

# **2025 Annual Monitoring Report of the Central Labor Inspectorate**

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## Table of contents

|   |    |
|---|----|
| Executive Summary -----   | 4  |
| Methodology-----  | 4  |
| Institutional Integrity and Professionalism -----                       | 6  |
| The Construction Sector -----   | 7  |
| The Manufacturing Sector -----  | 10 |
| Labor Relations: The Formalization Trap and Working Hours Dilemma ----- | 12 |
| Occupational Health and the Absence of Specialists -----                | 14 |
| Data and Transparency -----   | 17 |
| Recommendations-----  | 18 |

## Executive Summary

The year 2025 revealed a stark quantity vs. quality paradox in Kosovo's labor inspections. The Central Labor Inspectorate carried out more workplace inspections than in previous years – an intensification particularly visible in high-risk sectors like construction. On paper, this surge should have translated into safer workplaces, yet outcomes tell a different story. Fatal accidents and serious injuries continued to occur with disturbing regularity, especially in construction. The enforcement mechanisms remain woefully ineffective. Inspectors frequently check the boxes of legal compliance (issuing reports, citing violations), but the substantive impact is minimal. Many employers treat fines and penalties as a negligible cost of doing business, and some even openly flout inspector orders. For example, in one case a stop-work order at a major construction site was quietly ignored as work resumed the very next day which is a clear illustration that current penalties lack deterrent force. Meanwhile, fundamental procedural lapses by the inspectors themselves, from failing to present identification in the field to neglecting their own safety protocols, have eroded the credibility of the institution.

In sum, 2025 saw more inspection activity than ever, yet little improvement in actual labor conditions. The data and field observations paint a critical picture that labor inspectors often enforce rules in form but not in substance. Many inspections tick off paperwork requirements without addressing on-site dangers, and even when violations are found, consequences are weak. Kosovo's labor law framework (notably the Law No. 03/L-212 on Labour, aligned with EU directives) exists largely "on paper"; in practice, implementation is lagging and uneven<sup>1</sup>. The Central Labor Inspectorate is caught in a cycle of increased quantity with poor quality, leaving workers only marginally safer than before. This report analyzes why these enforcement mechanisms are failing despite greater activity. It examines institutional integrity issues within the Inspectorate, sector-specific challenges (construction and manufacturing are highlighted), labor relations enforcement gaps, the missing occupational health dimension, and the severe data transparency shortcomings. Finally, it proposes strategic recommendations including tougher sanctions (up to criminalizing willful defiance of safety orders) and systemic modernization to break the cycle of ineffectual enforcement.

## Methodology

This report is based on the Center for Policies and Advocacy's (CPA) independent monitoring of 30 labor inspections conducted across Kosovo in 2025. The CPA employed an "Ask vs. Proof" matrix to evaluate each inspection. Monitors accompanied inspections (without interfering) and recorded two critical dimensions for every legal requirement checked: procedural compliance ("Did the inspector ask about or verify this item?") and substantive compliance ("Did the

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<sup>1</sup> EU Commission. *Kosovo Report 2025*. 2025. Accessed at: [https://enlargement.ec.europa.eu/document/download/127563ea-4c03-44a4-b56c-2d569afd86a5\\_en?filename=kosovo-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/127563ea-4c03-44a4-b56c-2d569afd86a5_en?filename=kosovo-report-2025.pdf)

employer actually meet the requirement, upon proof?"). In practice, each observation was coded with a combination of symbols to capture these dimensions. A check mark (✓) denotes that the inspector fulfilled their procedural duty by asking the relevant question or requesting evidence, whereas an X indicates the inspector failed to address that issue which is a procedural negligence. Substantive outcomes, on the other hand, are denoted with "+" for compliance (the employer met the criteria) or "-" for a violation (the employer did not meet legal requirements). Thus, a code like "✓-" means the inspector did his or her job by checking, and a violation was found, while "✓+" means the inspector checked and found compliance. A lone "X" would mean the inspector entirely ignored that aspect, leaving a gap in the inspection. In cases where an item was not applicable or no information was available, monitors used "?" to denote the ambiguity.

Using this matrix, the CPA was able to differentiate between issues missed due to inspector oversight and those where inspectors did act but uncovered problems. For example, if a machine in a factory was missing a safety guard and the inspector noticed it, the outcome might be "✓-" (asked/observed, and violation present). If the inspector walked by the machine without ever checking the guard, that hazard would register as "X" (not checked at all) in our data, regardless of the underlying reality. This approach allowed the analysis to go beyond counting violations; it shines light on the performance of inspectors themselves. By distinguishing procedural compliance from substantive workplace compliance, we can pinpoint whether weak enforcement is due to inspectors not doing enough or employers disregarding the rules (or, as often the case, both).

The 30 inspections monitored were drawn from a range of regions and economic sectors to give a representative picture. Sites included construction projects, manufacturing plants, service and hospitality businesses, among others, across areas such as Prishtina, Mitrovica, Ferizaj, Prizren, and beyond. Each inspection was observed by a CPA monitor who noted, in real time, the inspectors' actions and the employer's responses. The monitors also took note of contextual factors, for instance whether inspectors followed basic protocols like presenting official identification at entry, or wearing personal protective equipment (PPE) when entering hazardous worksites. The resulting data set (summarized in an annex to this report) provides a granular look at enforcement in action. Patterns that emerged from these monitored inspections form the basis of the thematic findings in this report. In addition, CPA incorporated qualitative observations and testimonies from workers and employers where available, to cross-verify the inspectors' claims versus shop-floor reality. The methodology, in essence, scrutinizes not just what the outcomes of inspections were, but how those outcomes were arrived at revealing whether 2025's uptick in inspections was matched by diligence and effectiveness on the ground.

## Institutional Integrity and Professionalism

The integrity and professionalism of labor inspectors are foundational to effective enforcement and in 2025, these foundations were often shaky. A glaring issue was the failure of many inspectors to present official identification (ID) cards upon initiating an inspection, particularly in certain regions. In the Mitrovica and Ferizaj regional offices, monitors documented that in *every* observed inspection the labor inspectors entered the premises and proceeded with their work without showing their government-issued ID or badge. This may seem like a minor formality, but it has serious implications. Legally, an inspection can be challenged or deemed invalid if the officials did not properly identify themselves as inspectors. By forgoing this basic protocol, those inspectors left their enforcement actions open to dispute and undermined the formality of the process. Employers in these regions, aware of this laxness, were observed to treat the inspection almost as an informal visit rather than a regulatory audit as some managers even walked inspectors through sites as if giving a casual tour, reflecting a diminished respect for the inspectorate's authority. The "Identity Crisis" within the Inspectorate speaks to a broader culture of complacency or inadequate training. It suggests that Kosovo's Central Labor Inspectorate has not instilled uniform professional standards across all its field offices. In contrast, during inspections in Prishtina (the capital region), monitors noted that inspectors consistently presented their IDs at the outset, immediately establishing a formal tone. This disparity implies that management oversight and internal discipline vary significantly by region, an issue that the central leadership of the Inspectorate must address.

Equally troubling is what has been dubbed the "Car Helmet" hypocrisy among inspectors in high-risk sectors. Labor inspectors are, by regulation, supposed to model safety behavior including using personal protective equipment (PPE) like hard hats and reflective vests when entering construction sites or other hazardous workplaces. In practice, 2025 showed that inspectors often possess the required gear but simply leave it behind in their vehicles. Multiple incidents were recorded where inspectors arrived at a construction site, put on their high-visibility vest (the bare minimum) but left their hard hat in the car, proceeding to walk through active construction zones bareheaded. The implications of this hypocrisy are profound. First, it compromises the inspectors' personal safety (entering an unsafe environment without protection), which in itself is unacceptable. But second, and perhaps more importantly, it undermines the moral authority of the inspectors: how can they credibly enforce rules that they visibly ignore themselves? The message sent to workers and employers is that the safety rules are perhaps not truly serious – they're something to be performed when someone is watching, but not believed in. This culture of "do as I say, not as I do" cripples the Inspectorate's ability to foster a genuine safety culture in enterprises.

Our monitoring noted instances of inspectors conducting cursory, checklist-driven inspections without engaging with workers or really observing work processes – a mechanical approach that hints at either inadequate training or burnout. For example, in several manufacturing inspections, inspectors stuck to a predefined list of questions and did not deviate even when the situation on the ground clearly warranted deeper inquiry. In one case, an inspector in a food processing plant failed to notice that a machine had no emergency stop button cover, because it was not explicitly on the checklist. Moreover, inspectors are still filling out handwritten, carbon-copy reports on site (often on triplicate “indigo” paper forms). Not only does this method consume time that could be spent observing conditions, it also results in rushed handwriting and minimal detail in the narrative description of findings. Monitors saw reports where the “description of violations” was literally one or two vague sentences for an inspection covering an entire facility. Such brevity often cannot capture the nuance of complex labor violations. It is a symptom of an inspection force treating the job as a formality rather than a mission to actively uncover and rectify workplace injustices and dangers.

## The Construction Sector

Construction continues to be one of the most challenging sectors for labor inspection in Kosovo and remains among the highest-risk industries for workers. Year after year, it records a disproportionate share of serious injuries and fatalities, and 2025 showed that this structural risk has not yet been sufficiently reduced. Although official data indicates a slight decline in the overall rate of fatal workplace accidents compared to previous years, conditions observed on construction sites suggest that safety risks remain significant. During the first half of the year alone, several serious incidents drew public attention to ongoing gaps in prevention and risk management. In April, a young construction worker in Prishtina lost his life after falling from a structure, while another worker was severely injured in a separate collapse shortly thereafter. These incidents, widely covered by the media, point to recurring weaknesses in the consistent application of basic safety measures such as secured scaffolding, fall protection systems, and adequate protection of excavation sites. Industry reporting and media investigations have also indicated that tight deadlines and cost pressures continue to influence safety-related decisions, with some developers postponing or minimizing investments in protective infrastructure such as ground stabilization or high-quality scaffolding. While these measures require upfront resources, their absence significantly increases risk and highlights the need for stronger incentives, clearer accountability, and sustained cooperation between inspectors, employers, and other regulatory bodies to improve safety outcomes in the sector.

The labor inspectors are supposed to be the bulwark against this profit-driven endangerment of workers. In 2025, they did increase their presence at construction sites – partly in response to high-profile accidents and EU pressure to intensify inspections in high-risk sectors . Our monitoring data show several construction inspections where inspectors did identify serious violations: open elevator shafts with no barricades (a fall hazard), workers on high floors without

any harness or fall-arrest systems, missing perimeter railings on scaffolds, and lack of helmets on workers. In such cases, inspectors duly wrote up the violations, and in a few instances issued "Stop Work" orders on the spot, as the Law on Safety and Health at Work (Law No. 04/L-161) empowers them to do when there is an immediate danger to life or health. On paper, a Stop Work order is one of the strongest enforcement tools as it requires the employer to halt operations (at least the part of operations posing danger) until the hazard is corrected and the inspectorate lifts the order. However, our findings reveal an unsettling pattern of regulatory defiance by certain large construction companies. Several witnesses and follow-up visits indicated that some sites resumed work either fully or in part shortly after the inspectors departed, essentially thumbing their nose at the Stop Work notice.

This points to the heart of the problem: fines are too low and enforcement too weak to deter well-resourced builders. Under current regulations, monetary penalties for even grave safety violations (like lack of fall protection or ignoring a Stop Work order) are often on the order of a few hundred to a few thousand euros. For a large construction project worth millions, such fines are trivial – they become just another cost of doing business, a minor fee for the permit to continue operating unsafely. In fact, big firms budget for these fines. This renders the sanctions ineffective as a deterrent. When a safety violation results in, say, a €1,500 fine, but correcting the issue (e.g., installing proper scaffolding or halting work for a week) would cost €15,000 in materials and lost time, the cold calculus for many companies is to pay the fine and carry on. Some repeat offenders in the construction sector appear to treat inspectors' visits as routine nuisances. This is impunity by any other name.

The nature of serious construction incidents in 2025 continued to be closely linked to fall-related risks, which are widely recognized as among the most critical hazards on active building sites. Within the inspections monitored by CPA, fall hazards were repeatedly visible and, in several cases, were straightforward to identify during a standard walkthrough. Monitors observed workers operating at height on narrow ledges without adequate guardrails, bricklayers working on scaffolding where planks and edge protections were incomplete, and open elevator shafts or floor openings that were not consistently protected while work was ongoing. In one monitored inspection of a multi-story construction site, an open elevator shaft on an upper floor lacked a barrier at the time of the visit. The inspector documented the issue as a violation and instructed the responsible party to secure the opening. This type of finding illustrates a broader and recurring challenge in the sector. Formal compliance measures, including the existence of a risk assessment document as required under Law No. 04/L-161, are often present in documentation, yet they do not always translate into systematic hazard control on the site itself. The gap between written procedures and daily work practices remains a key driver of risk, and it reinforces the importance of consistent follow-up, clearer responsibilities on-site, and stronger incentives for employers to maintain protective measures beyond the moment of inspection.

Another recurring issue observed in construction relates to the use of personal protective equipment by workers and the way responsibility for its use is framed on-site. During several inspections, workers were observed without helmets or other protective gear, a situation that employers often attributed to individual behavior rather than to site management practices. In discussions on-site, some workers indicated that protective equipment was not consistently required or enforced for all tasks, particularly during short or routine activities, and that expectations around its use were uneven. This points to a broader challenge in safety management, where the presence of PPE alone is treated as sufficient, while active supervision and consistent enforcement by employers are limited. Effective use of protective equipment depends not only on its availability, but also on clear rules, regular oversight, and a workplace culture that prioritizes safety across all activities. When these elements are missing, responsibility is informally shifted to workers, even though employers retain the legal obligation to both provide adequate PPE and ensure that it is used correctly at all times. This dynamic risks diverting attention from more systemic safety controls, such as stable scaffolding, guarded openings, and engineered fall protection measures, which require employer-level planning and sustained commitment beyond individual behavior.

The analysis also highlights a structural challenge related to the division of responsibilities in construction oversight. Labor inspectors are mandated to address occupational safety and health conditions on construction sites, while municipal building inspectors are responsible for compliance with building codes and structural safety requirements. Events in 2025 demonstrated that when these oversight functions operate in parallel rather than in coordination, important risks can fall between institutional mandates. In cases involving soil instability and excavation safety in Prishtina, public reporting indicated that preventive measures linked to structural oversight had not been sufficiently enforced, even though the consequences ultimately affected workers on site. While such measures may fall outside the direct mandate of the Labor Inspectorate, their absence still results in occupational harm, underscoring the interconnected nature of construction safety. This situation points to the need for closer coordination and information exchange between labor inspectors and municipal authorities, so that safety risks are addressed comprehensively rather than in isolated regulatory silos. At the same time, effective prevention depends on each institution fully exercising the tools available within its own mandate. For labor inspectors, this includes timely use of administrative measures, clear follow-up on corrective instructions, and cooperation with other authorities when risks persist. Strengthening coordination mechanisms, clarifying escalation pathways, and reinforcing consistent enforcement across institutions would help ensure that legal requirements translate more reliably into safe working conditions on construction sites.

## The Manufacturing Sector

In contrast to the more visible risks present on construction sites, safety challenges in the manufacturing sector during 2025 were often less immediately apparent. Factories and production facilities in Kosovo, including small metalworking workshops, textile production units, and larger food processing operations, generally do not experience the same frequency of sudden, high-profile accidents. However, they are frequently characterized by longer-term and cumulative risks such as outdated machinery lacking modern safeguards, sustained exposure to high noise levels, inadequate ventilation, and workstations that place continuous physical strain on workers. Monitoring of manufacturing inspections suggests that these types of risks are not always captured with sufficient depth during routine inspections. In several cases, inspection practices emphasized the review of documentation and formal compliance indicators, which can convey an impression of safety, while more complex or less visible hazards received limited attention. This pattern points to the need for inspection approaches that are better adapted to the specific risk profile of manufacturing environments, combining document review with more detailed on-site assessment of working conditions.

Across several manufacturing inspections monitored in 2025, a recurring pattern emerged in the way risk assessment documentation was reviewed and interpreted. Inspectors consistently requested the risk assessment documents required under Law No. 04/L-161 on Safety and Health at Work, and in many cases the presence of such documentation was treated as an indication of compliance. While this reflects correct procedural practice, the monitoring suggests that the link between written risk assessments and on-site conditions was not always explored in depth. The existence of formal documentation does not automatically guarantee that identified risks are being actively managed or that preventive measures are consistently applied across the production process. This highlights a broader challenge that extends beyond individual inspections. When compliance is primarily assessed through documentation checks, there is a risk that discrepancies between written procedures and everyday work practices remain undetected. The pattern reinforces the importance of complementing document review with systematic observation of the work environment and verification of how identified risks are addressed in practice, particularly in manufacturing settings where hazards may be less visible but persist over time.

Training related to the safe operation of machinery represents an important component of occupational safety in manufacturing. Kosovo's labor regulations require that workers assigned to operate specific types of equipment receive appropriate training and that evidence of such training be available during inspections. Monitoring of manufacturing inspections in 2025 indicates that inspectors generally addressed this requirement by requesting documentation related to worker training. In many cases, the presence of certificates, attendance lists, or internal training records was treated as sufficient proof of compliance. While this approach satisfies procedural requirements, it does not always allow for an assessment of the quality,

scope, or practical effectiveness of the training provided. The review of documents alone may not capture whether workers have received hands-on instruction, whether training is tailored to specific machines in use, or whether equipment is being operated under safe conditions. This pattern suggests that inspections tend to prioritize verifiable documentation over deeper evaluation of how training is translated into daily practice on the shop floor. Addressing this gap does not imply a lack of effort on the part of inspectors, but rather highlights structural constraints such as limited inspection time, varying levels of technical specialization, and the absence of standardized tools for assessing training effectiveness. Strengthening guidance, sector-specific inspection methodologies, and access to technical expertise could help ensure that training requirements contribute more directly to improved safety outcomes in manufacturing environments.

Manufacturing environments also draw attention to the health dimension of occupational safety and health, an area that remains more difficult to capture within routine inspection practices. Many production facilities involve exposure to longer-term health risks such as sustained noise, dust, chemical substances, or repetitive physical tasks that may contribute to occupational illness over time. Monitoring of inspections in 2025 suggests that these health-related factors are generally addressed through checklist-based verification rather than through direct measurement or in-depth assessment. During the inspections observed, health considerations were typically reflected in the verification of basic requirements such as the presence of first aid equipment, signage, or documentation, while the use of technical instruments to measure noise levels, air quality, or other exposure indicators was not observed. This pattern indicates that current inspection approaches rely primarily on visual observation and document review, which may be insufficient to fully capture cumulative or less visible health risks. The absence of measurement tools and specialized expertise limits the ability of inspectors to assess such conditions comprehensively and points to a broader capacity gap within the inspection system. Addressing this gap would require clearer methodological guidance, access to appropriate equipment, and stronger links to occupational health expertise, rather than increased scrutiny of individual inspectors.

The analysis of procedural and substantive elements in manufacturing inspections points to a recurring imbalance between what is formally checked and what is substantively assessed. Data from the monitoring matrix shows that a significant share of substantive safety issues were recorded as not checked, indicating that certain risk areas were outside the focus of the inspection visit. At the same time, inspection reports frequently reflected a generally satisfactory picture of compliance, often based on the completion of procedural steps and the presence of required documentation. This creates a situation where inspections may appear effective on paper, even though broader working conditions are not examined in depth. Such an approach limits the capacity of inspections to function as an early warning mechanism, both for workers who remain exposed to unmanaged risks and for employers who may be unaware of underlying problems that could later result in injuries, operational disruptions, or legal liability. When

inspections prioritize formal completeness over comprehensive risk identification, opportunities for prevention are reduced and corrective action is postponed until risks become more visible or acute.

A related challenge concerns continuity and follow-up within the inspection process. Monitoring suggests that follow-up on identified issues in manufacturing settings is not always systematic or timely. Where corrective instructions were issued, the mechanisms for ensuring that these instructions were implemented within the specified timeframe were not consistently evident. In practice, the effectiveness of follow-up appears to depend heavily on individual case handling rather than on a structured system for tracking deadlines and revisits. This is closely linked to the continued reliance on paper-based case management, which limits institutional memory and makes it difficult to ensure continuity across inspections. Without a reliable system to flag pending corrective actions and prompt follow-up visits, inspections risk becoming isolated interventions rather than part of a sustained compliance process. Strengthening follow-up procedures and integrating them into a centralized tracking system would support a more consistent and preventive approach to manufacturing sector safety.

## **Labor Relations: The Formalization Trap and Working Hours Dilemma**

In addition to occupational safety, labor inspections are also tasked with enforcing core labor rights, including the existence of employment contracts, registration for social contributions, and compliance with working time regulations. In 2025, these aspects continued to present particular challenges, especially in service-oriented sectors such as gastronomy, retail, and hospitality, where flexible staffing arrangements and informal practices are more common. Monitoring data suggests that two closely linked issues shape enforcement outcomes in this area. The first concerns how undeclared work is addressed during inspections, and the second relates to the practical difficulty of verifying compliance with working hours and rest periods in dynamic service environments.

When inspectors encounter workers without formal employment contracts, the legal framework is clear. Kosovo's Law on Labour requires that all employees have a written contract and be registered for social insurance, and undeclared work constitutes a serious violation with fiscal and social implications. Monitoring observations indicate, however, that inspectors often prioritize rapid formalization over immediate sanctioning. In practice, this approach typically involves issuing a corrective instruction that gives the employer a short period to register the workers and submit proof of compliance. From an administrative perspective, this method can lead to swift improvements in formal compliance, as employers generally respond by regularizing employment relationships within the given timeframe. At the same time, the widespread use of corrective instructions rather than sanctions raises questions about the long-term deterrent effect of this approach. When formalization is achieved without financial

penalties, the incentive structure may inadvertently encourage risk-taking, particularly in sectors where margins are tight and labor costs are closely managed.

The monitoring data reflects the frequency with which corrective instructions are used in cases of undeclared work, often without accompanying fines. While this practice contributes to increased registration figures in the short term, it also highlights a tension between compliance promotion and enforcement credibility. The absence of immediate consequences can weaken the signaling effect of inspections and may foster expectations among employers that undeclared work will first be addressed through warnings rather than penalties. Addressing this balance does not necessarily require abandoning corrective approaches, but it does call for clearer criteria on when sanctions should be applied and how repeated or intentional non-compliance is escalated. A more transparent and consistent enforcement framework would strengthen both deterrence and fairness, while preserving the Inspectorate's capacity to encourage formalization and dialogue with employers in sectors where informality remains structurally embedded.

Related to this is the difficulty of verifying working hours and overtime in sectors like gastronomy, retail, security services, and other services. The Labor Law sets clear limits – typically 40 hours per week standard, with up to 8 hours overtime allowed (and paid at a premium), and mandates for rest days and paid public holidays. Yet, it is an open secret that in many restaurants, shops, and private security companies, employees routinely work well beyond these limits. "Double shifts" and 6-day (or even 7-day) workweeks are not uncommon, often without appropriate overtime compensation. Labor inspectors are tasked with checking time records and ensuring compliance, but verification is inherently challenging. Employers who violate hours rules usually keep two sets of records: one official (showing everyone nicely within 8 hours a day), and the unofficial reality (workers clocking 10-12 hour days). During inspections, inspectors typically ask to see working time registers or schedules. Not surprisingly, those documents nearly always appear normal, because any employer savvy enough to demand such long hours is also savvy enough not to document them truthfully.

Monitoring indicates that verification of working hours in service sector inspections is particularly constrained by time, resources, and inspection design. In most cases, inspectors rely on schedules, payroll records, or attendance sheets provided by the employer as the primary basis for assessing compliance with working time regulations. When these records appear formally consistent with legal requirements, inspections tend to proceed without deeper verification. While this approach allows inspectors to cover a high number of workplaces within limited timeframes, it also restricts their ability to detect discrepancies between recorded schedules and actual hours worked. More in-depth verification methods, such as confidential worker interviews, analysis of multiple pay periods, or targeted visits outside standard working hours, are rarely feasible within routine inspections. As a result, practices such as extended shifts, unrecorded overtime, or informal schedule adjustments may remain outside the scope of

detection, not due to oversight, but because current inspection models prioritize efficiency and coverage over investigative depth.

A similar dynamic applies to the enforcement of weekly rest periods and compensation for work performed on public holidays. While inspectors do identify violations in cases where non-compliance is readily apparent, more complex patterns of working time organization are harder to assess within the constraints of a single visit. Rotational scheduling arrangements, fluctuating workloads, and paper-based record keeping can obscure situations where workers effectively exceed legal limits over longer periods. Without systematic access to longitudinal data or dedicated time for detailed roster analysis, inspections tend to focus on snapshot compliance rather than cumulative exposure to excessive working hours. This limitation highlights the importance of targeted inspection campaigns, specialized methodologies, and improved data tools for sectors where working time abuses are structurally more difficult to identify through standard inspection practices alone.

## Occupational Health and the Absence of Specialists

One of the most critical, yet chronically neglected, components of labor inspection in Kosovo is the “Health” in Occupational Safety and Health (OSH). While safety issues (like accidents, injuries, physical hazards) get at least some attention, the health side – preventing work-related illnesses, monitoring workers’ health, and ensuring healthy work environments – is virtually missing in action. The fundamental reason for this vacuum is a dire shortage of expertise: Kosovo has fewer than 25 licensed Occupational Medicine specialists in the entire country. In fact, as of 2024, of approximately 4,800 doctors in Kosovo, only about 20 had specialized in occupational medicine<sup>2</sup>, and that number has not significantly increased since (a few new specialists may have completed training recently, but several veteran doctors have retired, keeping the total pitifully low). This shortage means that most workplaces have no access to occupational health services, and the Labor Inspectorate itself has no pool of medical experts to draw upon for inspections or consultations. In essence, Kosovo’s system lacks the “medical arm” of OSH enforcement.

The absence of occupational physicians has several concrete consequences. By law, certain high-risk industries are supposed to have regular medical check-ups for workers (for example, lung X-rays for miners or factory workers exposed to dust, hearing tests for those in noisy environments, etc.), and employers are to maintain medical records of workers’ fitness for duty. In practice, these requirements are rarely met because there are barely any occupational doctors to perform such exams or to guide employers on what is needed. Our monitoring noted that whenever inspectors asked about medical reports or health surveillance, the outcome was nearly always either “not applicable” or a perfunctory “✓+” if the employer showed any evidence of a

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<sup>2</sup> Altina Marmullaku. 2024. *Albania Post*. Accessed at: <https://albanianpost.com/kosova-me-mungese-te-specializanteve-ne-mjekesine-e-punes/>

doctor's note. But these were generally one-off general practitioner notes, not the kind of systematic occupational health surveillance envisioned by the law. Inspectors themselves often skip these questions entirely (recorded as X in our data) because they do not expect the employers to have anything, and possibly because the inspectors are not trained in what to look for in terms of occupational health documentation. For example, one inspection at a chemical plant included a question about whether workers had periodic medical examinations. The employer produced a few certificates from family medicine doctors stating workers were "fit for work". The inspector accepted this and moved on. There was no analysis of whether those workers were checked for chemical exposure effects, nor any inquiry into specific occupational diseases.

The structural issue goes beyond individual inspections: Kosovo does not even have a national list of occupational diseases (work-related illnesses). This means there is no formal recognition of, say, black lung disease from mining or chronic back injuries from manual handling, etc., as occupational diseases that employers and the state are accountable for. If workers develop such conditions, there is little recourse for compensation or preventive action, because they are not tracked. Who would be the experts to identify and certify such illnesses? Occupational physicians of which there are almost none active. As Pleurat Sejdiu, the Medical Chamber head, noted, Kosovo is one of the few countries in the world lacking this list, and "*who would be more suited to address this than the occupational doctors?*"<sup>3</sup>. It's a rhetorical question that underscores how the absence of specialists leaves a gaping hole.

Furthermore, the institutions that do exist for occupational medicine are on the brink of collapse. The National Center for Occupational Medicine in Gjakovë was, in 2025, reportedly down to just one occupational physician on staff, and that doctor was about to retire. Indeed, a report from 2022 highlighted that four out of the small cohort of occupational doctors had recently retired and most others were near retirement age. No new specialists had been trained for over two decades until a recent small batch of five residents began training in 2021. As of 2025, even if those five complete specialization, Kosovo will still not have nearly enough to service hundreds of thousands of workers or to embed one in each large enterprise as the law ideally envisions. The pipeline of expertise was effectively shut off for 20 years, and we are seeing the consequences now.

For the Labor Inspectorate, this means that its inspectors typically do not include any medical experts, nor do they coordinate with any when assessing workplace conditions. If they encounter, say, a complaint about workers getting sick from chemical exposure, they have limited capacity to investigate it properly. Inspectors are not toxicologists; they might check if

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<sup>3</sup> Ekonomia Online. 2022. Accessed at: <https://ekonomiaonline.com/mjekesia-e-punes-drejt-shuarjes-vetem-20-jane-specializuar-ne-mjekesine-e-punes/>

proper ventilation exists or if protective gear is provided, but they won't be measuring air quality or workers' blood lead levels.

The limited emphasis on occupational health within inspections also affects preventive approaches, particularly in relation to ergonomics and other factors associated with long-term injury and illness. Ergonomic risks, including repetitive movements, manual handling of loads, and sustained physical strain, represent a significant source of chronic health problems for workers across multiple sectors. Monitoring data suggests that these risks are rarely explored during routine inspections, largely because current inspection frameworks are oriented toward compliance with more easily verifiable requirements. In practice, inspections tend to focus on contractual documentation, certification of equipment, and general safety arrangements, while questions related to workload design, task rotation, or physical demands are not systematically addressed. As a result, opportunities to identify and prevent cumulative injuries are often missed. The health dimension of Occupational Safety and Health is therefore present in legal terminology and inspection templates, but less developed in practical application. Strengthening preventive capacity in this area would require clearer guidance on ergonomic risk assessment, closer collaboration with occupational health expertise, and inspection tools that allow health-related risks to be examined alongside traditional safety checks.

This deficiency has implications for EU integration too. **EU acquis Chapter 19** (Social Policy and Employment) not only covers labor laws and safety but also occupational health services and preventive health measures at work. While Kosovo has adopted laws that notionally require employers to ensure worker health surveillance, these are hollow mandates without personnel to implement them. The European Commission has implicitly noted weaknesses in this area, urging Kosovo to enforce health and safety standards and strengthen capacities. Strengthening capacity in this context means training more experts and integrating health into the inspection regime.

Ultimately, the missing link is human capital: the doctors and specialists who can bridge the gap between workplaces and medical science. Reviving occupational medicine in Kosovo is a long-term task as it requires opening more specialization slots at the University (which, after a two-decade pause, only recently started again), incentivizing young doctors to enter this field, and possibly bringing back retired experts on a consulting basis in the interim. The Labor Inspectorate could in the meantime establish a small unit or task force for occupational health, perhaps by contracting one or two of the existing specialists part-time to advise inspectors, develop guidelines, and handle complex cases. For instance, when an inspector encounters a factory with chemical hazards, that case could be referred to the specialist for a detailed assessment and recommendations. Without such steps, the "Health" in OSH will remain effectively unenforced. Workers' occupational illnesses will continue to fly under the radar, recorded only when acute enough to appear in general healthcare statistics (which themselves

often do not trace conditions back to workplace causes). In a sense, Kosovo is currently blind to an entire spectrum of labor issues.

## Data and Transparency

One of the most systemic impediments to effective labor inspection in Kosovo – cutting across all the issues discussed so far – is the Inspectorate's antiquated approach to data and record-keeping. In 2025, the Central Labor Inspectorate was still overwhelmingly paper-based, relying on handwritten logs, carbon-copy report forms, and physical archives. This is what we refer to as the "Indigo Block" paralysis – a reference to the indigo-colored carbon copy paper still used in report booklets. This outdated system has several deleterious effects: it hampers real-time analysis, obscures transparency, and allows many violations (and violators) to slip through the cracks of oversight.

Firstly, consider the impact on internal efficiency and analysis. Each inspector goes out with a booklet of triplicate forms, writes up findings manually, tears out copies for the employer, the regional office, etc. The data from those reports including number of violations, types of violations, names of companies, any repeat offenses does not automatically feed into a central database. Instead, someone would have to manually compile them, which in practice happens rarely and only for basic annual statistics. There is no digital case management system where an inspector can, for example, quickly look up the history of a workplace before they visit. One construction site had been ordered to improve scaffolding in an inspection in early 2025; when a new complaint led to another inspection in late 2025, the inspector was unaware of the past order and was told the same excuses by the company as if it were a first-time issue. A digital system could have flagged that this company is a repeat violator, guiding the inspector to take a tougher stance (e.g., impose fines rather than warnings). The current paper system makes it nearly impossible to track recidivism systematically.

Moreover, aggregate analysis such as identifying trends (e.g., which sectors are having the most violations, which types of violations are most common, which regions are under-performing in enforcement) is severely limited. In an era where data analytics can greatly enhance targeting of inspections and policy responses, the Kosovo Inspectorate is stuck in the 20th century.

The lack of transparency is another cost of non-digitalization. Currently, if the public or media or even other government agencies want to know, say, how many inspections have been done this month and with what results, there is no easy way. The Inspectorate occasionally releases summary numbers in press conferences or annual publications, but detailed records are not accessible. A transparency initiative would be to have an online dashboard or open data portal where inspection results (minus confidential details) are published. That is only feasible with a digital system feeding it. The public has a right to know, for example, if a serious accident happens, whether that company had been inspected, and if so, what was found or missed. Under the current regime, such information often comes out only through investigative journalism or

not at all. The opacity can breed public distrust and also potentially mask inconsistent enforcement. With digital records, one could analyze whether certain companies or sectors receive favorable treatment (e.g., always being found compliant despite evidence to the contrary, or rarely inspected at all). Without it, everything is in the dark.

Our monitoring experience illuminated small but telling examples of how the lack of digital tools hamstrings inspectors in the field. In one case, an inspector arrived at a manufacturing company and asked the employer if they had been inspected in the last year. The employer said no (truthfully, as our data later confirmed). But the only way the inspector could verify that would be to phone the central office or sift through paper files – an unrealistic step on-site. If the inspector had a tablet with access to a central database, they could instantly see the inspection history. This matters because the approach to a first-time inspection might differ from a follow-up inspection. As it was, inspectors often relied on the employer's word for things like previous visits or whether a fine had been paid. Understandably, some employers might not be truthful if they have something to hide. The information asymmetry favors non-compliant employers.

Another dimension is the inability to do real-time monitoring or cross-agency collaboration. For example, the Tax Administration (which fights undeclared work) and the Labor Inspectorate ideally should share data. The Tax Administration of Kosovo (TAK) in recent joint operations found many undeclared workers, and they coordinate with labor inspectors on some raids. However, continuous collaboration is hindered by the fact that labor inspection records are not in a readily shareable format. A digital inspection system could allow other enforcement bodies (with proper safeguards) to see relevant info, such as which companies have a history of labor violations or where undeclared workers were previously found. This synergy is currently weak. If an inspector goes to a company that TAK has flagged for tax evasion, they might not even know it, and vice versa, unless informal contacts are made.

A notable institutional development during this period has been the introduction of an Electronic Labor Inspection System, developed with support from the International Labour Organization and Swedish Embassy. The system has already been piloted, and inspectors have received training on its use, marking an important step toward modernizing inspection practices. According to information available at the end of 2025, the system was still in a phased implementation stage, with full rollout across all regions expected to begin in 2026. During the monitoring period, inspections continued to rely primarily on paper-based reporting, reflecting the transitional nature of this reform rather than an absence of progress. While the benefits of digitalization were not yet visible in day-to-day inspection work, the preparatory investments made suggest that the institutional foundations for change are being put in place.

## Recommendations

## **1. Recalibrate sanctions to strengthen deterrence while preserving corrective capacity**

The sanctioning framework should be adjusted to better distinguish between administrative non-compliance and deliberate or repeated violations. Fine schedules for serious occupational safety breaches and undeclared work should be revised through secondary legislation, with escalating penalties for repeat offenders supported by systematic tracking once the electronic inspection system is operational. Corrective instructions should remain available, but immediate fines should become the default response where non-compliance is intentional, repeated, or linked to elevated risk. Clear internal criteria for sanctioning would improve consistency and reinforce the preventive effect of inspections.

## **2. Strengthen enforcement of Stop Work orders through structured escalation and coordination**

The effectiveness of Stop Work orders should be reinforced through mandatory follow-up within defined timeframes and formal coordination protocols with municipal authorities and law enforcement where risks persist. Continued activity in defiance of a Stop Work order in situations of imminent danger should be systematically referred for assessment under existing criminal provisions related to endangering safety. This approach enhances deterrence while remaining fully aligned with the current legal framework.

## **3. Standardize inspection decision making and improve quality assurance**

Inspection outcomes would benefit from clearer internal guidance on decision making, including when corrective measures are appropriate, when sanctions are required, and how repeated violations are escalated. Standardization would reduce variability across regions and inspectors, strengthen legal certainty for employers, and enhance public confidence. Internal quality assurance mechanisms should focus on supervisory review, targeted coaching, and continuous professional development, with accountability measures applied proportionately and consistently.

## **4. Address capacity constraints through targeted specialization and staffing planning**

A structured assessment of inspectorate staffing and skill needs should be undertaken to align resources with sectoral risk profiles and international benchmarks. Recruitment strategies should prioritize technical and engineering expertise relevant to high-risk sectors, alongside general inspection capacity. In the interim, controlled use of external technical expertise for complex inspections may be considered, subject to clear mandates, independence safeguards, and oversight.

## **5. Enhance sector-specific inspection methodologies, with priority to construction and manufacturing**

Inspection tools should move beyond generic checklists toward sector-specific protocols that reflect distinct risk profiles. In construction, closer coordination with municipal inspectorates and risk-based targeting of high-risk sites should be institutionalized. In manufacturing and other technical sectors, protocols should prompt deeper assessment of machinery safety, ergonomics, and process-related risks. Preventive mechanisms such as workplace safety committees should be encouraged and verified as part of routine inspections.

## **6. Integrate occupational health more effectively into inspection practice**

The health dimension of Occupational Safety and Health requires dedicated policy attention. Expansion of national occupational medicine capacity should be prioritized through funded specialization pathways and inter-institutional cooperation. Within the inspection system, a coordination function for occupational health should be established to support inspectors, develop guidance, and facilitate referrals. Inspection methodologies should clearly differentiate between general medical documentation and occupation-specific health surveillance, particularly in risk-exposed sectors.

## **7. Ensure effective rollout and use of digital inspection systems to support prevention and accountability**

The full implementation of the Electronic Labor Inspection System should be treated as a central reform priority. Beyond technical deployment, success will depend on integration into daily workflows, consistent use by inspectors, and managerial oversight. Digital tools should support deadline tracking, follow-up monitoring, recidivism detection, and risk-based inspection planning. Aggregated data generated by the system should inform policy discussion, social dialogue, and public reporting, strengthening transparency and trust.