



KOMISIONERI PËR TË DREJTËN
E INFORMIMIT DHE MBROJTJEN
E TË DHËNAVE PERSONALE

STRATEGY OF THE INFORMATION AND DATA PROTECTION COMMISSIONER 2026 – 2030

Tirana 2026

Contents

Preface	3
Abbreviations and acronyms	4
I. Executive Summary	5
II. Vision, Mission and Values	6
2.1 Vision.....	6
2.2 Misioni	6
2.3 Institutional values and principles	6
III. Strategic Context	8
3.1 National legal framework	8
3.2 International and European framework	8
3.3 European integration.....	9
3.4 Institutional cooperation at European and international level	10
3.5 Strategic trends and developments	11
IV. Strategic Assessment (SWOT Analysis)	13
4.1 Strengths.....	13
4.2 Weaknesses	14
4.3 Opportunities	14
4.4 Threats	15
V. Situation Analysis.....	16
5.1 Current situation in the field of the right to information	16
5.2 Current situation in the field of personal data protection	17
5.3 Broadening of the institutional mandate	18
5.4 Institutional relations	19
5.5 Strategic challenges for the period 2026 – 2030.....	19
VI. Strategic Objectives.....	21
6.1 Strategic Objective 1: Strengthening transparency and effectively ensuring right to information	21
6.2 Strategic Objective 2 – Ensuring a high level of personal data protection in the digital society.....	22
6.3 Strategic Objective 3 – Strengthening open governance through public consultation and open data	23
6.4 Strategic Objective 4 – Effective implementation of the Commissioner's mandate in the area of transparency of lobbying activities	24
6.5 Strategic Objective 5 – Strengthening institutional effectiveness and developing organizational capacities.....	25
VII. Implementation and Monitoring of the Strategy	27
7.1 Strategy Implementation.....	27
7.2 Monitoring, reporting and review	27
7.3 Resources for Strategy implementation	27
7.4 Risk management	28
ANNEX I.....	29
Action Plan for the implementation of the Strategy 2026 – 2027	29

Preface

The Strategy 2026 – 2030 marks a new stage in the institutional development of the Information and Data Protection Commissioner. It reflects our commitment to effectively guarantee the right to information, protection of personal data, promotion of open data and the reuse of information in the public sector, as well as lobbying activity.

Over the recent years, the Commissioner's Office has consolidated its role as an independent supervisory authority, strengthening oversight mechanisms, increasing institutional transparency and accountability, and developing capacities for the effective delivery on its mandate. Simultaneously, digital transformation, development and growth in use of artificial intelligence, the EU integration process and the expansion of the institution's mandate of competences, has brought new challenges and opportunities, which require a clear strategic vision and a proactive approach in the exercise of the Commissioner's role.

This Strategy expresses the institution's commitment to strengthen supervisory and organizational capacities, increase institutional effectiveness and develop cooperation with public authorities, civil society and international partners. At the same time, it aims to ensure that the Commissioner's activity is carried out in accordance with the best national, European and international standards.

I am confident that the implementation of this Strategy will contribute to strengthening citizen's trust in public institutions, consolidating a more transparent, accountable and open state administration, promoting a culture of transparency, accountability and respect for individual rights.

Besnik Dervishi

Information and Data Protection Commissioner

Abbreviations and acronyms

Abbreviation / Acronym	Full name
Commissioner 's Office	Information and Data Protection Commissioner
European Union	European Union
GDPR	General Data Protection Regulation
LED	Directive (EU) 2016/680 on the Protection of Data in the Criminal Area
EDPB	European Data Protection Board
GPA	Global Privacy Assembly
ICIC	International Conference of Information Commissioners
ERPNC	Electronic Registry for Public Notification and Consultation
ERoR&R	Electronic Registry of Requests and Responses to the Right to Information
ASPA	Albanian School of Public Administration
KPI	Key Performance Indicators
AI	Artificial Intelligence
CSO	Civil Society Organizations
DPO	Data Protection Officer
SMG	Strategic Management Group

I. Executive Summary

The Strategy of the Information and Data Protection Commissioner's Office 2026 – 2030 (hereinafter “the Commissioner's Office”) introduces the vision, priorities and strategic directions for the Office development over the next five years, in order to strengthen protection of right to information, personal data, and to promote open data and reuse of public sector information, as well as lobbying activity.

The Strategy has been designed in a context characterized by rapid technological developments, digital transformation, EU integration process, and broadening of the Commissioner's competences. These developments generate new opportunities for strengthening transparency and protecting fundamental rights of the individual, but at the same time bring new challenges related to the processing of personal data, the use of artificial intelligence, data governance, citizen participation in decision-making and guaranteeing integrity of public processes.

The Strategy has been developed based on the analysis of the national and European legal framework, strategic documents drafted within the framework of the integration process, international standards, situation analysis, SWOT analysis, assessment of the Commissioner's Office institutional capacities, as well as challenges identified in the exercise of its mandates.

The Strategy is built on the vision that public transparency and personal data protection constitute fundamental guarantees of democracy in the digital age. In this context, the Commissioner's mission is to guarantee the effective exercise of the right to information and personal data protection, by promoting transparency, accountability, institutional integrity and respect for the fundamental rights of the citizens.

To achieve this vision, the Strategy sets five strategic objectives, namely: (i) strengthening transparency and effectively guaranteeing the right to information; (ii) guaranteeing a high level of personal data protection in a digital society; (iii) strengthening open governance through public consultation and open data; (iv) effectively implementing the Commissioner's mandate in the field of transparency of lobbying activities; (v) strengthening institutional effectiveness and developing organizational capacities. These objectives are translated into strategic priorities, concrete measures and performance indicators, detailed in the following chapters of the Strategy and Action Plan 2026 – 2027.

The implementation of the Strategy will be carried out through periodic action plans, approved by the Commissioner, which will describe concrete measures, responsible structures, deadlines and performance indicators. The first Action Plan covers the period 2026 - 2027. The subsequent plan for the period 2028 - 2030 will be drafted and approved within 2027, based on the monitoring results and institutional priorities. Monitoring of the Strategy will be based on semi-annual reporting by the responsible structures, monitoring of performance indicators and annual assessment of results. The Strategy will be subject to a mid-term review and, when necessary, updating to adapt to legal, institutional, technological developments as well as European integration process.

Through the implementation of this Strategy, the Commissioner aims to further consolidate his role as an independent supervisory authority, strengthen citizen's trust in public institutions, contribute to the development of a more transparent, accountable and open public administration, and guarantee the effective protection of citizens' fundamental rights in accordance with national and European standards.

This Strategy has been developed with the support of the PACEP II project, funded by the Swiss Agency for Development and Cooperation (SDC) and implemented by Global Partners Governance (GPG) Albania.

II. Vision, Mission and Values

2.1 Vision

"Transparency, personal data protection and integrity in decision-making are fundamental safeguards of democracy and the rule of law in the digital age."

The Commissioner's Office vision for the period 2026 – 2030 is to consolidate as an independent, effective, proactive and trustworthy authority, which guarantees the right to information, personal data protection, promotes transparency through open data and public consultation, and strengthens integrity in public decision-making processes, in line with national and European standards.

Through this vision, the Commissioner will contribute to strengthening citizens' trust in public institutions, promoting a culture of transparency, accountability and respect for fundamental rights, and increasing integrity, transparency and accountability in public administration.

In an environment characterized by digital transformation, development of artificial intelligence, data governance and increased use of data, the Commissioner's Office will act as an institution that not only guarantees the effective implementation of legislation, but also identifies, anticipates and proactively addresses challenges which relate to access to information, personal data protection, reuse of public sector information, public consultation and transparency of public decision-making processes.

By following the technological, legal and institutional developments which affect his areas of responsibility, the Commissioner will contribute to building a safe, transparent and trustworthy environment for citizens, public institutions and private entities, contributing to the development of a transparent, accountable and citizen-oriented public administration.

The achievement of this vision relies on professionalism, independence, integrity, innovation of and close cooperation with public institutions, private sector, civil society, academia and international partners, with the aim of strengthening a sustainable culture of transparency, personal data protection, integrity, accountability and respect for fundamental rights.

2.2 Misioni

The Commissioner's Office mission is to guarantee the effective implementation of legislation in the areas of access to information and personal data protection, as well as to exercise legal powers in the field of open data, public notification and consultation and transparency of lobbying activity, through supervisory, regulatory, decision-making, advisory, awareness-raising and cooperative functions, in pursuant to the Constitution, applicable legislation and European standards.

In fulfilling this mission, the Commissioner monitors the implementation of legislation in areas where the law recognizes him supervisory powers, reviews administrative complaints, conducts investigations and inspections, monitors the fulfillment of legal obligations, drafts and adopts regulatory and guidance acts, provides recommendations for improving administrative practice and legal framework, and promotes public awareness and capacity development.

The Commissioner's Office cooperates closely with public institutions, private sector, civil society, academia and international partners, with the aim of harmonizing national legislation and practices with European standards, developing institutional capacities and continuously improving mechanisms for the supervision and protection of individual rights.

2.3 Institutional values and principles

The Commissioner's Office activities and the implementation of the Strategy 2026 – 2030 are driven by a system of values and principles that guide the performance of its institutional mandate and

relations with citizens, public institutions, private entities and international partners. These values and principles embody the constitutional standards, national legislation and international instruments, which guarantee the right to information, personal data protection, transparency, integrity and good governance. The Commissioner's Office exercises its activities on the basis of the following fundamental values and principles:

- **Independence** – exercising the mandate independently, without undue political, institutional or private interference or influence;
- **Legality** – respect for the Constitution, applicable legislation and international standards in every aspect of institutional action;
- **Integrity** – exercising powers with honesty, professional ethics and accountability, serving the public interest;
- **Professionalism** – ensuring high professional standards, continuous capacity development and quality of institutional decision-making;
- **Citizen-centred** – placing the protection of citizens' rights and legitimate interests at the centre of institutional activity, guaranteeing accessibility, open communication and quality services;
- **Impartiality and objectivity** – handling every case fairly, impartially, and based on facts and law;
- **Proportionality** – balancing the public interest with the protection of fundamental rights and freedoms of the individual;
- **Transparency and accountability** – exercising powers in a transparent and accountable manner, promoting open governance and public trust;
- **Confidentiality** – guaranteeing information and personal data protection during the exercise of legal functions;
- **Equality and non-discrimination** – ensuring equal treatment and respect for the dignity of every individual, without any form of discrimination;
- **Innovation** – promoting continuous improvement and adapting to technological developments to increase institutional effectiveness;
- **Institutional cooperation** – developing effective partnerships with public institutions, private sector, civil society, academia and international partners for the effective fulfilment of the institutional mandate.

These values and principles constitute the foundation upon which the Commissioner exercises his constitutional and legal mandate. They guide institutional decision-making, relations with the public and partners, as well as the implementation of the strategic objectives of this Strategy, ensuring that the institution's activity remains at the service of the protection of fundamental rights, transparency, integrity and the rule of law.

III. Strategic Context

3.1 National legal framework

The activities of the Commissioner's Office are based on a consolidated constitutional and legal framework, which guarantees the protection of the fundamental rights of the individual.

The Constitution of the Republic of Albania constitutes the basis of the Commissioner's Office activity, in safeguarding the right to information, personal data protection, as well as the principles of the rule of law, transparency and accountability of public institutions. The exercise of the functions and powers of the Commissioner is based on these constitutional guarantees.

In line with these principles, the national legal framework grants the Commissioner's Office the powers and responsibilities on the main areas of its activity. As regards transparency and open government, the Commissioner's Office powers are provided by Law no. 119/2014 "*On the Right to Information*", as amended, Law no. 146/2014 "*On Public Notification and Consultation*", and Law no. 33/2022 "*On Open Data and Reuse of Public Sector Information*". This framework guarantees the right to access information and to proactive transparency; recognizes the Commissioner's powers to review complaints in the field of public consultation; and defines his functions in supervising and promoting the reuse of public sector information.

In the field of personal data protection, the Commissioner exercises his functions in accordance with Law no. 124/2024 "*On Protection of Personal Data*", harmonized with the EU *acquis*. This law sets standards for the lawful processing of personal data, guarantees the rights of data subjects and consolidates the role of the Commissioner as the national supervisory authority in this field.

With the entry into force of Law no.12/2026 "*On Lobbying in the Republic of Albania*", the Commissioner's powers have also been expanded with regard to transparency of lobbying activity. The law tasks the Commissioner's Office with the administration and publication of the Lobbying Registry, supervision of legal compliance, handling of administrative offenses and annual reporting on its implementation.

The Commissioner's activity is also governed by sectoral legislation and sub-legal acts governing administrative procedures, organisation and functioning of public authorities, and exercise of supervisory powers in areas of his responsibility. Overall, this legal framework creates the basis for the exercise of an independent, effective and continuously developing role, in line with constitutional standards and European integration process goals.

This national legal framework is complemented by international and European instruments, which guide the development of national legislation and the exercise of the Commissioner's mandate in accordance with the most advanced international standards.

3.2 International and European framework

The Commissioner's activity is carried out in accordance with international and European standards, which govern the right to information, personal data protection, transparency and functioning of independent supervisory authorities. Such instruments constitute an important reference point for the development of national legislation, exercise of the Commissioner's powers and alignment of its institutional practices with European standards. In the area of access to information, a fundamental reference is the Council of Europe Convention on Access to Official Documents (Tromsø Convention, otherwise known as "CETS 205"), which guarantees the implementation of the highest international standards for citizens' access to information/documents produced/held by public authorities. At the core of this Convention is the principle of transparency of such documents in view of good

governance, in view of strengthening democracy and rule of law. Albania has ratified this Convention through Law no. 45/2022, dated 28.04.2022, which designates the Commissioner's Office as the country's representative in the Council of Parties for Convention CETS 205.

With regard to the EU legislation in this field, in April 2023, Law no. 33/2022 "*On Open Data and Reuse of Public Sector Information*" entered into force, which transposes the EU Directive with the same title, adding a new competence to the Commissioner's Office in the supervision and promotion of this right. Through this law, a clear and specific policy is ensured in this regard, encouraging the wide availability and possibility of reuse of public sector information for private and commercial purposes.

Also, within the framework of the country's EU integration process, Law no. 12/2026 "*On Lobbying in the Republic of Albania*" has been adopted, which aims to create a comprehensive and clear legal framework for the regulation of lobbying activity in the Republic of Albania. This legal framework aims to guarantee transparency, integrity, accountability and effective oversight of entities that exert influence over public decision-making processes. Under this law, the Information and Data Protection Commissioner is the responsible authority designated to register, supervise and control the exercise of lobbying activity, as well as to guarantee the implementation of the rules on transparency and integrity in lobbying processes. In the field of personal data protection, the international framework builds on the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (Convention CETS 108), which constitutes the only binding international instrument in this field and establishes the fundamental principles for the lawful processing of personal data, respect for the rights of the individual and the functioning of independent supervisory authorities. In order to respond to the challenges of economic and social development, especially technological ones, in fulfilment of the recommendations addressed over the years by international documents, Albania has ratified the Amending Protocol (CETS no. 223) to this Convention (otherwise known as Convention 108+), through the adoption of Law no. 49/2022, dated 12.05.2022. In the context of the European integration process, the Commissioner's Office activity is also guided by the EU *acquis* in this field, specifically Regulation (EU) 2016/679 (GDPR) and Directive (EU) 2016/680 (Law Enforcement Directive – LED), which set the standards regarding personal data protection, and which have been transposed into Albanian domestic legislation with the adoption of Law no. 124/2024 "*On Protection of Personal Data*".

An important component of the international framework is also the Cooperation Agreement between the Republic of Albania and EUROJUST, ratified by the Parliament by Law no. 113/2018. Under this Agreement, the Commissioner's Office is granted an important role in monitoring the implementation of obligations regarding personal data protection within the activities of the Albanian prosecution bodies. This Agreement has established the regular exchange of views between the Commissioner's Office and EUROJUST regarding its implementation and further developments in this field and the security of personal data. To this end, the Data Protection Officer of EUROJUST and the Albanian authority report to each other at least once a year. Overall, international and European standards have not only guided the development of Albanian legislation in the areas of the Commissioner's responsibilities, but also constitute the basis for institutional development, strengthening of independence, increasing professional capacities and harmonizing national practices with the most advanced European standards.

3.3 European integration

Albania's accession into the European Union is a national strategic objective, where the Commissioner's Office, as part of the Chapter "Political Criterion", Public Administration Reform, Chapter 23, "Judiciary and Fundamental Rights", Functioning of Democratic Institutions, and

Chapter 10 "Information Society and Media", has given its contribution throughout all phases of the opening of negotiations process. This progress summarizes a set of activities, reports, collaborations and meetings, which, within the medium-term and long-term strategic frameworks, in response to integration challenges aim to achieve objectives that serve the development of democratic institutions, transparency in decision-making at all levels, and strengthening the rule of law.

In this context, the process of Albania's integration into the European Union constitutes one of the main factors that guides the activity of the Commissioner's Office throughout 2026 - 2030. The alignment of Albanian legislation with the EU *acquis* has brought important developments in the field of personal data protection, transparency, open governance and strengthening of independent institutions. In this context, the Commissioner plays a key role not only in supervising the implementation of legislation, but also in promoting European standards, supporting public institutions and developing administrative practices in accordance with the requirements of the integration process.

The European Commission's report on Albania 2025 evaluates the adoption of the new framework on personal data protection, but emphasizes the need for effective implementation and strengthening of the administrative and budgetary capacities of the Commissioner's Office. The report also highlights those public authorities should improve compliance with transparency requirements and responsiveness to information requests, while public consultation processes require more regular, timely and transparent follow-up. At the same time, the European integration process requires the Commissioner to continue harmonizing institutional practices with European Union standards, strengthen cooperation with counterpart authorities and European institutions, as well as develop professional capacities that enable the effective implementation of legislation and addressing new challenges related to technological transformation, data governance and the protection of fundamental rights.

In this context, these findings guide the priorities of the 2026-2030 Strategy, which represents an important instrument for consolidating Commissioner's role as an independent, effective and reliable institution, in accordance with the European Union standards and values.

3.4 Institutional cooperation at European and international level

International cooperation constitutes an important component of the institutional development of the Commissioner's Office and also supports fulfilment of its mandate in accordance with European and international standards. Active participation in professional networks and international mechanisms enables the Commissioner's Office to exchange experiences, follow the latest developments in the area of transparency and personal data protection, as well as contribute to the development of international standards and good practices.

In the field of the right to information, the Commissioner is an active member of the International Conference of Information Commissioners (ICIC), the most important global platform of independent authorities for right to information. Participation in this network enables the exchange of international best practices, promotion of transparency and strengthening of cooperation between counterpart authorities in addressing common challenges related to open government, digital administration and balance between transparency and protection of personal data.

A particularly important achievement for the Commissioner's Office of Albania is its election as President of the International Conference of Information Commissioners (ICIC) for the period 2025 – 2027, entrusting Albania with the leadership of this global network. This role strengthens the international profile of the institution, increases the opportunities to contribute to the development of

international standards in the area of access to information and creates new opportunities for institutional cooperation and development of professional capacities.

Within the framework of the Council of Europe Convention on Access to Official Documents (Tromsø Convention), the Commissioner represents the Republic of Albania in the Council of Parties, contributing to the monitoring of the Convention implementation, exchanging of experiences between State Parties and promoting of international standards on transparency and right of access to official documents.

In the field of personal data protection, the Commissioner's Office cooperates with key international networks and mechanisms, including the Global Privacy Assembly (GPA), the European Data Protection Board (EDPB), where it enjoys permanent observer status since 2016, and the Council of Europe mechanisms under Convention 108+. These platforms contribute to the harmonisation of national practices with international standards, development of professional capacities and exchange of experiences on issues such as, cross-border data processing, artificial intelligence, data governance and cybersecurity. Participation in these international networks and mechanisms contributes to strengthening the institutional role of the Commissioner, harmonisation of national practices with European and international standards, development of professional capacities and enhancing effectiveness in supervision its areas of responsibility.

3.5 Strategic trends and developments

The period 2026–2030 is characterized by rapid technological, institutional and societal developments, which directly affect the way in which right to information, personal data protection and transparency of public institutions are exercised.

One of the most important developments is the increased use of digital technology and artificial intelligence within the public and private sectors alike. The EU Artificial Intelligence Act on the one hand and Albania's signature, on 15 June 2026, of the Council of Europe Framework Convention on Artificial Intelligence, Human Rights, Democracy, and the Rule of Law, on the other, reinforce the need for a rights-based and risk-based approach.

Another trend is the expansion of the use and exchange of data, both within public administration and between the public and private sectors. This requires strengthening data governance mechanisms, ensuring high security standards and developing practices that balance the need for innovation with personal data protection.

At the same time, citizens increasingly demand transparency, accountability and participation in public decision-making processes.

At the national level, a particular important development is the enactment of the legal framework on transparency of lobbying activities, which expands Commissioner's role in promoting integrity and accountability in public decision-making processes. The effective implementation of this framework requires the establishment of new oversight mechanisms, development of institutional capacities and promotion of a culture of transparency within relations between public institutions and lobbying actors.

The European integration process and the ongoing harmonisation with the EU *acquis* and standards will continue to influence the development of legislation and institutional practices in the areas under the Commissioner's Office responsibility.

In the face of these developments, the 2026 – 2030 Strategy aims to strengthen the institutional capacity of the Commissioner 's Office to act proactively, based on analysis, inter-institutional cooperation and international standards, ensuring that technological, legal and institutional developments are accompanied by effective safeguards of the fundamental rights of the individual.

IV. Strategic Assessment (SWOT Analysis)

The SWOT analysis constitutes an important strategic planning tool, which enables the assessment of internal and external factors that influence the achievement of the Commissioner's Office mandate. Through this analysis, the strengths and weaknesses of the institution are identified, as well as the opportunities and threats emanating from the external environment, laying the foundation for setting strategic objectives and development priorities for the period 2026 – 2030. The strategic assessment is based on the analysis of the legal and institutional framework, reports of national and international organizations, recommendations of the European Union and OECD/SIGMA, as well as on the own experience of the institution in exercising its functions.

The analysis also takes into account the expansion of the institutional mandate to cover transparency of lobbying activity, developments in digital technologies and artificial intelligence, as well as European integration process.

4.1 Strengths

The Commissioner 's Office enjoys a number of institutional advantages that create a stable basis for the achievement of the mission and strategic objectives for 2026 - 2030. These strengths are related to the consolidated legal mandate, institutional independence, expertise built over the years, reputation of the institution, as well as active engagement in national and international processes related to transparency, personal data protection and good governance.

Main strengths of the Commissioner 's Office include:

- A clear, broad and continuously evolving legal mandate, covering the right to information, personal data protection, public consultation, open data and reuse of information in the public sector, as well as the transparency of lobbying activities;
- Institutional and functional independence, guaranteed by law, which enables the exercise of supervisory, regulatory and decision-making powers in an independent, impartial and professional manner;
- Consolidated experience in supervising the implementation of legislation, handling administrative complaints, conducting investigations and promoting good practices;
- Specialized professional expertise built over the years, in the areas of transparency, personal data protection and administrative oversight;
- Capacity to exercise regulatory, advisory and monitoring functions in support of the implementation of legislation and the improvement of public policies;
- A consolidated role in promoting transparency, accountability and protection of fundamental rights, through supervisory, regulatory and awareness-raising activities;
- Consolidated institutional reputation and credibility in cooperation with public institutions, private sector, civil society and international partners;
- Active engagement in international networks and mechanisms, including the International Conference of Commissioners on the Right to Information, the Global Privacy Assembly (GPA), the European Data Protection Board (EDPB), as a permanent observer, as well as Council of Europe mechanisms;
- Holding the Presidency of the International Conference of Information Commissioners (ICIC) for the period 2025 – 2027, which highlights the international profile of the Commissioner's Office and its position in the development of global standards in the area of right to information;

- Consolidated cooperation with public institutions, international organizations, development partners, civil society and professional networks, which has contributed to the development of institutional capacities, harmonization with European standards and promotion of best practices.

4.2 Weaknesses

Despite the progress achieved in consolidating its institution's role, the analysis highlights a number of internal factors that affect the full effectiveness of the exercise of the Commissioner's mandate. These factors are mainly related to organizational, human and technological capacities, as well as the need for the institution's continuous adaptation to its broadening mandate and rapid developments in the digital environment.

Main identified weaknesses include:

- Human and financial resources still limited in relation to the expansion of the institutional mandate, increase in the volume of work, and the need for specialized expertise;
- Further development of professional capacities is needed regarding new areas, such as artificial intelligence, data governance, information security and transparency of lobbying activity;
- Information systems and digital processes require further modernization, with the aim of increasing administrative efficiency, improving complaints management, monitoring and reporting;
- Mechanisms require further development for monitoring institutional performance, including the use of key performance indicators (KPIs), data analysis and evidence-based planning;
- Limited capacities for expanding education, awareness-raising and public communication activities, especially for specific categories of the public and public authorities.

4.3 Opportunities

The external environment creates important opportunities for the further development and consolidation of the Commissioner's role. The European integration process, technological developments, the increasing demand for transparency and good governance, as well as cooperation with national and international partners, create favourable conditions for strengthening institutional capacities and increasing the effectiveness of the Commissioner's mandate.

Main identified opportunities include:

- The EU integration process, which supports harmonization of legislation, strengthening of independent institutions and development of administrative capacities;
- Open Government and open data policies, which create opportunities for increased transparency, citizen participation and accountability of public institutions;
- Digital transformation of public administration, which creates opportunities for modernizing work processes, improving public services and increasing institutional efficiency;
- Increasing public awareness on the right to information, personal data protection, transparency and integrity in public decision-making;
- Lobbying legislation, which creates opportunities for strengthening the supervisory and advisory role of the Commissioner in promoting transparency and integrity in public decision-making processes;
- Technical and financial support from international partners for the development of institutional capacities, processes modernization and alignment with European standards;

- Cooperation with public institutions, civil society, academia, media and private sector, to promote a culture of transparency, personal data protection, and civic education;
- Development of new technologies and analytical tools, which create opportunities for improving monitoring, data analysis, risk assessment and effectiveness of supervisory activity;
- Active participation in international networks and mechanisms, which creates opportunities for the exchange of best practices, professional development of staff, harmonization with international standards and raising the institutional profile.

4.4 Threats

The Commissioner's activities are affected by a number of external factors that may limit the effectiveness of the exercise of his mandate. These factors are related to the rapid technological developments, increasing complexity of personal data processing, continuous evolution of the regulatory framework, as well as the level of implementation of legislation by public authorities and private entities. Addressing these challenges requires continuous adaptation of institutional capacities, inter-institutional cooperation and continuous professional development.

The main threats identified are:

- The increasing complexity of digital technologies, artificial intelligence and massive data processing, which creates new challenges for personal data protection, transparency and regulatory oversight;
- The increase in cybersecurity incidents and risks related to information security, with a direct impact on the protection of personal data and public trust;
- Failure to implement or incomplete implementation of the Commissioner's decisions and recommendations, limiting the effectiveness of his supervisory functions;
- The continuous increase in the volume and complexity of complaints and administrative issues, linked to the expansion of the use of digital technologies and the broadening of Commissioner's institutional mandate;
- Rapid changes in legislation and international standards, which require continuous adaptation of institutional practices and continuous development of professional capacities;
- Insufficient level of a culture of transparency, personal data protection and compliance with legal obligations among some public authorities and private entities;
- Budgetary constraints and increased demands on the institution, which may affect the achievement of strategic objectives and the development of institutional capacities.

The SWOT analysis shows that the Commissioner's Office has a solid institutional foundation, supported by the legal framework, institutional independence, professional expertise and national and international cooperation. These factors support the further strengthening of the institution's role in guaranteeing the right to information, personal data protection, open data and transparency in public decision-making.

At the same time, further development of organizational, human, financial and technological capacities is required to face the challenges of digital transformation, artificial intelligence, personal data processing and implementation of the legal framework for lobbying transparency.

The opportunities offered by European integration, digital transformation and cooperation with partners, together with addressing weaknesses and threats, guide the Commissioner's Office priorities and strategic objectives for 2026–2030.

V. Situation Analysis

The situation analysis presents the current state of play in the Commissioner 's Office areas of responsibility, and identifies the main developments that affect the exercise of its institutional mandate. It is based on an analysis of the legal and institutional framework, the Commissioner's Office experience in exercising its functions, the results of monitoring and administrative investigations, reports from national and international institutions, as well as developments related to the European integration process, digital transformation and the broadening of the Commissioner 's mandate.

In recent years, significant developments have been noted in strengthening the legal and institutional framework in the areas of right to information, personal data protection, open data, public consultation and transparency of lobbying activities. However, effective implementation of legislation, increased institutional capacities, technological developments and rising expectations of citizens continue to pose challenges that require a strategic and coordinated approach.

In this context, the situation analysis aims to highlight the progress achieved, existing challenges and priority areas where the strategic objectives of the Commissioner 's Office will be focused for the period 2026 - 2030.

5.1 Current situation in the field of the right to information

The right to information in Albania has seen significant developments in recent years, as a result of the consolidation of the legal framework, strengthening of the supervisory role of the Commissioner and the gradual growth of a culture of transparency in public administration. The legal changes of recent years, the ratification of Council of Europe Convention 205, the development of legislation on open data and reuse of public sector information, as well as the improvement of proactive transparency and public consultation mechanisms, have expanded the standards that public authorities must apply to guarantee access to information and increase the transparency of public decision-making.

Monitoring over recent years has shown an overall improvement in the level of proactive transparency and compliance with legal obligations among public authorities, although the level of implementation across institutions remains uneven. In 2025, a total of 367 public authorities were monitored, compared to 355 in 2024; out of the total monitored public authorities, 357 published a Transparency Program, all had an information coordinator designated, and 348 had published a Registry of Requests and Responses.

Proactive Transparency Index highlights a positive trend in proactive disclosure of information and gradual consolidation of the Transparency Program, an instrument of good governance. Continuous monitoring over the past few years shows an increase in the number of authorities scoring a high level of transparency, although differences remain in implementation level between institutions.

In 2025, a development of strategic importance was the adoption of new Transparency Programmes templates for central public authorities and local self-government units. The new templates reflect the latest legal changes, including requirements stemming from Council of Europe Convention 205 and from the European integration process, expanding the categories of information that must be proactively disclosed and strengthening transparency of the public decision-making process.

Although progress has been made, the level of law implementation remains uneven across public authorities. Challenges relate to administrative and organisational capacities, changing of designated information coordinators, non-periodical update of official websites, uneven implementation of proactive transparency duties and technological capacity. The European Commission's Report on

Albania for 2025 also highlights the need for public authorities to increase compliance with transparency requirements and responsiveness to information requests. These challenges require continuous capacity development, evidence-based monitoring, and strengthening of accountability mechanisms.

At the same time, a higher demand of citizens for transparency, development of digital services, implementation of legislation on open data and reuse of public sector information, as well as the European integration process, are raising expectations on the Commissioner's role as a supervisory, regulatory and advisory authority. These developments require not only the strengthening of oversight and law enforcement mechanisms, but also the development of new monitoring instruments, data analysis, education of public authorities and citizen awareness.

For the period 2026 – 2030, the main challenge lies in ensuring a uniform and effective implementation of legal standards by public authorities. In this regard, the Commissioner's Office will focus on strengthening and improving areas of proactive transparency, handling of information requests, developing modern monitoring and performance evaluation mechanisms, and contributing, within its legal powers, towards a better quality of public consultation.

5.2 Current situation in the field of personal data protection

Personal data protection constitutes one of the fundamental rights of the individual and an essential element to ensure citizens' trust in public administration and the digital economy. Over the past few years, this area has seen significant legal and institutional developments, which has in turn strengthened personal data protection standards and broadened the responsibilities of public and private controllers in the processing of personal data. The most important development is the adoption of Law no. 124/2024 *"On Protection of Personal Data"*, harmonized with the relevant EU *acquis*, establishing a new framework for guaranteeing citizens' rights and strengthening the role of the Commissioner's Office as a supervisory authority.

The implementation of the new legal framework has significantly increased the complexity of the Commissioner's Office functions. In addition to exercising supervisory powers, the Office is engaged in drafting sub-legal acts, providing guidelines, developing training activities and cooperating with national institutions and international partners, with the aim of harmonizing Albanian practices with European standards. The European Commission's Report on Albania for 2025 commends the new legal framework, but calls for effective implementation, strengthening of the administrative and budgetary capacities of the institution, as well as raising public awareness and enhancing preventive capacities of public institutions.

At the same time, the digital transformation of public administration, the expansion of the use of electronic services, the growth of large-scale data processing, and the development of artificial intelligence are creating new challenges in the area of personal data protection. The increasingly widespread use of automated decision-making systems, cross-border data exchange, and the increase in cybersecurity incidents, require a risk management-based approach, development of professional capacities and strengthening of inter-institutional cooperation.

The analysis of the situation shows that, although the level of personal data protection awareness has improved, practical implementation of the legislation remains uneven across sectors. The entry into force of the new Law on Personal Data Protection has brought transitional challenges for controllers, as it requires adaptation of practices, investment in information security, and strengthening of the role of the Data Protection Officers. These challenges are related not only to the rapid development of technology, but also to the need to increase the professional and organizational capacities of data controllers and processors.

At the same time, the European integration process, cooperation the European Union and the Council of Europe bodies, as well as the active participation of the Commissioner 's Office in international networks of supervisory authorities, create important opportunities for the harmonisation of national practices with European standards and the further development of institutional capacities. Issues such as artificial intelligence, data governance, international data transfers and privacy protection in the digital environment will continue to be among the main priorities of the Commissioner 's activity in the coming years.

For the period 2026 – 2030, the main challenge lies not only in the effective implementation of the new legal framework, but also in building a sustainable culture of personal data protection in all sectors of public administration and the economy. In this regard, the Commissioner 's Office will aim to strengthen its supervisory functions, develop professional capacities, promote a risk-based approach, and raise awareness of public controllers, private entities and citizens alike, in line with European standards and developments in the digital society.

5.3 Broadening of the institutional mandate

In recent years, the mandate of the Commissioner for the Right to Information and Personal Data Protection has expanded significantly, reflecting the legal, institutional and technological developments that characterize modern governance. From a supervisory authority with responsibilities chiefly in the access to information and personal data protection areas, the Commissioner is consolidating itself as an authority with an increasingly broader role in promoting transparency, integrity, accountability and open government.

In addition to the traditional functions in the field of the right to information and personal data protection, the mandate of the Commissioner's Office covers the review of complaints in the field of public notification and consultation, supervisory and promotional functions for open data and reuse of public sector information, as well as promotion of proactive transparency as a standard of good governance. These roles have broadened the scope of the Commissioner's Office and its role in supporting public administration in implementing standards of transparency and citizen participation.

A particularly important development is the adoption of Law no. 12/2026 *"On Lobbying in the Republic of Albania"*, which assigns new functions to the Commissioner, namely for supervising the implementation of the law, administering the Lobbying Registry, examining administrative violations, and promoting transparency and integrity in public decision-making processes. This development marks the most significant expansion of the Commissioner's Office mandate since its establishment, and positions the Commissioner as a key factor in strengthening public integrity and citizens' trust in institutions.

The broadening of the institutional mandate is accompanied by increased supervisory, regulatory, advisory, and awareness-raising responsibilities of the Commissioner. At the same time, it requires the development of new organizational and professional capacities, strengthening of inter-institutional coordination, modernization of work processes, and development of information systems that support the effective exercise of the new functions.

In this context, the expansion of the mandate should not be understood only as an increase in legal powers, but as a transformation of the Commissioner 's Office institutional role.

For the period 2026 – 2030, the Commissioner's Office aims to consolidate itself as the leading national authority in promoting transparency, personal data protection, open governance and integrity in public decision-making, guaranteeing the implementation of national and European standards in all areas of its responsibility.

5.4 Institutional relations

The effective fulfilment of the Commissioner's mandate requires sustainable and structured cooperation with public institutions, private entities, civil society, academia, media and international partners. Due to the cross-sectoral nature of his functions, the Commissioner exercises a coordinating, advisory, and supervisory role in relation to a wide range of institutions and actors, with the aim of guaranteeing transparency, personal data protection, open governance, and integrity in public decision-making.

Cooperation with public authorities constitutes the basis for the exercise of the Commissioner's functions, and is carried out through monitoring the implementation of legislation, handling administrative complaints, conducting investigations and inspections, and providing technical and methodological assistance. The Commissioner also cooperates with the Assembly of Albania and other constitutional institutions in the process of drafting and improving legislation in the areas under his mandate. Institutional dialogue and the consultative approach constitute important elements for increasing the level of compliance with legislation and improving administrative practices.

Civil society, media, and the academic community constitute important partners in promoting transparency, protecting individual rights, raising public awareness, and identifying issues that require institutional intervention. Cooperation with these actors contributes to the development of more inclusive policies, and towards strengthening the culture of transparency and accountability.

The Commissioner also has close cooperation with counterpart authorities and international organisations, actively participating in European and international professional networks. This cooperation enables the exchange of best practices, harmonisation with international standards, development of professional capacities, and coordination in addressing common challenges related to personal data protection, right to information, open governance and technological developments.

Within the broadening of the Commissioner's Office institutional mandate and the increasing complexity of the challenges related to areas of digital transformation, artificial intelligence and transparency of public decision-making, strengthening inter-institutional cooperation will remain one of the key determinants for achieving the Commissioner's strategic objectives throughout 2026 - 2030. In this regard, the Commissioner's Office will aim at developing sustainable mechanisms for coordination, information exchange, and capacity development, in order to effectively implement legislation and protect citizens' rights.

5.5 Strategic challenges for the period 2026 – 2030

The situation analysis highlights that the Commissioner's Office operates in a constantly evolving institutional, legal, and technological environment, where the broadening of the mandate, the European integration process, and the digital transformation require continuous adaptation of institutional capacities. In this context, 2026-2030 Strategy aims to address the main challenges that affect the effective implementation of the Commissioner's mandate and the guarantee of the fundamental rights of citizens.

The strategic challenges for the period 2026 – 2030 include:

- Need to strengthen effective implementation of legislation, by increasing the level of compliance of public authorities and private entities with the obligations arising from legislation in areas of right to information, personal data protection, public consultation, open data, and transparency of lobbying activity;

- Commissioner's Office need to adapt to its broader mandate through the development of organizational, professional and technological capacities, with the aim of effectively exercising new functions and increasing institutional effectiveness;
- Need to address the challenges related to digital transformation and development of artificial intelligence, ensuring a balance among innovation, transparency, protection of personal data, and respect for fundamental rights;
- Need to strengthen transparency and open governance through the promotion of proactive transparency, public consultation, reuse of public sector information, and development of open data policies;
- Need to increase the effectiveness of Commissioner's supervisory and advisory functions through strengthening monitoring and evaluation mechanisms, use of evidence-based analysis, performance indicators, and improving decision-making processes;
- Need to develop institutional and professional capacities through investment in human resources, continuous professional development of staff, improvement of institutional processes and strengthening of technological infrastructure;
- Need to strengthen inter-institutional and international cooperation with public institutions, local government, justice system, civil society, academia, media and international partners, with the aim of harmonizing national practices with European and international standards;
- Need to increase public awareness and trust, promoting a culture of transparency, personal data protection, integrity and accountability, as well as empowering citizens in exercising their rights.

Addressing these challenges will guide the priorities and strategic objectives of the Commissioner's Office for the period 2026 – 2030, with the aim of consolidating itself as an independent, effective and credible authority in guaranteeing transparency, personal data protection, open governance and integrity in public decision-making.

VI. Strategic Objectives

6.1 Strategic Objective 1: Strengthening transparency and effectively ensuring right to information

Strategic goal

To guarantee the effective exercise of the right to information by strengthening transparency of public authorities, improving implementation of the law, developing monitoring mechanisms, and increasing accountability, in accordance with national and European standards.

Objective description

This objective aims to consolidate Commissioner's Office role as the national authority responsible for guaranteeing the right to information and promoting transparency in public administration. During the 2026 – 2030, the focus will be on strengthening the implementation of legislation by public authorities, increasing the quality of proactive transparency, improving Transparency Programs and the Registry of Requests and Responses, as well as developing more effective evidence-based monitoring and evaluation mechanisms.

In line with the principles of open government, the objective aims to promote proactive information disclosure, increase accessibility of public documents, and improve the quality of information published by public authorities. At the same time, the Commissioner's Office will continue to exercise its supervisory, regulatory, advisory, and awareness-raising functions, combining systematic monitoring with the provision of methodological guidance and support for the development of public administration capacities.

Achieving this objective will contribute to strengthening institutional transparency, increasing accountability of public authorities, and empowering citizens in the effective exercise of the right to information.

Strategic priorities

- Strengthening monitoring of implementation of right to information legislation and proactive transparency;
- Improving and developing the Transparency Program, supporting the development of digital tools for proactive publication of information;
- Developing advanced methodologies and tools for monitoring and supervising implementation of the right to information legislation, combining documentary monitoring, administrative investigations and on-site verifications, as well as improving existing transparency assessment tools;
- Improving mechanisms for monitoring and following-up on the implementation of the Commissioner's decisions and recommendations;
- Strengthening the supervisory function through monitoring and administrative investigations, in accordance with the Commissioner's legal powers;
- Drafting and publishing thematic reports on the implementation of the right to information legislation;
- Developing the capacities of public authorities to implement transparency standards.

Expected results

- Increased level of compliance of public authorities with legal obligations in the field of the right to information;

- Improved quality and accessibility of proactive transparency;
- Strengthened effectiveness of the Commissioner 's supervisory and advisory functions;
- Increased capacities of public authorities to implement transparency standards;
- Increased citizens' trust in public institutions and more effective exercise of the right to information.

6.2 Strategic Objective 2 – Ensuring a high level of personal data protection in the digital society

Strategic goal

To guarantee the effective protection of personal data and respect for individual rights through strengthening supervision, increasing legal compliance, developing institutional capacities and promoting a culture of personal data protection, in accordance with national and European standards.

Objective description

This objective aims to consolidate the Commissioner 's Office role as the national supervisory authority in the area of personal data protection, in a context characterized by digital transformation, development of artificial intelligence, and an increasingly widespread use of technologies which involve personal data processing.

During 2026 – 2030, the Commissioner's Office will focus on strengthening the implementation of legislation by public and private controllers, increasing the effectiveness of supervisory and advisory functions, promoting good practices for the lawful and secure processing of personal data, as well as developing the professional capacities of data controllers and processors. In this context, special attention will also be paid to assessing the effectiveness of the sub-legal framework in the personal data protection area, aiming to identify the needs for its updating, harmonization, or improvement in line with legal, technological developments, and European standards.

At the same time, this objective aims to promote a risk management -based approach and the principle of accountability, by encouraging the implementation of personal data protection principles at all stages of their processing. Particular attention will be paid to the challenges related to digital transformation, use of artificial intelligence, information security, international transfers of personal data and the protection of children and other categories requiring special protection.

The achievement of this objective will contribute to strengthening citizens' trust in public institutions and private entities, increasing legal certainty and guaranteeing a high level of personal data protection, in accordance with European standards.

Strategic priorities

- Strengthening the supervision of the implementation of personal data protection legislation by public and private controllers;
- Improving mechanisms for monitoring compliance with legal requirements and for following -up on implementation of the Commissioner 's decisions and recommendations;
- Strengthening the supervisory function through monitoring and administrative investigations, in accordance with the Commissioner's legal powers;
- Assessing the effectiveness of sub-legal acts and developing a methodological framework for the implementation of legislation in the field of personal data protection;
- Drafting and updating of sub-legal acts and guidelines for the implementation of legislation in accordance with international standards;

- Developing professional capacities of personal data controllers and processors, as well as other relevant stakeholders;
- Promoting safe and responsible practices in the processing of personal data, with a focus on new technologies, artificial intelligence, information security and the protection of children and other vulnerable categories;
- Increasing citizens' awareness of rights related to the protection of personal data and ways to exercise them.

Expected results

- Increased level of compliance with personal data protection legislation;
- Strengthened effectiveness of the Commissioner's supervisory and advisory functions;
- Improved methodological and sub-legal framework for the implementation of legislation in the area of personal data protection;
- Developed data processing practices by public authorities and private entities;
- Increased professional capacities in the field of personal data protection;
- Increased public awareness and trust in privacy protection mechanisms.

6.3 Strategic Objective 3 – Strengthening open governance through public consultation and open data

Strategic goal

Strengthen open governance through the exercise of the Commissioner's powers on public notification and consultation and supervision of implementation of legislation on open data and reuse of public sector information, contributing to increasing the transparency of decision-making, citizen participation and access to information of public interest.

Objective description

This objective aims to strengthen the Commissioner's Office role in promoting open government through the review of complaints and analysis of practice in the area of public notification and consultation, as well as through the supervision and promotion of implementation of legislation on open data and reuse of public sector information.

In the area of public consultation, the priority will be the effective exercise of the powers to review complaints, analyse recurring issues and formulate recommendations to increase the quality, transparency and participation in consultation processes. Special attention will be paid to cooperation with the institutions responsible for the Electronic Registry for Public Notification and Consultation (ERPNC). In the area of open data, the Commissioner's Office will promote the effective implementation of Law no. 33/2022, encouraging the publication of data in open and machine-readable formats and their systematic updating, publication of high-value data sets and increasing the reuse of public sector information by citizens, businesses, academic community, media and civil society organizations.

Through monitoring, methodological guidance, capacity development and inter-institutional cooperation, the Commissioner's Office will contribute to improving the quality of public policy-making, increasing transparency and accountability, as well as to developing a more open, participatory and citizen-oriented public administration.

Strategic priorities

- Strengthening mechanisms for reviewing complaints, analysing practices and formulating recommendations in the area of public notification and consultation;
- Improving the quality and transparency of public consultation processes, promoting a meaningful participation of citizens and stakeholders;
- Cooperation with responsible institutions to improve the use and functioning of the Electronic Registry for Public Notification and Consultation (ERPNC);
- Promoting and overseeing the implementation of open data and reuse of public sector information legislation;
- Promoting the publication of high-value datasets, in open and machine-readable formats, in accordance with national and European standards;
- Development of methodological guidelines and capacity building of public authorities in the field of public consultation and open data;
- Promoting the reuse of public sector information by citizens, businesses, academic community, the media and civil society organizations.

Expected results

- Increased level of implementation of legislation on public consultation and open data, in accordance with the Commissioner's mandate;
- Improved quality of public consultation processes and increased citizen participation in decision-making;
- Increased number and quality of datasets published in open and reusable formats;
- Strengthened capacities of public authorities to implement open government standards;
- Increased use and reuse of public sector information;
- Improved transparency, accountability and public trust in institutions.

6.4 Strategic Objective 4 – Effective implementation of the Commissioner's mandate in the area of transparency of lobbying activities

Strategic goal

Ensure the effective implementation of legislation on the transparency of lobbying activities through the creation of mechanisms for supervision, registration, monitoring and methodological guidance, with the aim of strengthening transparency, integrity and accountability in public decision-making processes.

Objective description

This objective aims to consolidate the role of the Commissioner as the authority responsible for supervising the implementation of legislation on transparency of lobbying activities, pursuant to its powers provided by Law no. 12/2026 *"On Lobbying in the Republic of Albania"*.

During 2026 – 2030, the priority will be to create and consolidate the institutional, organizational and methodological framework necessary for the exercise of this new mandate. In this context, the Commissioner's Office will adopt the sub-legal acts within the legal deadlines, develop procedures for the registration, monitoring and supervision of lobbying activity and create the Lobbying Registry, as a key instrument for transparency and public access to information.

At the same time, the objective aims to develop the capacities of public officials, lobbyists, and lobbying beneficiaries for the correct implementation of legislation, as well as promoting a culture of integrity, transparency and accountability in relations between public and private actors.

The achievement of this objective will contribute to increasing the traceability of lobbying interactions, reducing the risk of improper influence, strengthening public trust in decision-making processes and aligning national practices with international standards in the field of lobbying transparency.

Strategic priorities

- Drafting, adopting and updating sub-legal acts for the effective implementation of legislation on the transparency of lobbying activities;
- Creation, administration and development of the Lobbying Registry, as an instrument for guaranteeing transparency and public access to information;
- Developing mechanisms for monitoring and supervising the implementation of legal obligations by lobbyists, lobbying beneficiaries, and public officials;
- Drafting methodological guidelines and standards for the implementation of legislation in the field of lobbying;
- Developing the professional capacities of public officials, lobbyists and other actors involved in law enforcement;
- Promoting transparency and public awareness on the importance of transparency in lobbying activities and integrity in public decision-making.

Expected results

- Functional regulatory and institutional framework for the implementation of lobbying legislation;
- Functional and publicly accessible Lobbying Registry;
- Increased level of compliance with legal obligations by entities involved in lobbying activities;
- Strengthened professional capacities for the implementation of legislation;
- Increased transparency and integrity in public decision-making processes;
- Increased public trust in transparency and accountability mechanisms.

6.5 Strategic Objective 5 – Strengthening institutional effectiveness and developing organizational capacities

Strategic goal

To increase the institutional effectiveness of the Commissioner's Office through the development of organizational, professional and technological capacities, improvement of work processes, consolidation of new institutional functions and the strengthening of national and international cooperation.

Objective description

This objective aims to strengthen Commissioner's Office institutional capacities, with the aim of increasing the effectiveness in the exercise of legal mandates and improving the quality of supervisory, regulatory, advisory and awareness-raising functions. In the context of the broadening of the Commissioner's Office mandate and rapid technological developments, the Office will invest in

human resource development, improvement of organizational processes and modernization of information systems that support its activity.

The objective also includes the development of mechanisms for monitoring institutional performance, improving case management and following up on the implementation of the Commissioner's decisions and recommendations, as well as strengthening cooperation with public authorities, international partners and professional networks. Through these measures, the aim is to build a modern, efficient institution capable of responding to challenges related to transparency, personal data protection, open governance and transparency of lobbying activity.

Strategic priorities

- Development of organizational and professional capacities in line with the broadening of the institutional mandate;
- Improving work processes, case management systems and technological infrastructure;
- Developing mechanisms for monitoring institutional performance and following- up on the implementation of decisions and recommendations;
- Investing in the professional development of staff and specialization in new areas of mandate;
- Strengthening cooperation with public authorities, international partners and professional networks, for the exchange of expertise and the development of institutional capacities;
- Active participation in international networks and mechanisms, promoting the role of the Commissioner and the harmonization of practices with European and international standards.

Expected results

- Organizational structure and institutional capacities adapted to the expansion of the Commissioner 's mandate;
- Improvement of organizational processes and development of information systems that support institutional activity;
- Improvement of institutional performance monitoring and mechanisms for following up on the implementation of the Commissioner 's decisions and recommendations;
- Increasing the level of professional expertise and specialization of staff in the areas of the institution's mandate;
- Expanded cooperation with public authorities, international partners and professional networks, contributing to institutional development and harmonization with European and international standards;
- Increased institutional effectiveness and quality of the exercise of the Commissioner 's functions.

The strategic objectives set out in this chapter are translated into concrete measures in Annex I - Action Plan 2026 - 2027, which sets out the expected outcomes, indicators, responsible structures, deadlines and funding sources.

VII. Implementation and Monitoring of the Strategy

7.1 Strategy Implementation

The implementation of the Commissioner's Office 2026 – 2030 Strategy relies on the commitment of all structures within the Office, coordination between them and the rational use of human, financial, and technological resources. Responsibility for overall coordination lies with the Secretary General, with the support of the Directorate of Legal Affairs and Integration and the Strategic Management Group (SMG).

The Strategy is implemented through action plans approved by the Commissioner. The first Action Plan covers the period 2026 – 2027. The Action Plan for 2028 – 2030 will be drafted on the basis of monitoring outcomes, legal developments and institutional priorities, and will be adopted no later than the end of 2027, to avoid a gap in operational planning.

The Strategy's measures will be integrated into the Annual Work Plan, Medium-Term Budget Program (MTBP) and, as appropriate, into procurement, human resources development and information technology plans. The annual recommendations of the Assembly of Albania addressed to the Commissioner's Office and the obligations arising from the European integration process will be reflected in operational planning, when relevant to the objectives of the Strategy.

Implementation will also rely on cooperation with public authorities, private sector, civil society, academia, counterpart authorities, and international partners, while maintaining the Commissioner's institutional responsibility for results that depend on his competences and resources.

7.2 Monitoring, reporting and review

Monitoring is an ongoing process and is based on the measures, deadlines and indicators of the Action Plan. Each responsible structure reports every six months on progress, verification evidence, issues and corrective measures. The Directorate of Legal Affairs and Integration consolidates the information and submits to the Secretary General and GMS for review.

For each indicator that does not have a measurement baseline at the time of the Strategy's adoption, the responsible structure shall determine the baseline within the first year of implementation and propose the corresponding target for approval. Changes to indicators or targets must be documented and must not affect accountability for the expected results.

Two internal monitoring reports will be prepared every year, along with one annual consolidated report. The summary of the results will be reflected in the Annual Activity Report of the Commissioner and in the reports addressed to the Assembly of Albania. Where appropriate and without prejudice to protected information, the main results will be published to strengthen institutional transparency.

A mid-term review of the Strategy will be carried out during the first half of 2028. The review will assess progress, feasibility of the objectives, effectiveness of the measures and the need for changes stemming from the legal framework, European integration, technological developments or institutional capacities. Any changes shall be approved by decision of the Commissioner.

7.3 Resources for Strategy implementation

The implementation of the Strategy will rely on the Commissioner's Office human, financial, and technological resources, allocated in accordance with the legislation in force, the Medium-Term Budget Program and institutional priorities.

Funding will be provided mainly from the institution's budget. For measures requiring additional expertise or investment, the Commissioner will seek technical and financial support from national and international partners. The inclusion of a measure in the Action Plan does not automatically imply the provision of external funding; measures will be rescheduled when funding, procurement or capacities do not allow implementation within the initial timeframe, documenting the reasons and corrective measures.

The 2026 – 2027 Action Plan, provided in Annex I, is an integral part of the Strategy and contains indicators, goals, verification sources, responsible structures, deadlines and funding sources.

7.4 Risk management

The main risks to the implementation of the Strategy are related to human and budgetary resource constraints, delays in procurement, and development of information systems, reliance on cooperation of other institutions, level of compliance of supervised entities, and rapid legal and technological changes.

The GMS will maintain and update a risk register, which defines the probability, impact, responsible structure and preventive or corrective measures. High-impact risks and the measures taken will be included in the semi-annual monitoring reports.

ANNEX I

Action Plan for the implementation of the Strategy 2026 – 2027

Methodological note: Where a measurement basis is missing, it is established within the first year of implementation and the target is approved on the basis of verified data. Deadlines and measures that depend on procurement or external financing are revised only with documented justification in the monitoring report.

Strategic Objective 1: Strengthening transparency and effectively guaranteeing the right to information

Code	Priority and measure/action	Expected result	Indicator, purpose and source of verification	Responsible/collaborative structure	Deadline	Source of funding
1.1	Strengthening proactive transparency Measure/activity: Implementation of annual monitoring of the Transparency Program, Registry of Requests and Responses, designation of information coordinators and use of ERPNC/pyetshtetinal portal, according to the annual monitoring plan.	Sustainably increased compliance of public authorities and better proactive transparency.	Baseline 2025: 357/367 authorities with Transparency Program (97.3%); 367/367 with coordinator (100%); 348/367 with registry of Requests and Responses (94.8%). Target 2027: ≥98%, 100% and ≥97%, respectively; 100% of authorities foreseen in the annual plan monitored. Verification: annual reports and Transparency Index.	General Directorate for the Right to Information; Directorate for Monitoring Transparency Programs; IT support	Q4 2026 / Q4 2027	Institution's budget
1.2	Improvement of the oversight methodology Measure/activity: Draft, approve and pilot the proactive transparency audit methodology, combining documentary analysis, practical verification and, where appropriate, field verification; update the methodology after piloting.	More standardized, in-depth, and evidence-based supervision.	Approved methodology; piloting in at least 3 public authorities by Q4 2026; piloting report and updated version; implementation in the defined sample for 2027.	General Directorate for the Right to Information; Directorate for Monitoring Transparency Programs	Q4 2026 – Q4 2027	Institution's budget/development partners
1.3	Strengthening supervisory and decision-making functions Measure/activity: Review complaints, conduct administrative investigations and thematic monitoring, and follow-up on the implementation of the Commissioner's decisions and recommendations.	More efficient case handling and increased implementation of decisions and recommendations.	100% of complaints handled within legal deadlines or with documented justification; number of thematic investigations/monitoring; 100% of decisions and recommendations with expired deadlines verified for follow-up; annual reporting on average handling time.	Directorate for Assessment of Complaints; Directorate for Monitoring Transparency Programs; Legal Affairs and Integration Directorate	CONTINUALLY	Institution budget
1.4	Assessment of the implementation of the legal framework Measure/activity: Conduct an institutional assessment on the implementation of the amendments to the law on the right to information and identify the needs for methodological, legal or sub-legal improvements.	Implementation issues identified and improvement measures proposed.	Approved evaluation report; analysis of complaint data, monitoring and jurisprudence; recommendations classified by priority and responsible institution.	General Directorate for the Right to Information; Directorate of Legal Affairs and Integration	Q4 2027	Institution budget
1.5	Capacity development of public authorities Measure/activity: Design and implement, in cooperation with ASPA, a training program for coordinators and employees of public authorities on the right to information, proactive transparency and the use of relevant instruments.	More sustainable professional capacities and more unified practices.	Approved program; 100% implementation of the sessions foreseen in the annual plan; number of participants; pre/post-training evaluation or evaluation form with at least 80% positive results.	General Directorate for the Right to Information/ASPA	2026 – 2027	Budget/development partners
1.6	Promoting a culture of transparency Measure/activity: Design and pilot an awareness-raising program on the right to information and transparency, in collaboration with universities and higher education institutions.	Increasing students' practical knowledge on exercising the right to information.	Programme and materials developed; involvement of at least 3 higher education institutions by the end of 2027; number of activities and participants; summary of participant evaluations.	General Directorate for the Right to Information; partner universities	2026 – 2027	Budget/development partners

Strategic Objective 2: Ensuring a high level of personal data protection in the digital society

Code	Priority and measure/action	Expected result	Indicator, purpose and source of verification	Responsible/collaborative structure	Deadline	Source of funding
2.1	Strengthening risk-based supervision Measure/activity: Implementation of annual supervision plans for public and private controllers and processors, based on risk analysis, complaint issues and institutional priorities; follow-up on recommendations made.	Increased compliance and better focus of supervisory resources.	Documented annual risk analysis; ≥90% of planned activities implemented or rescheduled with justification; number of investigations and acts; 100% of recommendations with completed deadlines included in the verification process.	General Directorate for Personal Data Protection and its directorates	Q4 2026 / Q4 2027	Institution's budget
2.2	Assessment of the sub-legal framework Measure/activity: Inventoried and assess implementation and effectiveness of the sub-legal acts adopted for implementation of Law no. 124/2024, with the aim of identifying the needs for, harmonization and supplementation.	Coherent sub-legal framework adapted to European and technological developments.	100% of applicable sub-legal acts inventoried and evaluated; evaluation report; prioritized proposals for amendment or supplementation.	General Directorate for Personal Data Protection; Directorate of Complaints and Harmonization; Directorate of Legal Affairs and Integration	S2 2027	Institution's budget /development partners
2.3	Sectoral guidelines for high-risk areas Measure/activity: Draft and publish sectoral guidelines for the implementation of legislation, with a focus on high-risk sectors and new technological developments.	More unified practices and higher compliance in priority sectors.	At least 3 sectoral guidelines published by the end of 2027; consultation with relevant stakeholders; explanatory materials and evidence of distribution/use.	Directorate of Sectoral Investigation and Data Security; Directorate of Complaints and Harmonization	2026 – 2027	Institution's budget /development partners
2.4	Capacity development of controllers and DPOs Measure/activity: Design and implement, in collaboration with ASPA and sectoral stakeholders, a continuous training and methodological support program for public administration, data protection officers and priority private sectors.	Increasing capacities for the practical implementation of the law and the principle of accountability.	Approved program; at least 4 sessions during the period 2026 – 2027; number of participants by category; knowledge or satisfaction assessment with at least 80% positive results.	General Directorate for Personal Data Protection/ASPA/sectoral actors	2026 – 2027	Institution's budget /development partners
2.5	New technologies and data security Measure/activity: Develop thematic activities on artificial intelligence, automated decision-making, data protection impact assessment, data protection by design and by default, security breach management and international transfers.	Clearer and more preventive approach to the risks of new technologies.	At least 2 thematic oversight or analytical activities; at least 1 guideline, recommendation or public report; documented issues and proposed measures.	Directorate of Sectoral Investigation and Data Security; Directorate of Complaints and Harmonization	S2 2027	Institution's budget /development partners
2.6	Promoting a culture of privacy Measure/activity: Design and pilot an awareness-raising program on personal data protection and the safe use of digital technologies, with a focus on children, youth, and educational institutions.	Increased awareness and practical skills for privacy protection.	Age -appropriate program and materials; involvement of at least 5 educational institutions; number of activities and participants; brief assessment of benefits.	General Directorate for Personal Data Protection; responsible education institutions	2026 – 2027	Institution's budget/development partners

Strategic Objective 3: Strengthening open governance through public consultation and open data

Code	Priority and measure/action	Expected result	Indicator, purpose and source of verification	Responsible/collaborative structure	Deadline	Source of funding
3.1	Exercise of public consultation powers Measure/activity: Review of complaints under Law no. 146/2014 and drafting an annual analysis on the issues identified in the consultation processes and the use of the ERPNC, based on complaints, public data and a defined sample.	Effective administrative protection and evidence-based recommendations for improving public consultation.	100% of complaints handled within legal deadlines or with documented justification; annual analysis/report; number of recommendations and their follow-up with responsible institutions.	Directorate for Open Data and Public Consultation; Directorate for Assessment of Complaints	2026 – 2027	Institution's budget
3.2	Capacity development for public consultation Measure/activity: Design and implement, in cooperation with ASPA and responsible institutions, of a training program on public consultation standards and the effective use of the ERPNC.	Better capacities of coordinators and responsible structures.	Approved program; at least 3 sessions during the period; number of participants; knowledge/satisfaction assessment.	Directorate for Open Data and Public Consultation/ASPA/administrative institution of the RENKP	2026 – 2027	Institution's budget /development partners
3.3	Supervision of the implementation of open data legislation Measure/activity: Monitor an annual sample of public sector bodies on the publication of document lists, open formats, data updating and fulfilment of the obligations of Law No. 33/2022.	Gradual improvement of data availability, quality and reusability.	Sample and methodology approved each year; measurement base established in 2026; monitoring report 2026 and follow-up report 2027; number of recommendations and follow-up status.	Directorate for Open Data and Public Consultation	Q4 2026 / Q4 2027	Institution's budget
3.4	Guidelines for publication and reuse Measure/activity: Draft or update, in coordination with responsible institutions, guidelines for publication in open and machine-readable formats, metadata, updating and high-value datasets.	Clearer requirements and more uniform practices for public sector bodies.	At least 1 complete guidance package approved/published; technical consultation with responsible institutions; number of authorities oriented.	Directorate for Open Data and Public Consultation; Directorate for Legal Affairs and Integration	S2 2027	Institution's budget/development partners
3.5	Promoting reuse and participation Measure/activity: Carry out activities with universities, CSOs, media, businesses and partners to promote the reuse of open data and informed participation in decision-making.	Increasing the practical use of data and awareness of open government.	At least 3 documented activities or use cases; number and type of partners/participants; public summary of results and recommendations.	Directorate for Open Data and Public Consultation; external partners	2026 – 2027	Institution's budget /development partners

Strategic Objective 4: Effective implementation of the Commissioner 's mandate in the field of transparency of lobbying activities

Code	Priority and measure/action	Expected result	Indicator, purpose and source of verification	Responsible/collaborative structure	Deadline	Source of funding
4.1	Completing the regulatory framework Measure/activity: Draft and approve all sub-legal acts assigned to the Commissioner by article 27 of Law no. 12/2026, as well as the guidelines and forms necessary for implementation.	Complete and implementable regulatory framework within the legal deadline.	100% of delegated sub-legal acts under article 27 drafted and approved within the legal deadline; instructions and forms published.	Directorate of Legal Affairs and Integration; structure responsible for lobbying; other relevant structures	Within the time limit of article 27	Institution's budget
4.2	Establishing internal organization for the new mandate Measure/activity: Define the responsible structure, roles, workflows, internal procedures, staffing needs and initial capacity development plan for law enforcement.	Clear responsibilities and functional work processes.	internal regulation approved; process and responsibilities map; capacity needs assessment; procedures for registration, verification, supervision, complaints and sanctions.	Secretary General; Directorate of Legal Affairs and Integration; Directorate of Internal Services and Finance	Q4 2026	Institution's budget
4.3	Create and operationalize the Lobbying Registry Measure/activity: Determine functional and security requirements, design, procurement/development, testing and commissioning of the Lobbying Registry, with publication of information according to the law and accessibility standards.	Functional, secure and publicly accessible electronic registry.	Approved functional and security requirements; procurement/development procedure completed according to plan; acceptance testing and minutes; functional log; availability and incidents documented after commissioning.	Structure responsible for lobbying; IT sector; Directorate of Internal Services and Finance	2026 – 2027,	Institution's budget/ development partners
4.4	Supervision of law enforcement Measure/activity: After the framework and registry are operational, administer applications and reports, verify compliance with legal obligations and development of supervisory and administrative procedures.	Uniform implementation and gradual increase in compliance of subjects of the law.	100% of applications processed within legal deadlines; number of registered entities; number of verifications/procedures; status of implementation of decisions and recommendations; annual statistics published.	Structure responsible for lobbying; Directorate of Legal Affairs and Integration	From functionalization and continuously	Institution's budget
4.5	Capacity development and methodological orientation Measure/activity: Draft guidelines, FAQs and practical materials, as well as develop training for public officials, lobbyists, lobbying beneficiaries and other relevant stakeholders.	Clearer understanding of obligations and more uniform application of the law.	Published guidance package; at least 4 sessions during the period; number of participants by category; frequently asked questions updated based on practice.	Structure responsible for lobbying; ASPA; development partners	2026 – 2027	Institution's budget/ development partners
4.6	Public reporting and transparency Measure/activity: Draft and submit to the Assembly the annual report on the implementation of the law, as well as publishing the data and analyses required by the legal framework.	Institutional accountability and regular public information on law enforcement.	Annual report submitted and published within the legal deadline; key registry and implementation data published in an accessible format; report recommendations followed in the planning for the following year.	Structure responsible for lobbying; Directorate of Legal Affairs and Integration; Cabinet	Every year, according to the law	Institution's budget

Strategic Objective 5: Strengthening institutional effectiveness and developing organizational capacities

Code	Priority and measure/action	Expected result	Indicator, purpose and source of verification	Responsible/collaborative structure	Deadline	Source of funding
5.1	Development of organizational and human capacities Measure/activity: Implementation and evaluation of the approved organizational structure, filling of vacancies according to the recruitment plan and assessment of additional needs arising from the new mandate and workload.	Organizational capacities better aligned with strategic functions and priorities.	100% of authorized vacancies included in the recruitment plan and procedures initiated on time; annual report on workload, skills gaps and resource needs.	Secretary General; Directorate of Internal Services and Finance; heads of structures	2026 – 2027	Institution's budget
5.2	Modernization of work processes and systems Measure/activity: Mapping of priority processes and development in phases of solutions for case management, follow-up of decisions/recommendations and electronic circulation of documents, depending on funding and procurement procedures.	More standardized, traceable and efficient processes.	Priority processes designed; functional and security requirements approved; treatment time measurement baseline created; funded phases developed/ tested; improvement objectives approved after measurement baseline created.	Secretary General; IT sector; Directorate of Internal Services and Finance; user structures	2026 – 2027	Institution's budget /development partners
5.3	Monitoring of the Strategy and institutional performance Measure/activity: Approval of the monitoring methodology, creation of the register/panel of indicators, semi-annual and annual reporting, and drafting of the Action Plan 2028 – 2030.	Regular monitoring, evidence-based decision-making and continuity of Strategy implementation.	Methodology and reporting formats approved; 2 internal reports per year and 1 consolidated annual report; measurement bases completed for missing indicators; Action Plan 2028 – 2030, approved by Q4 2027.	Secretary General; Directorate of Legal Affairs and Integration; Strategic Management Group; all structures	H2 2026 – Q4 2027	Institution's budget
5.4	Professional development of staff Measure/activity: Annual assessment of training needs and implementation of a continuous professional development program, with a combination of external training, internal training and knowledge exchange.	Deeper expertise and better knowledge sharing within the institution.	Annual needs analysis and approved program; at least 80% of staff participating in a professional development activity each year; at least 2 internal knowledge exchange sessions per year.	Directorate of Internal Services and Finance; heads of structures; ASPA/partners	2026 – 2027	Institution's budget /development partners
5.5	Information security and business continuity Measure/activity: Carry out an information security and business continuity risk assessment, approving the plan of measures and periodic testing of recovery/ backup and continuity procedures.	Higher institutional resilience and better information protection.	Risk assessment and approved measures plan; register of measures and their status; at least 1 documented test per year; incidents and corrective measures reported.	Secretary General; IT sector; Directorate of Internal Services and Finance	2026 – 2027	Institution's budget /development partners
5.6	National and international cooperation Measure/activity: Develop cooperation with public authorities, counterpart authorities, professional networks and international partners; timely preparation of required contributions and reports; transfer of knowledge within the institution.	Results-oriented cooperation and better use of acquired expertise.	100% of mandatory reports submitted on time; number of initiatives and substantial contributions; documentation of results; at least 2 internal sessions per year following priority international participations.	Directorate of Legal Affairs and Integration; responsible structures; Cabinet	2026 – 2027	Institution's budget /development partners
5.7	Mobilization of technical and financial assistance Measure/activity: Identify fundable needs and draft concepts/proposals for projects that support the implementation of strategic priorities, without replacing core institutional funding.	More structured project portfolio and additional opportunities for institutional development.	Annual map of needs and potential resources; at least 2 project concepts or applications by the end of 2027; number of agreements signed and measures implemented, when funding is secured.	Directorate of Legal Affairs and Integration; Directorate of Internal Services and Finance; beneficiary structures	2026 – 2027	Development partners/co-financing as appropriate

Strategy of the Information and Data Protection Commissioner 2026–2030 represents the institution's commitment to strengthening transparency, effective protection of personal data, open governance, integrity and accountability in the digital age.

Through its implementation, the Commissioner's Office aims to further consolidate its role as an independent, professional and trustworthy authority, at the service of citizens, and in accordance with national and European standards.

Transparency. Integrity. Protection of rights. Trust.

This Strategy was drafted with the support of the **PACEP II** Project, funded by the **Swiss Agency for Development and Cooperation (SDC)** and implemented by **Global Partners Governance (GPG) Albania**.



Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Agjencia Zvicerane për Zhvillim
dhe Bashkëpunim SDC



Global Partners
Governance