

Management Response and Action Plan

Name of Evaluation Report:	Final Evaluation of the “Project against Economic Crime in Kosovo*”		
Date of Evaluation Report:	23 June 2025	Date of Action Plan:	6 October 2025

Overall management response to the evaluation:

The Council of Europe’s Economic Crime and Cooperation Division (ECCD) took note of the findings of the final evaluation report. The report contains a very positive evaluation for the results of PECK III project confirming the project’s significant and multi-layered contribution to advancing the rule of law and enhancing Kosovo’s institutional response to economic crime. The scope was to cover all components and activities implemented from 1 July 2020 until the start of the evaluation report in March 2025. It includes five recommendations.

This management response is the one of the Council of Europe. Accepted recommendations and findings of the evaluation will feed into the preparation of the fourth phase of the Project against Economic Crime.

[FOR DECENTRALISED EVALUATIONS] Dissemination plan for the evaluation: please briefly explain how the report will be shared (internally, other CoE entities, donors, beneficiaries etc.), methods (email, events, website etc.), resources, timeframe and person responsible.

The ECCD has accepted fully three recommendations, partially accepted one recommendation related to Institutionalisation of Learning and Knowledge Transfer because the responsibility here does not lie solely with the CoE. Provided that new resources and co-operation possibilities are available, the Council of Europe is ready to further strengthen this area of intervention and support the designated authorities.

The ECCD rejects the recommendation related to further integrating M&E and Gender Expertise starting at project design.

The evaluation report will be shared with the DPC in Strasbourg, and EUD (donor) as well as the main beneficiaries (FIU, APC, AMSCA and Police) together with the final report in early 2026.

The report together with the Management Response will also be published on the [PECK III](#) website as well as on the dedicated webpage of the [DIO](#).

Management Decision ¹	Entity in Charge	Planned Actions ² (determined by Entity)	Justification ³ for Non-Acceptance	Target Date for Action	Person Responsible for Action
Recommendation 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.					
☐ Accepted ☒ Partially accepted ☐ Rejected	ECCD	Third phase of PECK project will end in December 2025. Addressing challenges related to the implementation of key legislation, particularly the Law on Conflict of Interest and the Law governing the APC was foreseen under the fourth phase of technical assistance provided there would be clear expectation of its starting due to political considerations. However, competent authorities would have the responsibility for implementation of the core of this recommendation pending confirmation for any future technical assistance support from the Council of Europe.		01/01/2027	Vlora Marmullakaj

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

² For implementing accepted recommendations.

³ For recommendations that are partially accepted or rejected.

Recommendation 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.					
☒ Accepted ☐ Partially accepted ☐ Rejected	ECCD	Under PECK III several crucial initiatives were undertaken to strengthen private sector compliance capacity. As noted in the assessment report, the mentoring on risk-based supervision enhanced the FIU's ability to monitor private sector compliance whereas due to the project support CBK transitioned from rule-based to risk-based supervision. However, there are further needs in this area which the CoE will follow up in future technical assistance with the clear understanding that the usual main beneficiaries of the technical assistance would be relevant public authorities.		01/01/2027	Edmond Dunga
Recommendation 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.					
☐ Accepted ☒ Partially accepted ☐ Rejected	ECCD	During the PECK III a number of technical tools and manuals were developed including ToT for Institute for Public Administration and Justice Academy. However,		01/01/2027	Edmond Dunga

		application of such knowledge and trainers remains inconsistent due to limited institutional absorption and dependency on donor-funded expertise. Provided that new resources and co-operation possibilities are available, the Council of Europe, would be ready to further strengthen this area of intervention and support the designated training authorities.			
Recommendation 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.					
☒ Accepted ☐ Partially accepted ☐ Rejected	ECCD	Throughout the implementation, PECK project ensured close cooperation and promotion of ownership to beneficiaries. This is also documented in the evaluation report whereby evidence from the desk review and the KIIs confirms that ownership by PECK III partners was actively ensured from the outset and strengthened over time. Authorities such as FIU and APC 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		01/01/2027	Edmond Dunga

		high degree of institutional buy-in and strategic ownership. Ownership was also 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. Key competent institutions will be involved from the design phase of any future technical assistance action.			
Recommendation 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.					
☐ Accepted ☐ Partially accepted ☒ Rejected	ECCD		There was lack of analysis presented to evidence any adverse impact or gender bias. The fact that the recommendation is not in line with the agreed action/contractual documents is obvious and very important for a project which is expected to deliver what has been agreed with the donor. The analysis presented in the report supports indeed the opposite conclusion taking into account the positive impact of the human rights approach in a number of activities. The latest annual report also gives		

			examples of specific action taking into account gender-related aspects of the implementation of AC and AML/CFT measures (including on the participation, financial inclusion and crime policies, relations with the private sector). Incorporation of a dedicated monitoring and gender equality specialist for a project (or even in a bigger programme) on economic crime should clearly be among the agreed actions from the start and will not be feasible from a financial standpoint unless the project is dedicated specifically to the gender impact of the frameworks countering economic crime. Implementing this recommendation will render the Council of Europe not competitive compared to other technical assistance providers and has no practical relevance. Dedicated action to focus on gender equality would have required a structured approach and a specific outcome to be included in the logframe of the project. Furthermore, none of the international standard-setting and monitoring bodies in the area of		
--	--	--	---	--	--

			AML/AC have developed any dedicated and comprehensive review of the gender-related aspects of the application of AC and AML measures. Gender balance (which the project is extensively considering) is the only or among a very few examples of such work by international bodies. GRECO for example focuses on gender balance in its latest horizontal overview. The report notes that “GRECO was pleased to see the majority of the countries make efforts to implement the recommendations, applying many good practices and tools to improve women’s representation and gender balance in the police forces”. No noteworthy examples in the AML world emanating from standard-setters and monitoring bodies can be provided. The recommendation of the evaluation requires “evidence-based course correction” without noting or presenting any evidence of adverse effect of the project actions or any further positive action or considerations needed.		
--	--	--	---	--	--

			That being said, the Council of Europe already has unique expertise in gender mainstreaming stemming from its concern for human rights and work conducted by other parts of the organization on specific aspects (which are taken into account for economic crime as needed – such as women as victims, compensation mechanisms, sextortion as a form of corruption). Extensive standalone action on the part of the ECCD (in cooperation with DPC and other entities) in this area is already noted, rendering external monitoring or advice largely irrelevant and without any practical added value. It is noted that a gender coordinator has already provided relevant support within the Horizontal Facility programme which is related in terms of geographic scope (covering also Kosovo in its regional component) and the advice thereof has been taken into account and incorporated as needed horizontally. Based on this the Council of Europe (the ECCD) has developed (based on horizontal overview of all project implementation activities, more than 50 projects in the area of		
--	--	--	--	--	--

			economic crime), very extensive understanding and expertise regarding the gender dimension of its actions. The results of this analysis are informing all ECCD project activities and project design in the economic crime area.		
--	--	--	--	--	--