is already public (ICC “<a href="#">About</a>” page) and information on the programme’s objectives and mutual obligations is contained in the Statement of Intent. However, there is scope for improving the structure of the ICC website and the packaging of information to increase clarity and visibility.</p> <ol style="list-style-type: none"> <li>The Advisory Group will contribute to refining the strategic and operational (including governance) framework of the programme by bringing more clarity about the objectives and functioning of the programme (<i>see recommendation 1</i>).</li> <li>The ICC website will be re-structured and ICC tools repackaged so that information and resources are more</li> </ol>		<ol style="list-style-type: none"> <li>June to December 2023</li> <li>December 2024</li> <li>December 2024</li> </ol>	<p>ICC Unit and Advisory Group</p>

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		clearly presented (see recommendations 10 and 14). 3. Documents introducing the goals of the programme will also be reviewed to reflect these changes.			
<p>Recommendation 10: The ICC unit should clearly and transparently communicate on its website (i) the benefits and obligations of membership of the international and national networks, including what level of support members can expect, and the expectation that members should repeat the indexing process at regular intervals (e.g. between three and five years), (ii) the objectives and functioning of the international and national networks, (iii) which national networks the programme is supporting financially, (iv) the objectives and substance of cooperation with other networks and institutions, and (v) the level of engagement of cities and national networks. This last point is important to avoid giving a misleading impression about the engagement of less active cities and networks. A range of indicators could be used for this. All cities that have completed the index within the last five years should be listed on the ICC website, including cities that have completed the index in the context of other projects (e.g. EU-funded projects).</p>					
<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input checked="" type="checkbox"/> Under consideration	DGII		<p>Not all sub-points of this recommendation are deemed relevant by the management. For example, measuring the level of engagement of cities and networks could be inconsistent. Indeed, the level of engagement of cities and networks fluctuates due to external factors (e.g. the national context, the proximity of elections, domestic crises). Those factors can have a negative effect on the cities' engagement in the programme and discourage them to report for fear of being formally assessed through the Index. Furthermore, all cities which have completed the index are listed on the ICC website at "<a href="#">Intercultural</a></p>	<p>This recommendation will be assessed by December 2023.</p>	<p>ICC Unit and ICC Advisory Group</p>



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			<a href="#">Cities Index reports by city”</a> However, 1. Needs and suggestions related to the re-structuring of the ICC website so that information is more clearly presented will be agreed upon at the first meeting of the Advisory Group. 2. Subject to the availability of adequate resources, an external provider will be contracted to carry out this work.		
<b>Recommendation 11: The ICC Unit should target email communication with members based on the content. It may be more efficient to develop a closed web portal for communicating with members and other actors (e.g. national-level representatives), or to use a readily available third party communication/collaboration tool.</b>					
<input type="checkbox"/> Accepted <input checked="" type="checkbox"/> Rejected <input type="checkbox"/> Under consideration			Findings of the annual survey of ICC member cities carried out between December 2022 and January 2023 indicate that a web portal with tailored access would be the least favourite option and that email communications are preferred. <sup>5</sup> Concerning communication with other actors, it needs to be noted that EU Data Protection rules prevent us from communicating with persons who have not given explicit authorisation. In addition, a curated mailing list is difficult to maintain as it requires the cities sharing (and updating) names		

<sup>5</sup> Source : [ICC Annual Survey 2023](#).

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			and contact details of staff working in the different areas. Therefore, the model where coordinators receive the information and distribute it is preferred. However, the periodicity and format of e-mail communication and communication tools will be discussed by the Advisory Group to explore avenues for improvement.		
<b>Services and tools</b>					
Recommendation 12: The ICC Unit should give member cities a more active role (e.g. via the proposed ICC steering group – see recommendation No.1) in decisions on thematic focus and specific projects, and in developing tools to ensure their relevance and applicability in practice. Regarding services linked to specific events and activities, the ICC Unit should communicate key dates in advance on an annual basis to facilitate cities' planning and engagement in ICC activities.					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Under consideration	DGII	Strategic involvement of cities and forward planning will be achieved through the setting up of the Advisory Group ( <i>see recommendation 1</i> ). The ICC online <a href="#">calendar</a> (providing information on key dates for the whole year) will be maintained and coordinators will be invited to check it more regularly.		May/June 2023	ICC Unit and ICC member cities
Recommendation 13: The ICC Unit should place more emphasis on facilitating regular, systematic in-person networking and exchange of experience between pairs of cities with similar challenges and experiences, where this is requested. This could be extended to include peer review.					
<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input checked="" type="checkbox"/> Under consideration	DGII		The planning will be defined jointly with the ICC Advisory Group, which will analyse the need for and feasibility of the proposed actions. the acceptance of this recommendation is subject to the	This recommendation will be assessed by December 2024.	ICC Unit and ICC Advisory Group

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			availability of adequate resources and to the availability of city coordinators to travel for an increased number of meetings. The level of prioritisation of this recommendation might also influence its acceptance.		
<b>Online resources</b>					
Recommendation 14: The ICC Unit in consultation with member cities should better group online resources on the website to address specific policy challenges and to make it easier to find relevant information. Older content on the website should be regularly archived to facilitate identification of relevant, up to date information. The long list of good practice examples on the website could be made more useful by improving search and filtering capability, and by analysing the content to extract useful insights. This website should be reorganised so that it loads faster.					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Under consideration	DGII (with input from DIT/DC)	1. Needs and suggestions related to restructuring the ICC website and good practice database will be agreed upon by the Advisory Group. 2. An external provider will be contracted to carry out this work.		1. December 2023 2. December 2024 (finalisation of work)	ICC Unit and ICC Advisory Group
<b>Membership fees</b>					
Recommendation 15: The ICC Unit should ensure clarity and transparency around membership fees. All members of the ICC international network should be required to pay a membership fee. Services and participation in network activities should be withdrawn from international cities that do not pay a membership fee. They will still be able to access the many tools that are freely available on the ICC website. Membership fees could be graduated transparently and objectively according to population and/or annual budget.					
<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input checked="" type="checkbox"/> Under consideration	DGII		Risks need to be assessed prior to the introduction of a generalised membership fee, in particular the risk of withdrawal of old member cities which had been granted free membership for having participated in the initial phases and development of the programme.	This recommendation will be assessed by December 2024.	ICC Unit and ICC Advisory Group

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			Risks and modalities to provide clarity around ICC membership will be discussed by the Advisory Group.		
<b>Assessment of change</b>					
Recommendation 16: The ICC Unit should ensure that measurement, by cities, of change is addressed by the indexing and strategy development process. There should be guidelines on involving civil society organisations in the assessment of strategy implementation – their role should be made more explicit. The programme could provide monitoring and evaluation tools and resources to support systematic assessment of intercultural initiatives by cities including ICC activities.					
<input type="checkbox"/> Accepted <input checked="" type="checkbox"/> Rejected <input type="checkbox"/> Under consideration			The ICC index is already a tool to support cities in assessing change and strategy implementation. The ICC Index questionnaire already includes questions on the evaluation of intercultural strategies, the involvement of civil society and the measurement of public perception of diversity. Cities are also provided with inspiring good practices on ways to proceed. In addition, the ICC Unit is promoting <a href="#">CM/Rec(2022)10</a> <sup>6</sup> , the Model Framework <sup>7</sup> , and the Step by Step guide <sup>8</sup> , which highlight the importance of civil society participation.		
Recommendation 17: The ICC Unit should work with interested member cities on indicators to measure progress in diversity management and interculturalism, to be used between the indexing processes.					
<input type="checkbox"/> Accepted	DGII		The services and tools to be	This	ICC Unit and

<sup>6</sup> See: [Recommendation of the Committee of Ministers to member States on multilevel policies and governance for intercultural integration](#) (Adopted by consensus by the Committee of Ministers on 6 April 2022 at the 1431st meeting of the Ministers' Deputies)

<sup>7</sup> See : [Model Framework for an intercultural integration strategy for the national level](#) (adopted by the CDADI in December 2021)

<sup>8</sup> See : [The intercultural city step-by-step - A practical guide for applying the urban model of intercultural inclusion](#) (2021 – revised edition)

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<input type="checkbox"/> Rejected <input checked="" type="checkbox"/> Under consideration			prioritised will be defined jointly with the ICC Advisory Group.	recommendation will be assessed by December 2024.	ICC Advisory Group
Recommendation 18: The ICC Unit should put in place a systematic approach to following up with international cities periodically to discuss progress in the implementation of strategies and to identify specific needs and how they can be addressed.					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Under consideration	DGII	The Advisory Group will discuss and agree upon the best way to put in place such a systematic follow up (e.g. form, periodicity).		This recommendation will be assessed by December 2024	ICC Unit and ICC Advisory Group
Recommendation 19: The ICC Unit should allocate resources specifically to regular, systematic collection, analysis, and dissemination of information from cities about changes happening in member cities that are influenced by the programme.					
<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Under consideration		The secretariat will use the annual survey of member cities to collect (1), analyse and disseminate (2) information about changes happening in member cities that have been inspired by the programme.		1. December 2023 2. June 2024	ICC Unit