

Strengthened enforcement capacities of public authorities in the European  
Union project (STEP EU)

**MANAGEMENT RESPONSE TO THE STEP EU FINAL PROJECT EVALUATION  
REPORT**

APRIL 2026

## INTRODUCTION

This management response outlines how the Transparency International Secretariat (TI-S) intends to follow up on the findings and recommendations of the final independent evaluation of the European Commission-funded project “**Strengthened Enforcement Capacities of Public Authorities in the European Union**” (STEP EU). Implemented between 2024 and 2026, the project aimed to strengthen understanding of cross-border corruption risks and financial crime data gaps in the European Union, while supporting improved cooperation and engagement between civil society and relevant public authorities. Through comparative research, policy engagement, and collaboration among TI-S, the Liaison Office to the EU, and nine National Chapters (chapters), the project sought to contribute to stronger transparency, accountability, and enforcement in the area of financial integrity.

The independent evaluation was conducted between September 2025 and March 2026. It provides an assessment of the project’s performance against the OECD DAC evaluation criteria of relevance, coherence, effectiveness, efficiency, sustainability, and impact. The evaluation offers valuable reflections on the project’s achievements and implementation challenges, as well as practical recommendations to inform future initiatives addressing cross-border corruption, financial crime data, and civil society engagement in this policy area.

TI-S welcomes the findings of the evaluation and appreciates the constructive analysis provided. In particular, TI-S notes the confirmation of the project’s continued relevance in the evolving EU anti-corruption and anti-money laundering policy landscape, as well as the progress achieved across its objectives. The project has played an important role in strengthening the evidence base on financial crime data gaps, fostering collaboration among chapters, and supporting engagement with national and EU-level stakeholders.

The management response below outlines how TI-S interprets the evaluation findings and identifies areas where lessons learned will inform future programme design, implementation, and partnership-building efforts. The section below examines some of the points discussed by the evaluators.

Lead author: Linnea Mills, Dieter Zinnbauer
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Contributing authors: N/A
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## RESPONSE TO FINDINGS

- **Relevance**

TI-S agrees with the evaluation’s finding that the project was highly relevant to both EU policy priorities and national contexts. Its focus on cross-border corruption, financial crime data gaps, and emerging risk areas responded directly to evolving EU anti-money laundering and anti-corruption frameworks. The project also supported participating chapters in strengthening technical expertise

and engagement with relevant authorities, reinforcing its continued relevance beyond the implementation period.

- **Coherence**

TI-S agrees that the project demonstrated strong internal and external coherence. The three objectives - improving understanding of financial crime data, strengthening investigative capacities, and enhancing cooperation among authorities - formed a logically sequenced approach aligned with Transparency International's strategic priorities and complementary initiatives. At the same time, the evaluation highlights useful lessons regarding differing capacities among chapters and the need for clearer articulation of the Theory of Change at project inception.

- **Effectiveness**

TI-S acknowledges the evaluation's conclusion that the project successfully delivered its planned outputs, notably comparative research and dissemination activities that contributed to improved understanding of financial crime data gaps. While early indications suggest that the research has begun informing policy discussions and strengthening engagement with authorities, outcomes related to strengthened institutional capacity and enhanced inter-agency cooperation are likely to materialise over a longer timeframe.

- **Efficiency**

TI-S notes the evaluation's finding that the project was implemented with an overall sound level of efficiency despite initial staffing delays and turnover. Cost-effective approaches, including prioritising internal expertise and strategic use of digital collaboration tools, supported delivery. The evaluation also provides useful lessons regarding workload planning, coordination processes, and the balance between research and advocacy activities.

- **Sustainability**

TI-S agrees that the project established a solid foundation for continued work in this policy area. Participating chapters have strengthened their expertise and institutional relationships, and several are continuing engagement through follow-up initiatives and ongoing policy processes. As noted in the evaluation, sustainability will depend on continued resources, staff capacity, and sustained advocacy efforts.

- **Impact**

TI-S agrees that it is too early to assess the full impact of the project in terms of strengthened enforcement against cross-border corruption. Nevertheless, the project has contributed to early outcomes, including increased policy engagement, strengthened positioning of Transparency International in the financial integrity field, and improved access to relevant national authorities. These developments provide important foundations for longer-term impact.

## RESPONSE TO RECOMMENDATIONS

The evaluators made 13 recommendations. This section details TI-S’ response to each of them. Out of the 13, TI-S accepts ten, partially accepts two, and considers one as not feasible, as explained below.

### Project Design

Recommendation	Response
<ul style="list-style-type: none"> <li>● <b>Levelling up to build even capacity:</b></li> </ul> <p>From a relevance and coherence perspective, the evaluation highlights the value of embedding an early, on-demand capacity-building component. Joint activities at project inception—such as co-creating a shared Theory of Change—can support a stronger common understanding of objectives, assumptions, and roles, and help establish a unifying narrative that complements more linear deliverables. A needs-based assessment of technical research capacities and thematic knowledge at chapter level in the first project phase can enable more targeted and tailored support during the project period.</p>	<p><b>Accepted.</b></p> <p>TI-S welcome this recommendation and recognise the value of embedding early, needs-based capacity-building to support stronger alignment across participating chapters. In future initiatives, TI-S will consider incorporating joint activities at project inception, such as co-creating a shared Theory of Change, to foster a common understanding of objectives, assumptions, and roles. Conducting an early assessment of research capacities and thematic expertise may also help ensure that tailored support is provided where it is most needed throughout the project.</p>
<ul style="list-style-type: none"> <li>● <b>Modular research, with more focus on research exploitation/advocacy:</b></li> </ul> <p>The project design placed strong emphasis on research, generating substantive outputs. Looking ahead, a more</p>	<p><b>Accepted.</b></p> <p>It strongly aligns with TI-S’ experience in implementing multi-country research projects, where uneven research capacity and engagement across chapters have been</p>

differentiated design could enhance effectiveness and efficiency. A two-tier research model—comprising a core module for all chapters and an optional advanced module that chapters can self-select into—could better accommodate differing capacities and allocate research support while allowing advocacy objectives to feature more prominently where specific context and windows of opportunities make this advisable. Greater methodological flexibility could further enhance effectiveness. In some contexts, semi-structured interviews may complement or partially substitute surveys, enabling richer insights while retaining sufficient cross-country comparability.

a recurring structural challenge. In practice, differences in research expertise, access to stakeholders, staffing levels, and familiarity with methodologies can significantly affect delivery timelines and output quality. When such differences are not sufficiently factored into project design, delays may occur, ultimately placing pressure on the central team to compensate under tight deadlines.

TI-S therefore agrees that a more differentiated and capacity-sensitive model would enhance both effectiveness and efficiency. Rather than applying a uniform approach to all participating chapters, future multi-country research projects would benefit from adopting a more differentiated and capacity-sensitive design that better reflects variations in chapters’ research expertise, stakeholder access, and research capacity.

This could involve:

1. Systematically assessing research capacity of chapters at the design stage for selection or adoption of adequate research capacity building strategies. This could involve mapping research capacity and establishing research profiles of chapters.
2. Informing chapter selection by a careful consideration of research capacity and adapting the research training and support accordingly.
3. Establishing clear agreements with chapters regarding expectations, deliverables, and timelines to reduce implementation risks.
4. Moving toward a more differentiated support model rather than uniform technical assistance.
5. Providing regular tailored bi-lateral support to chapters needing capacity strengthening throughout the research process.

Importantly, TI-S will aim to allocate resources to support chapters’ research capacity based on the initial assessment. Providing intensive “handholding” to a limited number of weaker chapters can absorb significant central team capacity and should be properly resourced. Where resources are limited, project design, scope, and support modalities may need to be adjusted to ensure realistic expectations, manageable risks, and timely, high-quality delivery.

● **Shopping for access:**

**Partially accepted.**

<p>The evaluation also points to access constraints in some policy and practitioner spaces, issues that were most likely already anticipated during the design phase. Where appropriate, engaging a liaison consultant with existing networks in the AML/law enforcement area or establishing an advisory committee with retired and practising professionals may produce considerable benefits, improve strategic positioning, and facilitate much-needed broader access to key stakeholders.</p>	<p>Expanding contacts among law enforcement agencies and financial intelligence units was an added value of this project, especially for chapters. TI-S considers that it was worthwhile for TI-S and for chapters to initiate new and cultivate existing relationships under this project to strengthen the alignment of our advocacy with practitioner experiences and to raise the profile of our research findings among relevant communities. An external consultant may bring their own contacts, but the value was in the development of contacts within the TI Movement.</p> <p>TI-S will consider in the future inviting some of these contacts to join an advisory committee or contact group, to draw on their expertise and to sustain meaningful long-term relationships.</p>
<ul style="list-style-type: none"> <li>● <b>Forging meshes and personal connection:</b></li> </ul> <p>Finally, more frequent in-person check-ins and structured opportunities for lateral exchange between sub-groups of participating TI chapters could strengthen coherence and collective action across countries, particularly if organised around emerging thematic sub-areas such as crypto assets or art-related financial crime.</p>	<p><b>Partially accepted.</b></p> <p>Project coordination meetings, while online, aimed to serve this purpose. TI-S also hosted quarterly online Dirty Money Exchanges where chapters (including those working on Corrupt Money Flows issues beyond this project) had an opportunity to exchange and to get inspired on specific issues.</p> <p>Whether TI-S is able to go beyond these, especially for in-person sessions as recommended, depends on available time, funding, interest/initiative from chapters, and the strategic value (such as exploring a new issue or addressing an immediate opportunity).</p> <p>TI-S will aim to link chapters together when issues of joint relevance come up, on a case-by-case basis, for peer learning and exchange.</p>

## Project Implementation

Recommendation	Response
<ul style="list-style-type: none"> <li>● <b>Broader alliances, non-traditional partners:</b></li> </ul> <p>In terms of coherence and effectiveness, the project demonstrated the value of cross-practice collaboration with other civil society actors, with several strong examples at the country level. Building on these experiences, future initiatives could adopt a more systematic approach to partnership-building across all participating chapters. Additional opportunities to consider include collaborations with academic institutions, particularly to maximise the analytical use of the generated data, as well as with NGOs working on emerging or adjacent issues. More deliberately broadening outreach beyond established AML stakeholders may further enhance the potential impact.</p>	<p><b>Accepted.</b></p> <p>TI-S welcomes this recommendation and agrees that broadening alliances beyond traditional AML stakeholders can further strengthen the coherence and impact of future initiatives. Building on the positive examples of cross-practice collaboration within the project, TI-S will reflect on how to adopt a more systematic approach to partnership-building across participating chapters. This may include exploring collaborations with academic institutions to deepen the analytical use of project data, as well as engaging with NGOs working on related or emerging issues.</p>
<ul style="list-style-type: none"> <li>● <b>Editing the editing process:</b></li> </ul> <p>Clearer and more streamlined participation and consultation procedures for collective output production—supported by well-defined roles and responsibilities—would likely further improve implementation efficiency.</p>	<p><b>Accepted.</b></p> <p>TI-S agrees that the efficiency of the editorial process could be strengthened through clearer and more streamlined participation and consultation procedures, supported by well-defined roles and responsibilities. At the same time, it is important to note that established editorial processes are already in place, have been tested repeatedly, and are essential to ensuring the quality and consistency of collective outputs. While these processes and their respective steps have been communicated, TI-S partially acknowledges that they may not have been sufficiently clear or accessible to all contributors.</p> <p>This could be further strengthened by:</p>

	<ol style="list-style-type: none"> <li>1. TI-S to establishing a structured editorial process with clearly designated lead authors, reviewers, and final decision-makers would reduce duplication and overlapping review stages.</li> <li>2. TI-S to limit the number of review rounds, consolidating feedback before sharing it with authors, and introducing standardised commenting protocols.</li> <li>3. Early agreement on scope, key messages, and strategic positioning would also help bring more coherence to the review process and prevent late-stage substantive revisions.</li> <li>4. The introduction of firm timelines for feedback and a “silence implies consent/no objection” principle could also support timely completion.</li> </ol>
<ul style="list-style-type: none"> <li>● <b>Counter-talking points:</b></li> </ul> <p>The evaluation also suggests scope to strengthen policy influence through more systematic testing of research messages and policy asks. Proactive “red-teaming” could help anticipate both tactical counterarguments and substantive concerns—such as those related to surveillance or law enforcement accountability—and address them more robustly.</p>	<p><b>Accepted.</b></p> <p>TI-S accepts the suggestion of considering a ‘red teaming’ approach to help anticipate both tactical counterarguments and substantive concerns. TI-S is currently engaging with chapters to develop more robust arguments for certain thematic areas, such as personal data protection, that have arisen under the project.</p>
<ul style="list-style-type: none"> <li>● <b>A live business card for the project:</b></li> </ul> <p>Establishing a web presence that collects and showcases all public-facing deliverables and communications outputs also from chapter level could further strengthen public, dynamic visibility to external and internal stakeholders, provided this can be technically implemented at reasonable effort level.</p>	<p><b>Rejected.</b></p> <p>All TI-S projects have dedicated pages on the TI global website that bring together all externally published outputs produced by TI-S. These pages follow a standard template, which currently does not include direct linking to all external content hosted on chapters websites.</p> <p>It is also worth noting that many chapters primarily produce their project-related outputs in their national languages and for domestic audiences, publishing them through their own platforms. For this reason, the project page currently highlights the chapters involved in implementation and provides links to their respective websites.</p>

	<p>At this stage, TI-S is unable to further commit to enhancing the visibility of chapter-level outputs on the TI globalwebsite, as this would entail significant effort from both TI-S and the chapters to maintain the links. TI-S currently lacks the capacity to undertake this task. However, TI-S will explore avenues to encourage visitors to access the chapter pages, while ensuring that the approach remains practically feasible and consistent with the current template structure.</p>
<ul style="list-style-type: none"> <li>● <b>From follow-up to all-along fundraising:</b></li> </ul> <p>With regard to sustainability, the findings indicate the benefits of shifting from ad hoc follow-up fundraising to a more continuous approach. Mapping emerging research insights and potential new partnerships during the project and linking them to additional funding opportunities and developing joint add-on proposals along the way, may help sustain commitment, capacity, and results beyond the project period.</p>	<p><b>Accepted.</b></p> <p>TI-S accepts this recommendation and recognises the importance of a more continuous approach to fundraising to strengthen sustainability. In future initiatives, TI-S will reflect on how to more systematically link emerging research insights, partnerships, and advocacy opportunities to potential funding streams during the project period. This may include identifying opportunities for joint follow-up or add-on proposals that help sustain engagement, capacity, and results beyond the project lifecycle.</p>

## Managing staff transitions and relationships

Recommendation	Response
<ul style="list-style-type: none"> <li>● <b>Connection redundancy:</b></li> </ul> <p>Broadening external relationships can mitigate risks associated with staff changes. This may include cultivating linkages at both more senior and more junior levels, supported by practical measures such as co-attendance at key meetings.</p>	<p><b>Accepted.</b></p> <p>TI-S accepts this recommendation. Strengthening and diversifying external relationships can help mitigate risks related to staff turnover and support continuity in engagement with key stakeholders. TI-S will therefore encourage broader relationship-building across different levels. At the same time, TI-S recognises that chapters often operate with limited staff capacity and funding, so implementation will need to remain proportionate and focus on key relationships where broader engagement adds the most value.</p>
<ul style="list-style-type: none"> <li>● <b>Relationship handover:</b></li> </ul> <p>Strong internal and external handover protocols, underpinned by a shared and living Theory of Change, can further support continuity and organisational learning.</p>	<p><b>Accepted.</b></p> <p>Strong internal and external handover protocols are essential to ensuring continuity, safeguarding institutional memory, and maintaining consistent stakeholder engagement.</p> <p>Anchoring these processes in a shared and regularly updated Theory of Change would further strengthen coherence, support smoother transitions, and enhance organisational learning by ensuring that new team members and partners understand both the strategic objectives and the intended pathways to change.</p>
<ul style="list-style-type: none"> <li>● <b>Continuity architectures:</b></li> </ul> <p>Light forms of institutionalisation—such as participation in technical working groups or advisory mechanisms—may also</p>	<p><b>Accepted.</b></p> <p>TI-S accepts this recommendation and recognises the value of lighter forms of institutionalised cooperation to support sustainability. Where appropriate, future initiatives will explore opportunities to engage in technical working groups, advisory mechanisms, or other informal coordination structures that help maintain dialogue</p>

enhance sustainability, while recognising that formal agreements (e.g. MoUs) may be impractical in some law enforcement contexts.	and collaboration beyond the project period, while remaining mindful of the practical constraints that may exist in certain law enforcement contexts.
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### Monitoring, evaluation, and learning (MEL)

Recommendation	Response
<ul style="list-style-type: none"> <li>● <b>Learning paper</b></li> </ul> <p>The production of a learning paper that consolidates feedback and lessons for future programming was also identified as good practice, providing a solid evidence base to inform future design and implementation decisions.</p>	<p><b>Accepted.</b></p> <p>TI-S welcomes this recognition and agrees that producing a learning paper is good practice. TI-S will continue to reflect on lessons learned and document key insights where possible. However, due to capacity considerations, TI-S may not always be able to prepare a learning paper in the same format as in this project (e.g. based on extensive 1:1 interviews with chapters) for every project.</p>

## Final Remarks

Transparency International gratefully acknowledges the support of the European Commission, in particular the Directorate-General for Justice and Consumers (DG JUST), as an important partner in advancing our work on anti-corruption and financial integrity. The European Commission's support for the work of the Transparency International at both national and regional levels has enabled continuity in our efforts and contributed to creating the conditions for longer-term change and impact.

TI-S also extend sincere thanks to the evaluators for facilitating a constructive and valuable evaluation process. The exercise has provided important reflections and learning for Transparency International, generating insights that extend beyond the scope of this project and will inform future programming and organisational practice.

## Annex

### Final Evaluation Lessons and Recommendations

# STEP EU final project evaluation report

## 9. LESSONS, RECOMMENDATIONS AND CONSIDERATIONS FOR FUTURE PROGRAMMING

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The evaluation identified a set of lessons learned and forward-looking considerations relevant to the *relevance, coherence, effectiveness, and sustainability* of similar future initiatives. These reflections should be read in close conjunction with the [Draft Learning Paper](#)<sup>1</sup>, which provides a more detailed synthesis of participant perspectives on what worked well and where adaptive improvements may be warranted.

### Project design

- **Levelling up to build even capacity:** From a *relevance and coherence* perspective, the evaluation highlights the value of embedding an early, on-demand capacity-building component. Joint activities at project inception—such as co-creating a shared Theory of Change—can support a stronger common understanding of objectives, assumptions, and roles, and help establish a unifying narrative that complements more linear deliverables. A needs-based assessment of technical research capacities and thematic knowledge at Chapter level in the first project phase can enable more targeted and tailored support during the project period.
- **Modular research, with more focus on research exploitation/advocacy:** The project design placed strong emphasis on research, generating substantive outputs. Looking ahead, a more differentiated design could enhance *effectiveness and efficiency*. A two-tier research model—comprising a core module for all chapters and an optional advanced module that Chapters can self-select into—could better accommodate differing capacities and allocate research support while allowing advocacy objectives to feature more prominently where specific context and windows of opportunities make this advisable. Greater methodological flexibility could further enhance *effectiveness*. In some contexts, semi-structured interviews may complement or partially substitute surveys, enabling richer insights while retaining sufficient cross-country comparability.
- **Shopping for access:** The evaluation also points to access constraints in some policy and practitioner spaces, issues that were most likely already anticipated during the design phase. Where appropriate, engaging a liaison consultant with existing networks in the AML/law enforcement area or establishing an advisory committee with retired and practising professionals may produce considerable benefits, improve *strategic positioning* and facilitate much-needed broader access to key stakeholders.
- **Forging meshes and personal connection:** Finally, more frequent in-person check-ins and structured opportunities for lateral exchange between sub-groups of participating

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<sup>1</sup> This is an internal Transparency International document and may be shared upon request.

TI chapters could strengthen *coherence* and collective action across countries, particularly if organised around emerging thematic sub-areas such as crypto assets or art-related financial crime.

## **Project implementation**

- Broader alliances, non-traditional partners: In terms of *coherence and effectiveness*, the project demonstrated the value of cross-practice collaboration with other civil society actors, with several strong examples at the country level. Building on these experiences, future initiatives could adopt a more systematic approach to partnership-building across all participating chapters. Additional opportunities to consider include collaborations with academic institutions, particularly to maximise the analytical use of the generated data, as well as with NGOs working on emerging or adjacent issues. More deliberately broadening outreach beyond established AML stakeholders may further enhance *the potential impact*.
- Editing the editing process: Clearer and more streamlined participation and consultation procedures for collective output production—supported by well-defined roles and responsibilities—would likely further improve *implementation efficiency*.
- Counter-talking points: The evaluation also suggests scope to strengthen policy influence through more systematic testing of research messages and policy asks. Proactive “red-teaming” could help anticipate both tactical counterarguments and substantive concerns—such as those related to surveillance or law enforcement accountability—and address them more robustly.
- A live business card for the project: Establishing a web presence that collects and showcases all public-facing deliverables and communications outputs also from Chapter level could further strengthen public, dynamic visibility to external and internal stakeholders, provided this can be technically implemented at reasonable effort level.
- From follow-up to all-along fundraising: With regard to *sustainability*, the findings indicate the benefits of shifting from ad hoc follow-up fundraising to a more continuous approach. Mapping emerging research insights and potential new partnerships during the project and linking them to additional funding opportunities and developing joint add-on proposals along the way, may help sustain commitment, capacity, and results beyond the project period.

## **Managing staff transitions and relationships**

Considerable staff turnover was observed across chapters, the Secretariat, partner institutions, and funders. While largely unavoidable, transitions were managed competently overall, with no major delivery failures or significant delays, indicating adequate *adaptive capacity*. Nevertheless, the experience underscores the importance of strengthening institutional resilience.

- Connection redundancy: Broadening external relationships can mitigate risks associated with staff changes. This may include cultivating linkages at both more senior and more junior levels, supported by practical measures such as co-attendance at key meetings.

- Relationship handover: Strong internal and external handover protocols, underpinned by a shared and living Theory of Change, can further support continuity and *organisational learning*.
- Continuity architectures: Light forms of institutionalisation—such as participation in technical working groups or advisory mechanisms—may also enhance *sustainability*, while recognising that formal agreements (e.g. MoUs) may be impractical in some law enforcement contexts.

At the same time, the evaluation recognises that not all partnerships need to be permanent. Some relationships are context-specific or time-bound, and efforts to maintain them beyond their period of relevance may not represent an efficient use of resources.

### **Monitoring, evaluation, and learning (MEL)**

From a *learning-and-adaptive management perspective*, the MEL approach is a clear strength. The longer time frame and early initiation of MEL activities allowed learning to accompany final implementation stages in real time.

The production of a learning paper that consolidates feedback and lessons for future programming was also identified as good practice, providing a solid evidence base to inform future design and implementation decisions.