

Mid-term evaluation of the European Union / Council of Europe Joint Programme “Horizontal Facility for the Western Balkans and Turkey - Phase II”

Management response

Title of the evaluation report:	Mid-term evaluation of the European Union / Council of Europe Joint Programme “Horizontal Facility for the Western Balkans and Turkey - Phase II” – final report		
Date of the evaluation report:	June 2021	Date of the management response:	December 2021

Overall management response to the evaluation:

The Office of the Directorate General of Programmes (ODGP) of the Council of Europe considers that the report is an overall fair assessment of the implementation of the European Union/Council of Europe Joint Programme “Horizontal Facility for the Western Balkans and Turkey – Phase II”.

It appears that the external evaluation report presents several findings stemming from misunderstandings on specific notions or issues by respondents. ODGP fully agrees with the recommendations to:

- Continue the standard practice under HFII of following a participatory approach in design and implementation to ensure the relevance of the actions, and of the HFII overall;
- Actions that have not yet conducted a gender analysis should do so, also in view of a forthcoming HFIII which will build on the current actions.

- The CoE should continue the good practice to systematically review gender mainstreaming achievements and lessons learned at the end of HFII as an internal exercise in preparation for HFIII.
- CoE should consider organising visibility reporting in an accumulative way rather than stating bi-monthly figures.

ODGP partially agrees with the following recommendations as they stand:

- The CoE should consider dedicating HFII funds to the continuation of Human Rights Advisor post to support the ongoing actions under HFII and to input into the systematic mainstreaming of human rights into the design of the future HFIII. This would also be of importance in light of recurring staff changes.
- For actions which have included local institutions or local multi-stakeholder mechanisms, the CoE should consider strengthening accountability through citizens' involvement through e.g. the introduction of participatory budgeting approaches, by which citizens contribute to the design of budgets for local Action Plans or monitor budgeting and spending at local level.
- The CoE should leverage its good standing with beneficiary institutions and civil society to promote increased civil society participation; facilitate the collaboration of smaller, marginalised groups; and initiate a review of the 2010 recommendations of the Committee of Ministers to member states on measures to combat discrimination on grounds of sexual orientation or gender identity.

Accepted recommendations will feed into the preparation of the third phase of the Horizontal Facility Programme.

Evaluation recommendations on relevance and coherence of the Horizontal Facility II:

- HFII should continue its standard practice of following a participatory approach in design and implementation to ensure the relevance of the actions, and of the HFII overall.

Recommendations to:

- Programme designers and co-ordination
- Project designers

Priority level (1 (low priority) to 3 (high priority)):

3

Management Decision (Accept/Partially Accept/Reject): **Accept**

Management response

The recommendation is already fully addressed in the design and implementation of the HFII. Namely, the programme supports tailored reform processes agreed with the authorities, in line with relevant Council of Europe monitoring and advisory bodies' recommendations, in the fields of human rights, rule of law and democracy. The programme enables the Beneficiaries to meet their reform agendas and to

comply with the European standards, including where relevant within the framework of the EU enlargement process. Tailor-made and demand-driven support is provided to further improve legal and policy frameworks and build institutional capacities, reinforcing the functioning of institutions.

The participatory approach is ensured in HFII via tailor made actions which are designed to address the specific needs in each Beneficiary following consultations with the respective authorities. In addition, the flexibility of HFII is valued by the beneficiary institutions as it enables adaptation of the programme to the changing circumstances and domestic priorities, while fostering strong local ownership of the results. Resources can be reallocated during the implementation, to respond to emerging needs. For example, thanks to its flexibility and close communication of all partners involved in the HFII design and implementation, the programme was able to respond to the needs of the beneficiaries emerging from the COVID-19 pandemic.

Participatory approach was at the core of both the first and the second phase of the HF and it will remain a standard practise in the planning of the third phase of the programme.

Planned actions	Target date for action	Entity responsible for action
<ul style="list-style-type: none"> - Multi-stakeholder approach will be further pursued along all stages of HFII; joint approaches are to be sought involving the authorities, academia, civil society as well as both public and private partners where possible; - Good practise of applying the participatory approach in design and implementation will be maintained in the third phase of the Horizontal Facility. To this end, proposals for actions under HFIII will take into account consultations and strategic priorities of the authorities in the Western Balkans and Turkey, as well as the priorities set for the EU accession negotiations. In addition, starting from the programming phase of HFIII, the project proposals will continue to incorporate the standards of the Council of Europe monitoring bodies and the EU. 	<ul style="list-style-type: none"> - Continuous action - June 2021 onwards (preparations of the Horizontal Facility – phase III) 	Council of Europe: <ul style="list-style-type: none"> - ODGP HQ - Project teams in MAEs

Evaluation recommendations on effectiveness

- The CoE should reassess whether action goals and expected results in the thematic area of anti-discrimination have been set realistically in light of external constraints and, based on this, take the available budgetary resources into consideration.
- Concerning regional actions, the CoE should assess where exchange can be expanded to generate learning from good practice from outside of the region e.g. on hate crime. Furthermore, CoE should review the added value of regional action exchange where relevant regional or European networks are already in place, in order to avoid duplication of efforts.

- The CoE should integrate citizens' awareness and involvement as distinctive third component into the HF, complementing support to legislative reforms and institution strengthening. At action level this could be operationalised, for example, through the inclusion of linkages with the Education for All actions and/or by means of partnerships with other actors with campaigning expertise.
- The CoE and DG NEAR should consider expanding the utilisation of the ECM budget line to support wider dissemination and communication of VC opinions to relevant stakeholders, in particular CSOs and the broader public; e.g. continue with translations of VC opinions into local languages or provide user-friendly digest/summary of the opinions and recommendations. This would increase transparency and avoid misinformation in the media and misuse by political interests.

Recommendations to:

Priority level (1 (low priority) to 3 (high priority)):

- Programme management and co-ordination
- Project management/implementation
- Financial management

2

Management Decision (Accept/Partially Accept/Reject): Accept

Management response

- The goals and expected results of all HF actions are a product of consultations with the stakeholders and needs assessments completed during the planning of the actions. In the same vein, all relevant counterparts have been consulted in the process of the planning and design of the anti-discrimination actions, and therefore the goals and expected results defined in the actions are the result of discussions with partners and beneficiaries of the actions. As regards the external constraints, mitigation measures have been defined in view of potential risks to implementation. Some external constraints, such as the COVID-19 pandemic, could not have been foreseen at the time of the planning of the HF II anti-discrimination actions but certain measures were taken to address the challenges in the implementation caused by the pandemic (e.g. shifting to online/hybrid activities, prioritising desk work, etc.) Moreover, the nature of the Horizontal Facility allows for flexibility when it comes to the reallocation of budgetary resources within the overall budget of the programme. As it was demonstrated during the COVID-19 pandemic, the programme was able to effectively adjust to the circumstances imposed by the pandemic and to meet the newly emerging needs of the beneficiaries.
- Peer exchanges and sharing of best practices with actors from other regions has been a key element in the implementation of regional actions. Such cooperation has already been established by the regional action on anti-discrimination HF45 "Promotion of diversity and equality in the Western Balkans". Namely, close complementarity and synergies were found with the twin project "Strengthening access to justice through non-judicial redress mechanisms for victims of discrimination, hate speech and hate crimes in the Eastern Partnership" implemented under the EU/Council of Europe Joint Programme "Partnership for Good Governance". Equality bodies from both regions expressed similar needs to learn about the relevant standards of the European Commission against

Racism and Intolerance (ECRI), and consequently the ongoing preparation of the online resources on ECRI general policy recommendations 2¹ and 15² is jointly performed. In terms of capacity-building, a joint session has been organised for equality bodies/Ombudsperson Institutions from the Western Balkans and Eastern Partnership regions, on the tools for counter-narratives to hate speech. Furthermore, steps are being taken to ensure that the regional exchanges do not overlap with efforts already made under other regional or European initiatives. For example, regional exchanges of equality bodies under HF45 take place on specific issues (hate speech and hate crime) and as such do not duplicate the efforts and work of the European Network of Equality Bodies (EQUINET), whose mandate and scope of work in the field of anti-discrimination is substantially wider.

- Awareness-raising and involvement of the citizens is at the core of HF actions. Specifically, in the field of education the efforts have been made in creating a platform for democratic participation while ensuring inclusiveness. More specifically, this entailed development of a tailor-made programme for each HF action in the field of education, by ensuring that all relevant stakeholders in the area of education are involved and actively participate. The role of school civic bodies (Parent-Teacher Associations, Student Councils, etc) played an important role in bringing parents, teachers and students together and enabling them to jointly discuss and propose recommendations for the issues of common concern which among others included ensuring quality education and democratic school culture as well as ensuring adequate education for all. Citizens' awareness was further raised through the organisation of events such as the Democratic School Day under the action in Serbia (HF27) and informative campaigns in co-operation with a local CSO in Montenegro (HF24). In addition, partnerships with other actors with campaigning expertise have been established beyond the education actions. Namely, many awareness-raising activities were organised by the grantees of actions in the field of anti-discrimination and combatting trafficking in human beings, whereby the grantees utilised their expertise to maximise citizens' involvement and increase their awareness. For example, under the action Preventing and combating trafficking in human beings in North Macedonia (HF29) two campaigns conducted by CSO grantees on trafficking for labour exploitation resulted in enhanced information on prevention and self-protection among the general public.
- With regards to the dissemination of VC opinions to relevant stakeholders, it should be noted that although it is not obligatory under the ECM, many VC opinions are translated to local languages already under HFII. To this end, many ECM requests have a separate budget line for the translation of the opinion to local languages, and the aim is to continue with this practise. Efforts were also made to share the ECM information leaflet in the local languages with the authorities, but also with participants in HF events including CSOs and the media, to raise awareness of the mechanism. Finally, the Council of Europe Directorate of Communication systematically prepares and disseminates press releases on the decisions/outcomes of the VC Plenary sessions.

Planned actions	Target Date for action	Entity responsible for action
<ul style="list-style-type: none"> - The situation relating to the COVID-19 pandemic will continue to be closely monitored in order to foresee any potential risks to the achievement of results in the ongoing actions, and to the setting of goals of actions in the third phase of the programme as well as to ensure that mitigation measures are in place. 	<ul style="list-style-type: none"> - Continuous action - June 2021 onwards (preparations of the 	Council of Europe: <ul style="list-style-type: none"> - ODGP HQ - Project teams in MAEs

¹ On specialised bodies to combat racism, xenophobia, antisemitism and intolerance at national level.

² On combating hate speech.

<p>All other external constraints will be anticipated in the preparation of the new phase of the programme through close communication with the beneficiaries, partners and stakeholders in all HF actions, including those in the field of anti-discrimination.</p> <ul style="list-style-type: none"> - The ongoing regional exchanges between the equality bodies from the Western Balkans and Eastern Partnership regions will continue. Further avenues for inter-regional exchanges will be explored, while continuously ensuring that no duplication of efforts with other relevant actors occurs. - The ongoing efforts to integrate citizens' awareness and involvement will continue, through close cooperation with the CSOs, citizens' associations, and with regards to the actions in the field of education also the school civic bodies. - The beneficiaries will be further encouraged to disseminate the information on the results achieved under the ECM. Proposal will be made to the VC colleagues to foresee the local language translation of all VC opinions produced under the ECM. 	<p>Horizontal Facility – phase III)</p>	<p>- Venice Commission</p>
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Evaluation recommendations on the efficiency (steering, monitoring and reporting)

On steering:

- The CoE should continue its good practice in the management of its Steering Committees and press for the inclusion of civil society into action Steering Committees.

On monitoring:

- The CoE and DG NEAR should reassess the need for a Facility logframe and/or identify the exact purpose a Facility logframe should serve so that its design ensures easy utilisation.
- In lieu of a Facility level logframe, the CoE and DG NEAR should consider introducing a logframe at Beneficiary level, with specific objectives to contribute to Beneficiary reform processes and outcomes on the basis of the thematic HFII areas. This logframe would be prepared in complementarity to TAPAs, to avoid any potential overlaps.
- The CoE should systematically formulate indicators for each outcome along the core areas of intervention: (a) Legislation/policies in place, draft stage; (b) Institutions strengthened; (c) Facilitation of multi-stakeholder processes; (d) Citizen involvement and awareness-raising.

- The CoE should aim to monitor outcomes of capacity-building and training components more systematically, applying a common monitoring approach across HFII. To that end, CoE should consider (a) developing practical guidelines for CoE staff and (b) supporting partner institutions in assessing the mid- to long-term training outcomes as part of their human resource management.

On reporting:

- The CoE should streamline its reporting template through the PMM in order to avoid repetitive description of outputs in annual and bi-monthly reports.
- CoE should increase efforts on outcome reporting. Concerning annual reports this should include accumulative reporting: (a) the status of each expected outcome should be captured from its point of departure and subsequent progress, followed by (b) short indication of contribution of HFII and (c) a short indication of factors influencing the status of each outcome.
- Beyond the Horizontal Facility, CoE should aim for reporting of mid- to long-term approaches on certain sectors or themes. This concerns for example how institution building/strengthening might build on legislative changes which had been supported before. This would make long-term impact more visible and easier to understand for external stakeholders/donors, even if this is done exemplary or case based.
- Reporting on outputs of training measures should not be based solely on absolute numbers but on percentages in order to get clarity on the coverage rate of the target groups.

Recommendations to:

Priority level (1 (low priority) to 3 (high priority)):

- Programme management and co-ordination
- Project management/implementation

3

Management Decision (Accept/Partially Accept/Reject): **Accept**

Management response

On steering:

- The management structure of HFII is characterised by three levels: the Action Steering Committees of the actions which are responsible for overseeing and guiding the implementation of the related action and which gather on a needed basis; the Beneficiary Steering Committee meetings (BSCMs) which monitor the implementation of the TAPAs in each Beneficiary and which meet annually; the Steering Board which meets once a year, following meetings of all Steering Committees at Beneficiary level, and which

is responsible for the overall implementation of the Horizontal Facility, including the operational procedure, and for adapting procedures where needed.

- This management structure allows to ensure effective planning, implementation and monitoring that is underpinned by co-ordination with counterparts in the European Union and respective Beneficiaries. Overall, the joint management and steering structure of HFII at both Facility and Beneficiaries levels works well. However, some room for improvement could be identified as for instance an increased focus on technical/operational issues such as the exploration of increased linkages and cross-cutting issues affecting the actions.
- As to the Steering Committees at action level, they provide a platform for discussion on implementation and achievements, reflections on lessons learned and future planning. This format works well and paves the way for good co-operation and trustful working relationships between the action and its beneficiaries, including civil society representatives who are usually taking active part in them (but also in the Beneficiary Steering Committee meetings). This systematic inclusion is in line with two of the founding principles (accountability and citizen participation) of the Human Rights Approach that the Council of Europe committed to follow in its co-operation activities. Some examples of actions which have CSOs as either members or observers of their Steering Committee meetings are HF18 “Promotion of diversity and equality in Albania”, HF23 “Promotion of diversity and equality in Montenegro” etc.

On monitoring:

- Thanks to good co-operation and close communication between DG NEAR and the Council of Europe, the partners have jointly decided to take a different approach in the third phase of the Horizontal Facility when it comes to the overall HF logframe. Namely, the overall HF logframe will be prepared during the planning of the third phase of the programme, but it will be designed in a more simplified and user-friendly manner so that it can achieve its purpose as a useful monitoring tool of the overall programme. Moreover, it is foreseen to cross-reference the IPA II Monitoring Framework Indicators in the overall HF III logframe, to achieve complementarity of the CoE and EU monitoring systems. While in the overall HF II logframe the indicators are a priori formulated along the lines of legislative developments, capacity-building and awareness-raising, this categorisation could indeed be more clear and therefore due attention will be paid to ensure that indicators are formulated for each outcome along the core areas of intervention.
- The idea of developing Beneficiary-specific logframes will be explored by the partners, and their added value to the already existing TAPA documents for each Beneficiary, as well as the overall HF logframe, will be assessed.
- Outcomes of capacity-building and training components: this recommendation is already being addressed as following the recommendation of the Committee of Ministers³, underlining that the member States' training institutions for judges and prosecutors do not have in place any sustainable and applicable methodology and tools for assessing effectiveness and impact of the training, one of the core objectives of the action “Judicial training institutes for Quality and Sustainability (JA-NET)” (HF42) is to improve the capacities of the training institutions to better assess the impact of human rights training. The capacities of domestic judicial training institutions to evaluate the quality and impact of both the initial and continuous training were improved with the new “[Methodology and Tools for the Evaluation of Human Rights Training](#)”, developed in co-operation with four judicial training institutes⁴ from the Western Balkans, published in English and local languages⁵ and disseminated to all judicial training institutes in the region. The methodology provides a ready-to-use, flexible, easily adaptable and user-friendly toolkit supporting the judicial training institutes in their evaluation

³ (DH-SYSC(2017)001)

⁴ School of Magistrates of Albania, Judicial Training Centre of Montenegro, Judicial Academy of Serbia and Academy for Judges and Prosecutors of North Macedonia.

⁵ Albanian, Macedonian and Serbian.

tasks, *inter alia* the evaluation of quality and impact of the provided training in the field of human rights. The approach and tools presented in the methodology contribute directly to strengthening and fine-tuning the efforts put in place by the judicial training institutes and to the harmonisation of existing tools and practices. Furthermore, a long-term post-evaluation questionnaire for selected completed courses was recently put in place by the “HELP in the Western Balkans” (HF40) action, following a recommendation to do so by its partners. The questionnaire, developed on the basis of the European Judicial Training Network (EJTN) Guidelines for evaluation of judicial training practices and adapted to HELP, was translated in all the local languages and disseminated through EU survey to the participants.

On reporting:

- Reporting template: specific capacity-building sessions were organised per theme in order to get the project teams acquainted with the purposes of the HFII reports, including the contractual obligations in terms of reporting. In addition to that, specific training on the PMM Methodology and PMM IT tool is provided to new HF staff members recruited providing these newly recruited staff members with the necessary knowledge on the “Theory of Change” and the results towards which the Council of Europe co-operation activities contribute. As a result, while indeed the HFII bi-monthly reporting is output-based, HFII annual reporting is entirely founded on reporting against the intermediate outcomes of the actions.
- Outcome reporting: this recommendation seems to be already addressed because, as stated above, the objective of the HFII annual reports is to provide information on the progress achieved during this reporting period by referring mainly to the outcome level. This implies per se a brief description of the baseline, together with a description of the contribution of the concerned action. When this is also the case, a short indication of the factors influencing the status of each outcome is provided. In this regard, one of the very recurrent examples recently are the circumstances resulting from the COVID-19 health crisis which inevitably impacted (more or less) the different actions’ outcomes.
- Mid- to long-term reporting: the recommendation goes beyond the scope of the Horizontal Facility but results and experience from technical co-operation are reported and taken into account in intergovernmental processes and monitoring processes in the organisation - all three “branches” (standard setting, monitoring and technical co-operation) cross-fertilise each other. Within the scope of the HF, reporting is organised thematically and a mid-term/long-term perspective is present in particular in annual progress reports and in the final report.
- Reporting on training measures: when accurate data is available, efforts are made in this direction. For example, in March it was reported that in Serbia following 15 capacity-building sessions organised for the past three years, with the support of the European Union and the Council of Europe, HF26 enhanced the knowledge of almost 100% of the Beneficiary’s labour inspectors (220 in total) to detect potential victims of trafficking for labour exploitation. As a result of this progressive capacity-building, the Centre for Human Trafficking Victims’ Protection provided statistical evidence of progress: twelve victims of human trafficking were detected in 2020 compared to only three in 2019. In addition, HF29 carried out a needs-assessment of the training needs of the State Labour Inspectors following the replacement of retired inspectors. The results were discussed with 74 labour inspectors and representatives of the line Ministry, CSOs and the Prime Minister’s Cabinet. Whereas under HFI, most of the labour inspectors could not understand their role regarding prevention and fight against trafficking for labour exploitation, under HFII 93% of the respondents considered that action against this phenomenon falls within the scope of their competences. The majority of the respondents had already attended at least one training in the area. The needs assessment and discussions initiated a profound rethinking of the role and competences of the labour inspectors with the aim to remove any normative or practical obstacles to the proactive identification of victims during inspections.

Planned actions	Target date for action	Entity responsible for action
<ul style="list-style-type: none"> - Further efforts will be undertaken to increase the focus on technical/operational issues such as the exploration of increased linkages and cross-cutting issues affecting the actions during the BSCMs; - Discussions between DG NEAR and the Council of Europe will continue on the development of the overall HF III logframe. In the meantime, reporting against the HF II logframe shall continue on a yearly basis to demonstrate the progress made during the implementation of HF II. 	<ul style="list-style-type: none"> - Continuous action 	Council of Europe: <ul style="list-style-type: none"> - ODGP HQ - Project teams in MAEs

Evaluation recommendations on gender mainstreaming

- Actions that have not yet conducted a gender analysis should do so, also in view of a forthcoming HFIII which will build on the current actions.
- The CoE should continue the good practice to systematically review gender mainstreaming achievements and lessons learned at the end of HFII as an internal exercise in preparation for HFIII.

Recommendations to:	Priority level (1 (low priority) to 3 (high priority)):
<ul style="list-style-type: none"> - Programme management and co-ordination - Project management/implementation 	3

Management Decision (Accept/Partially Accept/Reject): **Accept**

Management response

This recommendation is addressed through the multiple efforts systematically deployed by the Council of Europe to mainstream gender, including in the ongoing HFII programme.

Gender mainstreaming and gender equality continue to be in the focus of the Horizontal Facility II implementation. The [Council of Europe Gender Mainstreaming Toolkit](#) remains the main source of guidance on gender mainstreaming in co-operation activities. In this regard,

carrying out gender analyses has been the first step to further mainstream gender through the provision of information on the ways to enhance gender equality in relation to the main outcomes of each action, with tailored and concrete recommendations.

After two years of implementation, 16 actions (six during the reporting period) carried out a gender analysis which corresponds to 35% of the actions under the programme. In total, nine actions (six during the reporting period) revised their action logframe to integrate a gender dimension which corresponds to 20% of the actions under the programme.

Gender mainstreaming and gender equality require a holistic approach. To this end, a network of newly established Gender Equality Focal Points (GEFP) in field offices provides further support to actions in the region, and act as a catalyst for gender equality issues. In addition, several internal capacity-building sessions were held at a peer-to-peer level and collectively with actions within the same thematic area in order to share best practices. Additionally, staff in Council of Europe Offices were trained on gender mainstreaming and gender-sensitive communication through dedicated two-day online capacity-building sessions on gender mainstreaming in the project management cycle. Finally, in order to centralise and better co-ordinate the gender mainstreaming efforts of the individual HFII action, gender-specific indicators were included on the level of the programme logframe following its first year of implementation.

Mainstreaming gender will also remain a priority in the planning and implementation of the third phase of the programme.

Planned actions	Target Date for Action	Entity Responsible for Action
<ul style="list-style-type: none"> - The actions which have not conducted gender analyses yet, will be encouraged to do so and thoroughly supported in this; - Gender mainstreaming achievements and lessons learned will continue to be reviewed as an internal exercise until the end of the second phase of HF and in preparation of HFIII. 	<ul style="list-style-type: none"> - Continuous action - June 2021 onwards (preparations of the Horizontal Facility – phase III) 	Council of Europe: <ul style="list-style-type: none"> - ODGP HQ - Project teams in MAEs

Evaluation recommendations on human rights approach, added value, sustainability and impact
<ul style="list-style-type: none"> - The CoE should consider dedicating HFII funds to the continuation of Human Rights Advisor post to support the ongoing actions under HFII and to input into the systematic mainstreaming of human rights into the design of the future HFIII. This would also be of importance in the light of recurring staff changes. - In order to strengthen the accountability component of the HRA the CoE should consider supporting beneficiary institutions to strengthen their accountability towards rights holders which is currently not a very prominent element in the Beneficiary-specific actions; e.g. carry out an analysis of levels of citizens access to information of Beneficiary institutions; include a distinctive component on communication with citizens into the planning of actions, or support the development of communication strategies. - For actions which have included local institutions or local multi-stakeholder mechanisms, the CoE should consider strengthening accountability through citizens' involvement through e.g. the introduction of participatory budgeting approaches, by which citizens

contribute to the design of budgets for local Action Plans or monitor budgeting and spending at local level. The participatory budgeting approach could be piloted in some communities where the CoE can build on good experience in the co-operation with CSOs. It is particularly relevant to action at the local level.

- The CoE should leverage its good standing with beneficiary institutions and civil society to promote increased civil society participation; facilitate the collaboration of smaller, marginalised groups; and initiate a review of the 2010 recommendations of the Committee of Ministers to member states on measures to combat discrimination on grounds of sexual orientation or gender identity.
- The CoE should strengthen the extent to which HFII actions include elements of accountability and citizen participation to contribute to the sustainability of actions and to achieve real impact in terms of citizen trust.

Recommendations to:	Priority level (1 (low priority) to 3 (high priority)):
<ul style="list-style-type: none"> - Programme management and co-ordination - Project management/implementation 	1

Management Decision (Accept/Partially Accept/Reject): **Partially accept**

Management response

As a leading human rights organisation, the Council of Europe applies a human rights approach (HRA) in its work, including in HFII. Its main objective is to further advance human rights for all and achieve better and more sustainable results in projects. Its main principles are participation and inclusion, equality and non-discrimination, accountability, transparency and access to information.

- Regarding the position of the **HR Advisor**, it is to be noted that it was originally foreseen for a limited amount of time to develop the necessary tools and set the foundations of the approach within the Facility. This was the case for the period from June 2019 to June 2021 during which specific and tailored guidance was provided to project teams by the HF Advisor. In addition, the [Council of Europe Human Rights Approach Practical Guide for Co-operation Projects](#) was finalised and made available on the PMM website. Moreover, the HF project teams were trained on the HRA and coaching was provided on the reporting on HRA under HF. Therefore, all tasks foreseen during the existence of the post of HR Advisor have been completed. Activities previously performed by the HR Advisor, such as the reporting on HRA, will continue throughout HF implementation.
- **Accountability** and **citizen participation** are among the founding principles of the Council of Europe human rights approach, which is at the core of all HF actions. Further efforts could be undertaken to pursue concrete measures to address accountability responsibilities of beneficiary institutions towards their citizens, however some good examples should still be noted. In the second year of HF implementation, several actions adjusted or reformulated their activities following the feedback and suggestions of the beneficiaries and stakeholders. For example, the cooperation with the media CSOs under the action Freedom of expression and freedom of the media in North Macedonia made a bridge between the legal professionals and the journalists, contributing to the mutual dialogue and emphasising the human rights component and approach in implementing the activities. Following the feedback

provided by the beneficiaries and stakeholders, this HF action adjusted or reformulated some activities, including the provision of support to amendments of the freedom of expression and freedom of the media legislation. Furthermore, the action “Strengthening independence and accountability of the judiciary” (HF9) regularly exchanged with relevant CSOs in Serbia to share information on the progress with as many stakeholders as possible, which also allowed CSOs to shape their activities. As regards communication with the citizens on the planning of actions, this is systematically implemented in several actions, such as those in the field of countering trafficking in human beings (THB). For example, the action in Bosnia and Herzegovina awarded four grants to CSOs for the implementation of the awareness-raising campaigns that aim to reach out to vulnerable groups, including minorities and to inform them about the risks of THB for the purpose of labour exploitation and child trafficking.

- Regarding the promotion of **increased civil society participation**, as stated above, the principles of participation and inclusion are at the core of the Council of Europe’s HRA and as such, are applied in all HF actions. To this end, the majority of the actions (two thirds) report on efforts made to ensure participation and inclusion, including engagement with civil society. Several actions have CSOs as either members or observers of their Steering Committee meetings. Moreover, several actions were undertaken to ensure a civil society inclusive approach in the implementation of the programme, below is a sample of progress⁶:
 - CSO active inclusion as members of working groups on various topics;
 - participation of CSOs in arranging visibility activities such as under HF23 Promotion of diversity and equality in Montenegro, participation in capacity-building activities in Serbia under HF26 Preventing and combating trafficking in human beings as well as in online campaigns, photo exhibition and awareness-raising campaigns on the rights of LGBTI persons under HF18 Promotion of diversity and equality in Albania;
 - awareness-raising campaigns and distribution of sanitary materials by CSOs to communities at risk, in the context of COVID-19.
 - CSOs took part in Beneficiary Steering Committee meetings, seminars and consultations as participants, facilitators and expert speakers or providing valuable inputs. In some actions, CSOs are also members of the Action Steering Committees.

The recommendation to initiate a review of the 2010 recommendations on measures to combat discrimination on grounds of sexual orientation or gender identity of the Committee of Ministers to member states, does not fall within the scope of the Horizontal Facility. This is an issue covered by intergovernmental co-operation.

Planned actions	Target date for action	Entity responsible for action
<ul style="list-style-type: none"> - HRA will continue to be applied along all stages of HFII, as well as in the planning and design of the proposals for HFIII. Advice on HRA will continue to be provided to HF staff by ODGP. Reporting on HRA will continue in all HF reports and will be included in the DoA of HFIII. - Efforts will be made to further address accountability responsibilities of beneficiary institutions towards their citizens and to strengthen direct 	<ul style="list-style-type: none"> - Continuous action - Continuous action - June 2021 onwards (preparations of the Horizontal Facility – phase III) 	Council of Europe: <ul style="list-style-type: none"> - ODGP HQ - Project teams in MAEs

⁶ Listed below are only HFII actions which were sampled by the HFII Mid-term evaluation.

<p>citizens' involvement. CSOs will continue to be instrumental in this respect.</p> <ul style="list-style-type: none"> - The recommendation on participatory budgeting approach seems very specific to the anti-discrimination action in Serbia and less as a general consideration. This approach seems very ambitious for any other action, however the possibility to pilot participatory budgeting in pilot projects will be assessed. 		
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Evaluation recommendations on visibility

- CoE should consider organising visibility reporting in an accumulative way rather than stating bi-monthly figures. Relevant data on visibility - such as user figures, social media visibility, press releases, and newsletters - contributes to visualisation and analysis of processes and progress if presented in an accumulative report. No additional data needs to be collected, but data can be presented accumulative.

Recommendations to:	Priority level (1 (low priority) to 3 (high priority)):
<ul style="list-style-type: none"> - Programme management and co-ordination - Project management/implementation 	<p>1</p>

Management Decision (Accept/Partially Accept/Reject): Accept

Management response

While additional efforts could be made in strengthening the visibility reporting in a cumulative way, this recommendation is in line with the activities already implemented within the scope of the HF II visibility reporting. Communication under the Horizontal Facility II aims to promote the benefits and expected positive effects of the actions and to explain to target groups how and why Horizontal Facility actions will improve and enhance their quality of life.

For the purpose of reporting, project staff is encouraged to monitor the impact of communication activities over the lifecycle of the action (e.g. checking the local press coverage of an event, keeping note of most popular posts on Facebook etc.). Evaluation of communication can be done quantitatively (number of web news published, number of visitors to a website, number of newsletters sent, number of publications disseminated, etc.) or qualitatively (the most visited web pages, most shared Facebook posts, tweets/posts/articles about the project, etc).

Cumulative data is presented with each HFII annual (interim) report on different aspects of the communication efforts deployed, usually based on the bi-monthly figures already shared with the donor. This allows to show trends and provides room for analysis. Amongst the cumulative data provided within the HFII annual reports could be found the following information:

- Data on the HF website users: the HF website received 48,535 visitors, which is an increase of 63% in visitors compared to the first year of implementation (in the period May 2019-May 2020 the website received 29,717 visitors). In addition,
- Figures on the HF website news items: 473 web news items about activities were posted on the website, which is an increase of 64% compared to the first year of implementation (when 289 web news were posted).
- Data on the social media outreach: social media are regularly updated mostly in local languages, unless the posts are related to regional actions or general information. An increase in direct communication with the citizens on Facebook and Twitter was noticed in the second year of HFII implementation. Social media channels became the primary channel of communication during the COVID-19 pandemic, when more people were seeking information online. For instance, with the HF annual report information is provided on the number of likes and followers that the HF Facebook page achieved so far: 5,662 likes and about 5,921 followers. The post reach achieved during the second year of HF II implementation was in total 2,471,974 people, which represents an increase of 375% compared to the first year of implementation. On average, posts are reaching 64% women and 35% men. In addition, information on the HF Twitter account which continues to be an important channel of communication for different audiences in the region is also regularly updated. Posts on Twitter are published primarily in local languages to better reach local audiences in the Western Balkans and Turkey. The account has 1,065 followers. Between May 2020 and May 2021, Horizontal Facility posts reached 530,574 impressions, which represents an increase of 55% compared to the first year of implementation. It is noteworthy that the trend of increased activity on Twitter began with the COVID-19 pandemic and online presence on HFII Twitter account continued in the following months.
- Information about the newsletters released: the main aim of the quarterly HF newsletter is to highlight the most interesting and successful events and stories produced by the actions. In October 2020 the distribution tool changed, and the statistics therefore started being collected in a different and more detailed manner. Cumulative data on the number of distributed newsletters for each reporting period is also reported.

Furthermore, the HFII annual reports gather cumulative data on the different awareness-raising activities and campaigns launched by the actions.

Planned actions	Target Date for Action	Entity Responsible for Action
<ul style="list-style-type: none"> - Collecting cumulative data will continue throughout the HFII phase and the good practice will be reiterated in the next phase of HF; - Efforts will be made to present more cumulative data on the visibility with regards to grantees' activities, given that a significant 	<ul style="list-style-type: none"> - Continuous action 	Council of Europe: <ul style="list-style-type: none"> - ODGP HQ - Project teams in MAEs

<p>number of grants has a strong visibility component;</p> <ul style="list-style-type: none">- In order to address the recommendation on the visualisation and analysis of processes and progress, the use of graphs in the presentation of relevant data on visibility will be explored, and efforts will be made to enhance the visual illustration of key results.		
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