

# INSTITUTIONAL STRATEGY



## INFORMATION AND DATA PROTECTION COMMISSIONER

2022 - 2025



KOMISIONERI PËR TË DREJTËN  
E INFORMIMIT DHE MBROJTËN  
ETË DHËNAVE PERSONALE



Funded by the  
European Union



GARANTEE  
PER LA PROTEZIONE  
DEI DATI PERSONALI

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# 1. INTRODUCTION

The 2022-2025 Institutional Strategy (hereinafter the “*Strategy*”) of the Information and Data Protection Commissioner (hereinafter the “*Commissioner's Office*”) was developed taking into account the current legal framework and its modernization process with regard to the two areas of responsibility. In addition, this document has taken on board the reports and recommendations of European and international organizations assisting and/or supporting the Albanian state in achieving state of the art economic and social development standards in the country.



The Strategy identifies the Commissioner's Office vision and mission, objectives for each area, and concrete measures and activities to be implemented during the period in question.

The Strategy is complemented by the 2022-2025 Action Plan, serving as a programmatic and activity monitoring tool for the achievement of each objective defined in the Strategy. Their achievement aims at enhancing the actual exercise of constitutional rights, by way of higher regulatory standards in the field of the right to information and personal data protection.



The Strategy was developed with the assistance of the "*Institutional support for the approximation of legislation on personal data protection with European Union acquis*" Twinning Project. This project was funded by the European Union under the Instrument for Pre-Accession Assistance, IPA 2017, and was implemented by the consortium composed of the Italian Authority for Personal Data Protection (Autorità Garante per la Protezione dei Dati Personali), the Austrian *Ludwig Boltzmann Institute of Fundamental and Human Rights*, with the support of SCI-Piemonte in Italy.

## 2. VISION AND MISSION

### VISION

The Commissioner's Office vision is to promote a society with the core values of guaranteeing fundamental human rights and freedoms, the protection of personal data and the right to information, to guarantee transparency, responsibility and accountability.



### MISSION

Our mission is to monitor and oversee the implementation of the legal framework for ensuring effective exercise of rights in the digital era, stimulating public authorities and public and private controllers to build mutual trust with citizens leading to improved societal mentality and culture in respecting fundamental human rights and freedoms.

The establishment and operation of the authority since 2008 has resulted in increased citizen recognition and awareness around the exercise of these constitutional rights. On the other hand, legislation implementation by public authorities and public/private controllers has produced measurable outcomes. Furthermore, issues have been identified, and have been addressed through regulatory framework reform, enhancement of Commissioner's Office administrative and budget capacities and broader public education.

Another challenge faced by the institution is strengthening cooperation and interaction with actors and stakeholders, with the aim of turning regulatory standards and norms into opportunities to guarantee rights, and not reasons for limiting or avoiding them. This Strategy defines concrete and achievable objectives which are not only in line with national acts (the Constitution, applicable legislation, Assembly Resolutions, inter-institutional strategies, etc.), but also with European and/or international documents, while also addressing the needs identified during the implementation of the applicable legislation in the field.

Each of these objectives shall be achieved through specific activities, initiatives and measures, monitored using clear indicators. The outputs achieved will be reflected in periodic reporting, including the Annual Commissioner's Office Activity Report.

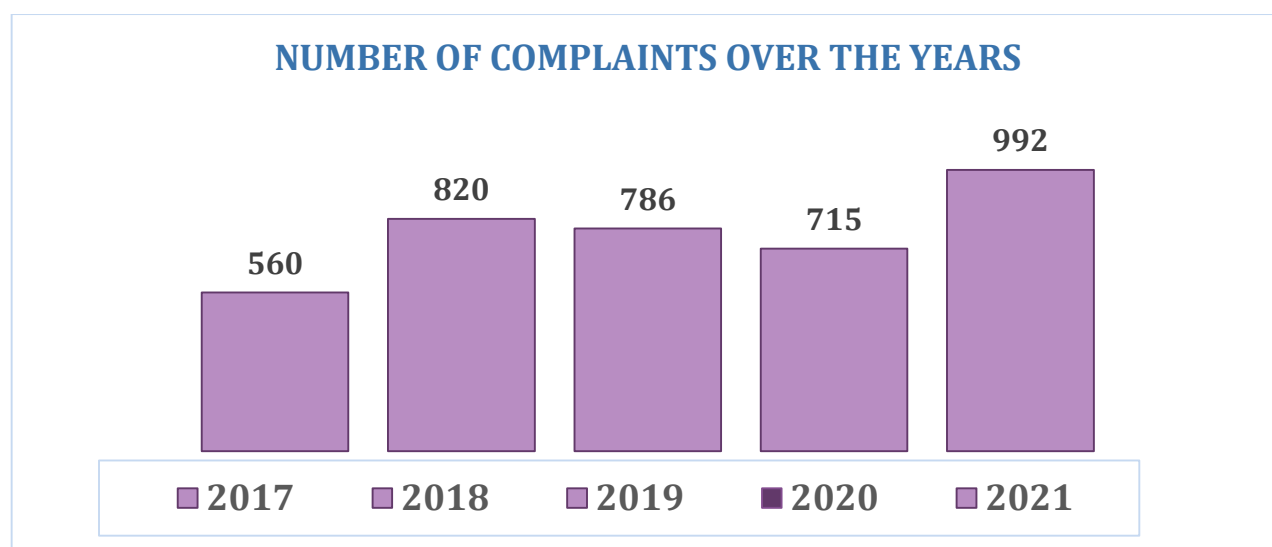
## 3. RIGHT TO INFORMATION

### 3.1 STATE OF PLAY

With the entry into effect of Law No. 119/ 2014 "On the right to information", continuous improvement has been made in guaranteeing this right, with an impact on public authority transparency, accountability and integrity.

With the development of the Transparency Program, proactive transparency has enabled citizens to have access to more and higher quality public information. In the performance of its legal duties, the Commissioner's Office has found improved proactive transparency in a considerable number of public authorities. Progress in upholding this right, ranks atop the Public Administration Reform principles regarding accountability. The 2021 SIGMA monitoring report for Albania indicates improvement of the "Access to public information" indicator, compared to the previous assessment of 2017. With regards to such progress, SIGMA, among others mentions the role of the Commissioner's Office, favorably assessing the institution's efforts in promoting transparency. In addition, the institution has organized continuous training for public authorities right to information representatives and coordinators, aimed at strengthening capacities in complying with legal obligations.

The Commissioner's Office monitoring and oversight activity has broadened proportionally, based on the number of complaints and the engagement of public authorities to comply with proactive transparency obligations. In recent years, the number of complaints filed by citizens, civil society and interest groups (investigative media) has shown a growing trend. The Commissioner's Office believes that this indicator is a result of awareness raising initiatives, better knowledge of the legislation and increased trust in the activities of the institution.



One of the awareness raising approach elements for exercising this right, but especially for enhancing administration capacities, is the inclusion of the right to information legislation in the curriculum of the Albanian School for Public Administration (ASPA). The Commissioner's Office has also actively cooperated with all individuals/organizations and public authorities exercising the right to information, in the framework of raising awareness around and promoting this right. Institutional consolidation and active participation in international relations resulted in the membership of the Commissioner's Office in the Executive Committee of the International Conference of Information Commissioners (ICIC), which had been a goal of the institution. This organization is the main global platform for promoting public authority transparency and integrity.

In recent years, the institution has actively engaged in improving the main right to information legislation. This process has taken into account challenges identified during implementation, but also continuous stakeholder suggestions/proposals. The Commissioner's Office developed the draft law "*On some amendments to Law No. 119, dated 14.09.2014 "On the right to information"*" the adoption of which is expected by the end of 2022. The authority believes that these improvements will lead to considerably greater citizen access to public information/documentation, consolidation of the institution oversight competences, and an enhanced coordinator role. These amendments should also be considered under the lens of reducing space for corruption in the public administration. The proactive exercise of this right is one of the main pillars for proper rule of law functioning.

In parallel, in the framework of modernizing its regulatory framework, Albania took concrete steps toward achieving current standards in this field, ratifying the Council of Europe Convention No. 205/2009 (CoE) "*On access to official documents*" in the national legislation with the adoption of law No. 45/2022 "*On the ratification of the Council of Europe Convention "On access to official documents"*". In addition, the Albanian Parliament also adopted law No. 33/2022 "*On open data and the re-use of public sector information*", approximating Directive 2019/1024 of the EU of the same name. These two legal acts aim at further completing and developing the right to information legislation and enhancing guarantees for citizen access to official information/documents. Their transposition in the Albanian regulatory framework provides citizens with an opportunity to participate in good governance and an effective expression of the exercise of representative democracy.

Upon conclusion of the ratification process for Convention 205/2009 of the CoE, the Commissioner's Office will become a representative in the Parties Council. Furthermore, the transposition of Directive 2019/1024 of the EU establishes the required standards for using open data, with the aim of driving innovation in the provision of goods and services. Pursuant to Law No. 33/2022, the Commissioner's Office is responsible for monitoring the right to reuse official documents and for reviewing complaints should this right be threatened.

## 3.2 OBJECTIVES

The main objectives in the right to information field for the current period are:

**OBJECTIVE 1:** Improving the legal framework in the right to information field in line with international standards.

The following activities will be undertaken to achieve this objective:

- ✓ Adoption of the draft law “*On some additions and amendments to Law no. 119, dated 14.09.2014 "On the right to information"*” and the relevant secondary legislation for its implementation.
- ✓ Effective implementation of law No. 33/2022 “*On open data and the reuse of public sector information*” and the adoption of the relevant secondary legislation for its implementation.
- ✓ Strengthening of Commissioner Office staff capacities for the effective implementation of the updated legal framework.
- ✓ Providing practical support to public authorities regarding the implementation of the new legal framework.

**OBJECTIVE 2:** Proactively communicating to consolidate public authority transparency culture.

The following activities will be undertaken to achieve this objective:

- ✓ Strengthening the right to information coordinator role;
- ✓ Orienting public authorities regarding the clarification of issues of public interest and cases of information restriction, especially in the framework of using the confidentiality and personal data protection concepts.
- ✓ Including the highest possible number of central level and central level subordinate public authorities in the Transparency Index.
- ✓ Verifying central level, central level subordinate, and local self-government public authorities level of transparency.

**OBJECTIVE 3:** Cooperating with citizens and stakeholders to understand the updated legal framework and raising awareness to achieve effective implementation.

The following activities will be undertaken to achieve this objective:

- ✓ Developing awareness raising initiatives to inform the public, civil society, stakeholders and the media about the new regulatory framework.
- ✓ Delivering training on the implementation of the right to information law focusing on youth, in cooperation with higher education institutions across the country.
- ✓ Contributing technical expertise required by civil society actors to further enhance their transparency and access to information watchdog role.

- ✓ Developing and periodically publishing information material on the official Commissioner's Office website, and using various communication platforms.

**OBJECTIVE 4:** Developing and broadening international relations within the global right to information regulatory community.

The following activities will be undertaken to achieve this objective:

- ✓ Organization of the 15<sup>th</sup> edition of the International Conference of Information Commissioners - ICIC.
- ✓ Contributing to the quality of the representative to the Council of Parties of the Council of Europe Convention "On access to official documents".
- ✓ Active participation in the International Conference of Information Commissioners (ICIC) working groups/boards, working closely with partners and counterpart institutions.
- ✓ Broadening cooperation with counterpart authorities on exchanging experience and best practices.



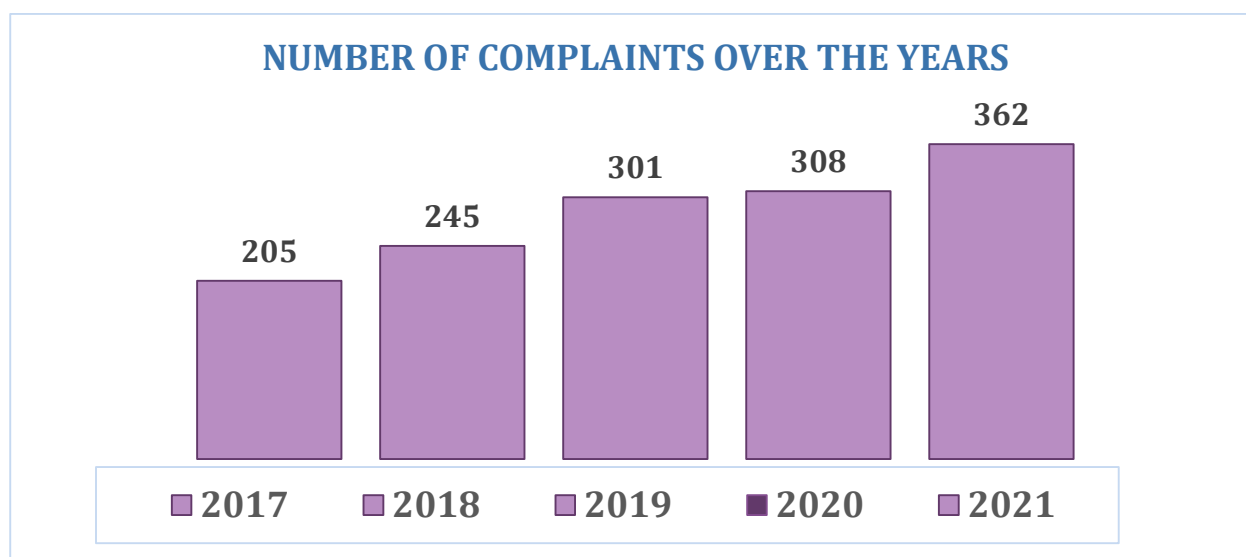
## 4. PERSONAL DATA PROTECTION

### 4.1 STATE OF PLAY

In today's global economy, innovative technology development has led to massive information flows and has, as a consequence, resulted in increased personal data use, which has in turn accelerated the digitalization of society.

The Albanian regulatory framework of the field is composed of law No. 9887/2008 "*On personal data protection*", as amended and the relevant secondary legislation for its implementation. In the context of the Commissioner's Office oversight activity, a proactive and preventive approach has been put in place in respect of public and private controllers complying with their legal obligations. The authority recognizes increasing cooperation with them, while also believing there is room for more serious engagement in achieving the standards required to guarantee this fundamental constitutional right. In particular, the violations and mass dissemination of citizens personal information pointed out significant weaknesses in the structures and systems administering these data. The current situation obligates us to take forward-looking legal measures, and develop safer infrastructure with better integrity to address the issues identified and to minimize their reoccurrence in the future.

In recent years, the Commissioner's Office has handled a growing number of complaints, reflecting increased citizen awareness about the exercise of this right in practice. However, the comparative analysis of the situation shows that responsibility of the public and private sector controllers in performing their obligations and functions is still weak and often fictitious.



Similarly with the right to information field, the legislation on personal data protection is included in the Albanian School for Public Administration (ASPA) curriculum for all civil servants, with the aim of broadening the awareness aspect beyond that of the general public. On the other hand, cooperation with stakeholders has been strengthened to ensure exercise of these rights in practice for any individual. In respect to foreign relations, the Commissioner's Office plays an active role in all European and international forums to identify and internalize best practices, and strengthen institutional capacities for implementation, according to up-to-date standards.

The applicable legislation in this field is fully approximated with Directive 95/46/EC of the EU "*On the protection of individuals in regard to personal data processing and free movement of such data*". The entry into effect of Directive (EU) 2016/679 "*On the protection of natural persons with regard to processing of personal data and on the free movement of such data*" (GDPR) on 25 May 2018 repealed the previous Directive. The aim of the GDPR is to expand and improve guarantees for personal data protection, at a time when due to technological development their processing has proliferated. This regulatory reform also includes processing modernization regarding the activity and cooperation of law enforcement agencies in criminal procedures, with the adoption of the Police Directive and the repeal of 2008/977/JHA framework decision.

Because of the importance of this reform and the necessity to guarantee the same European personal data protection standards for Albanian citizens, the Commissioner's Office intensified its efforts regarding approximation of the Albanian legislation with the GDPR and the Police Directive. This initiative was completed with the support of the Twinning Project, and was finalized with the draft law "*On personal data protection*", which should be adopted by the end of 2022. In addition, efforts were made to improve the 13 secondary legislation acts required for the implementation of this law. The updating of the national legislation in this field results in harmonization with the EU *acquis* and marks a development towards the completion of one of the country's integration process criteria for EU membership.

Furthermore, the updating of the Council of Europe (CoE) Convention "*For the protection of individuals with regard automatic processing of personal data*" was completed to be complementary to the GDPR, with ETS amending Protocol No. 223, in May 2018 (Convention 108+). Being a CoE member, but also in consideration of the recommendations made in the European Commission Progress Reports over the years, Albania ratified Convention 108+ with the adoption of law No. 49/2022 "*On the Ratification of the Protocol amending the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data*". The adoption of these two acts ranks Albania among the European continent countries with updated legislation in the personal data protection field, which results in a challenge for the institution related to their integral implementation.

## 4.2 OBJECTIVES

The main objectives in the personal data protection field for the period in question are:

**OBJECTIVE 1:** Achieving the highest regulatory standards to enhance personal data protection in the digital era.

The following activities will be undertaken to achieve this objective:

- ✓ Adoption of the draft law "*On personal data protection*" approximated with the EU *acquis* in this field and relevant secondary legislation for its implementation.
- ✓ Adoption of the draft law "On the establishment of unsolicited commercial communications Register";
- ✓ Promoting a new controller and processor approach to personal data processing with the aim of ensuring more effective information security;
- ✓ Promoting responsibility among public controllers to always ask the Commissioner's Office to provide opinion on primary and secondary legislation draft acts related to personal data, and projects that controllers would like to implement alone or in cooperation with other entities.

**OBJECTIVE 2:** Enhancing institutional capacities for legal improvements, focusing especially on information security management systems (ISMS).

The following activities will be undertaken to achieve this objective:

- ✓ Proposing Commissioner's Office structural changes regarding new competences and duties stemming from the new personal data protection legislation.
- ✓ Staff participation in international and European technology initiatives and networks, with the aim of enhancing their skills in this regard.
- ✓ Identifying and ensuring technical security in public and private controllers, with the aim of safeguarding confidentiality, integrity, availability and reliability of information security during personal data processing.
- ✓ Establishment of the personal data protection staff network in the public and private sector and promoting dialogue with them.

**OBJECTIVE 3:** Playing an active role in awareness raising and promotion of citizen rights, focusing on the education of the young generation.

The following activities will be undertaken to achieve this objective:

- ✓ Periodic organization of trainings and workshops aimed at enhancing controller/processor capacities related to responsible citizen personal data processing.

- ✓ Promoting the new legislation of the field in the country's education system through dedicated programs for all age groups, especially those most at risk of exposure to personal data sharing, such as children and youth.
- ✓ Provision of more in-depth academic knowledge to increase the number of experts/practitioners in this field, through cooperation with higher education institutions, the School of Magistrates and the Albanian School of Public Administration.
- ✓ Developing awareness raising materials to promote citizen culture regarding the exercise of this right.

**OBJECTIVE 4:** Strengthening cooperation with international partners in exchanging best practices, focusing on innovations ushered by the implementation of the approximated legislation.

The following activities will be undertaken to achieve this objective:

- ✓ Broader cooperation with counterpart authorities and/or international organizations in projects related to exchange of best practices/standards in this field.
- ✓ Enhancing administrative capacities regarding international personal data transfer practices;
- ✓ Consolidation of relations, experience exchange and practical know-how in the framework of law No. 113/2018 "On the Ratification of the cooperation agreement between the Republic of Albania and Eurojust;
- ✓ Active participation in forums and initiatives promoting international dialogue on data protection and privacy.

## 5. ACCOUNTABILITY, REPORTING AND MONITORING

The Strategic Management Group (SMG) administers the 2022-2025 Institutional Strategy and Action Plan implementation monitoring process pursuant to the Internal Commissioner's Office Regulation. This institutional mechanism periodically collects information from relevant structures and analyzes outcomes and identified issues, and evaluates progress towards strategic objectives semiannually and annually.

In the framework of inclusive participation, the Commissioner's Office invites citizens, civil society organizations, stakeholders and local and international donors to contribute to the strategy implementation. This coordination is achieved through the establishment of monitoring groups based on field of responsibility, which will function as consultation forums.

The SMG may decide to improve objectives/measures for a more complete achievement of the Strategy goal, aiming at its harmonization with the developments in both responsibility areas of the institution. Accordingly, financial and other requirements for the implementation of this document will be taken into account, planning accurate resources and assessing risks in the framework of the Midterm Budgeting Program.

The Commissioner's Office annual Work Plan and budget will reflect the objectives of this Strategy, which are further broken down into more concrete short-term activities.

The SMG develops an annual Strategy implementation monitoring Report, which is published on the official Commissioner's Office website.

## 6. STRATEGY FUNDING

The funding for the Commissioner's Office 2022-2025 Institutional Strategy will be obtained from two main sources, namely the state budget allocated for the Commissioner's Office for the period in question and/or support from local and foreign donors.

The financial effects of this document have been estimated on the basis of the institutional experience over the years and the effective planning of detailed programmed activities in the 2022-2025 Action Plan. This financial program also includes an analytic costing for each measure and concrete timeframes of implementation.

## 7. STRATEGIC ACTION PLAN

2022-2025 ACTION PLAN						
RIGHT TO INFORMATION						
No .	Activity for achievement of specific objective	Responsible Structure(s)	Starting date	Ending date	Indicative Cost (in thousand ALL)	Output
<b>OBJECTIVE 1:</b> Improving the legal framework in the right to information field in line with international standards.						
1.	Adoption of the draft law “ <i>On some additions and amendments to Law no. 119, dated 14.09.2014 "On the right to information"</i> and the relevant secondary legislation for its implementation.	Commissioner's Office	6 / II 2022	6 / II 2023	Administrative Costs	Law on right to information, as amended, adopted by end 2022. Secondary legislation adopted by end 2023.
2.	Effective implementation of law No. 33/2022 “ <i>On open data and the reuse of public sector information</i> ” and the adoption of the relevant secondary legislation for its implementation.	Commissioner's Office	6 / I 2023	6 / II 2025	Administrative Costs	5 secondary legislation acts adopted Awareness raising activities on promotion of right to reuse documentation according to this law.

						Complaints reviewed by the Commissioner's Office on violations of the right to reuse documents.
3.	Strengthening of Commissioner Office staff capacities for the effective implementation of the updated legal framework.	Commissioner's Office	6 / II 2022	6 / II 2023	Administrative Costs  EUD technical assistance through IPA 2020 funds for Good Governance	Project awarded through IPA 2020 funds on Good Governance implemented  Effective implementation of law No. 45/2022 "On the ratification of the Council of Europe Convention on Access to Official Documents".  Effective implementation of law No. 33/2022 "On open data and the re-use of public sector information".  Improving complaint handling performance in accordance with law No. 33/2022.  Improving complaint handling performance in accordance with the law on the right to information.
4.	Providing practical support to public authorities regarding the implementation of the new legal framework.	General Right to Information Directorate	6 / I 2023	6 / II 2025	Administrative Costs  Donors	Information sessions with PA right to information coordinators at the central and local level;  Civil servant trainings organized in cooperation with the Albanian School for Public Administration on the innovations and request for information handling methods, and on the compliance with right to information law obligations.

						<p>Awareness raising meetings at the Regional Council level, with central and LGU PA representatives on transparency programs and obligations stemming from the law on the right to information.</p> <p>Awareness raising activities/workshops/trainings on information request handling methods pursuant to law No. 33/2022 "On open data and the reuse of public sector information" and the obligations stemming from its implementation;</p>
<b>OBJECTIVE 2: Proactively communicating to consolidate public authority transparency culture.</b>						
1.	Strengthening the right to information coordinator role;	General Right to Information Directorate	6 / II 2022	6 / II 2025	Administrative Costs	<p>Year on year increasing trend of trainings aimed at providing coordinators with relevant knowledge and best practices.</p> <p>Continuous communication with central and local PA coordinators on complying with the obligations stemming from the law on the right to information.</p> <p>Right to information coordinators user manual publication.</p> <p>Proposal for a pay raise for the specific nature of the coordinator's work, adopted with relevant proposed legal amendments.</p>
					Donors	



2.	Orienting public authorities regarding the clarification of issues of public interest and cases of information restriction, especially in the framework of using the confidentiality and personal data protection concepts.	General Right to Information Directorate	6 / II 2022	6 / II 2025	Administrative Costs	Increasing trend of fulfilled requests for information, compared to the total number of requests.
3.	Including the highest possible number of central level and central level subordinate public authorities in the Transparency Index.	General Right to Information Directorate	6 / II 2022	6 / II 2025	Administrative Costs	Increasing trend in the number of public authorities included in the Central Authorities and Central Subordinate Authorities Transparency Index.  Central Authorities and Central Subordinate Authorities Transparency Index developed and published.
4.	Verifying central level, central level subordinate, and local self-government public authorities level of transparency.	General Right to Information Directorate	6 / II 2022	6 / II 2025	Administrative Costs	Increasing year on year trend of public authorities publishing the Transparency Program, the coordinator contact information, and the requests and reply Record on their official websites, pursuant to the legal provisions.  Increasing year on year trend of the number of public authorities providing public information requests and complaint for failure to provide information services on the e-Albania government portal.  Increasing year on year trend of public authorities that have installed the electronic requests and replies Register.



4.	Developing and periodically publishing information material on the official Commissioner's Office website, and using various communication platforms.	General Right to Information Directorate  Human Resources and Public Relations Sector	6 / II 2022	6 / II 2025	Administrative Costs	Monthly "Right to Information" newsletter developed and published.  Information and awareness raising materials such as the publication of the magazine, leaflets, videos, advertising spots.
<b>OBJECTIVE 4:</b> Developing and broadening international relations within the global right to information regulatory community.						
1.	Organization of the 15 <sup>th</sup> edition of the International Conference of Information Commissioners - ICIC.	Commissioner's Office	6 / I 2024	6 / II 2024	Administrative Costs  Donors	International Conference of Information Commissioners organized for the first time in Albania.  Promotion of a culture of transparency and good governance in Albania and throughout our region.
2.	Contributing to the quality of the representative to the Council of Parties of the Council of Europe Convention "On access to official documents".	General Right to Information Directorate  Legal Affairs and Integration Directorate	6 / II 2022	6 / II 2025	Administrative Costs	Reports, opinions or proposals by the Experts Group approved by the Parties Council.
3.	Active participation in the International Conference of Information Commissioners (ICIC) working groups/boards, working	General Right to Information Directorate  Projects and Foreign	6 / II 2022	6 / II 2025	Administrative Costs	Strengthened role of the Commissioner's Office in the international arena.

	closely with partners and counterpart institutions.	Relations Sector			Donors	
4.	Broadening cooperation with counterpart authorities on exchanging experience and best practices.	General Right to Information Directorate  Projects and Foreign Relations Sector	6 / II 2022	6 / II 2025	Administrative Costs	Projects funded through IPA funds and the TAIEX facility, implemented.  Cooperation agreement with counterpart authorities entered into and executed.
<b>PERSONAL DATA PROTECTION</b>						
<b>OBJECTIVE 1:</b> Achieving the highest regulatory standards to enhance personal data protection in the digital era.						
1.	Adoption of the draft law " <i>On personal data protection</i> " approximated with the EU <i>acquis</i> in this field and relevant secondary legislation for its implementation.	Albanian Parliament  Ministry of Justice	6 / II 2022	6 / II 2023		Law on the protection of personal data adopted.  More than 12 secondary legislation acts for the implementation of the new law adopted.  European standards in the personal data protection field implemented by end of 2022.

		Commissioner's Office			Administrative Costs	<p>Decreasing year on year trend in the number of complaints filed with the Commissioner's Office regarding violations of the right to personal data protection, since the entry into effect of the new law on personal data protection.</p> <p>More effective oversight of the personal data protection legislation through a strengthened role of the Commissioner's Office in its quality as the authority responsible for ensuring this right.</p> <p>Increasing trend in the number of public and/or private controllers complying with the obligations provided by the legal framework to improve security during personal data processing.</p> <p>Guaranteeing data protection with regard to their processing by competent authorities for the purposes of prevention, investigation, detection, or prosecution of criminal acts, or execution of criminal verdicts, and the free movement of such data.</p> <p>More aware citizens regarding their right to personal data protection.</p>
2.	Adoption of the draft law "On the establishment of the	Albanian Parliament	6 / II 2022	6 / I 2024	Administrative Costs	Law on the establishment of the unsolicited commercial communications Register adopted.

	unsolicited Commercial Communications Register";	Commissioner's Office			<p>2 secondary legislation acts adopted.</p> <p>Unsolicited Commercial Communications Register established.</p> <p>20% year on year decreasing trend of the number of complaints regarding direct marketing.</p> <p>Identification of an institution responsible for addressing citizen complaints on unsolicited commercial communications received from various commercial entities;</p> <p>Standardization of the work of commercial entities conducting direct marketing as part of their activities;</p> <p>Decreased disturbance of citizens caused by unsolicited commercial communications.</p>
3.	Promoting a new controller and processor approach to personal data processing with the aim of ensuring more effective information security.	Commissioner's Office	6 / II 2022	6 / II 2025	<p>Increased responsibility of controllers and processors in the dynamic process of personal data processing.</p> <p>Controllers informed about taking measures on:</p> <ul style="list-style-type: none"> <li>- <i>conducting impact assessments on personal data protection before starting processing activities;</i></li> </ul>

					Administrative Costs	<ul style="list-style-type: none"> <li>- <i>preliminarily consulting with the Commissioner before starting data processing when this processing poses high risk for the data subject;</i></li> <li>- <i>introducing the data protection by design and by default concept, and the use of these technologies;</i></li> <li>- <i>developing codes of conduct aimed at contributing to the best implementation possible of the personal data protection law;</i></li> <li>- <i>notifying the Commissioner about cases of personal data breaches, and notifying the data subject when the risk caused by the data breach is relevant;</i></li> <li>- <i>establishing the certification mechanism to demonstrate that processing is in line with the legal framework on personal data protection;</i></li> </ul> <p>Ensuring more effective information security during personal data processing.</p>
4.	Stimulating public controllers to ask the Commissioner's Office to provide opinion on primary and secondary legislation draft acts related to personal data, and projects that controllers would like to implement alone or in	Personal Data Protection General Directorate  Legal Affairs and	6 / II 2022	6 / II 2025	Administrative Costs	<p>Increasing trend in the number of acts preliminarily consulted with the Commissioner's Office, starting from 2021.</p> <p>Increasing trend in the number of acts adopted in line with the legislation on personal data protection starting from 2021.</p>

	cooperation with other entities.	Integration Directorate				
<b>OBJECTIVE 2:</b> Increasing institutional capacities for legal improvements, focusing especially on information security management systems (ISMS).						
1.	Proposing Commissioner's Office structural changes regarding new competences and duties stemming from the new personal data protection legislation.	Albanian Parliament Ministry of Finance and Economy Commissioner's Office	6 / II 2022	6 / II 2025	Administrative Costs	Structural reform and budget support for the Commissioner's Office.
2.	Staff participation in international and European technology initiatives and networks, with the aim of enhancing their skills in this regard.	Personal Data Protection General Directorate	6 / II 2022	6 / II 2025	Administrative Costs Donors	Better qualified staff for ICT. Improved administrative inquiry processes; Ensuring better data protection handling in relation to the new privacy challenges resulting from the growing use of technological devices and the increasing circulation of personal data in the digital world.
3.	Identifying and ensuring technical security in public and private controllers, with the aim of safeguarding confidentiality, integrity, availability and reliability of	Personal Data Protection General Directorate	6 / II 2022	6 / II 2025	Administrative Costs	Reformation of the data security systems of measures by public and private controllers. Increased public and private controller investments not just for service provision, but also better protection.



	information security during personal data processing.					
4.	Establishment of the personal data protection staff network in the public and private sector and promoting dialogue with them.	Personal Data Protection General Directorate	6 / II 2022	6 / II 2023	Administrative Costs	Consolidated personal data protection staff network.  Increased number of controllers/processors operating in compliance with the personal data protection legislation.
<b>OBJECTIVE 3:</b> Active role in awareness raising and promotion of citizen rights, focusing on the education of the young generation.						
1.	Periodic organization of trainings and workshops aimed at enhancing controller/processor capacities related to responsible citizen personal data processing.	Personal Data Protection General Directorate	6 / II 2022	6 / II 2025	Administrative Costs	Increasing trend in the number of controllers/processors operating in compliance with the personal data protection legislation. Decreasing trend in the number of decisions on fine penalties.
2.	Promoting the new sector legislation in the country's education system based on tailored programs for all age groups, especially for children and youth.	General Pre-University Education Directorate and its subordinate structures  Commissioner's Office	6 / II 2022	6 / II 2025	Administrative Costs  Donors	Expansion of the "Digital Education - Play and Learn - Happy Onlife" National Campaign.  Leaflets and guidelines;  Awareness raising video;  Improved culture on the exercise of the right to personal data protection among the young generation.

		(GPDPD)				
3.	Provision of in-depth academic knowledge to increase the number of experts/practitioners in the personal data protection field, through cooperation with higher education institutions, the School of Magistrates and the Albanian School of Public Administration.	School of Magistrates  Albanian School of Public Administration  Higher Education Institutions  Commissioner's Office	6 / II 2022	6 / II 2025	Administrative Costs	Trained civil servants;  Trained magistrates;  Trained students and academic/administrative staff.  Increasing trend in the number of experts/practitioners in the personal data protection field.
4.	Developing awareness raising materials to promote the civic culture of exercising the right to personal data protection.	Commissioner's Office	6 / II 2022	6 / II 2025	Administrative Costs	Information and awareness raising materials (magazine; leaflets; video) developed and/or published.  Citizens are more aware about the exercise of this right.
<p><b>OBJECTIVE 4:</b> Strengthening cooperation with international partners in exchanging best practices, focusing on innovations ushered by the implementation of the legislation approximated with the EU <i>acquis</i>.</p>						

1.	Broader cooperation with counterpart authorities and/or international organizations in projects related to exchange of best practices/standards in this field.	Personal Data Protection General Directorate.  Projects and Foreign Relations Sector.	6 / II 2022	6 / II 2025	Administrative Costs  Donors	Projects funded through IPA funds and the TAIEX facility, implemented;  Cooperation agreement with counterpart authorities entered into and executed.
2.	Enhancing administrative capacities regarding international personal data transfer practices;	Personal Data Protection General Directorate	6 / II 2022	6 / II 2025	Administrative Costs	Processes for handling international transfers are improved;  Personal data protection from additional risks that may be posed by international transfers is guaranteed.
3.	Consolidation of relations, experience exchange and practical know-how in the framework of law No. 113/2018 "On the Ratification of the cooperation agreement between the Republic of Albania and Eurojust;	Personal Data Protection General Directorate	6 / II 2022	6 / II 2025	Administrative Costs  TAIEX Facility	Study visit in the framework of "Benefiting assistance for the development of a personal data protection monitoring and reporting methodology in the framework of the implementation of the Eurojust - Albania Agreement" is completed.  The report in the framework of the obligation under article 19 of the Cooperation Agreement with Eurojust, is developed.
4.	Active participation in forums and initiatives promoting international dialogue on data protection and privacy.	Personal Data Protection General Directorate	6 / II 2022	6 / II 2025	Administrative Costs	Active participation in all forums, such as:  <ul style="list-style-type: none"> <li>• <i>Global Privacy Assembly (GPA), Executive Committee, Strategic Direction Sub-Committee (SDSC).</i></li> </ul>

					<ul style="list-style-type: none"> <li>• <i>Conference of European Data Protection Authorities and Working Group on the Future of the European Conference;</i></li> <li>• <i>European Data Protection Board.</i></li> <li>• <i>Consultative Committee of Convention 108 (TPD Committee).</i></li> <li>• <i>International Working Group on Data Protection in Telecommunications (Berlin Group), etc.</i></li> </ul> <p>Enhanced capacities through exchange of experiences, information and best practices.</p>
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