

Final report: Final Evaluation of the European Union/Council of Europe Horizontal Facility for the Western Balkans and Turkey – Phase I

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List of acronyms / abbreviations

CEPEJ	European Commission for the Efficiency of Justice
CoE	Council of Europe
CoE HQ	Council of Europe, Strasbourg
CPT	European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment
CSO	Civil society organisation
DG NEAR	European Commission, Directorate General for Neighbourhood & Enlargement Negotiations
DoA	Description of Action
ECM	Council of Europe Expertise Co-ordination Mechanism
ECtHR	The European Court of Human Rights
EU	European Union
EUD	European Union Delegation
EU Office	European Union Office in Kosovo
EUR	Euro
GRECO	The Group of States against Corruption
HELP	European Programme for Human Rights Education for Legal Professionals
HF	European Union / Council of Europe Horizontal Facility for the Western Balkans and Turkey
IPA	Instrument for Pre-Accession Assistance

IT	Information Technology
JP	Council of Europe / European Union Joint Programme
LGBT	Lesbian, gay, bisexual, and transgender
NGO	Non-governmental organisation
OBP	Offender Behaviour Programme
ODGP	Council of Europe Office of the Directorate General of Programmes
OSCE	Organisation for Security and Cooperation in Europe
PMM	Project Management Methodology
TAPAS	Tri-Annual Plans of Action
UNHCR	United Nations High Commissioner for Refugees
USAID	United States Agency for International Development

Executive summary

This evaluation covers Phase I of the 'Horizontal Facility for the Western Balkans and Turkey (Horizontal Facility)' (HF), implemented from May 2016 to May 2019.

In April 2014, prior to the design and implementation of the HF, the European Union (EU) and the Council of Europe (CoE) signed a statement of intent on their strategic cooperation in the EU Enlargement region, EU Eastern Neighbourhood and in the Southern Neighbourhood Region.¹ The statement designated four thematic areas for reinforced cooperation in the Western Balkans: Efficient and independent judiciary; Fight against corruption and economic crime; Freedom of expression and media; and Anti-discrimination and protection of the rights of vulnerable groups. The statement of intent resulted in the design and implementation of the HF.

CoE's Office of the Directorate General of Programmes (ODGP) ensured coordination of the HF. The overall programme budget was EUR 25 million (80% funded by the EU, 20% by the CoE).

The HF aimed to enhance beneficiaries' compliance with CoE standards and enlargement requirements, by increasing their understanding of the CoE standards-driven reforms and their capacities to implement CoE recommendations, as well as strengthening their institutional capacities to embark on reforms. To these ends, the HF provided tailored technical support to each HF beneficiary and legislative expertise and policy advice in response to requests from HF beneficiaries through the Expertise Co-ordination Mechanism (ECM).

Technical assistance was provided via the implementation of beneficiary-specific Tri-Annual Plans of Action (TAPAs). The HF Phase I included 36 different Actions that were implemented in Albania (7), Bosnia and Herzegovina (5), Kosovo*² (5), Montenegro (6), North Macedonia (6) and Serbia (7).³

The HF Phase I focused on three different themes: Theme I 'Ensuring Justice' with 17 different Actions; Theme II 'Fighting economic crime' with 6 Actions; and Theme

¹ <https://rm.coe.int/168066b99e>

² *This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

³ No Actions were carried out in Turkey.

III 'Combating anti-discrimination and protection of the rights of the vulnerable groups' with 13 Actions'.⁴

Furthermore, ECM policy advice was provided in response to 22 officially received requests, with 19 out of 22 processes completed as of 23 May 2019.

Requests for an expert opinion under the ECM were made by all beneficiaries, with the exception of Turkey, with Albania (6 times), Montenegro and North Macedonia (each 5 times) issuing most requests and Kosovo*⁵ (1 time) issuing the smallest number of requests.

This evaluation was undertaken between June and September 2019. It involved desk research, semi-structured interviews with key stakeholders who were involved in the HF Phase I, and a survey of CoE project managers.

The evaluation confirms that the HF themes and objectives were fully aligned with the main needs and priorities of beneficiaries as well as with their enlargement priorities. The HF also successfully addressed existing gaps and priorities and institutional development aims of the different beneficiaries.

Overall, the HF is considered to have been highly effective, and the different HF Actions made substantial progress towards the achievement of their short-term outcomes. Factors that supported effectiveness of the HF include its flexibility, in-depth engagement of beneficiaries both during design and implementation, and the quality of the CoE experts. Factors that constrained the HF's effectiveness include limited commitment of some beneficiaries and limited duration of some Actions.

Stakeholder feedback suggested that gender considerations played a somewhat minor role during the design phase of the HF Phase I. However, to some extent, implementation of the Actions remedied this lack of attention to gender mainstreaming in design, by among other things including some gender-specific outputs.

The CoE was considered to be the best placed actor to implement the HF. This was related to the dynamic triangle of standards, monitoring and technical assistance, and the corresponding credibility and reputation in the Western Balkans and its long-standing relevant expertise and specific knowledge of the HF themes.

Highly positive stakeholder feedback regarding the overall coordination and organisation of activities, together with positive feedback on HF outcomes suggests

⁴ The thematic area of freedom of expression and media was tackled separately by the European Union/Council of Europe Joint Programme JUFREX, <https://www.coe.int/en/web/freedom-expression/promoting-freedom-of-expression-in-south-east-europe>

⁵ *This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

that the HF has been implemented efficiently. Stakeholders commented positively on the existing architecture of the HF and what it allowed to achieve. However, stakeholders also noted areas for improvement for the HF Phase II, including improvements with regard to human resource practices and increased synergies between different HF thematic areas and Actions.

According to the majority of stakeholders, the overall performance of the HF in terms of impact (i.e. achievement of medium / long-term outcomes) was positive. However, various stakeholders were not able to comment on the overall impact of the HF and reported difficulties with assessing the impact of the different TAPAs at what was considered an early stage.

Feedback on sustainability presented a mixed picture. While there is evidence that some Actions led to a sustainable continuation of outputs and outcomes beyond the HF support, overall stakeholder feedback on sustainability acknowledged uncertainties, mainly related to beneficiary capacity constraints and / or commitment to take over after Actions are completed.

Finally, stakeholders saw room for improvement with regard to the visibility of the HF. There was mixed feedback on the provision of information on outcomes targeting the general public and beneficiaries. In a majority of cases, beneficiaries were provided information on outcomes on a regular basis. On the other hand, the general public was reportedly rather unaware of the HF and the benefits it brings them.

Recommendations for the HF Phase II should be understood in the light of the evaluator's efforts to stimulate further discussion among stakeholders with a view to enhance the overall relevance, performance, efficiency, sustainability and visibility of the HF. Recommendations are mainly related to: the HF structure (e.g. Actions' duration, number of Actions, linkages between different HF themes and Actions, and the format of the national and regional Steering Committees), the tools through which the performance of the HF is measured (e.g. at the level of the HF, e.g. ongoing evaluation; and at the level of the Actions, e.g. indicators and monitoring reports), the HF communication channels (internal and external), the ways the HF could engage with beneficiaries and other actors (e.g. local experts and CSOs), and the alignment between EU and CoE priorities.

1. Introduction

The CoE contracted Blomeyer & Sanz on 23 May 2019 to conduct the final evaluation of the HF between June and September 2019.

1.1. Evaluation objectives

The evaluation had four main objectives:

- To assess the performance (relevance, efficiency, effectiveness, coherence, impact, sustainability and added value) of the support provided through the HF;
- To assess the outcomes achieved by the HF, and identify to what extent they have helped the HF beneficiaries move towards domestic reforms in line with European standards;
- To assess the degree to which gender has been mainstreamed by the HF;
- To provide conclusions and in-depth recommendations on how to further improve the performance of the HF with a view to Phase II and on how to develop for Phase II a proper performance assessment mechanism at the overall HF level (e.g. monitoring and evaluation methodology, intervention logic and indicators at facility and action level).

1.2. Methodology

The methodology comprised desk research, interviews and a survey. A sampling of 14 different Actions was proposed for an in-depth review as shown in the following table.

Table 1 – Selected HF Actions

Beneficiary	Title	Action
AL	Enhancing the protection of Human Rights of prisoners in Albania	HF 1
AL	Action against economic crime	HF 16
AL	Fighting bullying and extremism in the Education system in Albania	HF 24
AL	Preventing and combating discrimination on grounds of sexual orientation and gender identity in Albania	HF 28
AL	Strengthening the protection of national minorities in Albania	HF 31
ME	Enhancing human rights protection for detained and sentenced persons in Montenegro	HF 6
ME	Action against economic crime in Montenegro	HF 18
ME	Strengthen integrity and combat corruption in the higher education in Montenegro	HF 20
ME	Fostering a democratic school culture in Montenegro	HF 26
RS	Enhancing human rights protection for detained and sentenced persons in Serbia	HF 7
RS	Supporting effective remedies and mutual legal assistance in Serbia	HF 11
RS	Fostering a democratic school culture in Serbia	HF 27
RS	Preventing and combating trafficking in human beings in Serbia	HF 30
RS	Strengthening the protection of national minorities in Serbia	HF 33

Regarding the ECM, the evaluation reviewed the expertise provided to the Constitutional Court of Albania (ECM/1/VC861/2016; ECM/4/VC868/2016).

A scoping mission to Strasbourg was undertaken on 6 and 7 June 2019. Moreover, the following data collection missions were conducted:

- Brussels, on 4 and 8 July 2019;
- Belgrade, from 15 to 17 July 2019;
- Podgorica, on 18 and 19 July 2019;
- Tirana, from 29 August to 4 September 2019.

Desk review

Various HF Phase I documents provided by the CoE have been reviewed. These are listed in Annex I.

Interviews

In total, around 110 different stakeholders were interviewed (see Annex II). The semi-structured interviews were organised in three parts:

- The first part, where interviewees provided an overview of their specific involvement in the HF Phase I;
- The second part, where the discussion focused on the relevance, effectiveness, efficiency, impact, added value, sustainability and visibility of the different Actions;
- Finally, interviewees were invited to share any additional comments and particularly ideas and suggestions for the HF Phase II.

Survey

An online survey was addressed to CoE project managers involved in the HF Phase I.⁶

A first draft of the survey was prepared and then revised on the basis of feedback provided by the CoE. The survey was divided into two parts: the first part covered general questions related to the respondents' overall experience with the HF. The second part comprised questions on specific HF Actions.

1.3. Difficulties encountered

No particular difficulties were encountered during the evaluation of this HF. The collaboration with both the CoE and DG NEAR and with the main stakeholders in the Western Balkans was excellent. Most notably, all stakeholders demonstrated strong ownership of the evaluation process by making time available to meet with the evaluators and share information, notwithstanding the fact that the evaluation was conducted during the summer holiday period. If any recommendation for improvement can at all be noted for future evaluations, it would be desirable to ensure that all relevant documents related to the HF Phase are readily available at the outset of the evaluation; a few documents had to be collected after the evaluation started, and this somewhat delayed the process of data collection.

⁶ Annex III includes the survey results. 12 CoE project managers completed the survey, i.e. 86% of the surveyed population.

2. Findings

2.1. Relevance

Do the HF Beneficiaries refer to the HF themes / interventions as domestic priority areas for reform? Did the HF provide adequate support to its beneficiaries in addressing any reform in line with CoE recommendations and European standards? Have the HF interventions contributed to the beneficiaries' enlargement priorities?

The HF themes and objectives were fully aligned with the main needs and priorities of the beneficiaries as well as their enlargement priorities.

Regarding the enlargement priorities, stakeholders considered the HF Actions to support beneficiaries in the process of the EU accession negotiations. The themes of democracy/human rights/rule of law were considered well-aligned with EU accession priorities for the Western Balkans. When the HF was prepared, the beneficiary and EU strategic priorities were properly taken into account, in addition to those of the CoE monitoring bodies. The HF portfolio for Albania illustrates this point. The CoE framework of cooperation with Albania took into account internal (Albania's Country Strategy for Development and Integration 2016-2020),⁷ EU priorities for Albania,⁸ and information of the CoE monitoring bodies. Indeed, four out of the five Albanian EU priorities were integrated as part of the HF pillars.⁹

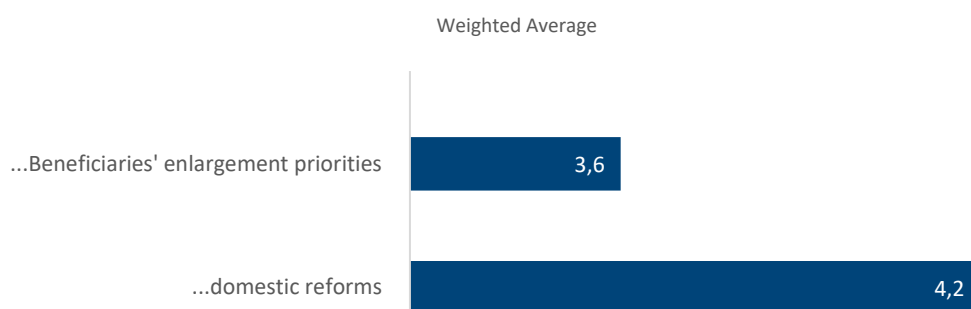
According to the survey of CoE project managers, the rate to which the HF Actions contributed to the beneficiaries' enlargement priorities and domestic reforms is as following:

⁷ Albania's Country Strategy for Development and Integration 2016-2020, available at: https://shtetiweb.org/wp-content/uploads/2014/06/NSDI_2014-2020_version_JUne-2013.pdf

⁸ Commission Staff Working Document, Albania Report 2018, available at: <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20180417-albania-report.pdf>

⁹ EU priorities for Albania include: 1) reforming public administration (not an HF pillar), 2) reinforcing the independence, efficiency and accountability of judicial institutions, 3) fighting corruption; 4) fighting organized crime; 5) reinforcing protection of human rights.

(0 = not at all; 5 = extremely)



Stakeholders considered the match between HF objectives and beneficiary needs to be very strong. Stakeholders considered that the HF had recognised the most relevant issues in the different beneficiary countries. Qualitative feedback indicated that the HF successfully addressed gaps and priorities of the different beneficiaries. For instance:

- The Ministry of Interior of Serbia considered that HF 30 (on trafficking of human beings) addressed the lack of compensation for victims - one of the key priorities for the institution;
- A former Government Agent before the ECtHR pointed out how HF 11 (on mutual assistance) recognised the most important issues in Serbia e.g. pending judgments;
- The Ministry of Education of Montenegro highlighted how relevance was ensured in the context of HF 20 (on corruption in education) by focusing it on the prevention of plagiarism instead of limiting efforts to the sanctioning policy;
- The Ministry of Education of Albania recognised that the issues related to inclusive education addressed by HF 24 (on education) were becoming a problem for Albania, and the Action enabled them to enhance their capacity and response;
- The Central Election Commission of Albania considered that HF 16 (on economic crime) came at the right time, i.e. when the Commission was about to draft legal documents and contract external auditors.

At the same time, some stakeholders (e.g. the CoE office in Albania) considered that the HF would benefit from dedicating more time and effort to reflections on the beneficiaries' needs as identified by them, rather than by the HF, even if the solutions seem fitting. For example, the HF promoted inter-institutional cooperation, which according to some beneficiaries does not directly reflect needs of the authorities themselves.

Factors facilitating relevance

Stakeholders considered that relevance for beneficiaries was ensured thanks to the framework of the HF, and mainly by:

- the way local priorities were identified, involving local stakeholders in a **participatory process** in the design and inception phase, to fully understand their needs (i.e. by formal / informal ex-ante needs assessments). Indeed, Actions had been consulted with the beneficiaries beforehand which made the interventions relevant and tailored to the beneficiaries' needs and reflected on what had been planned. It is worth noting that all beneficiaries were highly satisfied with this form of cooperation and felt their proposals were systematically taken into account.
- **flexibility of the HF**, that ensured relevance for beneficiaries was maintained during implementation of the Actions. Indeed, the activities of some Actions were redesigned and readapted to meet new emerging needs, or extended to ensure effectiveness.

Stakeholders from the different EUDs confirmed the strong relevance of the HF. These stakeholders also noted that the EUDs themselves played a role to ensure relevance, particularly with regard to those thematic areas where they considered the CoE was experiencing capacity constraints. For instance, it was pointed out that despite the high number of recommendations for Serbia by the Group of States against Corruption (GRECO) and the clear need of an Action in the field of corruption, the HF Phase I did not provide concrete support on this theme (the CoE explained this with timing issues; an Action was proposed under HF II, but not retained by the EU). Similarly, the EUD to Serbia noted that its efforts to promote HF 33 (on minorities) and felt that the CoE tended to prioritise on the basis of its own competences, e.g. HF 7 (on prisons) and HF 11 (on mutual assistance), which the EUD to Serbia considers to be less relevant for the beneficiary than HF 33 or the 'missing' Action in the area of corruption. This point was contested by the CoE, noting the CoE had provided substantial assistance to the authorities in this particular field (by supporting a working group in preparing the Action plan for minorities) just before the HF had started; hence the HF Action was considered a follow-up Action (implementation of the same Action plan). The preparation took some time in order to avoid overlapping with other implementing organisations (e.g. the Organisation for Security and Cooperation in Europe, OSCE).

The EUD to Serbia considered that there was room for further strengthening the dialogue between the EUDs and the CoE to ensure relevance by selecting the most important CoE recommendations and therefore addressing the most relevant beneficiary needs.

DG NEAR representatives referred to the HF as a 'supertool', and 'something they should have done much earlier'. Stakeholders identified Chapters 23 – 'Judiciary and Fundamental Rights' and 24 – 'Justice, Freedom and Security' of the EU acquis and, in general terms, the Rule of Law as areas where the Western Balkans should make

the most progress, and where the potential for impact is very high. For DG NEAR, the HF represents the 'primary project' that provides them with information and implements activities in line with priorities agreed with beneficiaries. Relevance is seen as particularly high for beneficiaries negotiating accession as the HF 'is completely embedded in the enlargement process'. At the same time, progress towards rule of law was identified as the starting point if accession negotiations are to be opened. Montenegro was cited by multiple DG NEAR stakeholders as a good example where the HF had contributed to the beneficiary's enlargement priorities by supporting relevant institutions.

To what extent did the HF / TAPAs complement other partner / donor interventions in the beneficiaries?

The evaluation considers the HF to have successfully **complemented other partner / donor interventions** in the Western Balkans (e.g. interventions by the OSCE). This was ensured by a broad consultation and coordination process both during the programming phase by DG NEAR and the CoE, that included civil society organisations (CSOs) and other important stakeholders, international organisations like Transparency International and the United Nations High Commissioner for Refugees (UNHCR) among others, as well as during the TAPAs' implementation. Qualitative feedback suggested that coordination was very successful, and possibly less of a challenge in Montenegro,¹⁰ while coordination with other projects/initiatives (e.g. the Instrument for Pre-Accession Assistance (IPA), OSCE, the United States Agency for International Development (USAID)) was more challenging in Serbia, according to Ministry of Interior. However, Serbian stakeholders also agreed on the increased level of coordination and reduced overlap among different actors/initiatives during last two years of Phase I. Finally, Albanian stakeholders confirmed there was no overlap between the HF and any other donors. Efficient coordination was ensured by donors 'finding each other' through formal and informal meetings as opposed to being brought together by beneficiary government efforts.

However, a few stakeholders identified a limited degree of overlap, e.g. the High Inspectorate for the Declaration and Audit of Assets of Albania noted some overlaps between HF 16 (on economic crime) and the EU Twinning project on fight against corruption. On this point, CoE feedback confirms strong efforts to ensure complementarity: The Action workplan was approved before the launching of the Twinning. The Action identified the overlap on political party financing and on asset declaration, and an agreement was achieved between the Action and the Twinning in close coordination with the EUD. The terms of the agreement provided a division of areas of intervention and that the two projects would be complementary and organise joint events. The Action invited the Twinning in all its activities on political party

¹⁰ This was explained with the comparatively small size of the beneficiary.

financing and it co-organised a training of inspectors and assistant inspectors on the efficiency of audits and on the new legal provisions.

What were the main pros and cons of not including a regional dimension?

Stakeholders referred to the **lack of regional Actions** in Phase I of the HF as a missed opportunity, particularly regarding those Actions that were quite similar, even if implemented in different countries (e.g. Actions on minorities or fight against economic crime and corruption). It was noted that the importance of the regional component was clear from the beginning, but the TAPAs were designed, and specific Actions were planned according to the needs of specific beneficiaries / local contexts.

Future regional Actions (under HF Phase II) were seen as presenting both opportunities and challenges. Opportunities were related to direct management and reaching grassroots NGOs, establishing links / channels for the sharing of experience, including of the CoE, with a whole region as opposed to a single beneficiary. At the same time, the inclusion of Turkey in the HF as of Phase II was considered a challenge for the implementation of regional actions as Turkey represents a different situation in terms of accession progress. Other possible disadvantages related to management, e.g. an EUD representative in Albania noted a preference for having a colleague in Tirana to deal with issues relating to specific projects rather than going through HQ or project officers with multiple Actions in their portfolio. Moreover, measuring outcomes of regional Actions contributed to complexity.

Another challenge mentioned was the potential lack of ownership in the absence of one specific beneficiary, and in turn, less follow-up from implementing organisations. Therefore, feedback was mixed in relation to whether there should be more regional Actions. While some stakeholders felt they are highly relevant and should be encouraged, others were doubting the utility of regional Actions in terms of concrete outputs and were not sure their number should be increased. Regional Actions were not seen as positive per se and stakeholders considered that their potential merit should be assessed on a case by case basis, e.g. in terms of their contribution to networking, sharing of good practices and complementarity to beneficiary-specific Actions.

Stakeholders saw room for strengthening the regional dimension in some Actions, e.g. the Actions on minorities,¹¹ anti-discrimination and fight against economic crime and corruption, especially in relation to cross-border crime such as human trafficking. Notwithstanding, CoE feedback on this point suggested limited potential in the area of cross-border crime, also noting that during the priority setting, this was not identified as a priority. Most stakeholders considered that Actions focusing on the

¹¹ With the exception of Albania, where stakeholders felt their issues regarding minorities are less urgent compared to the situation in the region overall, and hence they fear a regional action would not give enough priority/attention to the situation of minorities in Albania.

rule of law should remain beneficiary-specific in order to properly take into account local specificities and prioritise specific domestic needs.¹²

Beneficiaries appreciated their participation in regional events during HF Phase I, and called for more regional meetings, particularly among peers. At the same time, the EUD, for example, in Albania was wary of such meetings not yielding outcomes or not being cost-effective compared to beneficiary-specific actions.

Finally, most of the CoE field offices noted that the lack of a clear overall logframe also constrained the regional component in the HF Phase I, and welcomed more regional Actions in the HF Phase II. However, at the same time they noted that this change might negatively affect their communication with the EU (i.e. whilst they were now communicating with EUDs, they were wondering whether in the future, and in the context of regional Actions, they might also have to communicate with DG NEAR).

2.2. Effectiveness

To what extent has the HF delivered intended immediate / short-term outcomes?

The HF was considered to have been highly effective and the different HF Actions made substantial progress towards the achievement of their short-term outcomes.

According to the survey, the extent to which the HF Actions achieved objectives/intended outcomes is as following:

(0= not at all; 5= totally)

Weighted Average



When discussing the delivery of outcomes, stakeholders noted the absence of any major issues and problems. CoE and EU representatives as well as the majority of the HF beneficiaries were highly satisfied with the performance of the HF. Particularly, beneficiaries suggested that results achieved went often beyond their initial

¹² Stakeholders noted that needs regarding judicial reforms differ significantly from beneficiary to beneficiary and highlighted as an example the different needs of Albania and Montenegro.

expectations, and the fact that beneficiaries often requested a continuation of the Actions confirms this.

For instance, regarding **Serbia**:

- The Ministry of Interior confirmed that all expected results for HF 30 (on trafficking of human beings) had been achieved and that the Action contributed to enhanced interaction between different beneficiaries (e.g. between law enforcement and labour inspectors). CSOs considered the component of the Action on labour and exploitation particularly successful.
- Again, on HF 30 (on trafficking of human beings), the Ministry of Labour noted that the CoE had provided very high-quality training of labour inspectors on the prevention of human trafficking and on intersectional cooperation (e.g. with police, CSOs, prosecutors etc.). Trainings were very valuable and concrete and raised the participants' awareness, and equipped them with new skills and basic knowledge on how to identify and register victims.
- HF 11 (on effective remedies and mutual legal assistance) performed very well, and all objectives were achieved,¹³ according to the EUD.
- The Ministry of Education pointed out that HF 27 (on education) produced a change of mindset among Serbian teachers and students, and noted that the Ministry was recently contacted by other schools that were not part of the Action and that would like to participate in the future; the Ministry also noted that HF 27 had contributed to enhancing inter-ministerial cooperation and provided networking opportunities (e.g. sharing of good practices) for teachers from different schools.
- The Ministry of Public Administration and Local Self-Government Action was very satisfied with HF 33 (on minorities). The main benefit for the Ministry was receiving the experts' opinion in a timely manner before the adoption of the draft law on minorities.¹⁴ The Ministry also expressed satisfaction over having received a useful assessment on the official use of minority languages.
- The Ministry of Justice was very satisfied with the effectiveness of HF 7 (on prisons and police), particularly with the successful elaboration of four 'Offender Behaviour Programmes' (OBPs) to support reintegration of prisoners after release.

¹³ For instance, the dialogue on the systemic human rights violations and effective remedies was fostered, around 650 legal professionals were trained on how to apply and refer to the human rights standards arising from the ECHR and ECtHR, and the institutional capacity of the local Judicial Academy was strengthened.

¹⁴ I.e., the draft law on National Councils of National Minorities

Specific examples of effectiveness for Actions implemented in **Montenegro** include:

- The Ministry of Justice credited HF 6 (on prisons) with the improvement of the regulatory framework for classification and categorisation of prisoners; the development of guidelines for health care in prisons; and the development of a code of ethics for prison staff.
- The Ministry of Education considered HF 20 (on corruption in education) to have supported the adoption of the Law on Academic Integrity (adopted by the Parliament of Montenegro in March 2019); thanks to the Action, the University of Montenegro is now able to better understand its role in preventing corruption / plagiarism.
- The Supreme State Prosecutor's Office in Montenegro highlighted how HF 18 (on economic crime) had helped to improve the framework for implementing ethical rules and integrity plans in the prosecutorial organisation and noted that the institution had met GRECO recommendation number ix.¹⁵
- The EUD considered the results achieved on accountability of the judiciary in Montenegro in the context of HF 14 as very important.

Finally, examples of outcomes effectively delivered in **Albania** include:

- Several stakeholders considered HF 16 (on economic crime) to have triggered one of the most important reforms with regard to the transparency of political party financing and their election campaigns, ultimately resulting among other things in reducing the cost of election campaigns.
- The EUD considered HF 24 (on education) and HF 28 (on anti-discrimination) to have been particularly successful, and noted that the attitude of police towards lesbian, gay, bisexual, and transgender people (LGBT) changed thanks to the training and awareness raising.
- The Constitutional Court was highly satisfied with the quality of expertise received through the ECM (ECM/1/VC861/2016; ECM/4/VC868/2016), however, whilst this beneficiary was well familiar with the Venice Commission, there was limited knowledge of the wider framework of support, i.e. the anchoring of the ECM within the HF.¹⁶

¹⁵ GRECO recommended significantly strengthening and further developing mechanisms to provide guidance and counselling on ethics and the prevention of conflicts of interest for prosecutors.

¹⁶ It is worth mentioning that the Constitutional Court was not aware of the ECM as a mechanism, and equally unaware that the Venice Commission is financed by the HF. The Constitutional Court perceived no change in how the ECM had been working since 2003.

What factors have supported and hindered the effectiveness of the HF interventions?

This section discusses **factors that supported the effectiveness** of the HF.

Good engagement of local partners

Qualitative feedback suggests that the Actions that were more effective were those where local partners were highly involved and committed during implementation. Many stakeholders believed that, overall, the reputation of the CoE and their previous experience in the Western Balkans helped to build successful cooperation with local institutions, many of which the CoE had been working with in the past in the context of other programmes / projects.

Quality of experts

Stakeholder feedback clearly pointed to the quality of the expertise provided in the context of the HF as being paramount to its effectiveness. Various stakeholders considered the CoE to have the best experts on specific topics (e.g. regarding economic crime in Albania), and particularly appreciated the peer to peer approach of the trainings and their practical components, as highlighted by the Police Administration in Montenegro, amongst others.

HF flexibility

The flexibility of the HF, e.g. the possibility to slightly modify activities of ongoing Actions / their schedule or duration, or to include new stakeholders, strongly supported its effectiveness. In this regard, some stakeholders, including the CoE Office in Albania, believed that 'waiting for the right moment and adjusting the objectives without changing the scope' was an effective approach. Many local partners recognised this as a peculiarity of the HF that many other international interventions they are involved in do not allow for (e.g. this was noted by the Agency for the Prevention of Corruption in Montenegro).

Timing of Actions

Various local partners considered that Actions were implemented at the right moment. For instance, the Supreme State Prosecutor's Office in Montenegro considered the timing of HF 18 (on economic crime) to have been excellent, since the Office was just starting to implement a new law on asset recovery. Similarly, the High Inspectorate for the Declaration and Audit of Assets of Albania noted that HF 16 (on economic crime) came at the 'perfect moment' for them, i.e. when they were

Interestingly, the EUD was also not aware of the ECM as a mechanism beyond the Venice Commission.

setting their priorities, that are based not only on more general governmental and state priorities, but on institutional / beneficiary-specific ones.

Synergies between different partners

Good relations / synergies created among different local actors involved in the Actions were important for their performance. For instance, this was the case of HF 30 (on trafficking of human beings) in Serbia, where different actors (including public institutions, CSOs, and private companies) were involved in an interactive dialogue on how to increase prevention and fight human trafficking for the purpose of labour exploitation. This was also true of Albania, where the Action worked hand-in-hand not only with various public institutions but also the private sector, engaging banks as gate keepers in the implementation of HF 16 (on economic crime) on economic crime and campaign party financing in Albania. In various cases, stakeholders also referred to increased inter-sectoral and inter-ministerial cooperation both as a consequence of the Actions and as a factor for their success.

Involvement of CSOs

The evaluation confirms that the involvement of CSOs had a highly positive impact on the effectiveness of the HF. For instance, in the context of HF 6 (on prisons), HF 7 (on prisons and police), HF 16 (on economic crime), HF 28 (on anti-discrimination) and HF 30 (on trafficking of human beings), CSOs were considered to have positively contributed to effectiveness through the development of key documents, providing good experts, facilitating accountability and increasing visibility of the Actions concerned. Stakeholders considered the involvement of CSOs to be important and fruitful since this allowed to promote new ideas and to open people's minds, and also allowed CSOs to monitor progress on HF themes and hold the government to account. It also allowed to have more complete / inclusive processes during implementation of the Actions. Stakeholders agreed that CSOs could be involved even more frequently,¹⁷ or more in-depth in the future, e.g. by engaging some CSOs as members of the Steering Committee with the right to vote (i.e. not limited to being observers).¹⁸ From the CSOs' perspective, the CoE was considered to be a very open / accessible partner, and the small grant schemes in some countries were considered to work very well. On the other hand, and in the light of a possible more substantial involvement of CSOs during Phase II, it was also recommended to pay attention to involving a balanced selection of CSOs, considering that some CSOs are very donor-driven (e.g. in Montenegro), or highly politicised (e.g. in Serbia). Another suggestion

¹⁷ E.g. the Ministries of Education in Serbia and in Montenegro proposed to involve more the parents' associations.

¹⁸ Qualitative feedback suggests that this is likely to happen in the HF Phase II. For instance, for those CSOs that were involved in HF 30.

was not to limit CSO involvement to the Action-level and consider avenues for their horizontal engagement in the HF.

Role of the CoE local offices

Stakeholders were very satisfied with the CoE staff in the field offices. In general terms, they were considered to have a good understanding of the conditions and situation in the Western Balkans and to be capable to advocate for change. Stakeholders frequently noted the CoE offices' capacity to understand the specific needs of each partner, open doors, keep beneficiaries actively involved, and to efficiently coordinate the Actions' activities. Also, most beneficiaries noted the commitment of the CoE staff as well as their professionalism and experience as factors contributing to the success of the Actions. Finally, several local stakeholders noted that they felt considered as partners instead of beneficiaries by the CoE local staff.

CoE open and participatory approach

Stakeholders were very satisfied with the way they were always involved by the CoE both during the design and implementation of the Actions. In this regard, stakeholders believed the CoE was not imposing any Actions on them, and frequently referred to 'effective and transparent consultation processes'. Stakeholders believed that this approach supported the effectiveness of the Actions, and considered this to stand out in the international donor landscape. For instance, according to the Ministry of Education in Albania, initiatives of international actors / donors frequently adopt a top-down methodology. On the flipside of being non-imposing, EUDs and local stakeholders, for example in Albania, considered that the CoE could engage more strongly in the follow-up on outcomes.

Organisation of study visits and regional events

Participants considered study visits to other countries, e.g. those organised in the context of HF1 (on prisons) as very successful, useful and motivating for participants to engage in further capacity development; the study visit contributed to preparing the grounds for a regional Action on de-radicalisation under HF II. The study visits allowed participants to share experiences with peers from other Western Balkan countries that have similar contexts. This helped to transfer best practices and to pre-empt lessons learnt in other contexts during the implementation of the Actions. In some cases, the study visits also contributed to overcoming distances / tensions with neighbouring countries, e.g. according to the Institute for Improvement of Education of Serbia. Some stakeholders, particularly in Albania, underlined that they appreciated when regional exchanges also included perspectives of European countries not from within the Western Balkan region with best practices to share.

Synergies CoE / EU

Good coordination and cooperation between the CoE field offices and the EUDs was noted in various countries (e.g. Albania, Bosnia and Herzegovina, Montenegro, Serbia) both at strategic level and on operational matters, and was considered to be a factor driving the HF's effectiveness. Likewise, DG NEAR commented very positively on the relationship between the CoE HQ and DG NEAR. DG NEAR stakeholders provided various examples of CoE commitment contributing to the good relationship. One example was the considerable progress made in relation to the Action-level logframes and reporting. The CoE's internal development of the Project Management Methodology (PMM) was seen as an opportunity for the improvement of logframes and indicators and marked a start to joint efforts for improvement.

Relevance and visibility of topics addressed

Overall, stakeholders noted that most Actions addressed issues that were already highly visible in the Western Balkans. HF 24 (on education) in Albania was considered to be a good example: a) the issue of bullying was already visible in the media as it is globally visible; b) the government had no strategy to deal with the issue; c) the baseline study on bullying identified the extent and nature of bullying in Albanian schools, thus convincing the government of the need for action and shedding light on the specific needs, and attracting media attention that fed visibility considerably. In the end, the model was successful, as proven by a follow-up impact study, and sustainable, as the Education Ministry is rolling it out nationwide in the school year 2019/2020. Note however, that the EU decided not to support a follow-up Action on this theme under HF II. In addition, the survey provided feedback on the extent to which the HF governance arrangements / HF tools supported the effectiveness of the Action(s):

(0= not at all; 5= totally)

Weighted Average



3,8

The following paragraphs elaborate on **factors that constrained** the effectiveness of the HF:

Duration of Actions

Some Actions (e.g. HF 1 and HF 6, both on prisons) were considered to be too short. In some cases, Actions were then extended. In some cases, as with HF 24 (on education) in Albania, this was the right approach and resulted in increased

coherence and sustainability, but there were other examples where such extensions generated some uncertainty among local partners and instability among CoE staff, negatively affecting performance. This also complicated the scheduling of activities, according to stakeholders consulted. In this regard, the CoE office in Pristina noted that in some cases there was a misunderstanding between the size of the Actions and their length, and, therefore, it was difficult to properly manage both the budget and the staff. Most stakeholders regardless of type (beneficiaries, EUD, CoE, etc.) indicated that all actions should last for the whole HF duration (i.e. three years).

Fragmentation of Actions

The small-scale complimentary and concrete focus of specific Actions was considered as somewhat fragmented. This had an impact on the management of the HF, with many people involved and complex information flows. With regard to fragmentation, some stakeholders (e.g. the Ministry of Health and Social Protection of Albania) pointed out that with a smaller number of Actions, their implementation would be less challenging and would promote more inter-institutional cooperation. This was also noted by some stakeholders in Montenegro, regarding the two Actions on education (i.e. HF 20 on corruption in education, and HF 26 on education), arguing that the two Actions could have taken the form of one integrated Action. CoE feedback on this point suggested that fragmentation was largely explained with budget constraints.

Political context

The daily political developments were considered to be rather volatile in the Western Balkans, and in some cases, this affected the effectiveness of the HF. For instance, in Albania and Montenegro the opposition was (partially) boycotting the Parliament, and this hindered the adoption of some pieces of legislation related to the Actions; in Bosnia and Herzegovina, cooperation with local partners was constrained by difficulties over forming a government following the elections. Notwithstanding, CoE feedback suggested that the HF allowed for sufficient flexibility to adopt mitigation measures, ensuring the continued relevance of Actions.

Limited involvement of local experts

The CoE and EU's consideration of the status of civil servant was noted as a constraint. For instance, under the Serbian law, professors at public universities are not considered as civil servants. The EU, however, considers them as such and therefore they were not able to participate in the implementation of the Actions.¹⁹ This led to delays and additional workload. Similarly, some of the Albanian beneficiaries noted that it was not possible to hire experts working in the public administration. For instance, it was noted that the involvement of a local prosecutor in the context of HF 16 (on economic crime in Albania) would have been highly

¹⁹ Some university professors were involved in Serbia.

beneficial. In this regard, various stakeholders recommended a review of the rules to facilitate the involvement of local experts, in order to better combine the expertise of the international CoE experts and suitable local experts, including civil servants / public administration staff.

Some aspects related to experts and trainings

Stakeholders also commented on a series of issues related to the HF training activities and experts, for instance:

- Some trainings had too many participants, rendering them less effective (e.g. some of the trainings organised in the context of HF 30 on trafficking in human beings).²⁰
- Some of the experts were considered very good but too theoretical. This was for instance the view of the Ministry of Interior of Serbia with regard to training under HF 7 (on prisons and police), recommending for the trainers to involve more practitioners.²¹ Similarly, the Ministry of Education of Montenegro considered the limited involvement of experts with more professional backgrounds (e.g. teachers, school pedagogues, psychologists, etc.) to have limited the effectiveness of HF 26 (on education). Moreover, the Ministry of Education noted the need to more appropriately select the experts from local CSOs, by better defining their profiles in the calls for tender. The somewhat general nature of initial training under HF 28 (on anti-discrimination) in Albania was discussed by this Action's Steering Committee and served as a lesson learnt for the local CoE office which remedied this by conducting thorough needs assessments and involving CSOs in the design and delivery of subsequent training.
- It was also noted that in some cases the list of experts would benefit from being expanded (e.g. by the Agency for Prevention of Corruption with regard to HF 18 on economic crime in Montenegro).
- Finally, turnover of trainees was mentioned in Albania as a key factor hindering success, with avenues to remedy this including training of trainers, training mid-level staff less exposed to turnover in relation to their position than for example higher and lower level staff.

Commitment and experience of local partners

Stakeholders noted that the insufficient responsiveness of some beneficiaries sometimes caused a delay in the implementation of activities. This was particularly

²⁰ According to CSOs involved in HF 30, some trainings that were implemented had around 50 participants, while the total number should be around 20/25 to ensure training effectiveness.

²¹ With this regard the CoE HQ notes that all experts engaged, both on development of training material and delivery of training, were police officers.

valid for some of the beneficiaries in Kosovo.*²² According to the EU Office in Kosovo,*²³ insufficient commitment and inadequate compliance with the conditions of implementation that beneficiaries had agreed to, constrained the implementation of the HF. Regarding Kosovo,*²⁴ the EU Office also noted the fact that the local institutions had limited experience and capacity and this constrained implementation.

Internal communication

Some stakeholders saw further room for improvement with regard to the lines of communication within the HF, referring to what was perceived as a somewhat slow process of soliciting and receiving feedback. According to DG NEAR interviewees, lack of clarity on lines of communication was a deterrent to communication on specific issues, not because of a lack of intention but due to time constraints. DG NEAR felt that some actors were not included in important communication loops, e.g. 'geographical desks', or EUD staff, the latter being essential for follow-up on implementation, recognising that this was an EU-internal issue. DG NEAR suggested that there might be room for ad hoc direct communication between geographical desks and the CoE offices in the Western Balkans, whereas this type of link is facilitated through the EUDs as an interlocutor. While a formal link may not be warranted, informally, policy officers from some of the geographical desks felt they would benefit from, for example, informal meetings with CoE office staff during missions. CoE offices, for example in Albania, likewise were open to facilitating such a link.

Insufficient CSO engagement

Again, as discussed above, the HF was considered to have benefited from a strong involvement of CSOs. Notwithstanding, stakeholder feedback suggested some room for further improvements. Indeed, in some Actions, the limited involvement of CSOs was considered to have constrained effectiveness. CSOs were only involved in a small number of Actions, albeit in some cases their particularly effective involvement was cited by stakeholders, for example in relation to HF 28 (on anti-discrimination) and HF 16 (on economic crime) in Albania. In some countries, including in Albania, stakeholders reported some difficulties in engaging CSOs. This was explained with the lack of CSOs with adequate expertise in areas relating to the rule of law and judiciary reform.

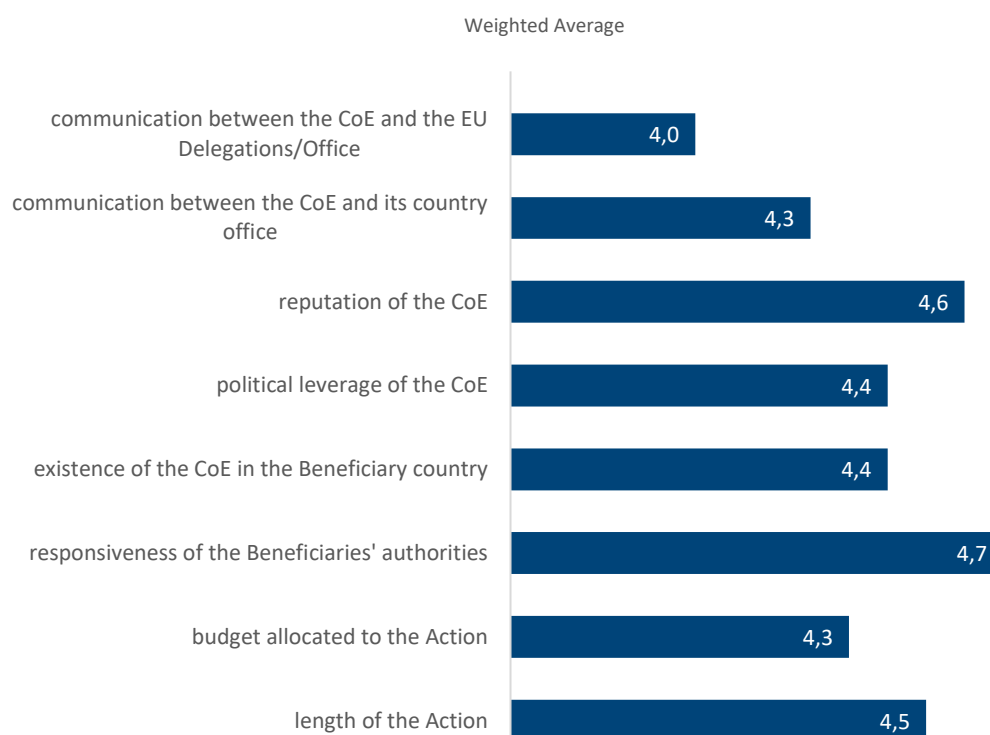
²² *This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

²³ *This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

²⁴ *This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

The following figure shows survey feedback on the importance of different factors to the effectiveness of the HF Action(s):

(0= not at all important; 5=extremely important)



Has the project design and implementation considered gender issues?

Stakeholders considered that insufficient attention was paid to gender during the design phase of the HF Phase I. This, in turn, complicated an adequate consideration of gender issues during the implementation phase.²⁵

The following figure shows survey feedback on the extent to which gender issues have been mainstreamed within the HF Action design (first bar in the figure) and implementation (second bar in the figure):

²⁵ According to some CoE project officers, this was done in an 'artificial way'.

(0= not at all; 5= extremely)

Weighted Average

3,3

Weighted Average

3,8

Similarly, various EUD stakeholders considered the limited focus on gender during the implementation of the HF a 'missed opportunity' and recommended a more systematic involvement of gender experts, as reportedly done in the context of IPA.

Other interviewees, including DG NEAR stakeholders, acknowledged gender as an important horizontal issue, but considered the HF's approach as of a rather 'declaratory' nature. DG NEAR noted structural and programmatic aspects, e.g. the absence of a coherent approach to gender mainstreaming at HF level, and the lack of human resources for overseeing that gender is taken into account in a meaningful way. DG NEAR further underlined the importance of thorough gender analysis at design stage and noted that the Descriptions of Action (DoA) only included generic information on gender (i.e. a 'standard paragraph'), and that this complicated DG NEAR's review of the DoAs from a gender perspective. Regarding gender during the implementation of the HF, DG NEAR expected the CoE to 'go beyond ensuring quotas at trainings', and for training materials to comprise a gender-specific dimension.

CoE stakeholders considered attention to gender issues an overall weakness of the HF Phase I. However, the CoE also considered awareness to have increased and expected the PMM to contribute to a stronger integration of gender issues in the context of the HF Phase II (e.g. review of Actions with a gender lens and gender analysis at the stage of designing Actions).²⁶ The CoE has also recently developed a toolkit for gender mainstreaming in development co-operation,²⁷ that provides detailed guidance on how to consider gender mainstreaming as well as the implementation of a gender dimension in co-operation activities.

²⁶ Regarding the HF Phase II, it is worth mentioning that one Action in Turkey will focus on the implementation of the Istanbul convention.

²⁷ <https://rm.coe.int/final-gender-mainstreaming-toolkit-februar-2019-public-access/1680936820>

Moreover, some CoE project officers in the field noted their limited insight into gender issues and acknowledged challenges when asked to address technical requests concerning gender coming from the CoE HQ.²⁸

In addition to that, some beneficiaries (e.g. the Ministry of Education and the Institute for Improvement of Education in Serbia) considered gender issues irrelevant to their activities. Those that did show interest in gender issues, e.g. the General Department of Prisons under the Ministry of Justice, in relation to HF 1 (on prisons) in Albania, noted they addressed gender issues themselves rather than receiving support under HF 1.

However, all Actions ensured gender balance in terms of participation in activities, e.g. when selecting training participants or panels for conferences. Actions were also mindful of gender-specific needs by adapting timing and location of training to facilitate attendance of working mothers (e.g. in Albania).

Moreover, some Actions included gender-specific outputs, for instance:

- In the context of HF 27 (on education), teachers amended their curricula and introduced gender equality, with gender equality now being taught regularly;
- Some workshops organised by the pilot schools' student parliaments under HF 26 (on education) focused on gender equality;
- HF 10 ('Fighting ill-treatment and impunity and enhancing the application of the ECtHR case-law on national level') contributed to collecting data on penal policies concerning gender-based violence;
- HF 7 (on prisons and police) included a gender assessment. The study was undertaken to provide relevant information on gender equality for the benefit of a follow-up intervention in this area under the HF Phase II;²⁹
- Gender issues have been part of the training on understanding why gender issues are relevant to the treatment of inmates under HF1 (on prisons);
- Under HF 28 (anti-discrimination), issues such as bullying of females was discussed from a gender perspective.

²⁸ This was despite the fact that some training activities on gender were organised in the CoE field offices in the context of the HF (staff received training on gender mainstreaming in projects as part of the TAPA Coordinators meeting. Additional training for HF project staff was conducted in 2019).

²⁹ It is foreseen that this pilot gender analysis can serve as an example of good practice to actions in other thematic areas and in other beneficiaries, so that similar analysis could be implemented in the first months of Phase II of the HF.

Does the monitoring mechanism include SMART indicators to measure progress towards achievement of objectives and to what extent are monitoring recommendations addressed?

Stakeholder feedback suggested that indicators at Action level were, on the whole, too focused on outputs:

The **CoE field offices** noted challenges when dealing with Action-level indicators, including: the substantial number of indicators, considering that the use of a smaller number of appropriate indicators would have been preferable, as this would facilitate verification / monitoring; indicators were too specific and in some cases not realistic and not useful to monitor progress over the long-term; most indicators were quantitative, and it was difficult to provide quantitative data, including baseline data.³⁰

CoE field offices and EUDs considered that most of the indicators were related to activities with a lack of indicators on outcomes, and, particularly, long-term term outcomes (i.e. to measure impact). Some stakeholders (e.g. CoE office in Montenegro) also noted complications with regard to the monitoring of activities. Indeed, the Actions' logframes were all very different, e.g. some were very detailed, and others were rather general, with limited harmonisation between logframes constraining monitoring at thematic or beneficiary level.

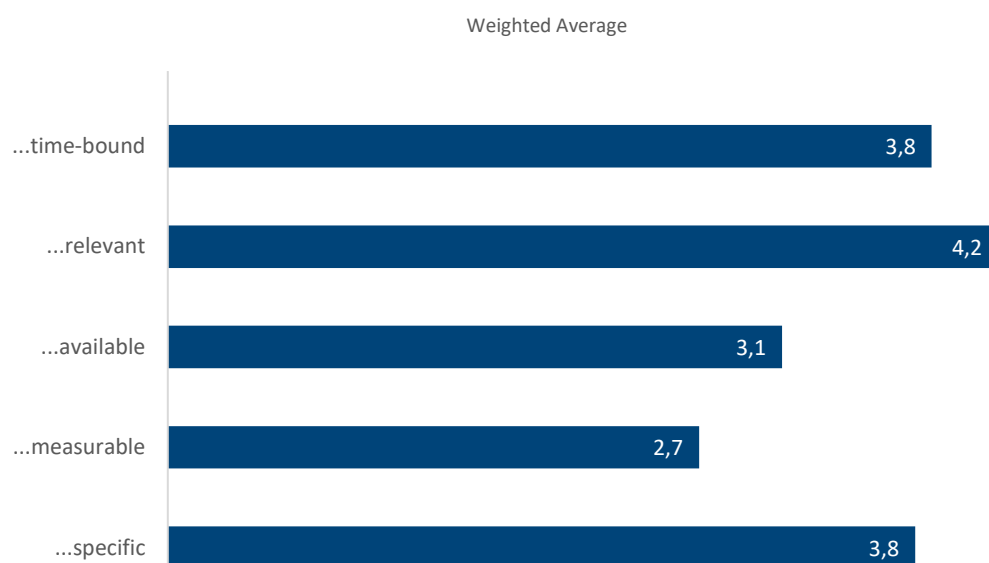
DG NEAR stakeholders in Phase I of the HF missed the use of a logframe and mentioned room for improvement in terms of how indicators were designed, and reported on. However, DG NEAR noted improvements following the ROM report (the CoE conducted training on results-based monitoring) and suggested the use of indicators might further improve courtesy of the new PMM.

CoE HQ feedback related to the monitoring mechanism was, on the whole, positive, and the majority of stakeholders considered that indicators were based on the CoE standards. Indicators were considered to be sufficiently specific and relevant, even if the Actions' outcomes were difficult to measure. Stakeholders acknowledged room for improvement, considering that indicators should be more measurable in Phase II. It was also acknowledged that progress of some Actions was very hard to measure due to the Actions' nature (e.g. Actions related to the rule of law were cited as an example since it is very difficult to design quantitative indicators in this field).

The graph below indicates to what extent survey respondents agreed with the following statement: 'the indicators of the monitoring mechanism used to measure progress towards achievement of objectives are timebound, relevant, available, measurable, specific':

³⁰ Some CoE field offices reported difficulties in collecting this information, due the limited data availability in the beneficiary countries.

(0= totally disagree; 5=totally agree)



2.3. Added value

Has the CoE put its comparative advantage and expertise into action by cross-checking of CoE monitoring recommendations and domestic accession priorities during the implementation of the HF?

The CoE was considered to be the best placed actor to implement the HF. This was related to the dynamic triangle of standards, monitoring and technical assistance, and the corresponding credibility and reputation in the Western Balkans and its long-standing relevant expertise and specific knowledge of the HF themes. Indeed, stakeholders frequently referred to the CoE as the holder of standards, and identified the three pillars of the CoE, namely standards, monitoring and technical assistance.

When stakeholders referred to further specific elements of the CoE's added value, most stakeholders emphasised the quality of the CoE's expertise and corresponding assistance delivered to the beneficiaries which, compared to CSOs or private companies, was considered much more effective and complex.

Discussing specific thematic areas, according to various stakeholders, the expertise and competence of the CoE in the domain of human rights is unquestionable and this was also considered the main motivation for the EU to collaborate with the CoE.

DG NEAR stakeholders underlined their reliance on the CoE with regard to support with the promotion of standards and their interpretation. DG NEAR stakeholders appreciated the cooperation with the CoE as the standard setter, particularly in relation to the judiciary. DG NEAR saw the CoE as being well-placed in relation to its role in the HF, and the natural choice of partner that dictates also the nature of the HF – using recommendations of the monitoring bodies and linking them with

accession priorities. DG NEAR representatives confirmed that they were regularly consulting the recommendations of relevant CoE monitoring bodies. For example, in North Macedonia, the beneficiary report by the geographical desk focuses on CoE recommendations that remain to be addressed. In Bosnia and Herzegovina, DG NEAR mentioned the utility of recommendations by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) for supporting the prison system. The European Commission for the Efficiency of Justice (CEPEJ) database and corresponding report was referred to as the 'bible' reference for work with the judiciary in Kosovo.*³¹ Whilst fewer standards were identified in the field of education, here too stakeholders identified relevant CoE guidelines, principles and recommendations.

DG NEAR stakeholders also provided some feedback on whether the added value of the CoE was sufficient reason for involving the CoE in the delivery of activities, not directly related to the thematic areas associated with the CoE's strongest thematic expertise. Examples included wider sector reforms, the upgrading of IT systems and support to enhancing ministry-internal management. In these areas it was felt that there were challenges to involving the CoE. An example provided in this regard related to prison reform and deficient prison infrastructure. According to one stakeholder at DG NEAR, training on human rights, for example, was not sufficient but should go hand-in-hand with other types of support, most notably support on enhancing infrastructure. The same point was also made by some of the beneficiaries. For instance, the Constitutional Court in Serbia appreciated the CoE support / expertise in the context of the HF, but noted that other donors (e.g. USAID) had 'better' tools and were able to quickly procure equipment such as new software. Similarly, stakeholders in Albania provided an example in relation to procurement activity. Under HF 16 (on economic crime) USAID and the CoE shared the cost of an IT solution, with the CoE covering the hardware costs and USAID the software. The hardware was provided within a sufficient timeframe to allow for proper testing and training of the staff of the High Inspectorate for the Declaration and Audit of Assets and Conflict of Interest of Albania. When it became clear that the IT solution would be costlier than could be covered by the Action, the CoE initiated exchanges between the donors, and this was highly appreciated by the beneficiary. Notwithstanding, the beneficiary also suggested that the CoE did not complete procurement as quickly as USAID. CoE feedback on this point confirmed that the CoE's added value should not be related to the procurement of goods / works.

Various beneficiaries related the CoE's added value with the CoE's more profound understanding of the overall local context / needs in comparison to other donors (e.g. USAID in Serbia). Moreover, added value was related to the efficient internal organisation of the CoE (e.g. in comparison to the OCSE in Serbia). The CoE was also

³¹ *This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

noted to be a very trustworthy partner, particularly when compared to other international actors (e.g. in comparison to the UNPD, according to the EUD to Albania).

Finally, stakeholders noted the opportunity to easily access different types of support in different thematic areas through the different CoE bodies, referring specifically to the Venice Commission, GRECO and CEPEJ. Similarly, the ECtHR was seen as a key 'mechanism' for promoting justice reform by many HF local partners.

What is the added value of cooperation being organised under the framework of the HF?

When asked about added value of cooperation being organised under the framework of the HF, stakeholders pointed to different aspects, including:

- The HF's flexibility, that allowed to introduce small changes with regard to budget, activities, introduction of new local partners / stakeholders etc. in the course of implementation. Overall, this allowed to adapt plans to real needs of the local partners. Flexibility of the Actions was considered high, particularly if compared to projects carried out under IPA;
- The HF had a positive impact on strategic relations and contributed to increasing synergies between the CoE field offices and the EUDs (this included a single interlocutor in the CoE for the EU, HF contact points in the EUDs etc.);
- The HF contributed to bringing together different departments in the CoE HQ that otherwise would be more isolated;
- The HF contributed to promoting consistency, e.g. in terms of methodology, programmatic approach, administrative issues;
- Having all Actions under the umbrella of the HF facilitated the addressing of EU recommendations (e.g. recommendations noted in EU progress reports on accession);
- Time between Action design and implementation was considered acceptably short (e.g. in comparison to IPA), according to various local partners;
- The HF, according to stakeholders interviewed at different EUDs, acted as 'a bridge' to the EC's bilateral funding.

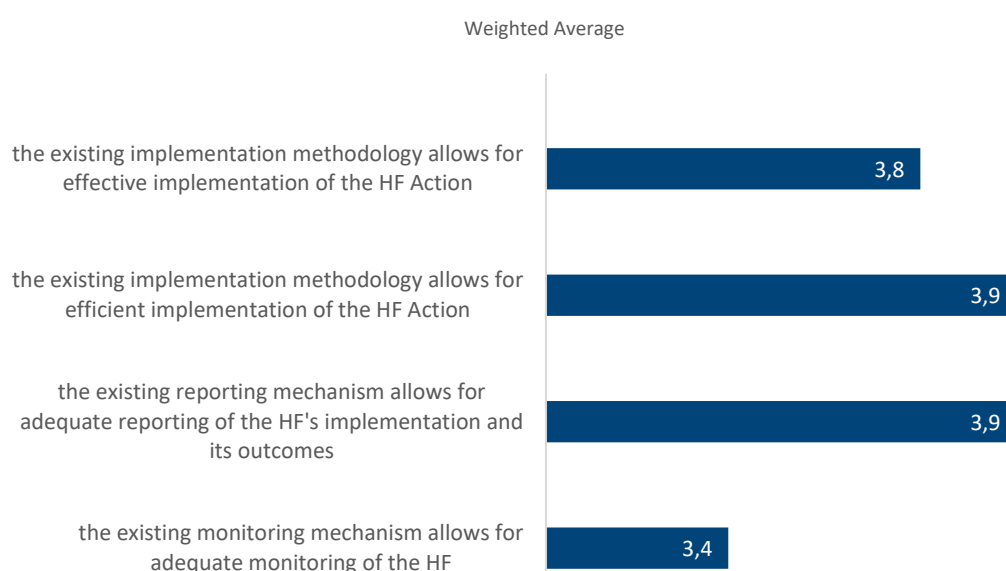
2.4. Efficiency

Does the existing implementation methodology allow for effective and efficient implementation of HF actions?

Stakeholders commented positively on the current architecture of the HF and what it allowed to achieve. All stakeholders appreciated the general HF approach, drawing on the recommendations issued by the monitoring bodies, and designing Actions in alignment with beneficiary priorities and the EU integration process.

The figure below shows the extent to which the CoE survey respondents agree with the following statements on efficiency:

(0= do not agree at all; 5=totally agree)



The HF, for its many actors and levels involved and the inherent complexity, was often portrayed as a very large, however, fully functional programme, thanks to the concerted efforts of all actors involved. For various stakeholders Phase II was proof that the programme works and meets the need it was designed to address.

At the same time, some of the DG NEAR feedback suggested that the EC lacked sufficient oversight over the programme. DG NEAR stakeholders explained this with the involvement of two large organisations, the EC and the CoE, and the funding being framed by general and special conditions, constituting two different sets of rules, and resulting in 'grey zones' that required addressing through common practices developed in the process of implementation. For Phase II, the incorporation of the themes of Freedom of Expression and Media (JUFREX) under the HF was felt to add to complexity. Notwithstanding, CoE feedback suggests that these comments might stem from misunderstandings of the contractual framework for the HF.

The different EUDs also provided positive feedback on the existing implementation methodology, which was seen as efficient, allowing the EUDs to contribute where relevant to the different Actions.

Stakeholders were particularly satisfied with the **HF Steering Committee**, both in terms of **content** and **frequency**. The three-level structure of the Steering Committees (i.e. at the Action, beneficiary and regional level) was considered to be effective. Steering Committees were also considered to be very open meetings (i.e. participants always felt free to express their views including criticism).

Steering Committees organised at Action level, presented different features depending on the beneficiary where they were organised. For instance, in Montenegro they were more informal and counted more junior-level participants, this allowing for open and frank discussions among participants. In North Macedonia and Serbia, the Steering Committees counted more senior-level representatives, and this generated commitment to results, according to stakeholders consulted.

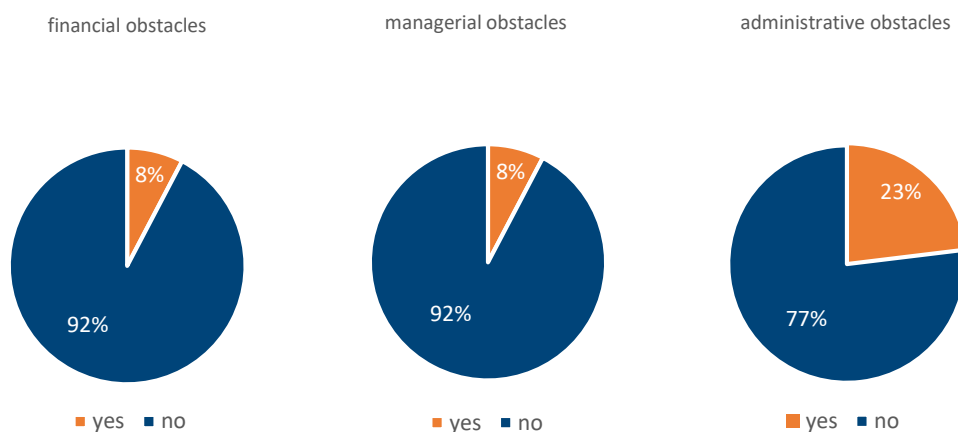
In some cases, e.g. in the context of HF 7 (on prisons and police), the last Steering Committee was organised at the CoE HQ, and the Serbian stakeholders and the EUD that attended the event considered this an excellent opportunity to learn more about the different CoE roles and functions.

Steering Committees organised at national and regional level were also considered to present an excellent opportunity to publicly take stock of HF achievements at an annual level. However, some participants (e.g. the EUD to Serbia) recommended a review of the organisation of the meetings, with a view to adopting a more dynamic format, with participants to be divided in smaller and interactive groups. Similarly, some interviewees suggested that regional events were too formal and proposed that future events should be more strategic, e.g. include different participants such as media, academia and CSOs.

The majority of stakeholders were also satisfied with the **Actions' monitoring reports**, considering them to be clear and very useful to obtain information on the state of play and, particularly, of the different activities carried out. Beyond the content of the reports, all HF stakeholders were highly satisfied with the frequency (bi-monthly and annual) of the reporting.³² However, while some interviewees (e.g. EUD to Montenegro) confirmed that they regularly received the reports, others (e.g. EUD to Serbia, some DG NEAR staff) noted that they did not receive them on a regular basis. DG NEAR suggested that there might be room for further improving the organisation and content of the reports, e.g. including clearer headlines, key outcomes and challenges.

³² Some CoE representatives noted this was quite time consuming / required a lot of effort.

The following figure shows survey feedback on obstacles during any of the HF stages (planning, implementation, reporting):



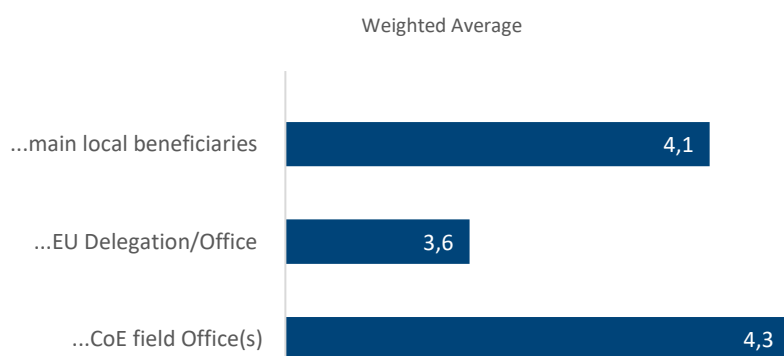
Moreover, the following figure shows survey feedback on the extent to which the identified obstacles affected the Actions' efficiency (if at all):



When asked about **factors that supported HF efficiency**, stakeholders highlighted the overall very good alignment and communication between the CoE field offices and the respective EUDs, the good coordination between the CoE HQ and CoE field offices, and the professional management of the Actions, e.g. in terms of coordination and communication with the different beneficiaries.

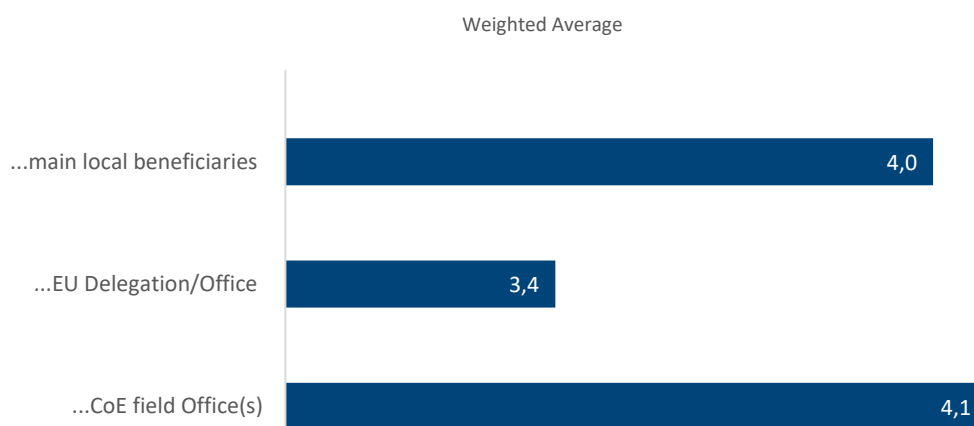
The following figure shows survey feedback on the efficiency of the existing communication mechanisms between CoE headquarters and beneficiaries, EU delegation/office, CoE field Office(s):

(0= not at all efficient; 5=extremely efficient)



The following figure shows survey feedback on coordination mechanisms:

(0= not at all efficient; 5=extremely efficient)



What should be changed in the future?

Stakeholders also noted areas for improvement with a view to HF Phase II.

Stakeholders noted several points with regard to **human resources**:

Some Actions (e.g. HF 33 on minorities in Serbia) were initially managed by the CoE HQ (i.e. there was no project officer in the field), and stakeholders considered this to have constrained the Action's efficiency (and effectiveness).

In more general terms, human resource practices at both organisations (CoE and DG NEAR) were considered to present room for improvement. Stakeholders recommended not limiting the pool of applicants for CoE staff to locals of the beneficiary concerned and residents, and, in general terms, further strengthening project management and administrative capacity among project managers. Some DG NEAR interviewees suggested that the lack of managerial capacity among CoE local

staff limited their ability to 'sell what they do' to DG NEAR, and this related to clarity of documents, and effectiveness of processes in place (noting the absence of a clear HF-level logframe). DG NEAR acknowledged internal resource constraints (referring to both, management and thematic expertise). Onboarding was considered not sufficiently effective as people have to learn for themselves as to what their specific role involves. Stakeholders voiced concerns over frequent turnover in DG NEAR and the CoE (including the former HF 'Hub' Office), especially for coordinating roles.

Notwithstanding survey feedback suggests adequate management skills at the CoE. The following figure shows survey feedback on the extent to which the respondents think their managerial skills are sufficient/adequate for managing the HF Action(s):

(0= not at all sufficient/adequate; 5= totally sufficient/adequate)

Weighted Average



Some DG NEAR interviewees considered the CoE offices' administrative capacity to be weak in comparison to that of the EUDs. To illustrate this point, DG NEAR noted the example of prison reform in Bosnia and Herzegovina, where DG NEAR wanted to support digitalisation. This implied procurement of equipment and software, and the CoE's involvement remained limited, with stakeholders in Bosnia and Herzegovina commenting on CoE capacity constraints. CoE feedback on this specific point notes that the EU only promoted the IT component during the last year of implementation, however, without providing the corresponding funding. At the same time, other stakeholders acknowledged that the CoE was not an implementing agency 'in its way of thinking and acting', and that the relationship with the CoE was different from that with the UN agencies or international CSOs that implement funds.

Other stakeholders, including the CoE office in Belgrade, believed that the HF would benefit from employing CoE office staff at more senior levels and with additional thematic capacity. Stakeholders suggested that if budget constraints prevented this from happening, this could perhaps be pursued at regional level (e.g. two senior persons coordinating the Actions under each thematic area splitting them between groups of three countries).

Stakeholders also reported areas for improvement with regard to **synergies between the different HF thematic areas**, considering that there was room for further enhancing the overall 'global vision' of the HF Phase I in the field. Similarly, it was pointed out that cross-dissemination of results between different Actions could be promoted. Indeed, a very limited number of stakeholders demonstrated awareness of what the other Actions were doing, and this limited opportunities for synergies, both between different Actions in the same beneficiary and at regional

level. CoE feedback on this point emphasises the importance of the different Steering Committee meetings, at beneficiary and regional level.

Room for improvement was also noted with regard to **CoE-internal formal communication**. Different CoE field offices noted that communication should be more efficient and more open, noting that they frequently 'felt lost' in the internal communication process, e.g. in the context of the recent preparations for the HF Phase II.

Some of the EUDs acknowledged underestimating the coordination effort of involving a large number of different EC Directorates during the design of the HF Phase I, resulting in delays in decision-making. The EUDs also noted remaining communication issues between them and the DG NEAR geographical units, recommending a less top-down structure where ideally the EUDs would have a stronger voice. This was seconded by some of the DG NEAR interviewees.

On communication, DG NEAR recommended improvements of communication within DG NEAR, and between DG NEAR and the CoE. On DG NEAR-internal communication, stakeholders indicated the need for a better platform / IT tool for sharing documents on the beneficiary level like a shared drive to replace current ad hoc solutions e.g. individual archives of documents. In this context, the example of the Western Balkans Investment Framework was noted,³³ where information on actions is shared via a dedicated IT tool. DG NEAR also recommended a tool for geographical desks, flagging contract signature dates, reviews, report deadlines among other important dates. This would be particularly helpful in the face of high turnover as well as for facilitating onboarding.

Regarding **budget**, it was noted that for some Actions there were cases of underspent budget and that in a few cases CoE field staff acknowledged a lack of experience of dealing with budget underspents. Some CoE field offices suggested that there might be room for further enhancing guidance on how to manage / spend the budget, and / or to provide relevant training on this. In more general terms, DG NEAR and the CoE HQ noted room for improvement with regard to dealing with unspent budget.

Regarding the adequacy of the budget allocated to the HF Actions, the survey respondents' feedback was positive, as shown in the figure below:

³³ <https://www.wbif.eu/>

(0= not at all sufficient; 5= totally sufficient)

Weighted average



Moreover, in relation to budget and efficiency, DG NEAR interviewees voiced different views on whether funding the Venice Commission's work through the ECM constituted double funding. While some stakeholders saw this as paying the Venice Commission, an independent advisory body, to fulfil their existing mandate to reply to requests on advice (using IPA funds), others saw this as particularly useful for systematic support that due to its need-based nature was particularly appreciated by the beneficiaries. CoE feedback suggests the possible presence of a misunderstanding as the Venice Commission input is either funded under the ECM or by the CoE, leaving no room for double funding.

The survey respondents rated the extent to which the HF Action(s) have been cost effective as follows:

(0= not at all; 5= extremely)

Weighted Average



The majority of interviewees commended the **HF for its flexibility**, with positive implications for relevance and effectiveness, however, some stakeholders suggested that at times there might be a need for more rigidity, i.e. no longer accommodating last-minute requests from local partners to address lack of foresight on their end rather than following standardised planning procedures.

Finally, a series of minor issues were also highlighted. The CoE field offices suggested further room for improving the **PMM**, recommending 'lighter' procedures for Actions of a smaller size / limited duration. Moreover, as already mentioned above with regard to the evaluation criterion of effectiveness, stakeholders agreed that Action duration in some cases was too short (e.g. HF 6 initial duration). This generated some uncertainty among local partners and instability among CoE staff, affecting the overall performance of the Action and complicating the scheduling of activities.

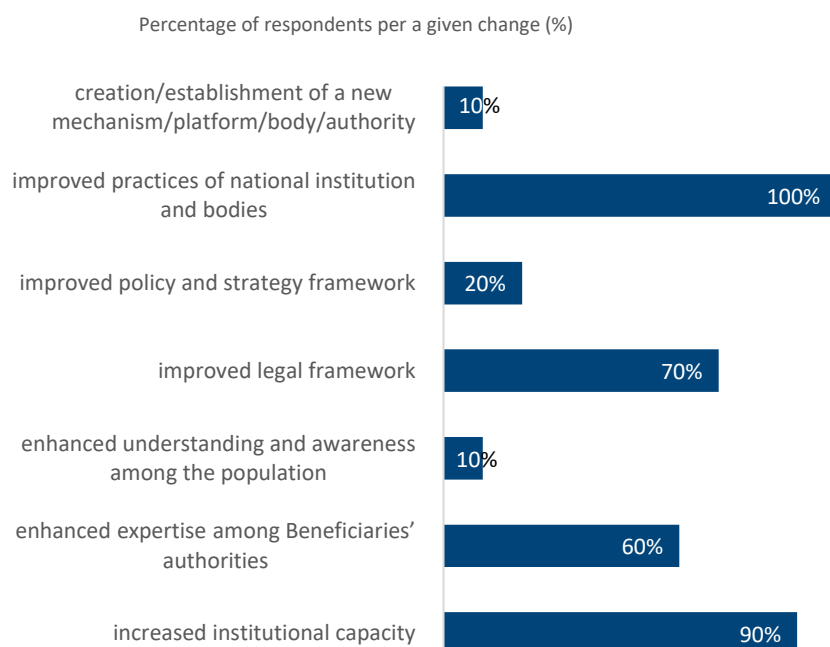
2.5. Impact

What have been the medium-long term outcomes of the interventions?

According to the majority of stakeholders, the overall performance of the HF in terms of impact (i.e. achievements of medium / long-term outcomes) was positive.³⁴ It was also clearly understood that the HF could not be held to account for impact, considering the wider political context in the Western Balkans; HF Actions were in a position to contribute to medium- and long-term outcomes, however, the latter could not be attributed exclusively to the HF.

However, most stakeholders were not able to extensively comment on the overall impact of the HF, and reported difficulties linked with assessing the exact impact of the different Actions at this early stage. Indeed, stakeholders tended to associate impact with the production of normative and institutional changes, noting that these would only materialise within a few years' time after the completion of the Actions. Therefore, the fact that some Actions had not yet triggered such change was viewed by the stakeholders as quite normal. In addition, stakeholders noted that some of the Actions will continue in the HF Phase II, precisely because the reform process is yet to be completed.

Survey respondents were asked to choose up to three most relevant changes generated/fostered by the outcome of the HF Action, with their choice shown in the figure below:



³⁴ Namely beneficiaries' enhanced compliance with CoE standards and enlargement requirements.

Stakeholders generally felt positive about the HF's achievements to date, agreeing that Actions had prepared the ground for future reforms and changes, and believed there were several indicators confirming that the HF was on track in terms of achieving long-term objectives.³⁵

For instance, DG NEAR stakeholders confirmed overall improvements of fundamental and minority rights in the Western Balkans; improvements on the policy side in those areas that had been targeted by HF interventions; an understanding of the implementing partners in the beneficiary of the importance of the specific fields targeted by the HF and of taking into account the recommendations of the monitoring bodies. They also noted the slow pace of progress when it comes to reform of the judiciary and standards-related work on corruption and human rights.

Specific HF impacts noted by DG NEAR included the approval of the law on political parties in Albania (HF 16 on economic crime in Albania); the courts in Montenegro dealing with human rights more frequently referring to Strasbourg case law (HF 10 on ill-treatment and Application ECtHR case-law in Montenegro); curbing corruption in higher education in Montenegro (HF 20); and fostering a more democratic school culture (HF 26),³⁶ which yielded expected results in terms of new legislation.

Finally, some stakeholders believed there was a need to evaluate the different training and capacity building activities to better understand their impact.³⁷ Similarly, some stakeholders noted a need for further improving the monitoring of outcomes through institutionalisation of monitoring mechanisms in the countries. In this context it should be noted that a substantial number of Actions was subject to external evaluation, looking inter alia at outcomes of capacity development.

When discussing impact of specific Actions, stakeholders also highlighted the following specific outcomes:

³⁵ E.g. the increased number of prosecutors who are aware of the European Convention on Human Rights in Serbia (HF 11).

³⁶ With regard to these two Actions focused on education in Montenegro (HF 20, HF 26), the CoE office in the beneficiary noted that is overall complicate to monitor their impact.

³⁷ Some stakeholders (e.g. the EUD to Serbia) noted that some training activities were not evaluated (e.g. in the context of HF 11).

Table 2 – Examples of outcomes

Action	Beneficiary	Outcome
HF 18	Montenegro	Introduction of a new code of conduct in the judicial branch (the judicial branch is now subject to specific rules on conflicts of interest and ethics).
HF 18	Montenegro	Adoption of different legislation and due diligence on terrorism financing: the beneficiary is now aware of different international standards and it is very likely these will be introduced in the area of terrorism financing. The beneficiary has also established a new sanctioning mechanism.
HF 20	Montenegro	Adoption of a new law on corruption.
HF 16	Albania	Establishment of a new electronic system for Asset Declarations; Changes in the law on political party campaign financing, in accordance with GRECO recommendations; The law on the prevention of money laundering was reviewed and amended in line with Moneyval monitoring recommendations.
HF 24	Albania	Bullying was identified in the law on the rights of protection of children in 2017 and also integrated in the national agenda for child rights 2017-2020.
HF 19	Kosovo* ³⁸	Development of a new code of ethics for professors as well as for University management.
HF 30	Serbia	Introduction of specific measures for compensation of victims in the Action Plan of the Ministry of Interior; Establishment of the Anti-trafficking Office within the Ministry of Interior.

³⁸ *This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

2.6. Sustainability

Has the CoE enhanced in a sustainable way the implementation of reforms and improved the capacity development in the HF Beneficiaries?

Feedback on sustainability presents a mixed picture. While there is evidence that some Actions are allowing for a sustainable continuation of outputs and outcomes beyond the HF support, stakeholders pointed to uncertainties mainly linked to reliance on **political will / political volatility** in the Western Balkans .

Sustainability also depended on the **level of commitment / involvement** of local partners, with those partners that were more engaged during the implementation of the Actions being more likely to take over upon the completion of the Actions. Therefore, sustainability differed from one Action to another, even within the same beneficiary. For instance, in Bosnia and Herzegovina, HF 2 (on prisons and police) was considered sustainable, because of the strong commitment of the Ministry of Justice, while sustainability of HF 22 (Strengthening the Human Rights Ombudsman to fight discrimination) was considered to be constrained by the lack of political commitment (according to the CoE office in Bosnia and Herzegovina) of the local Ombudsman Office to follow up. More specifically, it was explained that trainings provided at technical level to the staff of the Ombudsman Office were successful, but then the decision to adopt the proposed methodology would be taken at the political level, and the CoE office in Bosnia and Herzegovina was, at the time of drafting this report in September, 2019 unsure whether this would happen.³⁹

DG NEAR stakeholders believed that, given the focus of the HF Actions on training, sustainability would relate to its take-up by beneficiaries. In that respect, stakeholders mentioned that courts were using Strasbourg court jurisprudence. Actions on anti-corruption and education were considered to have more limited prospects of sustainability. With regard to the latter, HF 24 in Albania on bullying was an exception with strong performance in terms of sustainability. Stakeholders noted the importance of keeping up the pressure in these areas for sustaining results which can be easily reversed. In this context, the leverage of the EC via the enlargement process was emphasised. The Venice Commission's work through the ECM was also noted as important for leverage.

Stakeholders at DG NEAR also mentioned room for improvement on follow-up and integration with IPA projects through additional platforms for CoE experts and DG NEAR staff to pass on guidance and advice on how to further advance on specific topics, and ensure that documents produced are integrated in the daily work of the

³⁹ Lack of political willingness to follow up is also noted by the EUD to Montenegro with regard to the Agency for the Prevention of Corruption Montenegro, that was involved in HF 18.

institutions concerned. CoE feedback on this point confirms that different initiatives are underway to promote these exchanges.

Some interviewees noted that engagement was more problematic in countries with a high 'density' of donors, with Kosovo*⁴⁰ cited frequently as an example. A way to deal with this environment-related issue was, according to DG NEAR, to be stricter and more resolute in pulling out funding in face of insufficient political will. Similarly, the EUD to Serbia suggested that inviting local partners to participate in the Actions with an economic contribution might contribute to their commitment to take over, however, CoE feedback on this point suggested that this would not be in accordance with CoE approaches to capacity development.

According to other interviewees, including the EUD to Montenegro, in order to improve sustainability it was necessary to better understand in advance if partners intended to take over; otherwise this might open room for identifying alternative partners from the beginning, according to the EUD to Montenegro.⁴¹ For instance, the EUD to Montenegro, perceived the prison administration in Montenegro (HF 6 on prisons) as a partner whose level of engagement could have been higher, and considered that this might have limited sustainability. Notwithstanding, CoE HQ feedback on this point suggests the overall good level of commitment of the prison administration in HF 6, noting that the partner had also continued some activities (e.g. cascade training sessions) during the gap between HF I and HF II.

Another factor that was frequently mentioned was the duration and number of the HF Actions. On these topics, stakeholders (e.g. the CoE in Albania) believed that sustainability would have benefited from the HF focusing on fewer Actions, extended in time, and 'helping the authorities catch the fish not providing them the fish'. Staff turnover in local institutions was also frequently noted as one of the problems (e.g. in Albania).

Most stakeholders acknowledged that the most sustainable way for the implementation of reforms was the adoption of new legislation or amendments to existing laws, but only few Actions triggered legislative change.⁴² In this context,

⁴⁰ *This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

⁴¹ Similarly to what it happened in the above-mentioned HF 22 (on anti-discrimination) in Bosnia and Herzegovina, where, since it resulted complicate for the local CoE office to work with the local Ombudsman Office, it was decided to go beyond the scope of the Action and to include new beneficiaries (e.g. judges and the Agency for Gender Equality). However, in other cases, it might be more complicate to find alternative partners. Suitable alternative partners might also do not exist, in case of very specific topics.

⁴² However, others (e.g. the CoE office in Albania) noted that there is a need to go beyond that and provide means in place to monitor the effective implementation of what was adopted. For instance, regarding HF31 and the Minorities Law, the law is not implemented and the state

stakeholders underlined the need to continue their efforts and believed the HF Phase II would ensure sustainability.

Sustainability of the Actions appeared to be a common challenge for various international actors / donors active in the Western Balkans. For instance, OSCE representatives noted difficulties in achieving sustainability in the context of their interventions.

Looking at specific Actions, there were some cases where sustainability might need to be verified at a later stage. Various stakeholders considered that at the current stage there was uncertainty as to who was really making use of what was learned / acquired during the HF capacity development activities. For instance, regarding HF 11 (on mutual assistance) in Serbia, it was noted that sustainability depended on what the real capacity of the local Judicial Academy will be, with the EUD and the Constitutional Court expressing some doubts and noting that it would be useful to verify this in the coming months. Similarly, regarding HF 7 (on prisons) in Serbia, it was noted that the sustainability of the adopted individual treatment plans might depend on the managerial skills of each hospital. Notwithstanding, the CoE noted that the Ministry of Interior had included the new training curricula in mandatory annual education. Also, the lack of a proper mechanism to ensure that teachers will really apply what they learned in the context of HF 26 (on education), was noted by the CoE field office in Montenegro. The field office considered that several training activities were implemented in the context of the Action, but that there was uncertainty as to how to verify outcomes in the short run. Finally, speaking about HF 1 (on prisons) in Albania, the General Department of Prisons noted that trainees were delivering cascade trainings for staff at the regional level, but it remained challenging for the institution to measure outcomes in terms of trainees really improving their services. As noted by a CoE field office representative in Albania, one would need to ask the prisoners to find this out. The need to consult final beneficiaries as opposed to intermediaries frequently came up in the interviews in Albania.

Moreover, a common comment was related to the involvement of CSOs in the HF Phase I, with most stakeholders considering that additional CSO involvement would contribute to the overall HF sustainability. Involving more regularly the local universities in the HF capacity development activities was also noted as an element that would reinforce overall sustainability. Indeed, the limited involvement of local experts (e.g. academics) was noted by various stakeholders as a factor limiting sustainability.

Talking about risks related to the sustainability of the HF, some stakeholders, including the CoE office in Serbia, felt that these risks were not identified properly during the design phase, and this made it challenging to deal with them during the

minority committee not functioning – leaving a long way ahead to impact, according to the Commissioner for Protection from Discrimination.

implementation of the HF. ODGP feedback on this point confirmed that the PMM was now addressing sustainability issues systematically.

However, during stakeholder consultations, various promising elements / indicators of sustainability were noted regarding specific Actions. Some of the examples are included in the following table to illustrate the discussion.

Table 3 – Sustainability elements / indicators

Action	Beneficiary	Sustainability elements / indicators
HF 11	Serbia	The Public Prosecutor’s Office reported that the participants of the European Programme for Human Rights Education for Legal Professionals (HELP) were following up, continuing to consult the platform and were in continuous exchange among themselves.
HF 33	Serbia	The report on the implementation of the Action Plan for the realisation of the rights of national minorities (that was presented by two local consultants to relevant stakeholders on 18 March 2019) will be used by the authorities.
HF 27	Serbia	The Ministry of Education noted: <ul style="list-style-type: none"> • Schools’ good practices that were collected are now shared and published on the website of the Ministry; • Schools have successfully amended their curricula and extra-curricular activities.
HF 7	Serbia	The Ministry of Justice pointed out that the Serbian Training Centre included the four OBPs, to support reintegration of prisoners after release, in its official curriculum and will therefore continue provide training on this; <p>The Ministry of Interior noted that the Action triggered institutional changes with the decision of the Ministry of Interior to revive its Commission for the Prevention of Ill-Treatment and Torture by Police Staff.</p>

Action	Beneficiary	Sustainability elements / indicators
HF 30	Serbia	The Ministry of Labour, Employment, Veteran and Social Affairs noted that the material produced during the Action is being regularly distributed among staff of the Ministry and relevant stakeholders (e.g. the guide for labour inspectors for the identification of victims of labour exploitation).
HF 6	Montenegro	Both police and prison authorities have undertaken the continuation of the cascade trainings within the transition period between the first and the second phase of the HF.
HF 20	Montenegro	The Law on Academic Integrity was adopted; The University of Montenegro obtained the certification of academic integrity for the institution by the Swiss International Institute for Research and Action on Academic Fraud and Plagiarism (IRAFPA) a leading European ethics and anti-plagiarism educational institute affiliated to Geneva University (Uni ME).
HF 1	Albania	Stakeholders confirmed that the documents produced under HF 1 are contributing to the day-to-day work of the institution and that the training materials will be used in the second phase.
HF 16	Albania	The General Directorate for the Prevention of Money Laundering under the Ministry of Finance noted that the legislation that was changed is something that will define its work and the way they will operate.
HF 24	Albania	The Ministry of Educations confirmed that it will disseminate project outputs amongst schools.

Has the Horizontal Facility had different outcomes for men and women?

The evaluation considers that in most of the Actions, the outcomes achieved were the same for women and men. This was also confirmed by the gender specialists at DG NEAR, who could not provide any good case example where gender had been streamlined in an Action with corresponding disaggregated outcomes worth mentioning.

2.7. Visibility

Has the HF been visible during the implementation of its action? Were citizens, beneficiaries and domestic stakeholders sufficiently updated on the outcomes and benefits of the actions?

Stakeholders considered that there was substantial room for enhancing the visibility of the HF.

CoE stakeholders recognised that the way they dealt with visibility was not effective. A regional communication officer only joined the CoE in October 2018, based at the CoE office in Belgrade but covering the entire region, when some Actions had already been concluded. Before that, visibility depended to a significant extent on the individual capacity and time resources of the specific CoE project officers in charge of the different Actions, with some support by a communication officer based in ODGP.⁴³ CoE feedback on this point suggests that there have been improvements, e.g. the staff in the offices is increasingly asking for advice on communication issues.

CoE stakeholders also noted visibility constraints with regard to the HF website, where news related to the TAPAs' activities were regularly published. In some cases (e.g. in Montenegro and Albania) communication was also promoted by the establishment of dedicated pages on Facebook and the use of other social media. The EUD in Albania considered the CoE to have too rigid rules on communication, constraining autonomy at the level of the field office. The specific example brought up was that in the understanding of the EUD representative, CoE offices could not set up their own Twitter account, and had to have all communication approved by HQ and this could act as a factor limiting communication rather than promoting it.

However, visibility also depended on the specific Action and activities. For example, more technical activities presented a challenge in terms of visibility (e.g. Actions on rule of law). On the other hand, the Actions related to education or anti-discrimination (e.g. HF 24 and HF 28 in Albania) rendered themselves more readily to dissemination, and were therefore more visible. It was further acknowledged that even though the

⁴³ Most of the CoE project officers had no capacities to implement the recommendations included in the communication guidelines, according to the HF communication officer.

Actions were covered by the media providing a certain level of visibility of the HF, the scope of this was limited by the level of interest on the side of the readers of these news. Another problem was that some Actions had been promoted mostly by the local media whose coverage had decreased due to a lower buy-in that such a coverage provides.⁴⁴ There are other topics such as corruption cases, political events, etc. that are more appealing for the readers and provide a more important buy-in for the media outlets. This further impeded public awareness about the Actions and therefore the visibility of the HF.

Stakeholders underlined the need to better promote the HF and further increase its visibility, considering the communication guidelines they received to be too 'generic' and 'vague'.⁴⁵ Notwithstanding, ODGP feedback on this point confirmed that training on communication and visibility has been conducted in all the CoE Offices in the Western Balkans by the Senior Communication Project Officer in the course of implementation of HF I, and that the HF communication guidelines had been revised several times during the HF I implementation to make them more concrete and practical.⁴⁶

Stakeholders also noted difficulties with regard to the naming of 'Horizontal Facility', further exacerbated by translation difficulties. The name 'Horizontal Facility' does not render itself easily to triggering citizen interest. Perhaps tellingly, in Albania, an interviewee directly benefiting from the HF had the name written down on paper during the interview to be able to refer to it during the conversation. ODGP feedback on this point suggests that under HF II a slogan has been designed to enhance communication.

Moreover, the visual identity of the HF was seen by many stakeholders as difficult to understand and stakeholders recommended simplifying the language used in visibility materials to render the HF more visible for ordinary citizens. In addition, CoE field office staff noted the importance of differentiating between the HF, which is difficult to understand and likewise to communicate, and its outputs and outcomes, suggesting that the latter lend themselves more easily to grasp and represent.

Beyond the specific Actions, stakeholders considered the organisation of the Steering Committees at national level to enhance overall HF visibility.

⁴⁴ Regarding relations with local media feedback is different. For instance, relations with local media were challenging in Serbia while they were easier in Bosnia and Herzegovina.

⁴⁵ Apart from that, it is worth mentioning that some CoE project officers in the field offices noted that they had never received the HF Phase I communication guidelines.

⁴⁶ Communication guidelines were also regularly updated to be in line with the EU communication and visibility requirements in EU financed external actions from 2018.

Stakeholder feedback was mixed in relation to visibility vis-à-vis citizens and beneficiaries. In a majority of cases, the beneficiaries were informed about the outcomes as well as benefits on a regular basis. On the other hand, the awareness of the ordinary citizens was considered to present room for improvement, despite CoE efforts to promote the HF in local languages (e.g. website, social media).

The CoE Office in Pristina noted that in some cases it was difficult for the local stakeholders to fully understand the differences between support provided under the HF and support provided under IPA.

In relation to visibility, DG NEAR stakeholders noted some shortcomings relating to the CoE field offices. DG NEAR representatives noted compliance with EU visibility requirements as an area of 'concern'. DG Near provided the example of the EU Charter on local / regional languages that was printed with HF funds. However, the EU flag was added on the back page rather than the front page, thus not complying with the visibility requirements.⁴⁷ Similarly, DG NEAR noted examples of HF-supported events not complying fully with EU visibility requirements.

Beyond visual aspects, DG NEAR representatives noted a need to have 'more clarity on the message' to ultimately 'touch citizens' and get across what the CoE and the EU are working on in a given beneficiary. DG NEAR recommended being more 'human', 'organic' and 'creative' in the approach to visibility, for example, by engaging more strongly with local media and communicating through the channels and voices of the countries themselves. At the same time, stakeholders acknowledged visibility as a general challenge for the EU.

Notwithstanding, several stakeholders reported improvements related to visibility and communication during the last part of Phase I, and explained this with the different activities that took place to promote HF visibility and communication, including specific training delivered by the HF Communication Officer, with participation of EUD experts, to HF staff in CoE offices; the development of CoE Office communication plans in three out of six HF beneficiaries; the production of videos on the activities and results of the Actions (e.g. for HF 9 on human rights and ill-treatment in North Macedonia; and for HF 14 on accountability of the judicial system in Montenegro); and, particularly, by contributions of the recently appointed HF communication officer.⁴⁸ However, other EUD stakeholders (North Macedonia,

⁴⁷ ODGP feedback clarified that the incident related to Bosnia and Herzegovina, where the project officer was instructed to use the new logo with a text "translation co-funded by the EU", as it was agreed between EU and CoE between December 2018 – March 2019 (final e-mail correspondence on agreed visibility modality for translation of CoE documents was exchanged on 8 March 2019). All these details have been put into the new HF II Communication Guidelines and are clearly defined to avoid any misunderstandings.

⁴⁸ The HF communication officer referred that specific communication plans for each HF II Actions are under preparation and that the budget for communication in HF II will be higher.

Kosovo*⁴⁹) recommended hiring an external professional provider to enhance the visibility of the HF. ODGP feedback confirms that under HF I this had been tested in Albania without success, and in Montenegro with a certain degree of success. Under HF II a part-time communication officer has been recruited, based in Tirana and to cover Albania, Kosovo*⁵⁰ and partially North Macedonia.

⁴⁹ *This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

⁵⁰ *This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

3. Recommendations

Based on the findings, the following paragraphs briefly outline a set of recommendations. This is organised under five headings:

- Promoting exchanges between / involvement of relevant actors;
- Enhance Action design / promote synergies;
- Communicate;
- Measure outcomes;
- Other.

Recommendations under the heading 'Measure outcomes' aim to address the fourth objective of this evaluation, namely: 'To provide conclusions and in-depth recommendations on how to further improve the performance of the Horizontal Facility with a view to the Phase II and on how to develop for the Phase II a proper performance assessment mechanism at the overall Horizontal Facility level (e.g. monitoring and evaluation methodology and intervention logic and indicators at facility and action level)'.

Promoting exchanges between / involvement of relevant actors

Review the format of the Steering Committees at national and regional levels. Whilst stakeholders appreciated the format and organisation of Steering Committees at the Action level, it was also considered that there might be room for improvement for the Steering Committees at the national and regional levels. The latter were perceived as somewhat formal and not allowing for sufficient space to exchange good practices, and to exchange ideas for future activities and developments among peers. We therefore recommend structuring these events to allow for more interaction between participants.

Further CSO involvement. Stakeholders saw room for further enhancing the involvement of CSOs. When CSOs were involved in specific Actions, the evaluation noted increased effectiveness as well as benefits for the sustainability and visibility of the HF. In this light, it is suggested to involve CSOs more frequently and more in-depth during the HF Phase II.

Contemplate involving more local experts. Stakeholders suggested reviewing the HF rules in order to involve more local experts, considering that this would benefit both HF effectiveness and sustainability and it might also support the HF visibility.

Ensure staff from the beginning in the field. A few Actions were initially managed by the CoE HQ (i.e. there was no project officer in the field from the beginning). Qualitative feedback clearly suggested this had a negative impact on both effectiveness and efficiency.

Foster exchanges at regional level. Some local partners were not aware of how their peers were dealing with similar challenges in other countries. For instance, the Ministry of Justice of Montenegro is aiming to develop rehabilitation programmes for prisoners and was not aware that similar interventions were developed in Serbia in the context of HF 7. In this context, it is suggested to further promote exchanges among peers based in different countries.

Enhance Action design / promote synergies

Alignment of priorities and preparatory work. Some stakeholders noted room for further alignment between EU and CoE priorities. Even if needs assessment visits were conducted in the context of various Actions, some concrete examples to illustrate this need were provided with regard to Serbia and Bosnia and Herzegovina. Stakeholders suggested this had a negative impact on the HF relevance (in the case of Serbia) and on the HF efficiency (in the case of Bosnia and Herzegovina). An idea to deal with this could be to dedicate additional resources to scoping/assessment. In the case of Albania some misalignment was noted between the CoE HQ and the CoE office regarding the number of actions (7 Actions), i.e. the CoE office saw room for more integrated and less actions.

Reconsider the duration of Actions. Some Actions were comparatively short. The evaluation considers that in these cases there was some uncertainty among local partners and instability among CoE staff, that negatively affected the overall performance of the Actions. Also, qualitative feedback indicates that had the actual duration of the Actions been known from the beginning, planning and implementation would have been significantly facilitated. With a view to the future, it is suggested that the Actions last for the entire duration of the HF.

Review the number of Actions to reduce fragmentation. At beneficiary level, stakeholders (i.e. the CoE field offices and some EUDs) were almost unanimous in recommending more focus (less fragmentation) and noted fragmentation had a negative impact on effectiveness and efficiency of the Actions. For instance, it was considered that having merged similar Actions, like those focused on education, would have allowed to have a higher budget and therefore better recruitment.

Increase synergies between HF themes and different Actions. Stakeholders involved in only one Action had very limited knowledge of the different HF thematic areas / HF Actions, even within the same beneficiary. These limited connections were perceived as missed opportunities for synergies. It might be useful to intensify efforts to increase linkages both between different Actions in the same beneficiary and at

regional level, e.g. by institutionalising exchanges.⁵¹ Cross-dissemination of results within different Actions could also be fostered, e.g. by creating specific mailing lists. An additional measure suggested in this respect was engaging some actors, for example CSOs, horizontally rather than limiting their involvement to specific Actions.

Maintain flexibility in Phase II. Flexibility was one of the main features of the HF Phase I. Whilst some stakeholders regretted the need to frequently accommodate last minute requests from beneficiaries, flexibility clearly had a positive effect on relevance and effectiveness.

Communicate

Improve the distribution of monitoring reports. The Actions' bi-monthly reports were considered to be clear and to include adequate information on the state of play and particularly on the activities carried out. However, various stakeholders (e.g. DG NEAR and some EUDs) noted that they did not receive them systematically.⁵²

Harmonise the 'HF language'. Various internal key stakeholders do not use the 'HF language'. For instance, they indifferently refer to beneficiaries or countries and they often interchange the words partners and beneficiaries or refer to projects / TAPAs instead of Actions, this leading to misunderstandings / lack of clarity.

Improve internal communication. Stakeholders noted room to improve communication with HF stakeholders and with beneficiaries. Qualitative feedback suggested that there was room for further enhancing internal communication between the different EUDs and DG NEAR; for instance, some stakeholders noted that the information they received from the EUDs was not the same as what they received from DG NEAR. Stakeholders also noted the need to receive clear guidance on internal communication regarding the continuity of Actions under HF Phase II.

Regularly check visibility and external communication. Stakeholders considered the HF visibility and external communication to show some room for improvement. Some stakeholders reported progress at the time of conducting this evaluation and related this to the different measures undertaken during Phase I, including the recent appointment of the new HF communication officer. However, other stakeholders recommended additional efforts, e.g. to consider recruiting an external professional communication specialist to support the HF communication (e.g. to deal with media, organise events, produce videos etc.). It is recommended

⁵¹ For instance, regarding ways to increase synergies between different Actions in the same beneficiary, the CoE project officers working on different Actions started to organise informal meetings to update themselves on the HF activities and progresses. These meetings could perhaps take place more formally / be institutionalised.

⁵² Feedback on this is mixed also from people working in the same EUD. For instance, some interviewees at the EUDs in Serbia and Montenegro confirmed the regular reception of the reports, while others noted they did get them on regular basis.

to review the level of HF visibility and the effectiveness of the HF external communication on a regular basis to decide if any further structural change is required.

Measure outcomes

Review logframe at the HF level. The CoE has dedicated substantial efforts to develop a logframe for the HF Phase II and DG NEAR provided relevant inputs. In the view of the evaluators, the logframe in its current version appears adequate. Notwithstanding, it is recommended to review the logframe some three to six months into the implementation of Phase II (following the completion of needs assessment / inception phases for the Phase II Actions), to introduce relevant revisions on the basis of experience, including baselines and targets for indicators (and a review of the continuing validity of the indicators). It is also recommended to conduct six-monthly reviews of the logframe throughout the entire duration of Phase II, with the reviews involving relevant CoE and DG NEAR stakeholders but also the HF Beneficiary Co-ordinators. Moreover, it is recommended to move from an approach of conducting final evaluations at the HF level to an ongoing evaluation approach. The evaluation approach should consider the integration of innovative evaluation methods with a focus on the impact and outcome levels, most notably 'outcome harvesting'.⁵³

Harmonise log-frames and assessment reports at Action level. Some stakeholders noted that the Actions' logframes were all very different, e.g. some were very detailed and others were rather general, with limited harmonisation between logframes constraining monitoring at thematic or beneficiary level. Similarly, some assessment reports were found quite extensive (e.g. HF 7 assessment report) while others (e.g. HF 20 assessment report) were quite short. Promoting homogeneity of

⁵³ 'Outcome Harvesting collects ("harvests") evidence of what has changed ("outcomes") and, then, working backwards, determines whether and how an intervention has contributed to these changes. Outcome Harvesting has proven to be especially useful in complex situations when it is not possible to define concretely most of what an intervention aims to achieve, or even, what specific actions will be taken over a multi-year period'. The approach can help decision makers or the harvest users to understand the process of change and the role that outcomes played in producing the change. The main focus of the approach lies on outcomes rather than activities, which makes it most suitable for identifying and analysing effects rather than implementation. Harvesters identify and define 'outcome descriptions' based on documentary research and interviews (also known as outcome statements). These descriptions consist of two parts, the change per se and the way that the intervention contributed to it. The described changes need to be observable and verifiable. Independent individuals who are well informed about the outcomes are then consulted to substantiate the findings. To assess the findings, an analysis concerning the changes that the activities have brought about is conducted. See Wilson-Grau, R., & Britt, H. (2013), and Wilson-Grau, R. (2019) and http://www.betterevaluation.org/en/plan/approach/outcome_harvesting

assessment reports at Action level would facilitate monitoring and assessment during HF Phase II.

Review the indicators to measure performance at the Action level.

Stakeholders noted some areas for improvement regarding indicators, including the possibility to make use of a smaller number of indicators, facilitating the corresponding data collection / monitoring. In addition to that, it was noted that indicators were too focused on outputs, whilst a concrete set of indicators to take stock of progress towards achievement of expected outcomes was lacking. In this light, it is suggested to review the set of indicators, particularly those used to measure the achievement of medium and long-term outcomes. In this context, specific attention should be paid to indicators on gender mainstreaming.

Improve monitoring system. For sustainability and coherence, monitoring is required to track progress or lack thereof and hold beneficiaries accountable. Ideally, this monitoring could come in the form of a system that becomes institutionalised as this would contribute to sustainability. Also, most stakeholders expected the CoE to systematically follow up on the results by evaluating Actions at beneficiary level. A good practice case in this sense was the follow-up impact study on Action HF 24, which was cited by many stakeholders as a good practice. Moreover, there is a need for baseline studies to strengthen the data collection locally and to better show results, and this can draw on existing experience, e.g. the regional Action on Freedom of Expression and Freedom of the Media in South East Europe (JUFREX 2).

Training on PMM. Most stakeholders considered the new PMM to be very useful, including in terms of leading to improved logframes and indicators. The PMM was also expected to enhance the integration of gender considerations. However, some stakeholders, and particularly the CoE field office staff require additional training on the PMM.

Timing of the HF Phase II final evaluation. Various stakeholders claimed that this final evaluation came too late to allow for contributions to the design of the HF Phase II - this limiting the utility and learning component of the evaluation itself (i.e. stakeholders will have limited time / possibility to reflect on the recommendations for the HF Phase II).⁵⁴ In this light and with a view to the future, stakeholders suggested conducting the next evaluation exercise at an earlier stage, e.g. prior to the design of a hypothetical HF Phase III.

Other

Financial guidance. Some CoE field offices referred to remaining uncertainties on how to properly manage the budget available for each Action, e.g. in case of

⁵⁴ However, the CoE made use of the SC meetings, both at Action and beneficiary level, to collect feedback from partners and stakeholders.

underspending budgets, and called for clearer guidelines on how to make use of the budget.

Engage beneficiaries and CoE project managers in the discussion about the Actions' continuation. Several Actions implemented during Phase I will not be continued in Phase II. In some cases, this decision came as a surprise to both beneficiaries and CoE project managers who considered activities under these Actions as important. Some stakeholders believed that many of these Actions required more time to achieve objectives and that a continuation of these Actions in Phase II would enhance their efficiency and ensure sustainability of the Actions. It was therefore suggested to better engage beneficiaries and CoE project managers in the discussion about the Actions' continuation, i.e. informing stakeholders in advance to consider exit strategies.

Annex I – List of documents reviewed

- ✓ HF20 - Corruption in Education - Montenegro - Assessment Report - 2019
- ✓ HF 7- internal assessment 1
- ✓ HF 7- internal assessment 2
- ✓ HF30 - Trafficking in Human Beings - Serbia - Assessment Report - 2019
- ✓ HF 36 Kosovo Internal Project Assessment
- ✓ HF11 - SEMA - Serbia - Assessment Report - 2019
- ✓ HF 7 - Prisons and Police - Serbia - Assessment Report - 2019
- ✓ HF28 - Anti-discrimination, SOGI - Albania - Assessment Report - 2018
- ✓ HF33 - Minorities - Serbia - Assessment Report - 2019
- ✓ HF31 - Minorities - Albania - Assessment Report - 2019
- ✓ HF 1 - Prisons - Albania - Assessment Report - 2018
- ✓ HF 6 - Prisons - Montenegro - Assessment Report - 2019
- ✓ HF16 - Economic Crime - Albania - Assessment Report - 2019
- ✓ HF18 - Economic Crime - Montenegro - Assessment Report - 2019
- ✓ HF24 - Education - Albania - Assessment Report - 2019
- ✓ HF26 - Education - Montenegro - Assessment Report - 2019
- ✓ HF27 - Education - Serbia - Assessment Report - 2019
- ✓ Impact assessment of the Action 'Strengthening Legal Guarantees for Independent and Impartial Tribunals in Serbia', 2018
- ✓ Evaluation of the Action 'Supporting effective domestic remedies and facilitating the execution of judgments in Albania', 2019
- ✓ Evaluation of the Action 'Fighting ill-treatment and impunity and enhancing the application of European Court of Human Rights case-law on national level in Montenegro', 2019
- ✓ Evaluation of the Project Strengthening the Quality and Efficiency of Justice in Albania, 2019
- ✓ European Union/Council of Europe Horizontal Facility for the Western Balkans and Turkey, ROM report
- ✓ JUFREX Reinforcing Judicial Expertise on Freedom of Expression and the Media in South-East Europe, ROM report
- ✓ Comments on the evaluation of EU support for RoL in neighbourhood countries and candidates and potential candidates of enlargement (2010-2017), 2018

- ✓ Logframe table for action plan/programme "Horizontal Facility Phase II"
- ✓ List of ECM officially received requests, May 2019
- ✓ ROM: Results Orientated Monitoring of 2017 – Updated table on implementation, June 2019
- ✓ Evaluation of the project Strengthening the Quality and Efficiency of Justice in Kosovo, 2019
- ✓ Horizontal Facility I – Overview of Actions

Annex II – List of interviews

Scoping interviews (June 2019)

- ✓ Council of Europe, HF coordinator, Katerina Markovova, 6 June 2019
- ✓ Council of Europe, Human Dignity and Equality Department, Daniele Cangemi, Lilia Kolombet, Kristina Velcikova, 6 June 2019
- ✓ Council of Europe, HF/PGG coordinator for DG I, Eva Konecna, 6 June 2019
- ✓ Council of Europe, HF/PGG coordinator for DG II, Lilia Kolombet, 6 June 2019
- ✓ Council of Europe, Education Department, Sarah Keating, Vesna Atanasova, 6 June 2019
- ✓ Council of Europe, CEPEJ/Legal Co-operation (DGI), Simon Tonelli, Sophio Gelashvili, Martina Valdetara, Stéphanie Burel, Clémence Bouquemont, 6 June 2019
- ✓ Council of Europe, Criminal law cooperation unit, Donche Boshkovski, Raluca Ivan, 6 June 2019
- ✓ Council of Europe, Human Rights Policy and Co-operation Department, Ksenia Gruss, Sergey Dikman, 6 June 2019
- ✓ Council of Europe, Action Against Crime Department, Mustafa Ferati, 6 June 2019
- ✓ Council of Europe, Anti-discrimination Department, Irena Guidikova, Stefano Valenti, 7 June 2019
- ✓ Council of Europe, Office of the Directorate General of Programme, Fredrik Holm, Samira Kessour, Aydemir Demiroz, Malcolm Cox, 7 June 2019
- ✓ Council of Europe, Office of the Directorate General of Programme, Pilar Morales, Delphine Freymann, Katerina Markovova, 7 June 2019
- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Emma Ascitti, Jutta Pomoell-Segurola, María del Carmen Bueno Barriga, 19 June 2019

Interviews in Brussels (4 and 8 July 2019)

- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Emma Ascitti, 4 July 2019
European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Maria-Del-Carmen Bueno Barriga, 4 July 2019
- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Davide Denti, 4 July 2019

- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Eva Frech, 4 July 2019
- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Giedre Zukauskaitė, 4 July 2019
- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Sabine Zwaenepoel, 4 July 2019
- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Maria Esposito, 8 July 2019
- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Joakim Frendin, 8 July 2019
- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Olga Martin Gonzalez, 8 July 2019
- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Marek Nohejl, 8 July 2019

Interviews in Serbia (15-17 July)

- ✓ National Anti-trafficking coordinator, Ministry of the Interior, Mr Mitar Djuraskovic, 15 July 2019
- ✓ Council of Europe, TAPAS Project Officers, 15 July 2019
- ✓ Council of Europe, Deputy Head of Office, Irina Sahakyan Vetter, 15 July 2019
- ✓ European Union Delegation, Enrico Visentin 15 July 2019
- ✓ Constitutional Court, Natasa Plavsic, 15 July 2019
- ✓ Judicial Academy, Majda Krsikapa, 15 July 2019
- ✓ NGO ASTRA, Marija Andjelkovic, 15 July 2019
- ✓ Department for international co-operation and legal assistance, Republic Public Prosecutor's Office, Milena Manojlovic Nedeljkovic, 16 July 2019
- ✓ European Union Delegation, Mirjana Maksimovic, Irena Radinovic, 16 July 2019
- ✓ Ministry of Public Administration and Local Self-Government, Ivana Antic, 16 July 2019
- ✓ Ministry of Education, Science and Technological Development, Snezana Vukovic, 16 July 2019
- ✓ The Institute for Improvement of Education, Zlatko Grusanovic, 16 July 2019
- ✓ European Union Delegation, Marija Mitic, 16 July 2019
- ✓ Council of Europe, Tobias Flessenkemper, 16 July 2019
- ✓ European Union Delegation, Una Kelly, 17 July 2019
- ✓ Ministry of Justice, Aleksandra Stepanovic, Milan Tanaskovic, 17 July 2019

- ✓ State Labour Inspectorate, Ministry of Labour, Employment, Veteran Social Affairs, Maja Ilic, 17 July 2109
- ✓ Council of Europe, Marija Simic, Ana Stefanovic, 17 July 2019
- ✓ Ministry of Interior, Milivoj Nedimovic, 17 July 2019
- ✓ NGO SUPRAM, Marta Sjenicic, 17 July 2019
- ✓ Rule of Law and Human Rights Department, OSCE, Arthur Graham, 17 July 2019

Interviews in Montenegro (18-19 July)

- ✓ Council of Europe, Angela Longo, 18 July 2019
- ✓ Council of Europe, Tatjana Miranovic, 18 July 2019
- ✓ University of Montenegro, Sanja Pekovic, 18 July 2019
- ✓ Ministry of Justice, Aida Bojadžić, 18 July 2019
- ✓ Police administration: Ljulja Djonaj, Mladen Markovic, 18 July 2019
- ✓ OSCE, Siv Leirtroe, 18 July 2019
- ✓ Council of Europe, Vlado Dedovic, 19 July 2019
- ✓ Ministry of Education, Mubera Kurpejovic, 19 July 2019
- ✓ NGO Civic Alliance, Milan Radovic, 19 July 2019
- ✓ Ministry of Education, Tamara Milic, 19 July 2019
- ✓ Bureau for Educational Services, Anita Maric, 19 July 2019
- ✓ Agency for Prevention of Corruption, Marina Micunovic, Dusan Drakic, 19 July 2019
- ✓ Supreme State Prosecution, Miljan Vlaovic, 19 July 2019
- ✓ European Union Delegation: Annalisa Giansanti, Mladenka Tesic, Barbara Rotovnik, 19 July 2019

Interviews in Albania (29 August 2019 - 4 September 2019)

- ✓ Council of Europe Tirana Office, Jutta Gützkow, 29 August 2019
- ✓ Ministry of Health and Social Protection of Albania, Merita Xhafaj, and State Agency for the rights and protection of children Alma Tandili, 29 August 2019
- ✓ General Directorate of Prisons of Albania, Blerta Doci, 29 August 2019
- ✓ Council of Europe Tirana Office, Liljana Kaci, 29 August 2019
- ✓ Council of Europe Tirana Office, Ina Papa, 29 August 2019
- ✓ Council of Europe Tirana Office, Enisa Karaxho, 29 August 2019
- ✓ Commissioner for Protection from Discrimination of Albania, Robert Gajda, 30 August 2019
- ✓ Ombudsperson of Albania, Erinda Ballanca, and advisor Jorida Rustemi, 30 August 2019

- ✓ General Directorate for the Prevention of Money Laundering under the Ministry of Finance of Albania, Agim Muslia, Elvis Koci, Mikelian Shkalla, 30 August 2019
- ✓ Ministry for Europe and Foreign Affairs of Albania, Brunilda Minarolli, 2 September 2019
- ✓ Policy Office of the Embassy of the Netherlands, Albania, Elga Mitre, 2 September 2019
- ✓ Ministry of Justice of Albania, Edis Ibrahim, 2 September 2019
- ✓ Ministry of Health and Social Protection Emanuela Tollozhina, 2 September 2019
- ✓ European Union Delegation in Albania, Alessandro Angius, Xheni Sinakoli, Annelies Vanwymelbeke, 3 September 2019
- ✓ Constitutional Court of Albania, Elsa Toska, 3 September 2019
- ✓ High Inspectorate for the Declaration and Audit of Assets and Conflict of Interest of Albania, Erisa Proko and Evgjeni Bashari, 3 September 2019
- ✓ OSCE Presence in Albania, Claudio Pala, Alba Jorganxhi, 3 September 2019
- ✓ Council of Europe Tirana Office, Olsi Dekovi, 3 September 2019
- ✓ Ministry of Education, Sport and Youth, Tatjana Vuçani and Anila Ferizaj, 4 September 2019
- ✓ Central Election Commission, Deshira Pasko, 4 September 2019
- ✓ State Committee of Minorities, Kristo Goci, 4 September 2019
- ✓ European Union Delegation in Albania, Erol Akdag, Artes Butka, Tidita Fshazi, 4 September 2019

Skype/telephone interviews

- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Chloe Laurens Dinsdale, Jean-Baptiste Kastel, 12 July 2019
- ✓ European Union Delegation to Bosnia and Herzegovina, Normela Hodzic-Zijadić, 15 July 2019
- ✓ Council of Europe, Ilias Kalamaras, 18 July 2019
- ✓ European Union Delegation to Turkey, Paolo Scialla, 19 July 2019
- ✓ European Commission, Directorate General for Neighbourhood & Enlargement Negotiations, Julia Mueller Hellmann, 19 July 2019
- ✓ Council of Europe office in Pristina, Isabelle Servoz-Gallucci, 22 July 2019
- ✓ European Union Delegation to Republic of North Macedonia, Nicola Bertolini, 23 July 2019
- ✓ Council of Europe, Jelena Jolic, 23 July 2019

- ✓ European Union Office in Kosovo, Libor Chlad, 24 July 2019
- ✓ Council of Europe, Sergey Dikman, 1 August 2019
- ✓ Council of Europe, Vesna Atanasova, 8 August 2019
- ✓ European Delegation to North Macedonia, Snezena Kolekeska, Annabelle Regal, Danica Stoshevska, 14 August 2019
- ✓ Council of Europe, Eleni Tsetsekou, 20 August 2019
- ✓ Council of Europe office in Bosnia and Herzegovina, Loreta Vioiu, 23 August 2019
- ✓ Council of Europe programme office in Skopje, Ana Zec, 26 August 2019

Annex III – Survey

Part 1 - General questions

1. Please rate the extent to which you think your managerial skills are sufficient/adequate for managing the HF Action(s)

(0= not at all sufficient/adequate; 5= totally sufficient/adequate)

Weighted Average



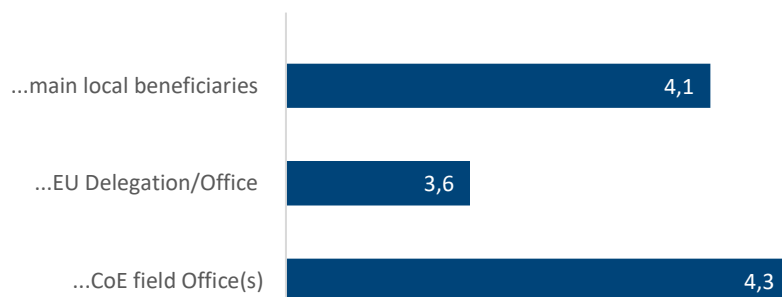
Please comment below if needed:

I have a steady experience in project management in international organisations and NGOs, but very often this is not the best skill of some project coordinators. I am pretty new to the CoE (less than 3 years), but I noticed that technical cooperation is pretty new for the Council and we should be better trained in Project Management (senior management included), we should use more advanced and soft tools (PMM is fine, but it has a lot of issues) and get more insight on topics such as procurement.

2. Please rate the efficiency of the existing **communication mechanisms** between CoE headquarters and...

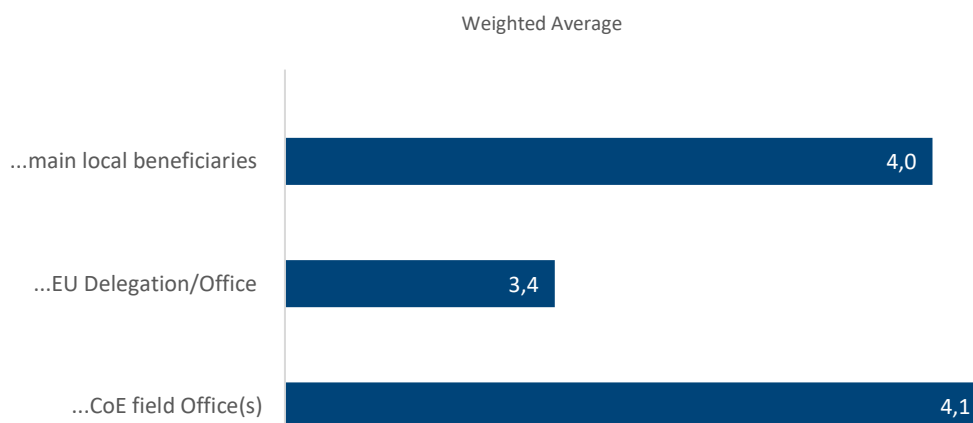
(0= not at all efficient; 5=extremely efficient)

Weighted Average



3. Please rate the efficiency of the existing **coordination mechanisms** between the CoE headquarters and...

(0= not at all efficient; 5=extremely efficient)



4. In your opinion, is there anything that would enhance the efficiency of the existing communication and/or coordination mechanisms?

More communication and coordination on the part of the EUDs.

The answers I provided above are for one particular Action in BiH (the only one I was involved in). The communication and coordination for this action were excellent; taken into account the well-established relations with the EUD and local beneficiaries over the years - starting with 2003.

Coordination between DGs and ODGP must be improved. Our organisation supports the decentralisation of the projects, however, working in the field and now in HQ, it is my personal belief that we do not have the necessary preconditions and resources in place to implement projects in a decentralised manner. All mayor decisions are still made in Strasbourg though lengthy bureaucratic procedures, thus the projects are sometimes losing the flexibility and the momentum.

Staff rotation in EU delegation is detriment to communication / coordination as often new EU staff is not acquainted with CoE and Joint EU/CoE programme.

Improved co-ordination between ODGP and implementing directorates.

It also depends on the people responsible for project implementation/coordination/field presence/EUD.

No. Maybe less coordination meetings at HF level.

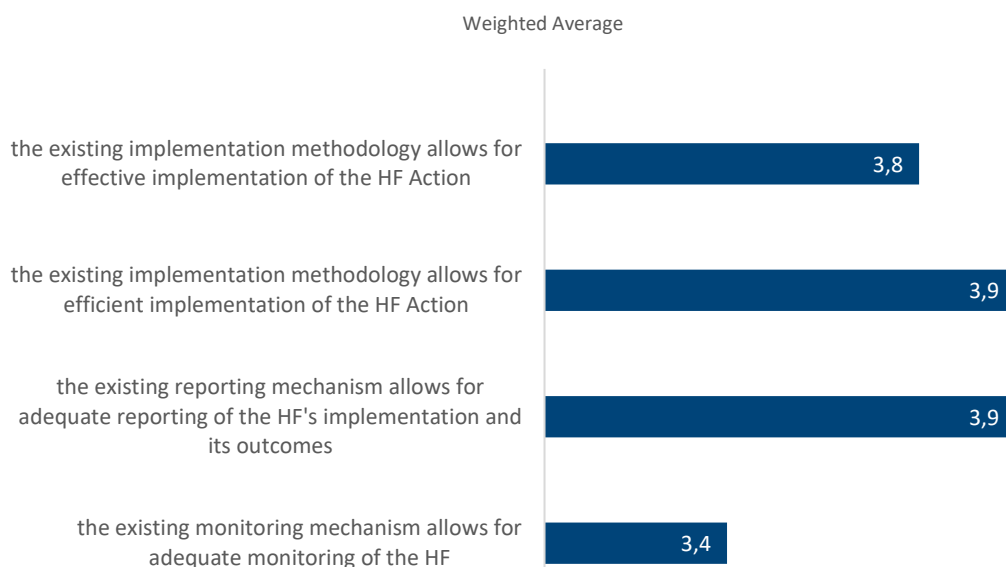
There is a problem of communications and coordination between DG NEAR and the EUD offices, they do not exchange information, and this affects the work of the CoE. First step would be to improve the communication and coordination within the two EU bodies involved in HF.

Especially in the case of EUD and beneficiaries, it frequently depend on personalities involved. Coordination HQ-field on the EU side at times appears insufficient.

Management board are usually used for high level communications - having ideas to institutionalise meetings with technicians and operational beneficiaries would help to increase ownership. How to ensure that beneficiaries feel like project managers - it is not easy to reach out to beneficiaries and involve them when they are so busy and in the middle of political turmoil.

5. Please rate to what extent you agree with the following statements:

(0= do not agree at all; 5=totally agree)



Add examples of what could be changed or improved:

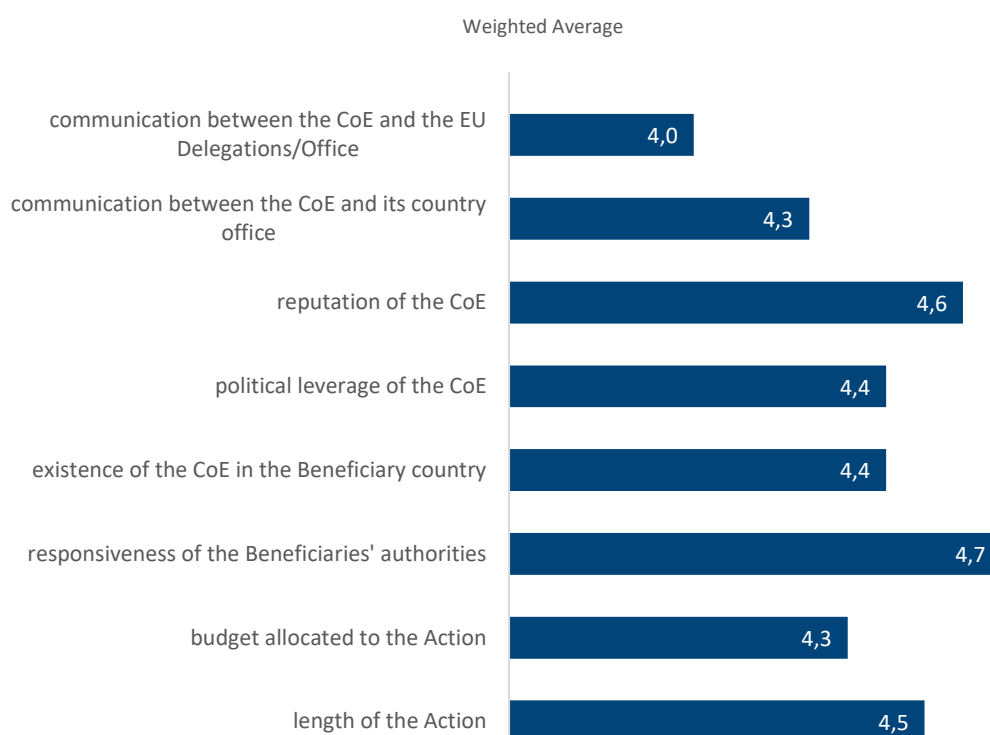
In particular in the reporting, there is a tendency to use standardized formulas/sentences which do not allow to understand the real impact of the action. The reports tend to give a pinkish picture of the outcomes, which do not correspond always to the reality. This is also due to the drafting skills of the local staff which tend to copy and paste instead of adapting the content to the specific project. There are also time and other constraints which do not allow for a thorough reflection on the impact of the action.

Quarterly reporting is quite a burden for both the HQ and the field staff, it would be better to have only annual interim reports and to share updates on problems, deviations or challenges directly with the donor. On the other hand, the financial monitoring and reporting is not very efficient, and doesn't allow the project managers to have an updated picture of expenditures, obligations and disbursements broken down per activity (in other words, we would need a ledger). This leads very often to unspent and delays. The coordination mechanism of HF is not efficient as well, there has been too much staff turnover within the coordination posts, the guidance is somehow lacking.

Too many details were requested at the initiation phase - rather than at the planning phase with more time for problem analysis and needs assessment NO project management tool existed at the beginning of the programme and a transition phase was required, this was not easy, although everyone was willing to make it work; the PMM tool should be further improved and simplified - it is currently counterproductive as it involves a lot of repetition and too many unnecessary details.

6. Please rate the importance of the following factors to the effectiveness of the HF Action(s):

(0= not at all important; 5=extremely important)



Please not any other factor(s) that you consider important:

Absence of overlapping with other donors' funded programmes.

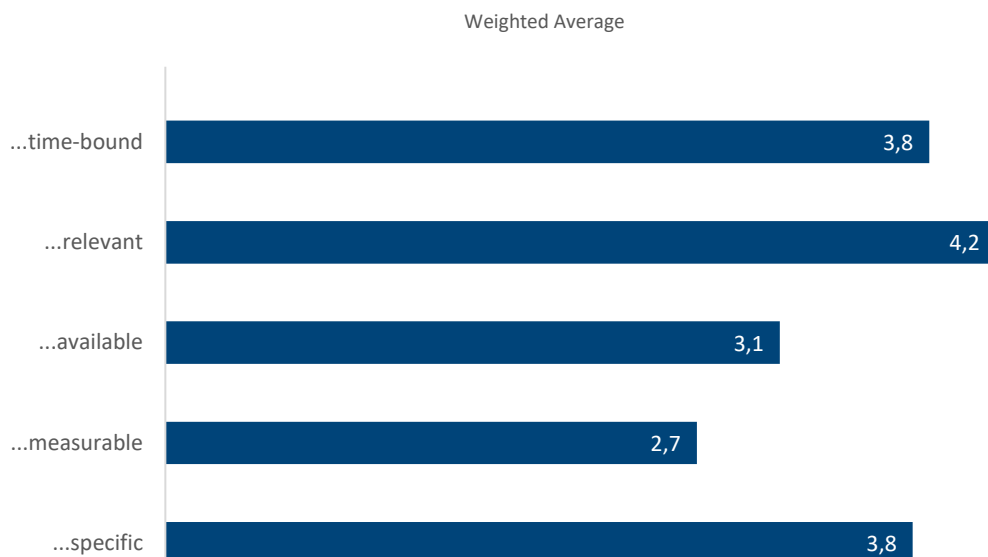
Communication between DG NEAR and EUD (now lacking).

Beneficiaries' commitment and contributions.

Sufficient HR, the ratio should be re-considered according to level of priorities.

7. Please indicate to what extent you agree with the following statement: the indicators of the monitoring mechanism used to measure progress towards achievement of objectives are...

(0= totally disagree; 5=totally agree)



8. Please rate the extent to which the HF governance arrangements / HF tools supported the effectiveness of the Action(s):

(0= not at all; 5= totally)



Provide specific examples:

Action-specific SC are to be established and meet on regular basis, being the main governing and steering mechanisms of the specific actions.

Support the execution of the ECtHR judgments and enhanced cooperation among domestic courts in the area of case-law harmonization.

Beneficiaries steering committees meetings, national and regional launching events, closing conferences should be better organised, as at the moment they are mostly formal events. They should be a moment to exchange good and bad practices, and exchanges ideas for future activities and developments, but at the moment they are just very formal moments to repeat again and again the same statements.

Excellent unified framework the COE actions in the region with HF Committee notably, common methodology and expectations communications and visibility was a very good asset, well thought good HF experts to help us with gender balance and other cross cutting issues HF coordinators for DG 1 and 2 were instrumental in ensuring the consistency between all projects: very, very necessary for the reporting, implementation, understanding of common objectives etc.

Parts 2 - Action(s) specific questions

9. Please rate the extent to which the HF Action achieved its objectives/intended outcomes:

(0= not at all; 5= totally)

Weighted Average

4,2

10. Please comment what factors hindered the achievement of the Action's intended outcomes:

Initially defined duration of the Action (18 month) and the message that no extension could be envisaged at the later stage, while the Action lasted in fact for 33 months. If the actual duration of the Action was known from the beginning, planning and implementation would have been significantly facilitated.

All factors solved at the end.

The Action, although implemented 100% of the planned activities, was not supported for no-cost extension which would have been beneficial and provided added value to the sustainability of the produced outputs.

The short duration of the project and the lack of local staff in the first phase of the Action.

The Action needed more time to achieve its objectives; political factors (constitutional reform, lack of trust between the judiciary and MoJ).

Lack of responsiveness from EUD.

Lack of sufficient time to show impact of the training component.

Political situation.

Delayed adoption of the Law of which the Action was supposed to support implementation. Limited capacities and absorption capacity of the main beneficiary.

Political instability, fear of change.

Political commitment by the authorities who did not pass the bylaws which were required to continue the Action.

In the beginning of the project one of the beneficiaries (Ministry of Justice) openly boycotted the project.

The complex institutional set up of the country. The short duration of the project (the shortest of all HF I project).

11. Please comment what factors supported the achievement of the Action's intended outcomes:

Responsiveness and engagement of beneficiary institutions, well-tailored support responsive to the needs of the beneficiary institutions, close engagement of the beneficiary institutions in the decision making process, close engagement of civil society institutions, wide scope of the Action (in terms of people reached with the relevant information and geographical coverage), very efficient visibility of the Action.

Full support of the beneficiaries; their direct involvement in the SC meetings and WGs to create ownership over the action proceedings; full support of the EUD; the methodology used - ToTs with a core group of local trainers; testing the developed tools and their applicability into practice (e.g. Implementation of Protocols for the Forensic Psychiatric Facility).

Open and regular communication and coordination with EUO Pristina and other relevant projects.

The political leverage of the EU/CoE related to the protection of Minorities in the context of the accession to the EU.

Relevance of the proposed interventions to the needs of the beneficiaries.

Beneficiary engagement.

Commitment and support from beneficiaries, role of trainers and willingness to make some changes.

High level of commitment of beneficiaries, excellent relational capacity of the field staff.

Good quality of consultants. Flexibility of the project team in adapting activities and outputs to the changing circumstances. Commitment of beneficiary.

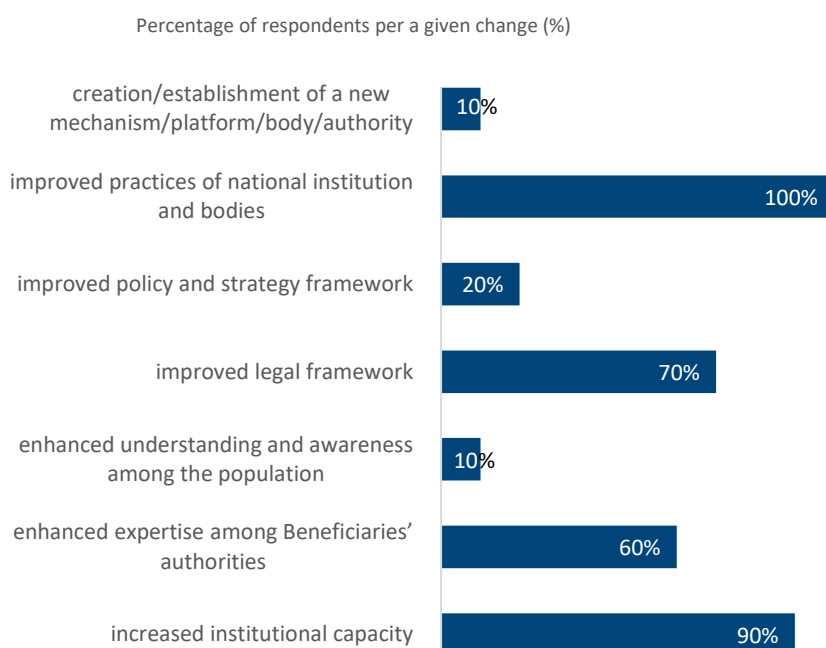
Dynamic Field office; impact of CoE expertise which was targeted and helpful in practice for beneficiaries; added value of CoE findings to instigate change.

High esteem by the Authorities of the CoE expertise and its experts by the Authorities, national minorities and EU. This was a factor which contributed to advance, up to a certain degree, the legislative reform.

Resilience of the staff (field and HQ); support of the EUD to Serbia; strong commitment of the other beneficiaries (State Prosecutorial Council, High Judicial Council).

The political support and commitment from the Authorities (also at local level) and the national minorities representatives

12. Please, choose up to three (3) most relevant changes generated/fostered by the outcome of the HF Action:



Others:

Support execution of ECtHR judgments.

New framework law on national minorities.

Enhanced individual capacity of participants in the trainings.

13. Please provide evidence/details that illustrate the above success:

The reference to the European Convention on Human Rights in the national courts' decisions has significantly increased by nearly 7 times during the Action's implementation period - reaching over 800 judges, public prosecutors and legal professionals in Montenegro, the Action contributed substantially to establishment of a regular dialogue between judicial instances and played a fundamental role in unifying application of the ECtHR case law - Several flag decisions of the Constitutional Court, but also of lower instances courts, concerning effectiveness of investigations under

Article 2 and 3 of the Convention in Montenegro, demonstrated a high level of awareness of Montenegrin judges of the European standards and the case law of the ECtHR. Two comprehensive assessments provided in the framework of the Action in 2018-2019 have resulted in political debate over legislative amendments to strengthen mechanisms for protection of the right to trial within a reasonable time and for enforcement of the Constitutional Court's decisions at the national level - 6 civil society organisations were closely involved in the discussions and provided a valuable source of information - 40% of lawyers in Montenegro trained better defend the rights of citizens - 800 judges, prosecutors and legal professionals trained and become more familiar with the ECHR and the ECtHR case law.

Legislative changes introduced in some of the legal instruments evidence impact of the Action at policy and legislative level. The Action's proceedings provided input to various regulations at the level of BiH and Republika Srpska. The Law on enforcement of criminal sanctions in Republika Srpska and the relevant Rulebook allowed the inclusion of the Action proceedings in the prisons' annual training programmes. In direct response to the Protocols on health care, some of the Articles regulating the provision of health care to prisoners in the BiH Ministry of Justice (MoJ) Rulebook on House Rules were amended by taking into account CoE and other international standards (e.g. Art 17a, 52a and 52b). "The Ministry of Justice amended legal provisions recently to allow for harmonisation of legislation with the CoE recommendations. Further, the prisons' annual training plans now include proceedings developed within the framework of the EU/CoE projects among training reference materials. The training sessions can, as necessary, be delivered by the accredited pool of trainers" The Governor of Banja Luka Prison At the institutional level, the Guidelines were included in the annual training programme of five (5) out of ten (10) police agencies in BiH. Eight (8) out of fourteen (14) prisons in BiH introduced now a multidisciplinary approach to the prisoner management through the Handbook. It is reflected primarily in risk and needs assessment tool and purposeful regime of prisoners' activities developed under the Action. As a direct result of the Action, the Protocols for forensic offenders were incorporated in the Forensic Facility Sokolac training curricula. In addition, there was a direct request of the MoJ to assist with introduction of electronic data exchange in entity prisons. It resulted with development of technical specifications for software and hardware for future IT system(s) (including a Human Resources module), as well as with the purchase of basic IT equipment for two pilot prisons (Zenica and Banja Luka). The police practices and procedures were developed in line with the European standards and the cooperation between prisons and law enforcement agencies was enhanced. The post training evaluation reports evidence the overall average rate of success achieved in improving police officers' knowledge and skills on human rights at 85%. The core prison staff training team worked with senior police officers assigned on behalf of all 10 police agencies in BiH on building training capacities and skills among law enforcement. Ombudsman found in its March 2019 report that a certain level of awareness about the non-acceptance of ill treatment exists among a number of police officers. The Ombudsman recommended continuing the professional training. Ombudsman's report on detention facilities in police stations in BiH corroborates success of the Action by emphasizing that "competent authorities' records on detained persons are well maintained and that detainees' signatures evidence that they have been informed of their rights". The preparation for the post-release of the prisoners

and their resocialisation was further enhanced through the Action. All prison establishments in Republika Srpska are required to implement offender management programmes in daily work with prisoners since the adoption of new prison legislation in June 2018. Capacities of health care staff in prisons have been further enhanced. The post training evaluation reports evidenced the overall average rate of success achieved in improving prison medical staff's knowledge and skills on human rights while administering primary level health care in custodial environment at 85%. In prisons that run in-house training for all staff, this has resulted in better implementation of the Protocols on health care, a reduction of resistance to them, and most importantly, standardised operational procedures for multidisciplinary approach to preventing self-harm, treatment of substance abusers and dealing with hunger strike, among other. The Action supported the authorities in the establishment of professional, effective and efficient treatment of mentally incapacitated offenders. 107 out of the total of 120 the staff members (meaning near 90% of the staff) of the Forensic Facility Sokolac and in particular forensic nursing staff, enhanced their knowledge on the provision of care to forensic patients. The post training evaluation reports evidenced the overall average rate of success achieved in forensic staff's improved knowledge and skills on human rights at 95%. The Protocols for forensic offenders had been well received by staff who consider them a vital part of the development of the Facility and the day-to-day running. Following the Forensic Facility management's feedback, the training resulted with the adoption of the concept of individual medical treatment plan and improvement of daily practices such as inter alia searches and processing complaints. The Forensic Facility management plans to develop in-house knowledge tests for the Protocols as part of the on-going professional staff development, which reflects the best practice and a commitment to continuing professional development.

Specific evaluation/monitoring reports on the piloting of the treatment programmes and the RNA tools in two prisons in Kosovo have been already provided to the evaluators.*

The improved legal framework concerning the national councils of national minorities allowed for the election of such council which took place just afterwards the amended law.

After a series of activities national courts changed their practice of the amount awarded for the violation of the reasonable time of judicial proceedings, now in line with the ECtHR approach.

Law on Academic Integrity has been drafted and adopted during the Action.

Following the raising awareness trainings on selected topics related to pertinent topics linked with ECtHR judgment, the Constitutional Court adopted its first judgment finding violation on Article 10 and 14 of the ECHR, following the case-law of the ECtHR. In addition it has its first public hearing in such a case which has been previously found as a violation by the ECtHR.

The main beneficiaries - Judicial Council, prosecutorial Council, and Judicial Training Centre - went through a functional analysis, developed a strategy and a roadmap for change and are now addressing major gaps and issues highlighted during the previous steps.

Please see Action's final report.

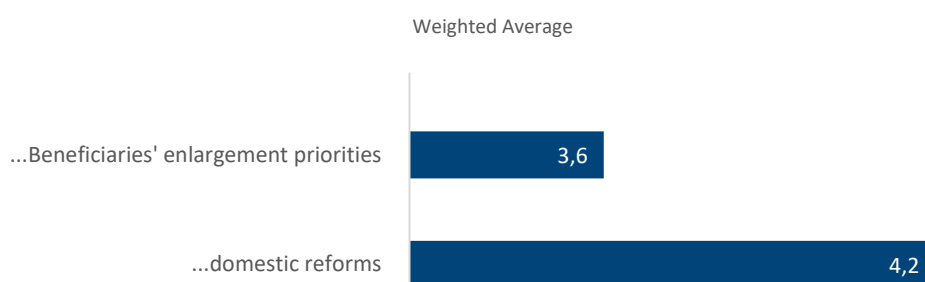
Beneficiaries have acquired the capacity to collect reliable statistics and analyse it to understand the functioning of their justice system - this approach was integrated to the scope of the draft Rule of Law Strategy - courts are now using CEPEJ indicators.

The law drafting part, initially planned for the project, was cancelled because of the opposition of the Ministry of Justice. Therefore the project addressed the individual capacity building of judges and prosecutors to resist undue pressure, and this was very effective.

An informal set up brought together all the relevant authorities (at state, entities and cantonal level) and beneficiaries (national minorities) thus improving communication and mutual trust. Local authorities were actively involved and implemented activities at local level to raise visibility of minorities thanks to small grants from the Action.

14. Please rate the extent to which the HF Action contributed to/fostered...

(0= not at all; 5= extremely)



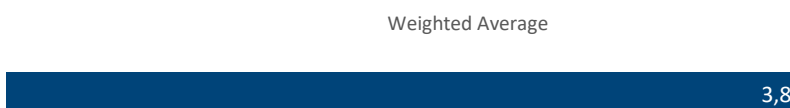
15. Please rate the extent to which gender issues have been mainstreamed within the HF Action design:

(0= not at all; 5= extremely)



16. Please rate the extent to which gender issues have been mainstreamed within the HF Action implementation:

(0= not at all; 5= extremely)



17. Please rate the extent to which the budget allocated to the HF Action was sufficient:

(0= not at all sufficient; 5= totally sufficient)

Weighted average



18. Please rate the extent to which the HF Action has been cost effective:

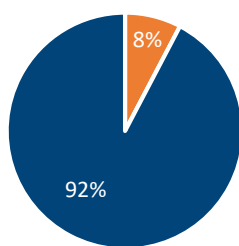
(0= not at all; 5= extremely)

Weighted Average



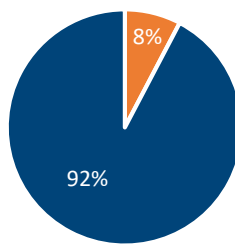
19. Did the HF Action face any of the below mentioned obstacles during any of its stages (planning, implementation, reporting)?

financial obstacles



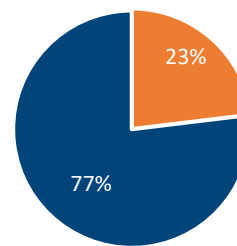
yes no

managerial obstacles



yes no

administrative obstacles



yes no

20. Please rate the extent to which the mentioned obstacles affected the Action's efficiency. In case there was no obstacle, please skip the question. (overall there were six (6) responses to this question)

(0= not at all affected; 5= extremely affected)

Weighted Average

