

Adoption: 19 March 2025  
Publication: 21 March 2025

Public  
GrecoRC5(2025)5

# FIFTH EVALUATION ROUND

Preventing corruption and promoting integrity in  
central governments (top executive functions) and  
law enforcement agencies

## SECOND COMPLIANCE REPORT

# ALBANIA



Adopted by GRECO  
at its 99<sup>th</sup> Plenary Meeting (Strasbourg, 17-19 March 2025)



Group of States against Corruption  
Groupe d'États contre la corruption

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

## I. INTRODUCTION

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (persons entrusted with top executive functions, PTEFs) and law enforcement agencies (LEAs)".

2. This Second Compliance Report assesses the measures taken by the authorities of Albania to implement the recommendations issued in the Fifth Round Evaluation Report which was adopted at GRECO's 86<sup>th</sup> Plenary Meeting (29 October 2020) and made public on 3 December 2020, following authorisation by the authorities of Albania. The corresponding Compliance Report was adopted at GRECO's 92<sup>nd</sup> Plenary Meeting (2 December 2022) and made public on 3 March 2023, following authorisation by the authorities of Albania.

3. As required by GRECO's Rules of Procedure<sup>1</sup>, the authorities of Albania submitted a Situation Report on measures taken to implement the recommendations contained in the Evaluation Report. This report was received on 30 September 2024 and served as a basis for this Second Compliance Report.

4. GRECO selected Greece (with respect to top executive functions in central governments - PTEFs) and Hungary (with respect to law enforcement agencies - LEA) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Panagiota VATIKALOU on behalf of Greece, and Dávid SZAKÁCS on behalf of Hungary. They were assisted by GRECO's Secretariat in drawing up this Second Compliance Report.

## II. ANALYSIS

5. GRECO addressed 24 recommendations to Albania in its Evaluation Report. In the Compliance Report, GRECO concluded that recommendations i, x, xi, xii and xv had been implemented satisfactorily or dealt with in a satisfactory manner, recommendations ii, iii, iv, v, vi, vii, viii, xiii, xvii, xx, xxi, xxii and xxiv, had been partly implemented and recommendations ix, xiv, xvi, xviii, xix, and xxiii had not been implemented. Compliance with the outstanding recommendations is examined below.

*Preventing corruption and promoting integrity in central governments (top executive functions)*

### **Recommendation ii**

6. *GRECO recommended that i) concrete integrity plans be adopted and implemented within all ministries, including a systematic analysis of integrity-related risks that ministers and political advisors might face in the exercise of their duties and monitoring and compliance mechanisms and ii) that appropriate remedial measures aimed specifically at PTEFs be designed and implemented.*

7. It is recalled that, in the Compliance Report, this recommendation was partly implemented. More precisely, as regards the first part of the recommendation, GRECO noted

---

<sup>1</sup> The Compliance procedure of GRECO's Fifth Evaluation Round is governed by its Rules of Procedure, as amended: Rule 31 revised bis and Rule 32 revised bis.

that integrity plans were in place in all ministries, but with different timespans for their implementation, and that only part of them addressed integrity-related risks and were monitored by integrity coordinators. As regards the second part of the recommendation, only three action plans had identified remedial measures addressing integrity-related risks.

8. The Albanian authorities now report that all ministries with specific government portfolio (ministries of Justice; Interior; Health and Social Protection; Education and Sports; Tourism and Environment; Finances; Economy, Culture and Innovation; Infrastructure and Energy; Defence; Europe and Foreign Affairs; Agriculture and Rural Development) have now strengthened integrity plans identifying integrity-related risks that ministers and political advisors may face in the course of their duties, together with specific measures to cope with such risks and monitoring the implementation of such measures. They include integrity coordinators tasked with overseeing, ensuring the implementation, and monitoring the plans. Monitoring reports have been issued for most of these ministries. Similarly, strengthened integrity plans containing the same level of measures, including the appointment of integrity coordinators, have been adopted for the six State ministries (Youth and Children; Relations with Parliament; Local Government; Public Administration and Anti-Corruption; Entrepreneurship and Business Climate, as well as the Office of the State Minister and Chief Negotiator). In each of these plans, a set of operational and regulatory measures aimed at ministers and cabinet members includes periodic training on ethics and anti-corruption, information packages regarding activities and events in which they participate, initial training on integrity and anti-corruption at the start of their terms, job descriptions outlining their responsibilities and areas of oversight, review of the relevant Codes of Ethics and internal regulations regarding job positions and duties, relations with technical directorates and other institutional functions (such as the right-to-information coordinator, public consultation coordinator, financial management coordinator, etc.).

9. GRECO welcomes that, in all relevant ministries, the existing integrity plans, supplemented by concrete action plans, are now based on integrity-risks assessments, and contain specific measures to cope with such risks. These plans are due to be regularly monitored, including through the effective appointment of integrity coordinators in each ministry. GRECO therefore considers that the first part of the recommendation has been implemented. GRECO also notes that remedial measures have been designed and implemented within this framework, aimed both at ministers and their cabinet members. Therefore, GRECO considers that the second part of the recommendation has been complied with.

10. GRECO concludes that recommendation ii has been implemented satisfactorily.

### **Recommendation iii**

11. *GRECO recommended to harmonise and increase the inherent coherence of the legal and institutional framework on the fight against corruption and integrity of public officials, in particular as regards PTEFs, for instance by compiling the norms and regulations into a handbook and providing guidance on the obligations of each category and on the role of each responsible body.*

12. It is recalled that, in the Compliance Report, this recommendation was partly implemented. GRECO acknowledged that coordination progress had been made in particular

with the establishment of the Directorate General against Corruption within the Office of the National Coordinator Against Corruption and the publication of promotional materials. GRECO was waiting for the new bill on conflicts of interest to be finalised.

13. The Albanian authorities now indicate that the bill on conflicts of interest is still under consideration in Parliament. The new law, prepared in consultation with Council of Europe's experts, should improve the prevention and regulation of conflicts of interest, including the declaration of interests, restrictions on the exercise of public duties, gifts, promises, favours, preferential treatment, post-employment rules, measures for preventing and resolving conflicts of interest, and provisions regarding the competencies of the body responsible for preventing, monitoring, and resolving them. According to the Action Plan (2024-2026) of the Intersectoral Strategy Against Corruption (ISAC) 2024-2030, the new law is due to be completed by a manual to facilitate its implementation and training sessions aimed at public administration employees. They will also cover PTEFs.

14. Pending the adoption of the new law on conflicts of interest, along with the relevant guidance and awareness-raising measures for PTEFs, GRECO concludes that recommendation iii remains partly implemented.

#### **Recommendation iv**

15. *GRECO recommended that i) the existing Ministerial Code of Ethics be complemented with concrete guidance for its implementation regarding conflicts of interest and other integrity-related matters (e.g. gifts, third party contacts, lobbying etc); ii) the effective functioning of the Ethics Commission, or any other credible mechanism of supervision and sanctions, be ensured, including with respect to the Prime Minister, and iii) the ethical rules be complemented by illustrative examples and enforcement mechanisms for political advisors.*

16. It is recalled that, in the Compliance Report, this recommendation was partly implemented. More precisely, GRECO concluded that only the second part of the recommendation was partly implemented, with the setting up of the Ethics Commission, which, however, still counted a representative of the Government in its composition. It also noted that there was no provision aimed at the Prime Minister him/herself. Furthermore, GRECO was expecting that an explanatory manual be finalised (part i of the recommendation) and the ethical rules be complemented by illustrative examples and enforcement mechanisms (part iii).

17. The Albanian authorities now report that they have published, with the support of Council of Europe's experts, a "Guide on the Rules of Ethics for Members of the Council of Ministers and Deputy Ministers", with a focus on conflicts of interest, and a "Guide for Members of the Council of Ministers on Obligations Related to Gifts, Favours, Promises, and Preferential Treatment", which have been made available electronically to all PTEFs. These manuals provide a detailed explanation, in simplified language, of the policies, principles, rules, and procedures applied to Members of the Council of Ministers, including the Prime Minister, as well as the applicable legislation on conflicts of interest.

18. The authorities further indicate that the composition of the Ethics Commission has been revised so that no political member is appointed.<sup>2</sup> It is chaired by the Secretary General of the Council of Ministers and includes the General Director of the Department of Regulatory Compliance and the General Director of the Department of Good Administration. The powers of the Commission are exercised towards all members of the Council of Ministers, including the Prime Minister.<sup>3</sup> The Ethics Commission has been confidentially consulted by two members of the Council of Ministers, on issues pertaining to the potential participation in the decision-making process.

19. Finally, regarding the third part of the recommendation, the authorities indicate that a Guiding Document “On the Rules of Ethics for Political Advisors in State Administration” has been published with the support of international experts. It includes the whole applicable legal framework, along with illustrative examples and implementation mechanisms, specifically designed for awareness and application by political officials. This Document has been distributed electronically and made available to all ministerial cabinets by the Minister of State for Public Administration and Anti-Corruption.

20. GRECO welcomes the publication and dissemination among PTEFs of concrete guidance for the implementation of the Ministerial Code of Ethics regarding conflicts of interest and other integrity-related matters, as well as illustrative examples and enforcement mechanisms for political advisors which complete the ethical rules. This is in line with the first and third parts of the recommendation. GRECO also notes the amendments to the composition and powers of the Ethics Commission, whose power has been extended to the action of the Prime Minister. However, there is no provision aimed at the Prime Minister if he/she violates provisions of the Code. Furthermore, GRECO is lacking information for assessing whether a credible mechanism of supervision and sanctions functions effectively. Therefore, GRECO cannot conclude that the second part of the recommendation is fully implemented.

21. GRECO concludes that recommendation iv remains partly implemented.

#### **Recommendation v**

22. *GRECO recommended that members of the Council of Ministers and political advisors be subject to systematic awareness raising on integrity-related matters, including the Ministerial Code of Ethics and the anti-corruption and integrity legislation and framework, via regular training, dedicated guidance and confidential counselling.*

23. It is recalled that, in the Compliance Report, this recommendation was partly implemented. GRECO noted that punctual trainings on the revised Ministerial Code of Ethics and on integrity-related matters had taken place but was expecting regular trainings to be organised for members of the Government. As regards confidential counselling, GRECO was expecting that the functioning of the Ethics Commission be amended to be able to assess the level of independence of the confidential counselling system.

---

<sup>2</sup> Order N° 203 of 23 October 2024.

<sup>3</sup> Article 18 of the Law N° 9000/2003 “On the organisation and functioning of the Council of Ministers” on “Guaranteeing impartiality of the members of the cabinet”.

24. The Albanian authorities now report that several trainings have been organised since 2022 for all the members of the Council of Ministers and for all political advisors on the Ministerial Code of Ethics and on integrity-related matters, including mock exercises. Moreover, an online training programme for political advisors on corruption prevention was conducted from January to April 2024, developed with the support of the Council of Europe's HELP Programme. Upon completion of this course, 35 political advisors from various line ministries were certified. The "Introduction to Corruption Prevention" training, launched in June 2024, was extended to serve as an informational tool for the technical staff of the Directorate General of Anti-Corruption. A total of 45 employees participated in this training module. Additionally, the "Guide on the Rules of Ethics for Political Advisors in State Administration" (see above) has come to consolidate the ethical standards applicable to members of the Council of Ministers, offering concrete guidance for the fulfilment of obligations arising from the legislation on conflicts of interest and the Ministerial Code of Ethics.

25. With regard to confidential counselling, the authorities recall that the members of the Council of Ministers can request an advisory opinion from the Ethics Commission, whose independence and powers have been strengthened (see above). The interpretation of the Ministerial Code of Ethics made by the Ethics Commission can then be used as a defence mechanism in disciplinary proceedings, but is not binding for assessing similar cases. The Prime Minister may preventively seek such an interpretive opinion before making any decision that might conflict with the provisions of the Code of Ethics, and ministers can request a preliminary advisory opinion to clarify whether a specific action or inaction violates the Code.

26. GRECO notes that Albania has demonstrated a proactive approach over the last three years, thereby fulfilling the requirement for systematic awareness-raising on issues related to integrity. This includes the Ministerial Code of Ethics, relevant legislation, and the anti-corruption and integrity framework through the development of training sessions aimed at ministers and their political advisors, as well as the creation of a curriculum comprising a series of training sessions and specific topics in 2024, which can be used continuously. This also includes a proper system of confidential counselling. This is in line with the recommendation.

27. GRECO concludes that recommendation v has been implemented satisfactorily.

#### **Recommendation vi**

28. *GRECO recommended that complementary measures be taken to make the consultation process of the draft primary and secondary legislation of specific public interest more effective for the particularly concerned stakeholders, including through more user-friendly official websites.*

29. It is recalled that, in the Compliance Report, this recommendation was partly implemented. GRECO noted that the statutory time-limit for public consultations were respected, and that that some initiatives as regards e-communication with the public and potential stakeholders had been introduced to increase the quality of public consultation. However, GRECO noted that the performance towards public consultation was declining. Therefore, GRECO called on the authorities to improve the effectivity of public consultation and to finalise the mapping process of potential stakeholders to be involved in the consultation process in respect of all line ministries.

30. The Albanian authorities now report that the overall public consultation frequency index for 2024 was 97.4 %, compared to 65.9% in 2021. In 2024, 365 non-governmental external actors were appointed as members of integrated policy management groups, consultative bodies and experts for drafting laws and strategies, and 3.552 participants were reported in public consultations, with 555 of them contributing with comments and feedback. On the comments received, 55% were fully or partially accepted. The Electronic Register for Notifications and Public Consultations (RENJKP) platform has been the main window for public consultations, while other methods such as consultative roundtables and discussions (21 public meetings were organised in 2024). 98% of the acts subject to consultation were published in RENJKP and viewed by 21,665 visitors, with an average of 750 views per act. Between January and September 2024, the National Agency for Information Society (AKSHI) issued 1,200 automated notifications to citizens and experts regarding the submission of draft acts for public consultation on RENJKP. Since June 2023, draft laws subject to public consultation have been additionally published on the official online pages of line ministries, synchronised with the online page of RENJKP, providing full access to all accompanying documentation (consultative documents, individual consultation plans, explanatory reports, impact assessment reports, etc.). The dedicated section for public consultation on the official websites of line ministries contains information on the institution's annual public consultation plans, periodic institutional performance reports, the current legal framework, informative audiovisual videos on the process. Central institutions have published all public consultation reports for each legal act consulted. Moreover, in 2024, all the draft laws underwent the regulatory impact assessment process. Fewer acts were exempted from public consultations (decrease of 66.3% for the acts in the general analytical programme, of 67% for the acts in the National Plan for European Integration and of 92.8% for the acts in sectoral strategic documents). The timeframe of public consultation was respected in 93 % of the cases.

31. The authorities also indicate that, in 2023, the Albanian School of Public Administration (ASPA) developed a training module on public consultation in collaboration with civil society organisations. This module was piloted from March to May 2023 with the participation of 40 civil servants from central government institutions. To ensure ongoing training of public administration at all levels on public consultation matters, this module will be integrated into and regularly applied in ASPA's programmes. Additionally, since 2023, training cycles have been conducted to enhance the professional capacities of technical staff involved in and facilitating the public consultation process for draft acts, involving the Prime Minister's Office and the Ministry of Justice. Furthermore, since the beginning of 2023, a public information video has been published to promote public consultation of acts.

32. GRECO notes that the Albanian authorities have taken significant steps to enhance the public consultation process for drafting acts, making it more effective and accessible to the public and stakeholders. It welcomes the increasing trend as regards the number of draft acts subject to consultation and the wide opportunity offered to the public for consulting and commenting online the relevant documents, as well as the awareness-raising tools and trainings developed in this framework. It notes that a significant number of comments resulting from such a consultation process have been taken into account. This is in line with the recommendation. GRECO encourages the Albanian authorities to pursue these transparency and consultation efforts as regards draft primary and secondary legislation of specific public interest.

33. GRECO concludes that recommendation vi has been implemented satisfactorily.

#### **Recommendation vii**

34. *GRECO recommended that i) detailed rules on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties who seek to influence governmental legislative and other activities be established and that ii) sufficient transparency be ensured about the purpose of these contacts (formal and informal), the identity of the person(s) with whom (or on whose behalf) the contacts have been taken and the specific subject-matter(s) discussed.*

35. It is recalled that, in the Compliance Report, this recommendation was partly implemented. More precisely, as regards the first part of the recommendation, GRECO noted discrepancies between the rules applicable to political advisors prohibiting their contacts with lobbyists and their presence requested in meetings between lobbyists and ministers. It also noted that the Ministerial Code was not detailed enough on the organisation of such contacts, in particular through means of remote communication. As regards the second part of the recommendation, GRECO regretted that the register to be kept by the Secretary General of each ministry on such contacts, based on the information provided by the two public servants who attended the relevant meetings, was not made public online and updated regularly.

36. The Albanian authorities now indicate that, as part of the rule of law road map and the Intersectoral Strategy Against Corruption 2024-2030, a dedicated legal framework and specialised institutional structures for its implementation and monitoring has been established in December 2024.<sup>4</sup> Moreover, a manual with rules and guidelines is due to be prepared aimed at avoiding misuse of confidential information, conflicts of interest, and corruption prevention in lobbying. This process is supposed to be accompanied by awareness-raising measures among political parties, the state administration and the public about the importance of transparent lobbying. A central registry of lobbyists should be set up, along with the strict requirement for all public officials to report lobbying activities, as well as regular analysis of lobbying data.

37. GRECO notes the authorities' intentions to strengthen the legal framework and the monitoring mechanism for organising, registering and monitoring contacts between PTEFs and lobbyists and third parties, and encourage them to implement concrete measures accordingly.

38. GRECO concludes that recommendation vii remains partly implemented.

#### **Recommendation viii**

39. *GRECO recommended that the abstention of a minister or deputy minister from taking part in a decision of the Council of Ministers because of a potential conflict of interest is actually recorded in the minutes of the Council of Ministers' meetings, as required by law.*

40. It is recalled that, in the Compliance Report, this recommendation was partly implemented. GRECO noted that only one instance of a minister abstaining from the decision-

---

<sup>4</sup> Decision by the Council of Ministers No. 859 of 26 December 2024.



making process of the Council of Minister was recorded, and considered that the authorities should regularly enquire on actual or potential conflict of interests prior to, or during, the Council of Minister's decision-making process, and report it into the minutes of the Council of Ministers' meetings.

41. The Albanian authorities now report that, since the last compliance report, in all meetings of the Council of Ministers, the discussions and positions of the attending ministers vis-à-vis the agenda items have been carefully documented. No new cases of abstention by a minister due to potential conflicts of interest have been recorded.

42. GRECO takes note of the authorities' statement according to which, although no new abstention has been registered so far, the position of the ministers is systematically assessed vis-à-vis the agenda items to be discussed by the Council of Ministers in order to prevent conflicts of interest. GRECO has no means to verify this claim. It recalls that this recommendation was linked to the fact that, during the evaluation visit, the evaluators found it improbable that no situation of conflicts of interest regarding a member of the Council of Ministers had arisen since the law was adopted in 2005. This highlights potential gaps in how the law is being enforced. GRECO is of the opinion that such doubts cannot be dispelled by a single case of abstention recorded in a twenty-year period. Therefore, it cannot consider that the recommendation has been fully implemented.

43. GRECO concludes that recommendation viii remains partly implemented.

#### **Recommendation ix**

44. *GRECO recommended ensuring that explicit rules on post-employment restrictions apply both to members of the Council of Ministers and to political advisors and that an effective enforcement mechanism regarding these rules is implemented for all PTEFs.*

45. It is recalled that, in the Compliance Report, this recommendation was not implemented as the situation had not changed since the adoption of the Evaluation Report. GRECO was expecting new rules to be introduced and the effectiveness of the human resources units in verifying post-employment restrictions and imposing appropriate sanctions for breaches thereof to be demonstrated.

46. The Albanian authorities now indicate that amendments related to post-employment have been drafted as regards members of the Council of Ministers and their political advisors, which are still in the process of being finalised and approved.

47. GRECO notes that rules on post-employment restrictions applying both to members of the Council of Ministers and to political advisors are being drafted, but has not been able to assess the relevant drafts which have not yet been submitted to GRECO.<sup>5</sup> Therefore, it cannot consider that the recommendation has been implemented, even partly.

---

<sup>5</sup> Draft amendments to the Ministerial Code of Ethics and to the Law N° 9131 "on the ethics rules in the public administration", addressing post-employment rules respectively for members of the Government and for political advisors, have been forwarded to GRECO during the plenary meeting, but have not been analysed so far.

48. GRECO concludes that recommendation ix remains not implemented.

*Preventing corruption and promoting integrity in law enforcement agencies*

### **Recommendation xiii**

49. *GRECO recommended (i) that a broad analysis be carried out on the legal framework and practice of private donations and sponsorship to the State Police and that, in light of its findings, rules are adopted to abandon private donations/sponsorship to the Police or, as a minimum, limit the risks of corruption and conflicts of interest in this respect; and (ii) that donations and sponsorship received are published on a regular basis (including on-line), indicating the nature and value of each donation as well as the identity of the donor*

50. It is recalled that, in the Compliance Report, this recommendation was partly implemented. More precisely, GRECO considered the first part of the recommendation as not implemented, as it noted that the practice of receiving donations/sponsorships was maintained and that the authorities had not carried out a broad analysis on the legal framework and practice on donations and sponsorships. It considered that the second part of the recommendation was implemented with the setting up of a dedicated webpage on donations and sponsorships and the publication of other announcements in other weblinks; it encouraged the authorities to implement a coordinated approach for such a publication.

51. The Albanian authorities now recall that an Order by the General Director of the State Police<sup>6</sup> defines the standard operating procedure and establishes guidelines for accepting, administering, and using donations, with the aim of limiting the risks of corruption and conflicts of interest, as well as enhancing the effectiveness of donated assets. Other regulations related to donations appear in orders of the Minister of Finance and Economy.<sup>7</sup> The authorities further indicate that an assessment of the legislation and standard procedures for donations and sponsorships has been undertaken to identify opportunities and necessary interventions that meet additional requirements, such as obligations to their partners, and ensure a proper operational process within the police. The analysis document prepared for this purpose provides detailed information on all stages of the donation process, issues related to conflicts of interest, and aspects concerning transparency and reporting. The analysis takes into account the current legal framework implemented by police structures, practical cases from the years 2021 to 2023, and relevant recommendations for action. This process resulted in amendments to the Law on the State Police<sup>8</sup> restricting donations and sponsorships: the police may only accept donations from representative bodies of the business community, and in every case, only following a prior review by the competent authority and with the approval of the General Director of the State Police.

52. GRECO welcomes the comprehensive analysis of the legal framework and the practice of private donations and sponsorships for the police which has been carried out, and the

---

<sup>6</sup> Order of the General Director of the State Police N° 130 (February 2021) "On the Rules for the Acceptance and Administration of Donations in the State Police".

<sup>7</sup> Orders of the Minister of Finance and Economy N° 19 (July 2019) "On the Oversight of Non-Profit Organizations for the Purpose of Preventing Money Laundering and Terrorism Financing" and N° 35 (September 2020) "On the Control, Registration, Use, Reconciliation, Reporting, and Publication of Foreign Financing Funds within the Framework of International Agreements".

<sup>8</sup> Law N° 82/2024, Article 139, entered into force in August 2024.

subsequent amendments to the relevant legislation, aimed at limiting the risks of corruption and conflicts of interest in this respect, as requested in the first part of the recommendation. Considering that the second part of the recommendation had already been implemented with the regular publication of donations and sponsorship received, GRECO can conclude that the recommendation has been fully taken into account.

53. GRECO concludes that recommendation xiii has been implemented satisfactorily.

#### **Recommendation xiv**

54. *GRECO recommended ensuring that the policy for provision by the State Police of additional services in return for payment duly takes into account risks of corruption and conflicts of interest.*

55. It is recalled that, in the Compliance Report, this recommendation was not implemented. GRECO regretted that nothing had been mentioned in the relevant Council of Ministers' Decision about the conduct of an assessment of risks of corruption and conflicts of interest associated with the provision of remunerated services by the police.

56. The Albanian authorities now report that the Ministry of the Interior and the State Police have been supported by Council of Europe's experts in analysing the risks of corruption and conflicts of interest related to the provision of paid services by the police to private individuals and in establishing a list of legal and sublegal acts to be amended. Recommendations were proposed to strengthen the system, and a detailed assessment was provided of all types of services that the police may offer for payment, including services for private physical security companies (licensing of activities, employees, and training; training; certification of armoured vehicles, etc.), services related to the circulation of firearms (licensing of import/export and trade; licensing of civilian shooting ranges; licensing of theoretical and practical training; authorization for the purchase of firearms by individuals, etc.), services related to the control of explosives (authorization for the storage of explosives, pyrotechnics, fireworks; authorization for the transfer of explosives for civilian use for import and export, etc.), services related to road safety (technical-legal report on vehicles upon request of the parties; accident scene sketch resulting in personal injuries for insurance companies; information for insurance companies on accidents resulting in material damages, according to the requested documentation, etc.), services related to the provision of legal expertise (biological legal examination; graphic or techno-graphic examination; forensic or legal-biological examination; criminalistic-forensic examination, etc.), physical security services for cultural and sports events, escort services for hazardous goods, physical security services for strategic objects, services related to migration control (issuance of a certificate of use for watercraft; issuance of the "residence permit for foreigners" certificate) and other services (fees for the stopping/blocking and removal of vehicles/watercraft; fees for parking of trucks and buses; application fees for initial police training at the Security Academy, etc.). In all cases, the legal basis for the provision of these services has been considered and assessed. This process resulted in amendments to the relevant legislation and rules.<sup>9</sup>

---

<sup>9</sup> Law no. 82/2024, Articles 2, 121 and 128, and Order of the General Director of the State Police N° 442 (March 2023) "On the provision of additional services by the State Police to legal and physical entities, public or private, against payment fees".

57. The authorities indicate that, concretely, the types of services offered by the police in 2023 and 2024 concerned paid services by the Road Police Directorate for escorting vehicles transporting hazardous goods and vehicles outside of normal dimensions and transports under abnormal conditions.

58. GRECO welcomes the analysis carried out on provision by the police of additional services in return for payment and the subsequent amendments of the legal and regulatory framework for implementing such paid services carrying. This strengthens the guarantees which come to limiting risks of corruption and conflicts of interest while offering such additional services, and is in line with the purpose of the recommendation.

59. GRECO concludes that recommendation xiv has been implemented satisfactorily.

### **Recommendation xvi**

60. *GRECO recommended that the ethical principles and rules of conduct contained in the State Police Regulation are complemented with a manual containing practical guidance that takes into account the State's Police specificity, variety of duties and vulnerabilities.*

61. It is recalled that, in the Compliance Report, this recommendation was not implemented. GRECO noted that the Manual of Ethics and Integrity lacked practical guidance regarding the conduct expected from police officers.

62. The Albanian authorities now indicate that the Police Ethics Manual has been approved and is due to be implemented by all structures of the State Police.<sup>10</sup> It contains the principles and norms that regulate the conduct, behaviour, task fulfilment and communication of police officials, ensuring they act in accordance with the law, with the highest professional standards, fairly, impartially, and with respect for human dignity, fundamental human rights and freedoms. It provides practical guidelines in the form of examples from the daily life of police officials, concrete explanations (dilemmas, alternative thinking examples for specific cases that police officials may encounter in the field) and photos, regarding the expected behaviour of police officials, considering the specificity, diversity of duties and vulnerabilities of the police. The Manual also supports police leaders and officers in better assessing the performance of their staff, and aims at guiding young people who aspire to join the police. The Manual has been published on the official website of the police, and disseminated to all police officials. It has become part of the police training.<sup>11</sup>

63. GRECO welcomes the adoption of the Police Ethics Manual which now applies to all police officials and includes practical guidance that takes into account the police's specificity, variety of duties and vulnerabilities. This Manual is distributed to all police officials, made public and subject to appropriate training. This is in line with the recommendation.

64. GRECO concludes that recommendation xvi has been implemented satisfactorily.

---

<sup>10</sup> Order of the General Directorate of the State Police No. 980 (June 2023).

<sup>11</sup> Decision of the Dean's Office of the Faculty of Security and Investigation at the Academy of Security N°. 634 (May 2023).

## Recommendation xvii

65. GRECO recommended (i) enhancing the initial and in-service training of police officers on integrity matters, as well as the specialised training for investigators dealing with corruption and economic crime cases; (ii) the setting up of a system and the appointment of trained persons of trust in order to provide confidential counselling on ethical and integrity matters to all police staff.

66. It is recalled that, in the Compliance Report, this recommendation was partly implemented. As regards the first part of the recommendation, GRECO noted the initial training programme for police officials and the in-service training activities organised for police officials and investigators, but was expecting a Manual containing illustrations by real-life experience to be adopted. As regards the second part of the recommendation, GRECO noted that the three-person unit established was not exclusively dealing with confidential counselling and wished to get additional information on the operation of the confidential counselling system.

67. The Albanian authorities now report, regarding the first part of the recommendation, that the Police Ethics Manual providing practical guidelines and concrete guidance has been adopted (see above) and serves as a basis for the development of initial and in-service curricula<sup>12</sup> which have been regularly applied since 2023 for several hundreds of police officials.

68. Regarding the second part of the recommendation, the authorities recall that confidential advisors are part of the process for handling cases of violence, harassment and sexual harassment in the police.<sup>13</sup> The list of confidential advisors has been compiled by the Directorate of Human Resources at the General Directorate of the State Police among persons known for their integrity, professional knowledge, professional ethics and communication skills to provide assistance at central and local levels. Their responsibilities have been expanded to ethics, integrity and the prevention of conflicts of interest.<sup>14</sup> The authorities further indicate that, according to the new Law "On the State Police"<sup>15</sup>, Confidential Councils operate within the structure responsible for human resources to offer confidential counselling to police officials on issues of ethics, integrity and corruption. The organisation, functioning and composition of the Confidential Councils are regulated by an order of the Minister of the Interior.<sup>16</sup> In compliance with this order, confidential councils have been established within both central and local police structures. Subsequently, an implementation mechanism has been set up.<sup>17</sup> The Confidential Council at the General Directorate is chaired by the Director of Human Resources and includes two other experts from the Professional Standards and

---

<sup>12</sup> Orders of the General Director of the State Police N°. 300 (February 2024) "On the admission of candidates for Police Training in the Professional College at the Academy of Security" and N° 1794 (December 2023) on the "Annual Mandatory In-Service Training Programme for State Police Employees for the Year 2024".

<sup>13</sup> Decision of the Council of Ministers N° 657 (July 2020) on "Procedure for handling cases of violence, harassment, and sexual harassment in the State Police".

<sup>14</sup> Order of the General Director of the State Police N° 917 (July 2024) "On the revision of the standard operating procedure for handling cases of violence, harassment, and sexual harassment in the State Police".

<sup>15</sup> Article 125 of the Law N° 82/2024 "On the State Police".

<sup>16</sup> Order No. 26 of 6 February 2025 "On the Organisation, Functioning, and Composition of Confidential Councils in the State Police".

<sup>17</sup> Order No. 272 of 13 February 2025 "On the Establishment and Functioning of the Confidential Council at the General Directorate of the State Police".

Legal Directorate. Additionally, the development of standard procedures for the Confidential Councils has been ordered<sup>18</sup>, according to which the councils will consist in the future of seven members, six of whom hold leadership positions. All police personnel and structures, both at the central and local levels, have been informed about the functioning of these councils and have received details regarding the councils' members.

69. Furthermore, in 2024, training sessions were organised, with the support of international partners, for individuals to offer confidential counselling on integrity-related matters, and periodic inspections have been conducted to monitor the implementation of ethics and disciplinary rules in the activities of the Local Police Directorates and the Local Directorates of Border and Migration. The trainings, aimed at 385 individuals, included specialised sessions for investigators dealing with corruption and economic crime cases.

70. GRECO welcomes the adoption and dissemination of the Police Ethics Manual which supports the initial and in-service trainings of police officials (including investigators dealing with corruption and economic crime cases), providing clear guidance and concrete examples as regards integrity-related matters. This is in line with the first part of the recommendation. Moreover, GRECO notes that the missions of the confidential advisors competent for handling cases of violence, harassment and sexual harassment in the police have been extended to confidential counselling on integrity-related matters. Confidential Councils have then been established to support and guide police staff on integrity-related matters, and all police staff has been informed about this system. Therefore, GRECO considers that the second part of the recommendations has been fully implemented as well.

71. GRECO concludes that recommendation xvii has been implemented satisfactorily.

### **Recommendation xviii**

72. *GRECO recommended that measures be taken to increase the stability of the State Police senior management, irrespective of political changes in the country.*

73. It is recalled that, in the Compliance Report, this recommendation was not implemented. GRECO considered that the situation had not changed since the Evaluation Report and was expecting long-established statistics to demonstrate the stability of senior management in their positions (at least for the duration of a full four-year term in office), especially when there are political changes.

74. The Albanian authorities now report that the new Law "On the State Police" (see above) provides for a competitive process for selecting the leadership of the police, including the General Director, the Deputy General Director, the department directors and the directors of the regional police directorates. The new law creates a transparent and functional promotion and career progression system in the police, establishes clear procedures and application criteria for recruitment to enhance the quality and stability of police personnel, establishes an effective disciplinary mechanism for police employees to ensure the fulfilment of responsibilities with efficiency, and in compliance with the law, develops a motivating career progression system for officers in operational and first-line leadership roles, and reduces the turnover of in order to ensure stability.

---

<sup>18</sup> Order N° 254 of 13 February 2025.

75. The General Director of the Police is thus proposed to the Council of Ministers by the Minister of the Interior, after an open competition process, based on the principles of equal opportunity, meritocracy, and non-discrimination, and according to rules and procedures determined by instruction of the Minister.<sup>19</sup> After a seven day call for applications, the Ministry of the Interior publishes the names of the candidates who have applied on its official website. A commission chaired by one of the deputy ministers and including the Secretary General of the Ministry and the General Director of the Police Oversight Agency verifies the applications and establishes a short list of the candidates who are in line with the legal requirements. The reasons for their exclusion are notified to the candidates who are not on the short list by an official letter. The Commission meets all the qualified candidates and submits a ranking to the Minister, who proposes one of the highest-ranked candidates to the Prime Minister. His/her proposal is grounded on a report explaining the reasons for the proposal. The current General Director of the State Police was appointed according to this new procedure on 2 October 2024, among 15 candidatures and on a short list of 5 candidates.<sup>20</sup> The new Law defines the reasons for releasing the General Director of the State Police from his/her duty. The Deputy General Director is appointed (and dismissed) by the Minister of the Interior, upon a proposal by the General Director on a list of three candidates, after an open competition process, based on the principles of equal opportunity, meritocracy, and non-discrimination and according to rules and procedures defined in the State Police regulations. The department directors are appointed (and dismissed) according to the same procedure. The directors of the local police directorates are appointed (and dismissed) by order of the General Director of the Police. The duration of the terms of office of the Deputy General Director of the Police (5 years, unified with the duration applied to the General Director), the department directors (4 years) and directors of the regional police directorates (3 years) have been reviewed to ensure their stability and independence, while facilitating the necessary rotation within the police leadership. They can be reappointed for a second term. The latest competition results have showed increased interest and greater trust in ensuring fair competition processes based on meritocracy. Specifically, for 12 positions for local directors, 48 candidates competed, and for 47 positions for police station chiefs, over 300 candidates participated.

76. The authorities report that, apart from one resignation and one termination of employment from the position, no senior police officers have left their positions or been dismissed since the last Compliance Report, and no police officers have claimed to have been dismissed for political reasons. Indeed, the General Director of State Police has been appointed since October 2024, the Deputy General Director since December 2022, the Director of the Criminal Police Department in August 2022, the Director of the Public Security Department since October 2010, the Director of the Border and Migration Department since July 2022, the Director of the International Relations Department since August 2020. They are all still in office. The Director of the Support Services Department, appointed in June 2022, resigned from his position and the Director of the Information Technology Department, appointed in June 2023, was relieved from his position due to the invalidity of his appointment act.

---

<sup>19</sup> Article 56 of the Law "On the State police" and Instruction N° 160 by the Minister of the Interior of 2 September 2024.

<sup>20</sup> <https://mb.gov.al/newsroom/thirrje-per-aplikim-per-pozicionin-e-drejtorit-te-pergjithshem-te-policise-se-shtetit/>

77. GRECO notes that the new legislation and the subsequent by-laws strengthen the transparency and the objectivity of the procedures for recruiting the police senior management, including the current General Director of the Police who has been recruited according to the new procedure. It notes that most of the police directors have been in office for several years and that the stability of this senior management has been increased *de facto*.

78. GRECO concludes that recommendation xviii has been implemented satisfactorily.

### **Recommendation xix**

79. *GRECO recommended that the heads of department of the State Police be appointed by the General Director.*

80. It is recalled that, in the Compliance Report, this recommendation was not implemented, as no specific measures had been taken.

81. The Albanian authorities now report that, according to the new Law “On the State Police” (see above), the directors of departments are appointed, dismissed, or removed by the Minister of the Interior upon the proposal of the General Director of the State Police. The duration of their mandate is 4 years, with the right to apply for a second term. The General Director proposes to the Minister three candidates, following an open competition process, based on the principles of equal opportunities, meritocracy, and non-discrimination.<sup>21</sup> The rules and procedures for selecting candidates for department directors are defined in the Police Regulation. The directors of the local police directorates, which are also part of the senior management, are appointed by the General Director of the State Police.<sup>22</sup> Furthermore, the Ministry of the Interior is due to consolidate an analysis document which addresses the issue of the appointment of the directors, based on a comparative analysis of organisational models and appointment procedures in other European countries.

82. GRECO notes that the directors of the local police directorates are appointed by the General Director of the State Police, which is in line with the purpose of the recommendation. Indeed, this purpose is to ensure that the police is not overly politicised, and that its independence is guaranteed in its operational management. Therefore, GRECO still recommends that the Minister of the Interior should not be involved in the appointment of directors of departments, other than formally. This is not the case according to the existing legislation, as the Minister makes a choice among three candidates proposed by the General Director. GRECO cannot then consider that the recommendation has been implemented more than partly.

83. GRECO concludes that recommendation xix has been partly implemented.

### **Recommendation xx**

84. *GRECO recommended i) that the functions more exposed to integrity risks are prioritised during the vetting process, in relation with the integrity plan and other existing risk*

---

<sup>21</sup> Article 60 of the Law “On the State police”.

<sup>22</sup> Article 61 of the Law “On the State police”.



*management tools; and ii) that checks on candidates' integrity are carried out in the context of changes of post and promotion and at regular intervals over the course of police staff's careers.*

85. It is recalled that, in the Compliance Report, this recommendation was partly implemented. GRECO took note of the suspension of the vetting process of police officers until the termination of the vetting of Police Oversight Agency's staff members. It noted that amendments to the Police Vetting Act had identified the functions more exposed to integrity risks, subject to an initial and periodic vetting process. GRECO was expecting the new legislation to enter into force to consider the first part of the recommendation as fully implemented. As regards the second part of the recommendation, GRECO welcomed the periodic vetting proposed by the draft legislation and was still expecting that the authorities carry out checks on candidates' integrity in the context of changes of post and promotion.

86. The Albanian authorities now indicate that the amendments to the legislation addressing the transitional and periodic evaluation of police officers<sup>23</sup> define the functions within the Police General Directorate subject to transitional and periodic evaluation. They include the Director and Deputy General Director, department directors, central directorate directors, directors in special structures, regional (deputy) directors, directors in the directorates of border and migration, chief commissioners, sector chiefs at central and regional levels covering the field of organized crime, economic/financial crime, and traffic police in the State Police. They also include the General Director and Deputy General Director, department directors and unit chiefs in the Republic Guard, as well as General Director and Deputy General Director, departments directors, sector chiefs at central and regional levels in the Police Oversight Agency, and employees to be appointed in the structure for transitional/periodic evaluation in the Police Oversight Agency. The evaluation process was resumed through random designation of the officers to be subject to re-evaluation in April and July 2023, including 60 officers in the positions of (deputy) department directors and (deputy) department directors at central and regional levels in the State Police, 8 officers in the positions of department directors at central and regional levels in the Police Oversight Agency and 4 officers in the positions of department directors in the Republic Guard. They were assessed as regards their integrity, assets and professionalism. Following this process, decisions have been taken as regards 47 officers (34 confirmations, 1 dismissal from duty, 1 removal from the position under evaluation, 11 terminations of the transitional evaluation process as the position is outside the scope of jurisdiction). The transitional evaluation is ongoing for 25 officers. Moreover, periodic evaluations are due to be conducted<sup>24</sup> every 5 years after the transitional evaluation for the staff of the police, the guard, and the agency who have passed the transitional evaluation, according to the same criteria as those for the transitional evaluation.

87. Regarding the second part of the recommendation, the authorities indicate that a transitional evaluation has been conducted for those officers who bear the obligation of declaration and have completed and submitted their forms to the human resources structures of the institutions where they are employed. The amendments to the relevant legislation (see above) provides that any employee promoted to a position and part of the structures specified

---

<sup>23</sup> Amendments to the Law N° 12/2018 "On the transitional and periodic evaluation of employees of the State Police, the Republic Guard, and the Service for Internal Affairs and Complaints in the Ministry of Interior".

<sup>24</sup> Article 65 of the Law N° 123/2018, as amended.

in this law (those with a higher risk of corruption, such as the structures for combating organized crime, economic and financial crime, and traffic police, as well as lower, middle, and high management levels) will be subject to evaluation. This is also the case at regular intervals over the course of the career, with a declaration to be made every five years, and a performance evaluation twice a year.

88. Additionally, the authorities report that the Police Oversight Agency has approved its Integrity Plan which identifies the field of transitional and periodic evaluation of police officials as a high-risk area. These measures are of a legal and administrative-institutional intervention nature, including the enhancement of human and technical capacities for those conducting the evaluations, increasing their professionalism through training and additional knowledge, control measures to ensure the proper functioning of the process and its progress, ensuring that members of the evaluation bodies have been previously evaluated, and establishing a complete database for the process.

89. GRECO notes that the transitional evaluation process aimed at clearly identified functions within the senior management of the police is under way, randomly carried out, and addresses integrity-related matters. Once this transitional process is over, such evaluation is due to be regularly carried out, based on the integrity plan and other existing risk management tools. This is in line with the first part of the recommendation. As regards the second part of the recommendation, GRECO notes that the amendments to the legislation provide that checks on candidates' integrity are carried out in the context of changes of post and promotion, which is in line with the recommendation. Such integrity checks are also foreseen for police officers at regular intervals over the course of their careers, beyond changes of posts. This part of the recommendation can then be considered as fully implemented as well.

90. GRECO concludes that recommendation xx has been implemented satisfactorily.

#### **Recommendation xxi**

91. *GRECO recommended that rules on the acceptance and declaration of gifts by police staff be subject to adequate supervision and enforcement.*

92. It is recalled that, in the Compliance Report, this recommendation was partly implemented. GRECO noted of the General Director's Order on the acceptance and declaration of gifts but was still expecting supervision and enforcement mechanisms to be established.

93. The Albanian authorities now report that the General Director of the State Police instructed<sup>25</sup> the central and regional structures of the police to provide information regarding the identification and registration of instances where gifts were accepted by police officials. This has made it possible to confirm that there have been no identified cases of gifts unduly accepted by police officials due to their position. The existing procedure has been reviewed so as to strengthen its enforceability and a gift register has been put in place, to be systematically completed and updated. Furthermore, according to the new law "On the State Police" (see above), the direct or indirect receipt or benefit of gifts, favours, promises, or

---

<sup>25</sup> Letter of the General Director of the State Police No. 979 (26.01.2024) "On the implementation of the Standard Operating Procedure regarding the rules for the acceptance and declaration of gifts".

preferential treatments, which are received due to the position held, even when it occurs outside the exercise of official duties, and even when formalised through a legal act, are considered as a disciplinary fault. Failure to report the acceptance of gifts constitutes a disciplinary violation to be evaluated by the Evaluation Committee<sup>26</sup> and which may involve a disciplinary measure.<sup>27</sup> Moreover, the authorities indicate that an order by the General Director of the State Police<sup>28</sup> provides that the human resources structures at the central, regional, and special levels of the police manage the self-declaration forms, including favours and gifts received from individuals involved in organised crime, to be part of the personal file of each police employee. Each supervisor must submit the nominal lists of employees who have fulfilled this obligation to the Human Resources Directorate.

94. GRECO notes that the existing rules now consider the acceptance of undue gifts, both during and outside the performance of duties, as a disciplinary fault, and that a more efficient control mechanism for the gift regime has been established, including a new regulatory framework and a gift register to be systematically completed and updated. It can then consider that the gift regime is subject to adequate supervision and enforcement, as requested by the recommendation.

95. GRECO concludes that recommendation xxi has been implemented satisfactorily.

#### **Recommendation xxii**

96. *GRECO recommended ensuring that the employees of the Illyrian Guard are subject to the same legal and regulatory measures (including enforceable rules of conduct and transparency rules in public procurement procedures) as employees of the State Police.*

97. It is recalled that, in the Compliance Report, this recommendation was partly implemented. GRECO noted that the Illyrian Guard administrator's order went in the right direction, but was expecting to be able to examine it. It also noted the Albanian Supreme Court's decision which did not shed light on the application of the same measures to the Illyrian Guard employees and to the Police employees.

98. The Albanian authorities recall that the Department of Public Security within the State Police is responsible for monitoring the activities of the private security SHPSF "Illyrian Guard" and for conducting inspections to assess the measures taken for the implementation of legal responsibilities and standard operating procedures during the activities of private physical security companies.<sup>29</sup> An Instruction<sup>30</sup> specifically outlines the cases in which objects, and their types, are taken under protection and security by the employees of the "Illyrian Guard",

---

<sup>26</sup> Order No. 798 by the General Director of 24 May 2024.

<sup>27</sup> According to Article 123 of the Law "On the State Police), disciplinary measures are reprimand, reprimand with warning, temporary salary reduction of up to 40% for a period not exceeding one year, postponement of promotion for up to 5 years, demotion by one rank for a period of up to 5 years, suspension from duty for a period ranging from 3 months to 2 years, with the right to receive the minimum salary, according to the decision of the Council of Ministers and dismissal.

<sup>28</sup> Order of the General Director of the State Police, N° 867 (June 2024) "On the approval of the self-declaration form for the verification of the integrity of police structure employees".

<sup>29</sup> Law no. 75/2014 "On Private Physical Security Services".

<sup>30</sup> Instruction of the Minister of the Interior N° 130 (March 2018) "On the Functioning of Private Physical Security Services".

as well as the procedures to be followed for submitting such a request. The authorities now report that on this basis, the regional structures of the State Police have monitored the activities of the SHPSF “Illyrian Guard” and have conducted inspections in accordance with the Control Plans prepared and approved by the leaders of the regional police directorates. The inspections aimed at assessing the measures taken by the SHPSF “Illyrian Guard” for implementing its legal responsibilities and standard operating procedures as a private physical security company. In 2023, the regional police directorates conducted 103 inspections of this entity, and 98 in 2024. No violations were identified. The “Illyrian Guard” has collaborated with the regional police directorates on matters related to facility security, the management and use of firearms, the re-certification of service personnel, the planning and execution of specialised and in-service training, as well as the monthly reporting on its activities.

99. Moreover, the authorities now indicate that complementary measures have been approved to ensure that the employees of the Illyrian Guard are subject to the same legal and regulatory measures as employees of the State Police.<sup>31</sup> Then, each employee, before commencing his/her employment with Illyrian Guard, signs an Integrity Declaration, through which he/she confirms that he/she has not been dismissed from any previous job due to integrity-related issues. Additionally, within the organisational structure of Illyrian Guard, a dedicated Ethics and Integrity Monitoring Unit has been established, which operates under the direct authority of the Administrator of Illyrian Guard and is responsible for monitoring, verifying, and overseeing the activities of the company’s structures to ensure compliance with professional standards and the applicable regulatory framework. This verification process is conducted both prior to recruitment and throughout employees' tenure. A periodic report on the findings is prepared for the Administrator of Illyrian Guard, who subsequently presents systematic updates on this matter during Supervisory Board meetings.

100. Furthermore, the authorities report that the Illyrian Guard is subject to internal auditing conducted by the Ministry of Interior. The financial audit aims at providing a reasonable assurance opinion on whether financial transactions and economic events have been accurately reported in the entity’s financial statements, in accordance with the applicable financial reporting framework. In addition, a compliance audit seeks to deliver an objective, professional, and independent assessment of the extent to which the audited entity adheres to established rules, laws, regulations, policies, codes, or terms and conditions relevant to its operations during the audited period. In 2023-2024, the Ministry of Interior conducted two audit processes aimed at the Illyrian Guard. In 2023, the Ministry issued 12 recommendations as a result of the audit. Of 22 recommendations (12 from the 2023 audit and 10 carried over from previous years), 11 recommendations have been fully implemented, 10 are in progress, and 1 remains not implemented. In 2024, the audit involved 14 recommendations - 4 have been partially implemented and 10 remain in progress.

101. GRECO welcomes the regular monitoring by the State Police over the private physical security activities of the “Illyrian Guard”, framed by the law and a specific regulation by the Minister of the Interior. It notes that, in addition, complementary measures have been approved to ensure that the employees of the Illyrian Guard are subject to the same legal and regulatory measures as employees of the State Police and that the Illyrian Guard is subject to internal auditing procedures. This is in line with the recommendation.

---

<sup>31</sup> Circulating Decision "For the approval of changes to the organisational structure of the company "Illyrian Guard" of 19 February 2025.

102. GRECO concludes that recommendation xxii has been implemented satisfactorily.

### **Recommendation xxiii**

103. *GRECO recommended developing explicit rules on post-employment restrictions, accompanied by an effective enforcement mechanism, for police employees.*

104. It is recalled that, in the Compliance Report, this recommendation was not implemented, as no changes had occurred.

105. The Albanian authorities now report that an analysis in view of establishing rules on post-employment restrictions for police officials has been launched by the Ministry of the Interior and the State Police. An initial implementation of the results of this analysis can be found in the new law “On the State Police” (see above)<sup>32</sup> which now provides for the prohibition from being employed during a one-year period in entities that were under the police official’s supervision or in which he/she participated in committees/boards for licensing or granting permits for their activities during his/her service. Additionally, there is an employment restriction for up to two years after leaving the police service as regards the representation, in a dispute or commercial relationships, of individuals or organisations that have dealt with the Police structure concerned. When former police officials wish to be employed before the one-year period in a position which is not subject to such restrictions, they must inform the State Police at least two weeks before starting the new position. In addition, the applicable legislation on the prevention of conflicts of interest in the exercise of public functions applies to police officers in the same manner as it does for other public administration employees.

106. A standard operating procedure has been approved<sup>33</sup> to define the post-employment restrictions and obligations applicable to police officers: the Human Resources Directorate of the State Police maintains and periodically updates a registry of departing employees, ensuring that they are informed about the post-employment restrictions and obligations they must adhere to. Each former employee signs a declaration confirming their acknowledgment and acceptance of these restrictions. To effectively monitor the enforcement of this measure, the Human Resources Directorate systematically reports on compliance and oversight of the procedure. All structures of the State Police have now established registries to track employees subject to post-employment restrictions. Since the procedure has come into force, 11 police officers who have left the service have signed the required declarations and have been registered for verification in the established records.

107. GRECO welcomes the inclusion of rules on post-employment restrictions in the new Law “On the State Police”. It also notes the obligation for former police officers to inform the State Police when being employed before a one-year period, which makes it possible to organise a monitoring system on the post-employment restrictions. In order to set up an effective enforcement mechanism, a detailed procedure for monitoring post-employment of former police officers has been established, accompanied with proper enforcement measures. This is in line with the recommendation.

---

<sup>32</sup> Article 97 of the Law “On State Police.

<sup>33</sup> Order by the General Director of the State Police No. 193 of 28 January 2025.

108. GRECO concludes that recommendation xxiii has been implemented satisfactorily.

#### **Recommendation xxiv**

109. *GRECO recommended that the effectiveness of the implementation of the law on whistleblowers is ensured, including through regular training and information of police staff about whistleblowing protection measures.*

110. It is recalled that, in the Compliance Report, this recommendation was partly implemented. GRECO took note of the Police Whistleblowers' Regulation and the setting up of an internal whistleblowers' unit which had been made visible in all police stations. It also commended on the initial trainings organised within the police on whistleblowers' protection. GRECO called on the authorities to develop further a regular training aimed at all levels within the State Police.

111. The Albanian authorities now indicate that conditions and procedures have been established to provide regular training for the entire structure of the State Police on whistleblowing through and order of the General Director of the State Police<sup>34</sup> and specific training programmes "On whistleblowing and the protection of whistleblowers" and "Ethics and conduct rules for State Police employees" already followed by 8,780 police officials (out of 11,932 officials) in 2023, regardless of their status. Trainers have also been trained at the Academy of Security on whistleblowing issues. Certified trainers selected from each structure of the State Police continue to provide training for all employees within their respective units, according to the training programme "On Whistleblowing, Administrative Investigation, and Whistleblower Protection, as well as the Ethics and Conduct Rules for State Police Employees"<sup>35</sup>. Additionally, a mandatory in-service training programme<sup>36</sup> includes specific topics on police ethics and whistleblowing, with training scheduled throughout the year 2024. In the first quarter of 2024, a training session was held, in collaboration with the Albanian Helsinki Committee, "On Whistleblowing, Administrative Investigation, and Whistleblower Protection, as well as the Ethics and Conduct Rules for State Police Employees"<sup>37</sup>, with the participation of 30 State Police employees.

112. GRECO notes that concrete developments have been engaged to consolidate regular trainings on whistleblowing issues and enhanced the capacities for implementing the law on whistleblowers, aimed at the entire command chain within the State Police. This is in line with the recommendation. GRECO encourages the authorities to pursue such a regular training, both within the framework of the initial and in-service training curricula. This is a sensitive domain where it is critical that trust is built into the system and improvements are made in time, as experience or the lack of it proves, in order to effectively enable police officers to speak up in a safe manner. The authorities are encouraged to keep these considerations in mind.

---

<sup>34</sup> Order of the General Director of the State Police N° 1244 (September 2023) "On whistleblowing, administrative investigation, and the protection of whistleblowers, as well as the ethics and conduct rules for State Police employees".

<sup>35</sup> Approved by Decision of the Dean's Office of the Faculty of Security and Investigation at the Academy of Security N° 634 (May 2023).

<sup>36</sup> Order of the General Director of the State Police N° 1794 (December 2023).

<sup>37</sup> Order of the General Director of the State Police N° 80 (March 2024).

113. GRECO concludes that recommendation xxiv has been implemented satisfactorily.

### III. CONCLUSIONS

114. **In view of the foregoing, GRECO concludes that Albania has made significant progress and implemented satisfactorily or dealt with in a satisfactory manner eighteen of the twenty-four recommendations contained in the Fifth Round Evaluation Report.** Of the remaining recommendations, five have been partly implemented and one has not been implemented.

115. More specifically, recommendations i, ii, v, vi, x, xi, xii, xiii, xiv, xv, xvi, xvii, xviii, xx, xxi, xxii, xxiii and xxiv have been implemented satisfactorily or dealt with in a satisfactory manner, recommendations iii, iv, vii, viii and xix have been partly implemented and recommendation ix has not been implemented.

116. In respect of the central government (persons entrusted with top executive functions (PTEFs)), the public consultation process of the draft primary and secondary legislation has been made more effective. Integrity plans have been adopted in respect of all ministries. Guidance and illustrative examples have completed the Ministerial Code of Ethics and regular training on integrity-related matters are organised for members of the Government and political advisors. The independence of the Ethics Commission has been strengthened, establishing confidential counselling channels. However, its effective functioning remains to be demonstrated, and provisions are lacking as regards possible violations of the Code by the Prime Minister. Certain rules on how PTEFs engage in contacts with lobbyists have been introduced but need to be strengthened. Further action is still called for in a number of areas, in particular for introducing post-employment restrictions, and ensuring an effective registration of abstentions of (deputy) ministers from taking part in decisions of the Council of Ministers because of potential conflicts of interest.

117. Regarding law enforcement agencies, significant progress has been made in almost all areas. Donations and sponsorships are now subject to a relevant legal framework aimed at limiting the risks of corruption and conflicts of interest. Amendments of the legal framework for implementing additional paid services help mitigate the risk of unethical behaviour. The Police Ethics Manual now applies to all police officers and includes practical guidance that takes into account the Police's specificity, variety of duties and vulnerabilities. It is subject to appropriate training. The system for offering confidential counselling on integrity-related matters has been completed. The stability of the senior management of the police has been increased, in particular through the new appointment procedures. However, in order to guarantee the independence of the Police in its operational management, heads of departments should not be appointed by the Minister but within the Police structure, as it is the case with the Directors of the Local Police Directorates. A transitional evaluation process of the senior management is under way and addresses integrity-related matters. Such integrity-check is due to be regularly carried out for the senior management and the functions considered at risk, based on the integrity plans and other existing risk management tools. The gift regime has been completed with adequate supervision and enforcement mechanisms, and post-employment restrictions are in place. Employees of the Illyrian Guard are now subject to the same legal and regulatory measures as employees of the State Police. A whistleblowing system is now in place; it is coupled with awareness-raising and training.

118. In accordance with Rule 31 revised bis, paragraph 10 of GRECO's Rules of Procedure, the adoption of this Second Compliance Report terminates the Fifth Round compliance procedure with respect to Albania. The Albanian authorities may, however, wish to inform GRECO of the developments concerning the implementation of recommendations iii, iv, vii, viii, ix and xix which remain incomplete.

119. Finally, GRECO invites the Albanian authorities to authorise, as soon as possible, the publication of the report, to translate it into the national language and to make the translation public.