

Evaluation of the “Project against Economic Crime in Kosovo*”

EVALUATION REPORT_V1
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Table of abbreviations

Acronym	Definition
AC	Anti-Corruption
AML/CFT	Anti-Money Laundering/Combating the Financing of Terrorism
AMSCA	Agency for Administration of Sequestered and Confiscated Assets
APC	Agency for Prevention of Corruption
CBK	Central Bank of Kosovo
CRA	Corruption Risk Assessment
CSO	Civil society organisation
DIO	Directorate of Internal Oversight
ECCD	Economic Crime Cooperation Division, Council of Europe
EU	European Union
EUO	European Union Office
FATF	Financial Action Task Force
FIU	Financial Intelligence Unit
GRECO	Group of States against Corruption
JIT	Joint Investigation Team
KAPS	Kosovo Academy for Public Safety
KII	Key Informant Interview
KJA	Kosovo Justice Academy

KP	Kosovo Police
LEA	Law Enforcement Agency
LFM	Logframe Matrix
M&E	Monitoring Evaluation
ML	Money Laundering
MoJ	Ministry of Justice
MONEYVAL	Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
OECD-DAC	Organisation for Economic Co-operation and Development - Development Assistance Committee
PECK III	Project against Economic Crime in Kosovo (Phase III)
PSC	Project Steering Committee
SOP	Standard operating procedures
STR	Suspicious transaction report
TAK	Tax Administration of Kosovo

1. Executive summary

This final evaluation of the Project against Economic Crime in Kosovo¹ (PECK III) confirms the project's significant and multi-layered contribution to advancing the rule of law and enhancing Kosovo's institutional response to economic crime. Implemented by the Council of Europe (CoE) through its Economic Crime Cooperation Division (ECCD), and co-funded by the European Union (EU) and the Council of Europe, the project demonstrated strong performance.

PECK III was well-anchored in the compliance priorities identified by the Group of States against Corruption (GRECO) and MONEYVAL², aligning its interventions with critical institutional gaps in Kosovo's anti-corruption (AC) and anti-money laundering/countering the financing of terrorism (AML/CFT) frameworks. The project responded directly to the findings of the CoE monitoring bodies^{3,4}, addressing gaps in legislative harmonisation, operational practices, and institutional coordination.

PECK III was a strategically targeted, technically sound and effective intervention that advanced Kosovo's compliance with international standards and improved operational capacity across its anti-corruption and AML/CFT frameworks. Its success was driven by a combination of contextualised tools, institutional engagement, and expert-led reform facilitation.

The design evolved over time to remain responsive to a shifting legal and political environment, particularly in areas such as asset recovery, financial investigation, and risk-based supervision. Strong coherence was observed with the work of other international actors with PECK III maintaining strategic alignment and avoiding duplication through its engagement in national platforms and technical working groups.

Ownership was ensured from the outset through the active participation of key beneficiary institutions. The inclusive Project Steering Committee enabled shared governance and encouraged stakeholders to assume increased responsibility for project design, oversight, and reform integration.

PECK III delivered its planned outputs and made a substantial contribution to outcome-level change. Its interventions catalysed impact at multiple levels:

The project supported the drafting, revision, or adoption of over 24 legal and policy instruments, including key frameworks on AML/CFT compliance, prevention of corruption, asset confiscation, beneficial ownership, and whistleblower protection.

¹ All reference to Kosovo, whether to the territory, institutions or population, in this text shall be understood in full compliance with United Nations Security Council resolution 1244 and without prejudice to the status of Kosovo.

² The Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism

³ Compliance with international standards in the anti-corruption area" (CoE AC Assessment) "Compliance of Kosovo with intentional anti-money laundering and combatting the financing of terrorism standards" (CoE AML/CTF Assessment)

⁴ Compliance with international standards in the anti-corruption area" (CoE AC Assessment)

Compliance of Kosovo with intentional anti-money laundering and combatting the financing of terrorism standards (CoE AML/CTF Assessment)

PECK III contributed to reforms in Kosovo by bridging gaps that national institutions were not equipped to address alone. The project's combination of strategic focus, technical credibility, and flexibility allowed it to function as a catalyst rather than a stand-alone driver of change.

The project demonstrably accelerated reform timelines, enhanced coherence, and provided the tools and momentum necessary for implementation. Stakeholder consensus confirmed that progress in areas such as AML supervision, prosecutorial capacity, and joint investigations would have been significantly delayed or less coordinated without PECK III.

Despite two extensions (primarily due to external delays and restrictive measures), the project avoided major cost overruns and remained focused on delivery. Beneficiaries consistently praised the contextual understanding and quality of the Council of Europe's experts and the commitment and professionalism of the team on the ground.

Many PECK III-supported reforms are now embedded within institutional frameworks, including SOPs, manuals, methodologies, and legislative changes. These reforms are normative in nature and do not depend on ongoing financial input, suggesting short-term sustainability in core institutions such as the APC, FIU, CBK, and Special Prosecution Office. Stakeholders across government and civil society warned that momentum could be lost without continued support and there is a tangible risk of stagnation or erosion of gains—particularly in politically sensitive areas such as asset recovery.

There is a large evidence base to suggest that a follow-up EU-funded intervention is justified. To maintain momentum and prevent regression, future support should focus on consolidating reform achievements, reinforcing weaker institutions, mainstreaming gender and monitoring & evaluation (M&E) integration, and embedding sustainability strategies through phased transitions and institutional capacity development. Continued EU-Council of Europe collaboration would offer a proven model for delivering context-sensitive, technically credible support that aligns with Kosovo's rule of law and EU integration trajectory.

1. **Address the challenges in the implementation of the Legal and Policy Frameworks**

Prioritise efforts to address challenges stemming from the implementation of key legislation, particularly the Law on Conflict of Interest and the Law governing the APC, to enhance their enforceability, relevance, and responsiveness to emerging corruption risks.

2. **Strengthen Private Sector Compliance Capacity**

As a secondary objective, a follow up phase should consider offering continued technical assistance to private financial institutions to address evolving AML/CFT/CPF threats. This includes updated guidance, risk-assessment tools, and enhanced supervisory coordination to counter increasingly complex financial crime patterns.

3. **Institutionalise Learning and Knowledge Transfer**

Ensure that future projects build internal capacity through the development and handover of modular training content, with a focus on building national trainer networks in justice and law enforcement institutions.

4. **Promote Meaningful National Ownership**

Engage key institutions from the project design phase through implementation to ensure local relevance, strengthen buy-in, and foster institutional leadership.

5. **Further integrate M&E and Gender Expertise**

Incorporate dedicated monitoring and gender equality specialists early in the project cycle to enable performance tracking, inclusion, and evidence-based course correction across all components.

2. Background and Scope of the Evaluation

2.1 Background

PECK III is an EU-Council of Europe joint initiative aimed at strengthening Anti-Corruption (AC) and Anti-Money Laundering/Countering Financing of Terrorism (AML/CFT) practices in Kosovo. The project, running from July 2020 to June 2025, is funded by the European Commission (90%) and Council of Europe (10%) with a budget of €2.46 million. It builds upon previous phases (PECK I and II) and seeks to enhance compliance with European and international standards. Through four key components—AC, AML/CFT, Confiscation and Asset Recovery, and Operational Capacity Building—the project has provided technical guidance, training, and institutional support to key national bodies such as the Financial Intelligence Unit (FIU), the Agency for Prevention of Corruption (APC), Central Bank of Kosovo (CBK), the Ministry of Justice (MoJ), Kosovo Police (KP), law enforcement agencies and the judiciary.

The project's goal is to contribute to strengthened institutional capacities and aligned legislation with European and international anti-corruption and AML/CFT standards, so that public officials, law enforcement agencies, judiciary, financial actors, and civil society are equipped with the tools, knowledge, and institutional frameworks needed to prevent, detect, and prosecute economic crimes. This will result in more transparent institutions, increased public trust, reduced impunity for economic crimes, and sustained alignment with EU accession priorities.

2.2 Scope, objectives and users of the evaluation

Scope

The evaluation is an end-of-project evaluation. The scope was to cover all components and activities implemented from 1 July 2020 until the start of the evaluation. It is commissioned by the Council of Europe based on the agreement signed with the EU Office in Pristina.

The evaluation of PECK III, as outlined in the terms of reference, was to assess its effectiveness, coherence, efficiency and sustainability, providing key lessons for future interventions in economic crime prevention and prevention sectors. While impact was not a defined criterion for this evaluation, some emerging findings on potential impact are worth mentioning in the report.

Objectives

1. To assess the results achieved against the objectives and indicators,
2. To identify lessons that could be of use for future interventions, and
3. To inform planning and design of the next project phase.

Users

The primary intended user is the Council of Europe, and the entities/project teams are:

1) the Economic Crime Cooperation Division of the Directorate General Human Rights and Rule of Law at the Council of Europe overseeing project implementation; and 2) the Project Team managing PECK III in the field.

The secondary users include: the donor (EU) and the beneficiaries of the project – including the FIU, APC, Police, and Agency for Administration of Sequestered and Confiscated Assets (AMSCA), MoJ, Ministry of Finance, CBK, Financial Sector, Tax Administration, Customs, Justice System.

Table 1: Intended Users of the Evaluation Report

USER	DESIGNATION	INTENDED USE
PRIMARY	Council of Europe Directorate General Human Rights and Rule of Law	Accountability, strategic learning, and decision-making for future interventions.
	Project Team managing PECK III	Improve project implementation, resource management, and alignment with international standards.
SECONDARY	Donor: European Union (EU)	Accountability and learning for future funding and policy alignment.
	FIU, APC, Police, Agency for Administration of Sequestered and Confiscated Assets	Improve implementation and institutional capacity, decision-making, and engagement.
	MoJ, CBK, Financial Sector, Tax Administration, Customs	Enhance inter-institutional cooperation in prevention and fight against economic crime.
	Other stakeholders: international organizations, NGOs, and other donors	Organisational learning and development, alignment with international best practices.

Context Analysis

Prior to PECK III, Kosovo was in a formation stage in developing a robust AML/CFT and AC system. Despite a foundation of legal reforms initiated in earlier years, the country faced significant institutional, operational, and political challenges in translating legal provisions into practice. This period was characterised by persistent implementation gaps, a lack of inter-institutional coordination, and weak enforcement capacity—conditions that continued to undermine Kosovo's alignment with international standards.

Legal and Policy Framework

Kosovo's primary AML/CFT legislation prior to the project's start—the Law No. 05/L-096 on the Prevention of Money Laundering and Combating the Financing of Terrorism—was in force but not fully aligned with Financial Action Task Force (FATF) Recommendations and other international standards. Key deficiencies existed in the areas of beneficial ownership transparency, targeted financial sanctions, and supervision of non-financial businesses and professions (DNFBPs).

In parallel, the anti-corruption legal framework was fragmented. While the Law on the Agency for Prevention of Corruption, Law on Declaration of Assets, and Law on Conflict of Interest were in place, their enforcement mechanisms were weak. The absence of a comprehensive national anti-corruption strategy after the expiration of the 2013–2017 strategy created a vacuum in coordinated

policy direction. Attempts to update the strategy stalled in 2018 due to limited political consensus and inter-ministerial disputes over leadership of the process.

The legal environment was further weakened by limited harmonisation across criminal laws, particularly regarding confiscation and seizure provisions. The Law on Extended Powers of Confiscation lacked clarity, and inconsistencies between the Criminal Code and the Criminal Procedure Code created confusion in courts regarding the application of financial crime charges.

Institutional Understanding and Capacity

Across public institutions, the understanding of AML/CFT standards and corruption prevention remained insufficient:

- FIU operated with limited analytical capacity and human resources. It received STRs primarily from commercial banks, but rarely from DNFBPs. Its ability to conduct strategic analysis was constrained by the lack of a formal risk-based supervision framework and insufficient cooperation with supervisory authorities.
- CBK had adopted AML compliance guidelines for financial institutions but had not yet institutionalised a risk-based approach. Oversight of money laundering risks in the financial sector remained primarily formalistic and document-driven.
- APC was hampered by internal fragmentation and insufficient staffing. While it had a mandate to conduct asset verification and risk assessments, its operational capacity to do so systematically was minimal. Its role was further undermined by political appointments and unclear lines of accountability.
- The judiciary and prosecutorial services, including the Special Prosecution Office, suffered from chronic under-resourcing and low involvement with complex financial crime investigations. Investigators and prosecutors had limited familiarity with parallel financial investigations, use of financial intelligence, or handling of cryptocurrency-related offences. There was no institutionalised training curriculum on economic crime, and prosecutors lacked access to financial analysts or forensic accountants.

Law Enforcement and Inter-Agency Coordination

Kosovo's law enforcement system was formally structured but functionally fragmented in 2018–2019. The Directorate for Investigation of Economic Crimes and Corruption within the Kosovo Police had jurisdiction over financial crimes but lacked specialised investigative techniques, particularly for cyber-enabled laundering and informal value transfer systems.

The Kosovo Prosecutorial Council (KPC) and Kosovo Judicial Council (KJC) were perceived as politically influenced, which limited institutional independence and undermined trust in the criminal justice system. Weak coordination between police and prosecutors often resulted in either poorly prepared indictments or lack of follow-through on financial crime referrals.

There was no national coordination mechanism dedicated to AML/CFT policy implementation or strategic oversight. Inter-institutional cooperation was mostly *ad hoc*, with little data exchange between entities like the FIU, CBK, Tax Administration, and police. Real-time exchange of financial intelligence, particularly with the private sector, was virtually non-existent.

Private Sector and Non-State Actors

The commercial banking sector operated under CBK regulations but varied significantly in its internal AML procedures. Only a few banks had dedicated compliance units, and these units often lacked trained personnel. Reporting of STRs was concentrated among the larger banks, while smaller financial institutions demonstrated low awareness and weak implementation of AML obligations.

Non-financial sectors, such as real estate agencies, lawyers, notaries, and accountants, were formally designated as reporting entities but had negligible engagement with AML/CFT obligations. Enforcement by supervisory bodies over these sectors was either absent or symbolic.

Civil society organisations (CSOs) played a growing but still marginal role in AML/CFT or anti-corruption oversight.

International Constraints

Kosovo's non-membership in key international bodies such as Council of Europe, MONEYVAL, GRECO, Europol, and Interpol severely restricted its access to international cooperation tools and judicial assistance frameworks. Despite having signed memoranda of understanding with some counterparts, the absence of full membership prevented Kosovo from participating in key mechanisms for cross-border financial intelligence exchange or mutual legal assistance. Efforts to develop the legal basis for the establishment of a Confiscation Fund, a central element in the asset recovery system, were stalled due to conflicting institutional interests over fund management responsibilities.

3. Methodology

This end-of-project evaluation of PECK III was structured as a process evaluation using a non-experimental approach employing qualitative methods. Data was collected using qualitative tools. Data collection methods included Desk Review and Key Informant Interviews (KIIs).

Methodological approach

The analytical framework includes an evaluation matrix linked to OECD-DAC and Council of Europe criteria. Data analysis techniques included content and thematic analysis for qualitative information, and contribution analysis to assess the project's plausible influence on observed changes in the institutional and policy environment.

Methods of data collection and analysis

The combination of two different and complementary data collection tools (Document Review, and KIIs) were chosen to enable the Evaluator to answer the Evaluation Questions and provide meaningful recommendations. The use of different and complementary sources of information helped to address the absence of information, or unreliable information.

Desk Review: In order to make the evaluation as comprehensive as possible, the Evaluator conducted a pre-field desk review of the project. It involved a comprehensive analysis of key programmatic and strategic documentation, including the original Description of Action, Logical Framework, successive addenda, annual and progress reports, budget files, and Council of Europe evaluation policies and guidelines.

Field Phase: 31 KIIs were conducted during the field phase with representatives from 15 institutions based on the list of contacts provided by the PECK III project team. Each KII protocol contained 6–8 open-ended questions, with variations per group, aimed at capturing informed perspectives on the project's relevance, effectiveness, sustainability, and policy-level impact. Their goal was to generate detailed insights, examples, and contextual feedback from individuals with expert or insider knowledge. The questionnaire was distributed in advance of the interview.

Qualitative Data Analysis: A descriptive analysis was conducted aiming at identifying and understanding the context in which PECK III has evolved, and to describe the types of interventions and other characteristics of the project. The Evaluator constructed a list of achievements based on different sources to determine the degree to which each achievement can be considered proven.

Triangulation of qualitative and quantitative data was conducted by examining whether findings obtained through the desk review are consistent with perceptions obtained through qualitative methods (KIIs). In addition to the desk review analysis, the Evaluator interpreted the KIIs findings which are then integrated in the report to summarise key insights, and link these to specific recommendations.

Gender analysis: To facilitate gender analysis, the Evaluator assessed whether and how the activities contribute to gender equality and women's empowerment outcomes.

The evaluation design adheres to the Council of Europe Evaluation Policy, Evaluation Guidelines, and Code of Conduct, and applied the following specific principles:

1. Human Rights-Based Approach: The evaluation assessed the extent to which PECK III integrated and promoted human rights, including access to justice, transparency, anti-corruption, and non-discrimination.

2. Gender-Responsive Methodology: A gender lens was applied across all evaluation stages. This includes gender-disaggregated data collection (e.g. participation in training sessions), inquiry into how the project addressed gender equality, and if outcomes were inclusive and gender sensitive.

3. Participatory Approach: The evaluation was inclusive of all key stakeholder groups: public institutions, civil society, oversight bodies, international actors, and the private sector.

Identification of the stakeholders

The project is structured to influence across all critical nodes in the AC and AML/CFT ecosystems.

1. Judiciary:

- Judicial Council (KJC)
- Justice Academy

2. Prosecution: PECK III engaged prosecution authorities to strengthen investigation, case management, and prosecution of corruption and money laundering:

- Office of the Chief State Prosecutor
- Special Prosecution Office (SPRK)
- Kosovo Prosecutorial Council (KPC) – oversight and policy coordination

3. Law Enforcement:

- Kosovo Police (DIEEC and general units)
- Police Inspectorate of Kosovo (KPI)
- Kosovo Academy for Public Safety (KAPS)

4. Financial Sector and Supervisory Bodies:

- Financial Intelligence Unit (FIU)
- Central Bank of Kosovo (CBK)
- Tax Administration of Kosovo (TAK)

5. Government Institutions acting as policy makers and key partners in reform processes:

- Ministry of Justice (MoJ)
- Ministry of Finance (MoF)
- Ministry of Internal Affairs (MIA)
- Office of the Prime Minister

6. Civil Society and Private Sector:

- Kosovo Institute for Public Administration (KIPA)
- Commercial banks and other reporting entities in the financial and non-financial sectors

7. International Partners:

- Council of Europe
- European Union Office (EUO)
- OSCE, EULEX, USAID, UNDP
- Embassies of the UK, USA, Switzerland, and Netherlands

8. Other Key Entities

- APC – Agency for Prevention of Corruption
- AMSCA – Agency for Management of Sequestered and Confiscated Assets
- NCCEC – National Coordinator for Combating Economic Crime
- Kosovo Business Registry (KBR)

- Labour Inspectorate

Evaluation Questions

The following Evaluation Questions (EQs) are identified in the ToR for this evaluation and further refined during the Inception and Field phases:

Relevance

1. To what extent were the project design and including its amendments suitable to address the findings of the Council of Europe assessments on “Compliance with international standards in the anti-corruption area” (AC Assessment), and on money laundering and combatting the financing of terrorism standards” (AML/CTF Assessment)?
2. What, if any, issues would still need to be addressed to further enhance the overall system and capacities of Kosovo authorities to counter economic crime?
3. To what extent has the project ownership been ensured by project partners?

External Coherence

1. To what extent is the intervention consistent with the interventions of other international actors in the context of economic crime?

Effectiveness

1. To what extent has the project contributed to improved international and inter institutional cooperation?
2. To what extent has the project achieved its expected results? What have been the reasons for achievement and lack thereof?
3. What difference has the project and its activities made to the beneficiaries up to date?
4. To what extent have the human rights approach and gender been mainstreamed in project design and implementation? What, if any, have been the project’s effects on gender equality?

Efficiency

1. To what extent could alternative working methods have led to the achievement of comparable or better results with fewer resources?

Sustainability

1. What is the likelihood that the benefits from the intervention will be maintained in the short term (3-5 years) after the end? What would be required to ensure the sustainability of the results?

The field mission was conducted in two consecutive weeks and lasted eight field mission days from April 14-17 and April 22-25. Sessions were mostly held one-on-one, allowing for in-depth exchanges.

The validation workshop with Council of Europe to present key findings from the evaluation and validate them was conducted online on 28 April 2025. During this workshop, the Evaluator

presented key recommendations proposed based on relevant evidence which inform the recommendations. The feedback during this workshop was used to inform this evaluation report.

Limitations

Scope of the evaluation: Due to the nature and purpose of the assignment, the evaluation was limited to short-term results. Nevertheless, the Evaluator determined early indications of potential impact.

Data collection tools: In agreement with Council of Europe, the field phase relied on Desk Review and KIIs, without the inclusion of FGDs or an online survey. These data collection tools were generally sufficient to address the EQs, however the Evaluator applied rigorous respondent selection and cross-validation of findings from different institutional levels. The timeframe of the evaluation assignment posed few limitations as well.

4. Key Findings

4.1 Relevance

EQ1: To what extent were the project design and including its amendments suitable to address the findings of the Council of Europe assessments on “Compliance with international standards in the anti-corruption area” (Council of Europe AC Assessment) and on “Compliance of Kosovo with intentional anti-money laundering and combatting the financing of terrorism standards” (Council of Europe AML/CTF Assessment)?

Finding 1: The PECK III project was designed with a high degree of strategic intent, directly responding to critical gaps identified in the Council of Europe assessments on AC and AML/CFT. From the outset, the project focused on key deficiencies—particularly in legislative harmonisation with GRECO and MONEYVAL recommendations, the operational capacities of core institutions, and fragmented inter-agency coordination.

The Addenda to the original project documents further fine-tuned activities to address evolving compliance challenges, including gaps in asset recovery, FIU operational independence, and prosecutorial effectiveness.

Document analysis confirms that the project’s outputs consistently mapped to Council of Europe recommendations. For instance, legal drafting support was provided for revisions to the Law on the Anti-Corruption Agency and the Law on AMSCA—both of which had been explicitly highlighted as needing reform. Similarly, the development of rules of procedure for AML/CFT supervision and prosecutor guidance on financial investigations addressed specific institutional shortcomings. These were not generic technical assistance activities—they were tailored interventions linked directly to external evaluations. The result was a coherent design with a logical chain from assessment to action.

Stakeholder interviews further validated this alignment. Institutions such as the FIU, MoJ, judiciary, and KP repeatedly cited the project's ability to remain responsive to shifting legal needs. Targeted support, such as the development of Kosovo's AML/CFT Concept Document and updates to confiscation frameworks, were perceived as both timely and relevant. Rather than imposing static reforms, PECK III adjusted its trajectory in real time, strengthening its relevance within Kosovo's dynamic rule of law environment.

The project's strategic relevance was evident not only internally. European Commission Progress Reports from 2018 to 2021 consistently noted Kosovo's challenges in AML/CFT enforcement and institutional coordination. PECK III addressed these deficits head-on, supporting risk-based supervision, improving the quality and frequency of STR, and mentoring enforcement agencies.

Reforms supported under the project—such as drafting the revised AML/CFT law and developing a Confiscation Fund concept—directly reflected the EU's calls for enhanced operational capacity.

KIIs echoed the value of this tailored technical assistance. Stakeholders credited PECK III with bridging critical capacity and resource gaps that national institutions could not address on their own. Through both design and delivery, the project demonstrated a high level of strategic foresight, institutional relevance, and real-time adaptability—qualities that distinguished it from more generic rule of law interventions.

EQ2: What, if any, issues would still need to be addressed to further enhance the overall system and capacities of Kosovo authorities to counter economic crime?

Finding 2: Despite progress under PECK III, several critical issues remain that hinder the full development of systems to counter economic crime. Institutional and operational gaps persist, notably the absence of specialised anti-corruption departments within key entities such as the judiciary and prosecution, lack of clarity in inter-institutional coordination mechanisms, and outdated or fragmented internal procedures in agencies like the KP and FIU.

AMSCA still operates without a finalised new law aligning it with international standards, and the confiscation of criminal assets is hindered by weaknesses in the implementation of the amended Law on Extended Powers of Confiscation.

From the perspective of stakeholder capacity, challenges include high staff turnover in institutions like the FIU and judiciary, insufficient allocation of national budget funds for AML/CFT operations, and a lack of continuous, institutionalised training.

Delays in appointment of Head of Institutions and operating with acting positions has been an ongoing challenge in the past four years together with insufficient strategic vision and support to key reforms and processes.

Stakeholders interviewed noted that while technical tools and manuals were developed, their application remains inconsistent due to limited institutional absorption and dependency on donor-funded expertise. Financial institutions expressed the need for clearer supervisory guidelines and

stronger inter-agency enforcement linkages, particularly to avoid regulatory arbitrage or duplication of efforts.

EQ 3: To what extent has the project's ownership been ensured by project partners?

Finding 3: Evidence from the desk review and the KIs confirms that ownership by PECK III partners was actively ensured from the outset and strengthened over time. For instance, the Terms of Reference for the project included the inputs and the views of FIU and APC, reflecting early national leadership in shaping the project scope.

The FIU also aligned its internal planning with PECK III objectives to ensure mutual reinforcement of priorities and facilitate coherent implementation. This level of upstream engagement signals a high degree of institutional buy-in and strategic ownership.

Throughout implementation, there were several indications of ownership which was expressed through partner participation in the Project Steering Committee (PSC), which served as the principal governance body for reviewing plans and making joint decisions on strategic issues of project implementation. Core institutions—including the MoJ, FIU, KP, and APC—were consistently represented, contributing to workplan fine-tuning and thematic focus areas. Furthermore, these actors assumed greater initiative in articulating institutional needs and proposing activities, indicating a positive shift from passive recipients to co-implementers.

In addition, terms of institutionalisation, multiple project-supported tools, policies, and practices were formally adopted by partner organisations. These included internal regulations, risk-based supervision manuals, and strategic inputs embedded into national frameworks such as the Rule of Law Strategy and Action Plan. The overall trajectory reflects deepening national engagement, signalling progress toward long-term sustainability and local ownership.

4.2 External Coherence

EQ4: To what extent is the intervention consistent with the interventions of other international actors in the context of economic crime?

Finding 4: The project demonstrated strong external coherence with the strategic priorities of key international actors engaged in economic crime prevention in Kosovo, including the EU, United Nations Office on Drugs and Crime (UNODC), United Nations Development Programme (UNDP), Organization for Security and Co-operation in Europe (OSCE).

The project's focus on legislative reform, institutional strengthening, and capacity building is coherent with EU Rule of Law priorities and FATF recommendations. Its efforts to enhance Kosovo's AML/CFT and anti-corruption frameworks complement broader EU enlargement benchmarks and MONEYVAL recommendations.

The project established coordination with other donor-funded interventions, particularly through structured engagement in national policy processes and thematic working groups, (e.g. for the Anti-

Corruption Strategy 2023–2026, led by UNDP, PECK III provided targeted legal recommendations).

The project maintained close communication with the EU's IPA programmes, (such as the Home Affairs Programme-HAPE), with UNODC (in relation to AML enforcement), OSCE (on judicial training), and GIZ (on institutional capacity-building), thus avoiding overlaps in technical support and reform sequencing.

There are several examples of the coordination with other initiatives. For example, the training of responsible police officers on protection of whistleblowers was organised in cooperation with the EU funded project "Support to Kosovo Police Reform" to maximise the impact of the activity.

Furthermore, the Concept document on Confiscation Fund and review of the AML/CFT legal framework was a joint effort between this project and the US and UK Embassy in Pristina.

In addition, PECK III enabled the participation of Kosovo authorities in the regional activities organised under the EU/Council of Europe joint programme Horizontal Facility for the Western Balkans and Turkey - phase II (HF II) and in particular to the regional action against Economic Crime (HFII-AEC-REG).

In another example, the project brought together relevant international partners at the Working Group meeting on "Aligning the AML/CFT Law with evolving international standards and EU Directives".

Coordination mechanisms included joint consultations, participation in donor coordination platforms, and contribution to national-level reviews such as the National Risk Assessment update. PECK III was an active contributor to information-sharing platforms and informal donor roundtables which promoted a harmonised approach to supporting Kosovo's economic crime response system.

4.3 Effectiveness

EQ5: To what extent did the project contribute to improving international and interinstitutional cooperation?

Finding 5: The project contributed substantially to improve both international and interinstitutional cooperation. At the international level, the Special Prosecution Office highlighted how PECK III facilitated effective mutual legal assistance—most notably with Italian authorities—by leveraging the project's expert networks, which led to prioritised and expedited responses to requests.

Through strategic coordination meetings and events, the project also supported and facilitated Kosovo institutions involvement to regional initiatives such as the EU/Council of Europe Horizontal Facility and the Western Balkans Coordination Workshop, fostering peer exchange and aligning practices with international AML/CFT standards.

Domestically, the project established a regulation on Joint Investigation Teams (JITs), leading to the operationalisation of multi-agency task forces on complex cases. Institutions like APC, KP, FIU,

and CBK reported enhanced cooperation, trust, and alignment of practices, driven by PECK III mentoring, joint training, and regulatory support.

EQ6: To what extent has the project achieved its expected results? What have been the reasons for achievement and lack thereof?

Finding 6: Strong output delivery and satisfactory outcome progress is evident as the project delivered the majority of its planned outputs, achieving over 80% of its Logframe targets across four components. Progress toward deeper outcome-level change was noted.

Component I (AC) saw significant progress. The project delivered a corruption risk mapping tool, supported the finalisation of the 2023–2026 Anti-Corruption Strategy action plan, and provided input on asset declaration legislative and institutional frameworks. Seven institutions—including APC, MoJ, and State Prosecutor's Office—received integrity assessments and tailored reform guidance. APC confirmed integration of PECK III tools into its 2024 institutional action plan.

Component II (AML/CFT) focused on strengthening operational frameworks. PECK III developed three SOPs for FIU, trained over 120 officers in financial investigation techniques, and facilitated a Memorandum of Understanding among the FIU, CBK, and the Prosecutorial Council. Legislative support extended to the AML/CFT Law and Beneficial Ownership Law. Thanks to these efforts (including but not limited to the training sessions) institutional feedback from the FIU, KP, and prosecutors noted improvement in handling of suspicious transactions and cross-border casework.

Component III (Asset Recovery) delivered a revised AMSCA manual, supported amendments to the Law on AMSCA, and trained 78 officials across agencies. All interviewees noted that, thanks to the manual and the training sessions, their staff knowledge and capacities have increased and this is gradually being reflected in their daily work, although a complete improvement in the institutional performance is a long term process and could not be observed at this stage. Substantial improvement in the institutional performance is also affected by external factors. For instance, while the MoJ and AMSCA incorporated outputs into internal reform proposals, systemic legal adoption was hindered by persistent institutional fragmentation, overlapping mandates, and limited political momentum—especially within Parliament.

Finding 7: Stakeholders widely praised the project's technical quality and methodological precision. MoJ, FIU, and the Special Prosecution Office highlighted the practical relevance of PECK III's tools and guidance. Prosecutors reported improved confidence in handling complex financial cases, while the FIU noted full adoption of SOPs in line with its strategic priorities.

However, institutional absorption varied. The judiciary and AMSCA reported difficulties sustaining reforms due to limited internal capacity, high staff turnover, and the absence of embedded training infrastructure. While Kosovo Police and the FIU demonstrated stronger institutionalisation, judicial and prosecutorial bodies remained reliant on external training.

Capacity-building was extensive: over 30 targeted training sessions were delivered, covering financial profiling, typology-based training, and investigative handbooks. Still, concerns were raised by civil society actors and technical staff that knowledge remained overly centralised within a few individuals, and cascading training systems had not been developed to ensure sustainability.

Finding 8: PECK III significantly influenced legislative and policy development. The project supported at least 12 legal and policy instruments. These reforms were coordinated with key institutions and reviewed within inter-ministerial working groups. The MoJ incorporated PECK III-supported inputs into the draft Criminal Code and the Rule of Law Functional Review Strategy.

PECK III introduced a range of technically sound and context-specific tools that were widely adopted by key institutions, contributing to operational reforms in anti-corruption, AML/CFT, and asset recovery. The CRA methodology was fully integrated into APC's annual work planning, which marked the first time such an approach had been undertaken in Kosovo.

The methodology and data derived from this exercise have since been integrated into the agency's broader preventive framework, including the "corruption proofing" of legislation. This has not only elevated the quality and strategic focus of APC interventions but also enhanced its ability to deliver evidence-based policy recommendations.

A second transformative outcome was the strengthening of the whistleblower protection system. The KIPA has certified six local trainers on whistleblower protection, whereas APC has been able to train designated public officials across approximately 200 public institutions responsible for implementing this mechanism. These efforts are now embedded into the APC's operational work and contribute to increased transparency, accountability, and early detection of potential wrongdoing within public administration.

A tailored typology of corruption risks and red flags supported institutions like the MoJ, CBK, and Police Inspectorate.

The Risk-Based Supervision Manual developed for CBK is now operational and used to guide inspections and prioritise supervisory actions, supported by compliance scoring tools and risk analysis templates. The FIU institutionalised SOPs for STR handling and interagency cooperation, alongside statistical templates for AML/CFT monitoring.

In the area of enforcement, case profiling and prioritisation tools were applied by prosecutors and investigators. Training and e-learning modules were handed over to KJI, KIPA, and KAPS, and several were incorporated into internal curricula.

Despite this progress, implementation was delayed by external constraints: shifting political leadership, parliamentary gridlock, and inter-agency friction. For instance, repeated postponements of the revised AMSCA Law stemmed from political turnover and lack of legislative momentum. Technical readiness did not always translate into political will.

EQ7: What difference has the project and its activities made to the beneficiaries up to date?

Finding 9: The project succeeded in building institutional trust and ownership. Core institutions consistently highlighted the relevance and depth of PECK III's assistance.

One of the most significant perceived contributions of PECK III was its role in strengthening the institutional integrity and structure of APC, particularly at a time when the agency was undergoing structural reform. This was confirmed by APC representatives, FIU, and also CSOs that observed a visible improvement in APC's credibility, internal organisation, and capacity to fulfil its mandate—results which they directly attributed to the project's technical support.

FIU is reported to have significantly improved its internal systems and operational integrity, particularly in its interactions with commercial banks and other institutions. Communication and cooperation mechanisms have become more robust, and the FIU is now seen as a more reliable institutional actor within the AML framework.

MoJ specifically underscored the value of the project's regionally experienced experts, who went beyond technical inputs to facilitate alignment among institutions during legislative processes. This early credibility laid a strong foundation for ongoing cooperation and encouraged sustained uptake of project outputs.

Finding 10: Practical application of the project-supported tools catalysed institutional changes and improvements.

The project's influence extended beyond knowledge acquisition to real-world application. Institutions began integrating PECK III tools into operational workflows. The Special Prosecution Office reported that project-supported methodologies improved their handling of complex economic crime, including mutual legal assistance processes and joint investigations.

Similarly, the APC adopted the corruption risk mapping tool for prioritisation of risk areas, while CBK transitioned from rule-based to risk-based supervision, citing project mentoring as a catalyst. These examples illustrate how PECK III fostered behavioural change, not just technical capacity.

The training sessions were pivotal in improving both the volume and quality of STRs, which rose from 320 in 2018 to 1,000 in 2024. This reflects greater awareness and capacity among financial institutions and reporting entities such as public notaries. Mentoring on risk-based supervision enhanced the FIU's ability to monitor private sector compliance.

The project's engagement with prosecutors also contributed to a rise in ML indictments, arrests, and convictions. A key milestone was Kosovo's first standalone ML conviction, issued by the Supreme Court in 2023—without requiring a predicate offence. This case, based on joint investigations involving banks and the FIU, set a legal precedent in Kosovo and the wider region. The project supported this outcome through mentoring on international jurisprudence, and four

similar convictions have followed. The 2023 case was also recognised globally, selected as one of 26 best practices in AML enforcement.

The project's role in strengthening Kosovo's AML legal framework contributed to improved alignment with EU standards, facilitating Single Euro Payments Area (SEPA) integration and enhancing Kosovo's credibility in international financial cooperation.

Finding 11: There is tangible (and to a good extent-unparalleled) contribution on legal and institutional reform thanks to the drafting or revision of at least 14 laws and 10 bylaws. Many of these instruments were adopted; others became strategic inputs for broader reform agendas.

In addition, PECK III-developed manuals and training materials were institutionalised in national training academies which reflects the project's contribution to aligning Kosovo's legal framework with international standards.

From the prosecution's side a particularly impactful element of the project was the facilitation of JITs. Through the project, the Special Prosecution Office successfully initiated several joint investigations, both internationally and domestically. Internally, a Regulation on JITs (2025) has been put into effect, allowing for the formation of multi-agency teams to address complex criminal investigations more systematically.

The interviewee from the prosecution side considered this institutional development as one of the most significant achievements facilitated by PECK III, given its direct impact on improving the efficiency and effectiveness of criminal prosecution in Kosovo.

Finding 12: All stakeholders across the entire spectrum clearly stated that without PECK III, the progress would have been slower, less coherent, and heavily dependent on sporadic donor interventions. Key legislative initiatives would have lacked technical depth and institutional buy-in.

Civil society actors noted that PECK III served as a stabilising force during political uncertainty, helping maintain reform momentum.

EQ8: To what extent have the human rights approach and gender been mainstreamed in project design and implementation? What, if any, have been the project's effects on gender equality?

Finding 13: The project moderately integrated human rights and gender considerations into its design and implementation. Evidence from progress reports and activities indicates that human rights and gender equality were treated as cross-cutting principles. For instance, several awareness-raising and training activities included dedicated segments on international human rights standards, with an explicit focus on anti-discrimination, gender-sensitive AML/CFT approaches, and access to justice for vulnerable groups. The project consistently requested

authorities to ensure gender equal representation in project activities, however this could not be promoted in case of composition of working groups related to drafting legislation and by laws, as that remains internal sole responsibility of institutions in charge of establishing such groups.

In terms of quantitative indicators, the project supported at least seven activities that explicitly addressed gender or human rights. There is limited consistent tracking of beneficiary perceptions regarding gender and human rights integration.

The absence of an M&E expert limited the project's capacity to systematically integrate gender perspectives into its activities and to consistently track performance across outputs and outcomes.

Regarding potential impact, while PECK III's influence on direct gender equality outcomes appears limited, the project contributed to laying groundwork for systemic improvements. Legal amendments and institutional procedures (e.g., FIU, police, judiciary) reflect increased attention to human rights principles and gender sensitivity, particularly in money laundering investigations involving trafficking and exploitation cases.

4.4 Efficiency

Finding 14: Despite operating with only two full-time staff on the ground the project successfully delivered a wide range of outputs across four technically demanding components.

This minimal field structure was compensated by targeted and efficient support from Council of Europe's Strasbourg office, which provided administrative backing and mobilised specialised technical expertise.

The project underwent two extensions, from an originally planned 36-month duration to 60 months. The first extension to 51 months was prompted by staffing limitations and delays in activity implementation; the second extension, to 60 months, was required due to the application of EU restrictive measures affecting Kosovo and subsequent administrative delays. While these extensions resulted in a longer implementation timeframe, they did not appear to compromise the cost-efficiency of the intervention.

There is no evidence to suggest that an alternative delivery model—such as a consultant-heavy structure—would have led to better results with fewer resources. On the contrary, the flexible hybrid model adopted—combining a lean in-country presence with high-level remote and mission-based expertise—appears to have enabled the project to adapt swiftly to local needs, avoid unnecessary fixed costs, and concentrate resources on delivering technical outputs.

4.5 Sustainability

Finding 15: A substantial number of project-supported reforms and tools have been formally adopted and embedded in Kosovo's legal and institutional frameworks, providing a solid basis for sustainability.

Because many of these deliverables are of a normative or "written" nature—such as legal frameworks, SOPs, and policy documents—they do not require continuous financial inputs to

remain in effect. However, it must be noted that the implementation of these deliverables is still not fully complete, although some steps related to their implementation are being taken by the authorities.

The beneficiary institutions reported that they have already embedded these tools into their internal operations. For example, the Central Bank's Manual on Risk-Based Supervision is now used operationally, and the APC's corruption risk mapping methodology has become part of its annual institutional workplan.

Finding 16: Mechanisms to sustain project outcomes exist but remain uneven across institutions; where embedded, sustainability is stronger, but gaps persist in enforcement and institutional capacity.

Several mechanisms to promote sustainability were built into the project's approach. These include the transfer of training materials to national academies (KIPA, KAPS, KJA), the certification of national trainers, and the production of manuals and SOPs with local ownership.

In institutions like the APC, CBK, and SPRK, reforms initiated through PECK III have begun to take root, supported by leadership buy-in and internalisation of methods. However, sustainability is less assured in other entities such as AMSCA, the judiciary, and smaller regulatory bodies, where project tools are not yet fully institutionalised or reliant on continued donor-funded training and mentoring.

KIIs revealed that high staff turnover, overlapping mandates, limited IT infrastructure, and a lack of internal budgeting for implementation were cited as main inhibitors.

Finding 17: Stakeholders widely recognise the value of PECK III and has laid good foundations. Nevertheless, the reform environment remains fragile and institutions do not have sufficient capacities to continue on their own with the same level of reform depth and coordination.

All beneficiary institutions expressed concerns about the ability to maintain reform momentum without a follow-up initiative and that ongoing support would be needed to consolidate reforms.

Civil society stakeholders also warned that the project's impact could go in vain without a mechanism to maintain momentum, track enforcement, and promote inter-agency accountability in the years following closure.

5. Conclusions and recommendations

5.1 Conclusions and lessons learned

Relevance

Conclusion 1:

The design and evolution of PECK III reflected a high degree of strategic relevance. The objectives were tightly aligned with the compliance gaps particularly those highlighted by GRECO and MONEYVAL. Beyond alignment, the project demonstrated clear responsiveness to Kosovo's evolving legal and institutional context—especially in areas such as legislative drafting, institutional coordination, and asset recovery. The design followed a logical progression from problem diagnosis to targeted intervention, with outputs directly addressing priority gaps.

Conclusion 2:

Ownership of the project by national institutions was evident throughout its lifecycle. Early-stage engagement with key partners ensured that PECK III's priorities reflected national needs and institutional realities. Entities such as the FIU and APC were active contributors to the project's design and its evolving implementation.

The inclusive governance structure, particularly through the Project Steering Committee, enabled sustained institutional participation and influence over project direction. Far from being passive recipients, national institutions emerged as active reform actors—suggesting a strong likelihood of sustainability for the project's results.

Conclusion 3:

PECK III demonstrated a high degree of external coherence by aligning its interventions with the strategic priorities and ongoing efforts of key international actors. Its focus on legal reform and capacity building complemented EU, UNODC, UNDP, OSCE agendas, while its coordination with donor platforms and technical working groups ensured complementarities and minimised duplication. Through joint consultations and sustained engagement in national policy processes, PECK III positioned itself as a relevant and collaborative actor within Kosovo's broader reform architecture.

Effectiveness and Impact

Conclusion 4:

The adoption and sustained use of PECK III-supported tools across multiple institutions demonstrates the project's significant contribution to operational reform and institutional strengthening. Tools such as the CRA methodology at APC, the strengthening of the Whistleblower system, the Risk-Based Supervision Manual at CBK, and SOPs at the FIU have been effectively institutionalised and are now embedded in day-to-day workflows. Their relevance and practicality

have translated into measurable improvements in risk assessment, supervisory planning, and financial crime investigation.

Moreover, the integration of case profiling tools within prosecutorial practice and the formal transfer of training materials to KJI, KIPA, and KAPS further underscore the project's potential long-term impact and sustainability. The consistent uptake of these tools across agencies not only reflects strong alignment with institutional needs but also confirms that the project's technical outputs have laid a sustainable foundation for continued progress in Kosovo's anti-corruption and AML/CFT efforts.

Its technical assistance and coordination efforts strengthened institutional trust. These achievements represent a clear shift from fragmented efforts toward cooperation mechanisms.

Conclusion 5:

The project delivered the majority of its planned outputs (few outputs were planned to be delivered after the evaluation field phase) and generated measurable progress at the outcome level across anti-corruption, AML/CFT, and asset recovery domains. Legislative reforms were enacted, institutional toolkits were adopted, and capacity development efforts received broad praise for their quality and applicability. However, the consolidation of these gains remained uneven due to structural barriers—including political inertia, institutional fragmentation, and limited mechanisms for follow-up.

Conclusion 6:

PECK III's effect on legal, policy, and institutional reform was both wide-ranging. The project catalysed tangible improvements in operational practices, from risk-based AML supervision to coordinated prosecutions. It supported the adoption or advancement of over 24 legal instruments, while its tools and methodologies began to embed within national training systems.

The absence of PECK III would have resulted in a markedly slower, more fragmented, and donor-dependent reform process. Stakeholders' consensus across all sectors confirms that the project played an indispensable role in accelerating progress and coordinating reform efforts.

Conclusion 7:

The implementation of PECK III through Council of Europe added clear and strategic value as the Council of Europe—through ECCD—ensured consistent alignment with GRECO and MONEYVAL methodologies. This combination of deep technical expertise, regional insight, and institutional neutrality fostered strong stakeholder trust and enabled highly contextualised support. As such, the Council of Europe proved to be not only an appropriate implementing partner, but a key enabler of Kosovo's compliance and institutional development in the economic crime field.

Efficiency

Conclusion 8:

PECK III's implementation model demonstrated a high level of operational efficiency. The project delivered its intended outputs through a lean structure that maximised resources—combining a small in-country presence with expert support mobilised via the Council of Europe's Strasbourg office. This approach ensured technical quality while maintaining cost discipline, and there is no evidence to suggest that a different model would have achieved better results with fewer resources.

Conclusion 9:

While the project required two extensions, these were driven by external and staffing-related factors rather than inefficiency. Despite this, the project's overall efficiency remained strong, with delivery achieved in a resource-conscious and effective manner.

Sustainability

Conclusion 10:

PECK III laid a solid foundation for sustainability by embedding a wide range of legal reforms, tools, and procedures within Kosovo's institutional architecture. Many of the project's outputs—such as laws, SOPs, and operational manuals—are normative in nature and likely to retain their relevance without requiring significant financial investment. In the short term, sustainability appears credible, particularly in agencies such as the APC, FIU, and CBK, which have demonstrated strong ownership and integration of project-supported tools.

Conclusion 11:

However, institutionalisation of the outcomes remains uneven. Bodies like AMSCA and segments of the judiciary continue to face structural and capacity-related challenges that limit their ability to fully sustain reforms. The country's non-membership in organisations such as Europol, Eurojust, OLAF, Interpol, and the UN constrains real-time information sharing and restricted access to international data hampers investigations and reduces the effectiveness of AML/CFT efforts. Moreover, the broader reform environment is fragile. In the absence of continued technical support, strategic coordination, and a mechanism for follow-up, there is a real risk of stagnation or regression—especially in politically sensitive or enforcement-focused areas.

Lessons learned

1. Strategic alignment with international standards enhances project relevance and uptake. Projects anchored in the recommendations of recognised monitoring bodies are more likely to secure institutional buy-in and facilitate adoption of reforms, especially when the implementing partner has direct involvement in shaping those standards.
2. A lean implementation model can be efficient, but requires targeted expertise and robust central support.
3. A crucial point and lesson learned is that ownership and sustainability are strengthened when national actors co-lead design and implementation. Early involvement of institutions in shaping priorities enables a shift from passive reception to active institutionalisation of reforms.

4. Legal reforms alone are insufficient without political commitment and operational resourcing. While PECK III supported the adoption of numerous legal instruments, sustainability depends equally on the institutional capacity to implement them.

5.2 Recommendations

1. **Address the challenges in the implementation of the Legal and Policy Frameworks**

Prioritise efforts to address challenges stemming from the implementation of key legislation, particularly the Law on Conflict of Interest and the Law governing the APC, to enhance their enforceability, relevance, and responsiveness to emerging corruption risks.

2. **Strengthen Private Sector Compliance Capacity**

As a secondary objective, a follow up phase should consider offering continued technical assistance to private financial institutions to address evolving AML/CFT/CPF threats. This includes updated guidance, risk-assessment tools, and enhanced supervisory coordination to counter increasingly complex financial crime patterns.

3. **Institutionalise Learning and Knowledge Transfer**

Ensure that future projects build internal capacity through the development and handover of modular training content, with a focus on building national trainer networks in justice and law enforcement institutions.

4. **Promote Meaningful National Ownership**

Engage key institutions from the project design phase through implementation to ensure local relevance, strengthen buy-in, and foster institutional leadership.

5. **Further integrate M&E and Gender Expertise starting at project design stage**

Incorporate dedicated monitoring and gender equality specialists early in the project cycle to enable performance tracking, inclusion, and evidence-based course correction across all components.

6. Annexes

6.1 Annex 1: Evaluation Matrix

Evaluation Criteria	Evaluation Question	Sub-Question	Indicators	Data Collection Instruments	Data Sources	Data Analysis
Relevance	EQ1: To what extent were the project design and including its amendments suitable to address the findings of the Council of Europe assessments on “Compliance with international standards in the anti-corruption area” (CoE AC Assessment) and on “Compliance of Kosovo with intentional AML/CTF Assessment)?	SQ1: To what extent did the project design and amendments align with the specific recommendations of the CoE AC and AML/CTF Assessments? SQ2: How effectively did the amendments enhance the project’s ability to address identified compliance gaps in anti-corruption and AML/CFT frameworks?	EQ1 I1: Degree of alignment between project activities and key gaps identified in CoE AC and AML/CTF Assessments. EQ1 I2: % of legislative and procedural reforms supported by the project that directly correspond to CoE AC and AML/CTF recommendations. EQ1 I3: Stakeholder perception on the relevance of interventions in addressing compliance gaps	Desk review: Comparative analysis of project design, amendments, and CoE assessment findings Key Informant Interviews (KIIs): project team and CoE experts. KIIs: FIU, judiciary, law enforcement, and policymakers.	CoE AC and AML/CTF Assessment Reports. - Project documents Kosovo legal and regulatory framework. - Government policy documents and action plans. – KIIs transcripts with key stakeholders.	Content Analysis: Comparison of project documents and CoE assessments to identify alignment gaps. Cross-referencing legal reforms with CoE recommendations; calculating percentage of compliance. Thematic Analysis: Coding qualitative data from KIIs for recurring themes.
	EQ2: What, if any, issues would still need to be addressed to further enhance the overall system and capacities of	SQ1: What institutional and operational gaps remain in Kosovo’s anti-corruption and AML/CFT	EQ2 I1: Nr of identified regulatory and enforcement gaps in AML/CFT and anti-corruption frameworks.	Desk review: Comparative analysis of existing policies vs. CoE recommendations.	AML/CFT laws and policies. CoE & FATF assessment reports Transcripts from KIIs; Government of Kosovo’	Content & Gap Analysis: Comparing policies, laws, and enforcement structures with CoE recommendations.

	Kosovo authorities to counter economic crime?	enforcement mechanisms? SQ2: What are the key challenges in ensuring the sustainability and effectiveness of economic crime prevention measures?	EQ2 I2: Stakeholder perception of remaining capacity challenges in law enforcement, judiciary, and financial institutions	Legal and policy experts. Structured questionnaire to officials. KIs with Law enforcement, judiciary, FIU, financial institutions.	capacity assessment reports.	
	EQ 3: To what extent has the project ownership been ensured by project partners?	SQ 1: How actively have project partners contributed to the design, implementation, and decision-making processes of the project? SQ2; What measures have been taken to ensure sustainability of outcomes by local partners?	EQ3 I1: Level of involvement of partners in key decision-making processes (measured through participation in meetings, consultations, and planning activities). EQ3 I2: Extent to which project-supported policies, tools, and practices have been institutionalized within partner organizations. EQ3 I3: Financial and human resources allocated by project partners to sustain project results beyond donor support.	PSC records analysis: KIs with project partners. Desk review: Analysis of policies integrated into official procedures. KIs with policymakers on future commitments.	PSC attendance records. Project progress reports. KIs transcripts. Project implementation reports.	Comparative Analysis of partner engagement over time (e.g., increased participation, contribution levels). Thematic Analysis: Coding KIs responses to identify patterns of ownership.

External Coherence	EQ4: To what extent is the intervention consistent with the interventions of other international actors in the context of economic crime?	SQ1: How well does the project align with the strategies and priorities of other international actors working on economic crime in Kosovo? SQ2: What mechanisms are in place to ensure coordination and avoid duplication of efforts among international actors?	EQ4 I1: Degree of alignment between project objectives and the strategic priorities of other international actors EQ4 I2: Nr and effectiveness of coordination mechanisms (e.g., joint initiatives, working groups, information-sharing platforms) involving the project and other international actors.	Desk review: Comparative analysis of project strategy vs. international actors' policies. KIIs: Interviews with donor representative. Review of joint initiatives and working groups	Strategic documents from EU, UNODC, FATF, etc, KIIs with international organizations. Minutes from coordination meetings. - Reports on joint activities.	Comparative Analysis between project goals and international strategies. Thematic Analysis of recurring themes in KIIs regarding coordination challenges and successes.
	EQ6: To what extent has the project achieved its expected results? What have been the reasons for achievement and lack thereof?	SQ1 What progress has been made toward achieving the project's key expected outcomes? SQ2: What factors have facilitated or hindered the achievement of project results?	EQ6 I1 Percentage of project outputs and outcomes achieved against planned targets. EQ6 I2 Stakeholder perception of project effectiveness in achieving expected results. EQ6 I3 Number of policy, legislative, or institutional changes directly attributed to project interventions.	Desk review: Comparing planned vs. actual results. Performance tracking matrix: Analysing project logframe indicators. KIIs with project beneficiaries and stakeholders. Desk review: Identifying laws and policies influenced by the project. KIIs: Interviews with	Project progress and final reports. Monitoring and evaluation (M&E) data. KII transcripts with key partners. Training attendance and assessment reports. KIIs with judicial, FIU, and law enforcement officials	Comparative Analysis: Measuring actual vs. expected project results. Thematic Analysis: Identifying key enablers and barriers from qualitative interviews. Trend Analysis: Evaluating changes in institutional capacity over time.

			EQ6 I4 Extent of capacity development among key institutions involved in anti-corruption and AML/CFT enforcement. EQ6 I5 Number of external or unforeseen barriers that delayed or obstructed project activities.	policyholders and experts. Training records, KIs with trained officials on practical application. Barrier mapping: Identifying delays and challenges. Desk review: Risk logs and mitigation strategies.	Project work plans	
	EQ 6: What difference has the project and its activities made to the beneficiaries up to date?	SQ1: How have project activities improved the capacity and effectiveness of beneficiaries in addressing economic crime? SQ2: What tangible changes have beneficiaries experienced as a result of the project interventions?	EQ6 I1: Percentage of beneficiaries reporting increased knowledge, skills, or institutional capacity due to project interventions. EQ6 I1: Number of documented cases where project-supported tools, policies, or training have been applied in real-world scenarios.	KIs: In-depth discussions with trained personnel and project beneficiaries. Desk review: Reviewing official records, reports, and legal cases where measures were used.	KI transcripts with law enforcement, judiciary, FIU, and policyholders. AML/CFT enforcement reports. Institutional reports on the use of project-supported frameworks.	Thematic Analysis: Extracting qualitative insights from interviews on the significance of project activities.
	EQ7: To what extent have the human rights	SQ1: How effectively has the project integrated human	EQ7 I1: Number of project activities explicitly addressing	Desk review: Review of project reports, training	Project design documents and implementation reports.	Content Analysis: Identifying references to human rights and

	approach and gender been mainstreamed in project design and implementation? What, if any, have been the project's effects on gender equality?	rights and gender considerations into its activities and outputs? SQ2: What impact has the project had on promoting gender equality and protecting human rights within economic crime enforcement?	human rights and gender equality (e.g., training, policies, guidelines). EQ7 I1: Percentage of beneficiaries who perceive the project as effectively integrating gender and human rights considerations.	materials, and policy documents. Project monitoring data analysis: Tracking project activities related to human rights and gender. KIIs with beneficiaries and gender/human rights experts.	- Training materials and participant records. KII transcripts with relevant stakeholders.	gender in project documents. Thematic Analysis: Coding interviews for key themes related to gender and human rights mainstreaming.
Efficiency	EQ 8: To what extent could alternative working methods have led to the achievement of comparable or better results with fewer resources?	SQ1: How do project costs and resource allocations compare to similar interventions in the region?	EQ8 I1: Cost-efficiency ratio of project activities compared to alternative methods or similar interventions.	Financial and cost analysis: Benchmarking study: Reviewing similar projects for efficiency comparisons.	Project financial reports and budgets. Cost data from similar interventions. Expert insights from KIIs with financial and project management staff.	Evaluating efficiency based on similar interventions.
Sustainability	EQ9: What is the likelihood that the benefits from the intervention will be maintained in the short term (3-5 years) after the end of the project? What would be required to ensure the sustainability of the results?	SQ1: What mechanisms are in place to sustain project outcomes beyond donor support? SQ2: What additional measures are needed to ensure long-term	EQ9 I1: % of project-supported reforms, policies, or institutional practices formally adopted and integrated into national frameworks. EQ9 I2: Amount of national budget allocation dedicated	Desk review: integration into legal/regulatory frameworks. KIIs:. Budget review: Assessment of government financial commitment post-project. KIIs: Discussions with budgetary decision-	Official government reports and ministerial records. KIIs with policymakers and implementing team Ministry of Finance allocations. - KIIs with relevant government officials.	Trend Analysis: Assessing national financial contributions toward sustaining results. Thematic Analysis: Extracting insights from KIIs on sustainability challenges and recommendations.

		sustainability of the intervention?	to sustaining project outcomes post-donor funding.	makers and finance officers.		
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6.2 Annex 2: List of KIIIs

List of Participants and Institutions

1. *European Union Office in Kosovo (EUO)* – [M]
2. *European Union Office in Kosovo (EUO)* – [M]
3. *Financial Intelligence Unit (FIU)* – [M]
4. *FIU* – [F]
5. *FIU* – [M]
6. *FIU* – [M]
7. *Central Bank of Kosovo (CBK)* – Head of AML/CFT Division – [M]
8. *CBK* – [M]
9. – *State Prosecution* – [M]
10. *State Prosecution* – [M]
11. *Agency for Prevention of Corruption (APC)* – [M]
12. – *APC* – [M]
13. – *APC* – [F]
14. – *APC* – [M]
15. – *Justice Academy* – [M]
16. – *Justice Academy* – [F]
17. – *Kosovo Police* – [M]
18. – *Kosovo Police* – [M]
19. *Kosovo Police* – [M]
20. *Agency for Managing Sequestered and Confiscated Assets (AMSCA)* – [M]
21. – *Kosovo Prosecutorial Council (KPC)* – [F]
22. – *Ministry of Justice (MoJ)* – [F]
23. *MoJ* – [M]
24. – *Basic Court of Prishtina – Special Department* – [M]
25. – *TEB Bank* – [M]
26. – *Kosovo Law Institute (KLI)* – [M]
27. – *Movement FOL* – [F]
28. – *BIRN/Kallxo/Drejtësia në Kosovë* – [M]
29. – *Credins Bank Kosovo* – [F]
30. – *Council of Europe (CoE)* – [M]
31. EU-funded project “HAPE” M

Total individuals: 31 (Women: 7; Men: 24)

Female participation: 23%

Male participation: 77%