



ANNEX C1: Twinning Fiche

Project title: Strengthening Open Data Publication and Personal Data Protection in Albania

Beneficiary administration: Commissioner for the Right to Information and Protection of Personal Data (IDPC), Republic of Albania

Twinning Reference: AL 26 IPA JH 01 26

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EU funded project

TWINNING TOOL

1. Basic Information

1.1 Programme

EU for Integrated Good Governance (ACT-63255) – Multi-annual Action Plan in favour of Albania for 2025–2027, AAP 2026, under direct management.

1.2 Twinning Sector

Justice and Home affairs

1.3 EU funded budget

Maximum amount of the grant: EUR 1,000,000.

1.4 Sustainable Development Goals (SDGs)

The project contributes primarily to SDG 16 – Peace, Justice and Strong Institutions, notably targets 16.6 on effective, accountable and transparent institutions and 16.10 on public access to information and protection of fundamental freedoms.

2. Objectives

2.1 Overall Objective

The overall objective is to strengthen transparency and accountability in public administration through the effective promotion of open data policies, and to reinforce the protection of citizens' privacy by ensuring robust safeguards for personal data.

2.2 Specific objective

The specific objective is to strengthen the institutional capacity of the Commissioner for the Right to Information and Protection of Personal Data (IDPC) to ensure the effective implementation and monitoring of open data policies and personal data protection framework, including the proper publication of key datasets and the integration of personal data protection safeguards into digital and AI-related public sector initiatives, in line with the EU acquis and Member State best practices.

2.3 The elements targeted in strategic documents i.e. National Development Plan/Cooperation agreement/Association Agreement/Sector reform strategy and related Action Plans

The project supports the Public Administration Reform agenda by improving accountability, openness and oversight within public administration, and contributes to the Rule of Law agenda by strengthening the effective implementation of the legal framework on personal data protection and access to information. It also supports Albania's broader EU accession efforts in areas linked to fundamental rights and public administration namely in digital governance.

3. Description

3.1 Background and justification

The IDPC is a public legal entity and an independent supervisory authority mandated to monitor and oversee the implementation and enforcement of the legal framework on the right of access to information, personal data protection, open data and the re-use of public sector information, and, more recently, lobbying. The project will focus on supporting the IDPC in improving specifically open data and personal data protection practices.

Open Data

In 2022, Albania adopted a new **Law on Open Data** and the Re-use of Public Sector Information in alignment with the EU Open Data Directive, while also defining high-value datasets in areas such as, most recently, geospatial, environmental and land-observation data. Institutions are now required to make documents available in open and machine-readable formats together with their metadata, ensure free reuse of high-value datasets, apply standard – preferably open licenses, and provide access to data through user-friendly interfaces and, where appropriate, application programming interfaces (APIs').

The public institutions must also publish data in alignment with the **transparency programmes**, designed and monitored by IDPC since 2015. These programmes require the public institutions to publish key information using standard templates, appoint coordinators and establish registers of requests and responses. Recent data-quality assessments conducted by IDPC show generally medium-to-high levels of proactive transparency.

Additionally, the government institutions shall also align with legal requirements setting a list of mandatory information and certain visual elements.

Central **open-data platforms** aim to concentrate the key information and datasets on single websites. The initial 'Open Data Albania' was later coupled with 'Transparent Albania'. However, both platforms are not yet used systematically by relevant authorities, and the quality, accessibility and interoperability of published data remain inconsistent. In parallel, civil society organisations maintain their own databases, such as 'Open Data', to complement the available datasets.

At the same time, there are certain **high-risk areas** which require additional attention for ensuring even more diligent data transparency and accessibility. These areas include high-interest sectors, such as political finance, public spending, strategic investment schemes, and public officials' asset declarations, as well as sectors identified as vulnerable to corruption, such as property (state cadastre), health and social care system, education, public procurement, public-private partnerships, tax administration, and customs.

Finally, while the efforts to proactively publish data continue, so is the number of **individual information requests** steadily increasing. Specifically, public institutions recorded around 13,000 requests in 2025, up from 11,500 in 2024, while IDPC received 800 complaints, showing perhaps growing demand for information, more diligent recording of requests, or persisting insufficiency of quality data published.

Hence, while the Open Data Law brought alignment with the EU acquis, the implementation remains uneven. Recent IDPC questionnaires show that many institutions still do not clearly distinguish between open data and transparency programme obligations, struggle with licences and compliant publication formats, and have insufficient human and technical capacities.

There is therefore a clear need to bring greater clarity, coherence and effectiveness to public access to information through centralised portals and a harmonised approach across institutional websites, with particular emphasis in high-risk areas, and to equip the IDPC and relevant institutions with practical guidelines, capacity-building, awareness-raising, and technical support.

Personal Data Protection

In 2024, Albania adopted a new **Law on Personal Data Protection** to align the legal framework with the GDPR and the Law Enforcement Directive, implemented through a series of by-laws. The new framework introduces stronger obligations for controllers and processors, broader rights for data subjects, mandatory breach notification, modernised transfer rules and stronger enforcement powers for the IDPC.

This marks a clear shift towards a stricter, EU-compatible regime, but has also created substantial transitional challenges: controllers must adapt internal practices, invest in information security, reinforce the role of Data Protection Officers, while the IDPC must guide and oversee this transition.

Rising complaint numbers (almost doubling in a year) and the IDPC's own investigations reveal systemic weaknesses in the practical organisation and implementation of legal

obligations, including gaps in standardisation, documentation, risk assessment and timely handling of complex cases.

Concurrently, Albania has achieved a high level of **digitalisation** of public services and is rapidly introducing AI-driven solutions, including in public procurement and smart-city surveillance. This expansion of digital and AI-enabled processing significantly increases the volume, sensitivity and reuse of personal data across systems, and raises new risks for privacy and fundamental rights if safeguards are not fully embedded.

Against this backdrop, there is a clear need for targeted support to help the IDPC finalise and operationalise the sub-legal acts, review and standardise practices, issue detailed guidance, scrutinise risk AI applications, and foster a culture of responsible data governance across public and private sectors.

3.2 Ongoing reforms

The Twinning project will be implemented in the context of Albania's ongoing reforms related to public administration, rule of law, digital governance and EU approximation. Recent developments include the adoption and initial implementation of the new Personal Data Protection Law, ongoing implementation of the Open Data Law, consolidation of transparency programmes and increased attention to artificial intelligence, interoperability and digital public service delivery.

The action fits within the wider framework of Albania's EU accession-related policy dialogue and sector reform efforts, notably under the Public Administration Reform and Rule of Law agendas. It will support the operationalisation of recent legislative reforms, help the beneficiary participate more effectively in sector monitoring and policy coordination frameworks, and strengthen the institutional basis for sustained implementation of relevant EU standards.

3.3 Linked activities

The project will build on previous and ongoing EU support in the same field. This includes a previous EU-funded twinning project with the IDPC focused on approximation of Albania's data protection legislation with the GDPR, as well as the ongoing 'EU for Good Governance' project, which supports implementation of access-to-information standards, the Tromsø Convention, the Convention 108+, and initial open-data training. The project will also complement several TAIEX workshops, including recently on open data, INSPIRE datasets and the EU AI Act.

The action will then take account of broader horizontal public administration reform and digitalisation efforts in Albania, including work on digital service delivery, interoperability and government transparency. The initiative anticipates cooperation with relevant government and local institutions, civil society, academia and the private sector where this contributes to better publication and re-use of data, while ensuring strong protection of people's privacy.

The twinning intervention adds value by mobilising peer-to-peer expertise from EU Member States and by translating existing legal and policy developments into practical systems, methodologies, guidelines and institutional capacities. Given the country's rapid uptake of AI technologies, the Twinning project can also offer valuable insights to the EU and its Member

States on how to manage open data and ensure robust personal data protection in AI-related areas and applications.

3.4 List of applicable Union acquis/standards/norms

The Twinning project will specifically draw on the following EU acquis: Directive 2002/58/EC (ePrivacy Directive), European Interoperability Framework (2004), Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR), Directive (EU) 2016/680 (Law Enforcement Directive), Directive (EU) 2016/2102 (Web Accessibility Directive), Directive (EU) 2019/1024 (Open Data Directive), Regulation (EU) 2022/868 (Data Governance Act), Regulation (EU) 2023/2854 (Data Act), and Regulation (EU) 2024/1689 (Artificial Intelligence Act).

It will also refer to the Council of Europe Conventions on Access to Official Documents (Tromsø Convention), and on the Protection of Individuals with regard to Automatic Processing of Personal Data (Convention 108+), OECD/SIGMA Principles of Public Administration, and the relevant case law of the Court of Justice of the European Union and the European Court of Human Rights.

The principal Albanian legal acts are Law No. 124/2024 on Personal Data Protection, Law No. 33/2022 on Open Data and the Re-use of Public Sector Information and the Law No. 119/2014 on the Right to Information.

3.5 Components and results per component

Twinning partners are expected to jointly define the specific activities during the preparation of the work plan and its updates. It is proposed to consider the indicative sub-results outlined under the following Mandatory Results:

Component 1 – Open Data

Result 1: The institutional capacity of the IDPC is strengthened to ensure the effective implementation and monitoring of open data policies.

Indicative sub-results:

- Identified strategic approach to overseeing the implementation of open data policies and their linkage with transparency programmes, access-to-information, personal data protection and other related policies.
- Reviewed the architecture, content, and interoperability of the central open-data platforms (such as “Open Data Albania” and “Transparent Albania”), and their formats for data driven analysis.
- Reviewed the maturity of open-data practices across key public-sector institutions.
- Developed training toolkits and materials on open-data policies.
- Identified key datasets for publication especially in (1) high-interest sectors such as political finance, public spending, strategic investment schemes and public officials’ asset declarations; and (2) sectors vulnerable to corruption such as property (state cadastre), health and social care, education, public procurement, public-private partnerships, tax administration and customs.
- Reinforced the capacities of the IDPC units and entities from high-interest and vulnerable sectors on open-data governance.

Component 2 – Personal Data Protection

Result 2: The institutional capacity of the IDPC is strengthened to ensure an effective implementation and monitoring of personal data protection framework.

Indicative sub-results:

- Identified strategic approach to overseeing implementation of personal data protection, in particular in relation to the digitalisation of public services and the introduction of artificial intelligence and similar technologies.
- Assessed the existing governmental digitalisation strategy and AI methodology to enhance privacy-by-design models and controls.
- Supported jointly relevant data controllers in producing Data Protection Impact Assessments (DPIA) on major applications driven by AI, such as public procurement and government-installed surveillance applications.
- Reviewed how to balance and align open data and personal data protection policies.
- Reinforced the capacities of the relevant IDPC units.

Communication – Components 1 & 2

Result 3: The communication and public awareness on open data and personal data protection is strengthened.

Indicative sub-results:

- Enhanced awareness of open data and personal data protection.
- Conducted visits to EU MS to study good practices in open data and personal data protection.
- Developed a concise post-project plan outlining key follow-up actions, responsibilities and indicative resource needs.

3.6 Means/input from the EU Member State Partner Administration(s)

The Member State partner administration(s) shall provide a Project Leader, a Resident Twinning Adviser, component leaders and short-term experts with complementary experience in open data governance and personal data protection, including in relation to digital public administration, interoperability, AI governance, institutional capacity development and public awareness.

The Member States shall propose a specific methodological approach, sequencing of activities and deployment of expertise.

3.6.1 Profile and tasks of the PL

The Project Leader shall be a high-ranking Member State official or assimilated agent who directs the implementation of the Twinning project with a

- University degree or equivalent professional experience of at least eight years, and
- Minimum of three years of specific professional experience

in law, public sector governance, personal data protection, open data or related fields.

- Experience in management of EU-funded institutional cooperation projects will be an asset.

The PL will provide strategic direction and overall coordination of the Twinning project, ensure political and institutional dialogue at senior level, supervise delivery of mandatory results, endorse work plans and reports, ensure internal quality control and support coordination between the Member State partner administration(s), the beneficiary administration and the Contracting Authority.

3.6.2 Profile and tasks of the RTA

The Resident Twinning Adviser shall be an official or assimilated agent from a Member State public administration or accepted mandated body with

- University degree or equivalent professional experience of at least eight years, and
- Minimum of three years of specific professional experience

in law, public sector governance, personal data protection, open data or related fields.

The RTA will reside in Albania for the duration foreseen by the Twinning contract and will be responsible for day-to-day coordination of implementation, preparation and follow-up of missions and activities, liaison with the beneficiary institutions, support to reporting, monitoring of progress towards results, and practical coordination of short-term expert inputs.

3.6.3 Profile and tasks of Component Leaders

Two component leaders shall be assigned to lead Component 1 – Open Data and Component 2 – Personal Data Protection, respectively.

Component leaders shall have

- University degree or equivalent professional experience of at least eight years, and
- Minimum of three years of specific experience

in law, public sector governance, personal data protection (component 1), open data (component 2) or related fields.

- Collectively, they should ensure strong expertise across the project's core areas, including personal data protection supervision, open data and public sector information, digital governance and interoperability, AI-related governance and risk issues, institutional training and public outreach.

Component leaders will support the PL and RTA in technical steering of the project, coordinate delivery under their respective components, supervise relevant short-term experts, contribute to the drafting and review of outputs, and help ensure coherence and quality across all project activities.

3.6.4 Profile and tasks of other short-term experts

Short-term experts shall have

- University degree or equivalent professional experience of at least eight years, and

- Minimum of three years of specific professional experience relevant to their assignment.

Short-term experts will provide technical expertise, draft analytical and guidance documents, deliver training and workshops, support study visits and peer exchange, and contribute to practical recommendations and tools required under the project.

4. Budget

Maximum budget available for the grant: EUR 1,000,000.

5. Implementation Arrangements

5.1 Implementing Agency responsible for tendering, contracting and accounting (AO/CFCU/PAO/European Union Delegation/Office)

The implementing agency responsible for tendering, contracting and accounting will be the European Union Delegation to Albania.

The contact person at the EU Delegation is:

Ms Cinzia Tarletti
Head of Section
Good Governance and Rule of Law
e-mail: cinzia.tarletti@eeas.europa.eu.

5.2 Institutional framework

The beneficiary administration is the IDPC. The project will be implemented in close cooperation with relevant partner institutions involved in digital governance, public data publication, access to information, statistics and sectoral data management, including AKSHI (National Agency for Information Society), relevant ministries, INSTAT, selected local government units and state-owned enterprises, as appropriate.

The IDPC will lead coordination on the beneficiary side. Practical coordination mechanisms, including focal points and participation of partner institutions in component-related activities, will be confirmed during the inception phase and reflected in the work plan. The project is not expected to alter the existing formal institutional framework, but it should strengthen inter-institutional coordination and operational cooperation.

5.3 Counterparts in the Beneficiary administration

The PL and RTA counterparts will be staff of the IDPC and will be actively involved in the management and coordination of the project.

5.3.1 Contact person

The contact persons at the beneficiary administration are

Ms Besa Velaj
Cabinet Director
e-mail: besa.velaj@idp.al

Ms Blerta Nerguti

Secretary General
e-mail: blerta.xhako@idp.al

Ms Denada Hysi
Head of Projects and Foreign Relations Sector
e-mail denada.hysi@idp.al

5.3.2 PL counterpart

The PL counterpart at the beneficiary administration is Ms Besa Velaj, Cabinet Director.

5.3.3 RTA counterpart

The RTA counterpart at the beneficiary administration is Ms Blerta Nerguti, Secretary General.

6. Duration of the project

The implementation period of the project shall be 18 months.

7. Management and reporting

7.1 Language

The official language of the project is the one used as contract language under the instrument (English). All formal communications regarding the project, including interim and final reports, shall be produced in the language of the contract.

7.2 Project Steering Committee

A project steering committee (PSC) shall oversee the implementation of the project. The main duties of the PSC include verification of the progress and achievements via-à-vis the mandatory results/outputs chain (from mandatory results/outputs per component to impact), ensuring good coordination among the actors, finalising the interim reports and discuss the updated work plan. Other details concerning the establishment and functioning of the PSC are described in the Twinning Manual.

7.3 Reporting

All reports shall have a narrative section and a financial section. They shall include as a minimum the information detailed in section 5.5.2 (interim reports) and 5.5.3 (final report) of the Twinning Manual. Reports need to go beyond activities and inputs. Two types of reports are foreseen in the framework of Twinning: interim quarterly reports and final report. An interim quarterly report shall be presented for discussion at each meeting of the PSC. The narrative part shall primarily take stock of the progress and achievements via-à-vis the mandatory results and provide precise recommendations and corrective measures to be decided by in order to ensure the further progress.

8. Sustainability

The achievements of the Twinning project should remain a permanent asset to the beneficiary administration after completion of implementation. Sustainability will be promoted through practical transfer of know-how, development of operational guidance, internal tools and training materials, and reinforcement of the IDPC's capacity to continue supervisory, advisory and awareness-raising functions beyond the life of the project.

Where the project supports policy development, internal rules, methodologies or legislative follow-up, sustainability will depend on adequate consultation, evidence-based preparation and realistic implementation planning, including regulatory and fiscal considerations where necessary.

The beneficiary should ensure that the human, organisational and budgetary resources needed to maintain the results are reflected in medium-term planning and internal work programmes.

9. Crosscutting issues (equal opportunity, environment, climate etc...)

The project has a strong human-rights dimension, as it supports the right to privacy, protection of personal data and access to information. It also contributes to equal opportunity and inclusion by promoting accessible public information, better user-oriented digital governance and awareness of rights among citizens, including vulnerable groups and groups potentially affected by digital exclusion. Environmental and climate impacts are limited, but digital delivery of services, materials and coordination may contribute indirectly to resource efficiency.

10. Conditionality and sequencing

The project is designed as a self-standing institutional cooperation action and is not dependent on the prior completion of procurement or other external interventions to achieve its core results. However, sequencing is important: the inception phase will confirm priorities, baseline conditions and institutional responsibilities; analytical work will precede operational recommendations; and training and awareness activities will build on validated outputs and agreed priorities.

Attention will be paid to complementarity with TAIEX and other EU initiatives already active in the field to avoid overlap and maximise coherence. If parallel actions are launched in related reform areas, practical coordination arrangements will be agreed between the beneficiary and the EU side in line with the Twinning template guidance.

11. Indicators for performance measurement

The following indicative indicators complement the Mandatory Results under section 3.5.

Component 1 – Open Data

- strategic brief on oversight of open data policies
- analytical report on the architecture, content and interoperability of ‘Open Data Albania’ and ‘Transparent Albania’
- maturity assessment report on open data practices across key public sector institutions.
- open data training toolkit
- practical guidelines for enhancing open data policies in high-interest and high-risk sectors.
- list and description of datasets prioritised for publication in key sectors
- attendance lists and questionnaires from training sessions

Component 2 – Personal Data Protection

- strategic brief on oversight of personal data protection in the context of digitalisation and AI
- assessment report on the national digitalisation strategy and AI methodology
- impact assessments of major AI driven applications, such as in public procurement or public surveillance
- guidance on reconciling open data and personal data protection obligations
- attendance lists and questionnaires from training sessions

Communication – Components 1 & 2

- concepts of awareness raising actions on open data and personal data protection
- mission reports from study visits
- post-project implementation plan

12. Facilities available

The beneficiary administration shall make available adequate office space for hosting the RTA and, where relevant, assistants; meeting rooms for coordination and expert missions; and facilities for training sessions, seminars and conferences. The beneficiary should also provide access to relevant documents, staff and working contacts, as well as the necessary basic hardware, software and secure working conditions in line with institutional rules. Additional logistical arrangements for workshops and larger events may be organised in coordination between the beneficiary, the Member State partner administration(s) and the Contracting Authority.