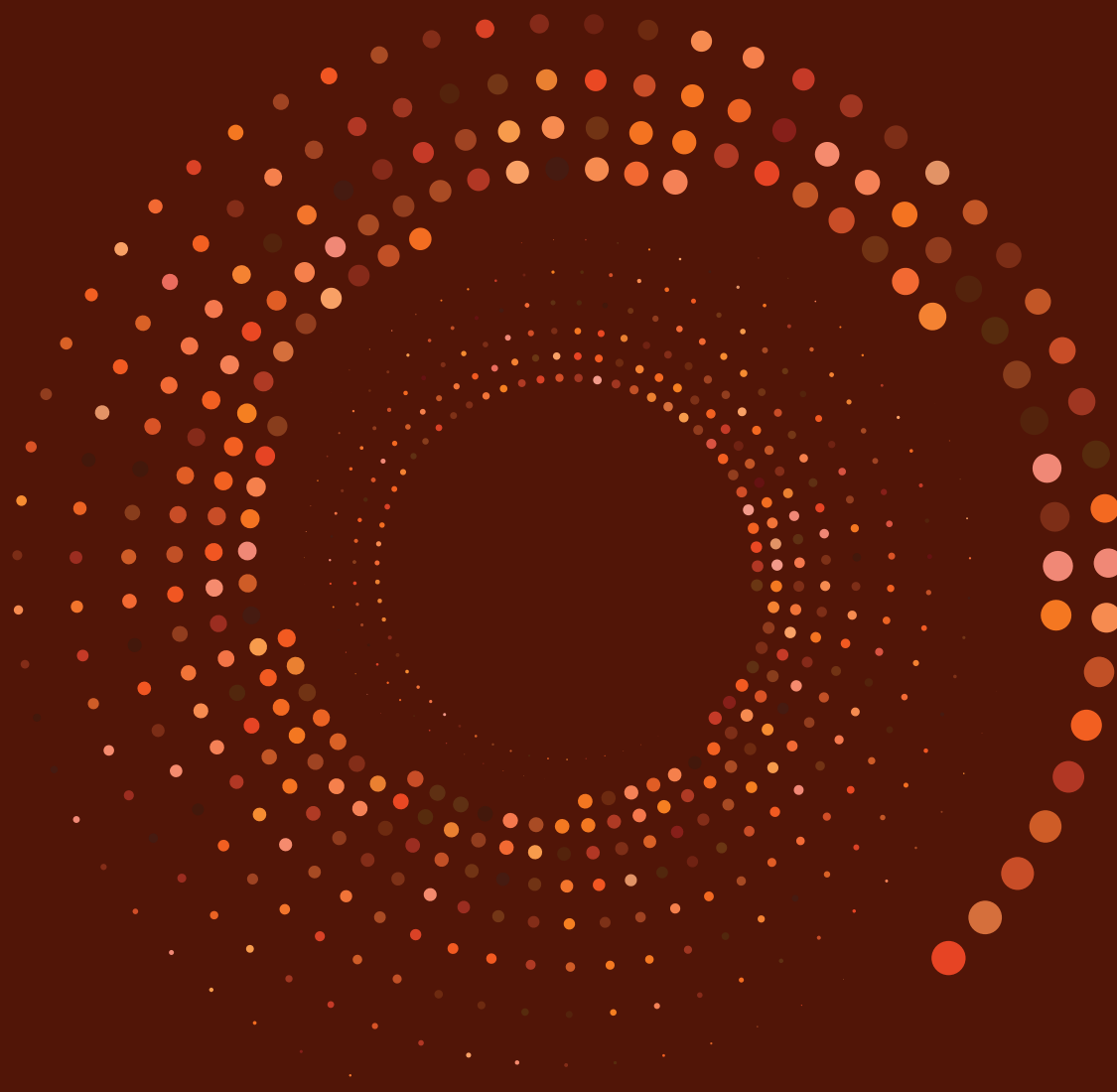


DG NEAR Guidelines For EU Support to Civil Society
in the Enlargement Region
2021-2027

2025 Assessment

REPORT FOR ALBANIA





This study was carried out by a team of experts under the supervision of the Hajde4EU project.

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Table of Contents

Table of Contents	3
List of Abbreviations	5
Methodology	7
Common methodology (Western Balkans and Türkiye)	7
Albania - country-specific approach to the methodology	8
Evidence base at a glance	8
Survey data	8
Respondent profile and reach	9
Key informant interviews	9
Validation	9
Interpretation and context	10
Executive Summary	11
Specific Objective 1 - Conducive Environment for Civil Society	11
Specific Objective 2 - Cooperation and Partnership between CSOs and Public Institutions:	12
Specific Objective 3 - CSO Capacities and Resilience:	13
IPA beneficiary Assessment	15
Specific Objective 1: A conducive environment for civil society to carry out its activities is in place.	15
SO 1.1 All individuals and legal entities in the Enlargement Region can establish, join and participate in non-formal and/or registered organisations, can assemble peacefully and can express themselves freely.	15
SO 1.2 Public authorities protect CSOs from interference and attacks and respect their right to privacy.	17
SO 1.3 Measures used to fight extremism, terrorism, money laundering or corruption are targeted and proportionate in line with the risk-based approach, and respect human rights standards on freedom of association, assembly and expression.	21
SO 1.4 Public authorities treat all CSOs equally with regards to their operations, and equitably with other entities (such as businesses).	22
SO 1.5 Central and/or local public authorities have enabling policies and rules for small community organisations and civic initiatives (grassroots organisations)	23

SO 1.6 All CSOs are free to solicit and receive funding.	25
SO 1.7 Public financial and non-financial support to CSOs is available in IPA beneficiaries, and provided in a transparent, accountable, fair and non-discriminatory manner.	26
SO 1.8 Individuals and corporations enjoy tax benefits for their donations to CSOs.	30
SO 1.9 Tax benefits are available to CSOs.	31
SO 1.10 The policies and legal environment provide incentives and facilitate volunteering for and employment in CSOs.	32
Specific Objective 2: Strengthened cooperation and partnership between CSOs and public institutions.	36
SO 2.1 Public authorities and institutions include CSOs in decision and policy-making processes.	36
SO 2.2 Public authorities and institutions acknowledge the importance of civil society in societal policy debate and EU integration processes.	38
SO 2.3 Public authorities contribute to civil society strengthening by cooperating with civil society through strategic policy frameworks and relevant institutional mechanisms.	39
Specific Objective 3: CSOs' capacities and resilience in carrying out their activities are strengthened.	42
SO 3.1 CSOs' internal governance structures follow the principles of good governance.	42
SO 3.2 CSOs are able to communicate the results of their activities to the public.	45
SO 3.3 CSOs are transparent about their programme activities and sources of funding.	46
SO 3.4 CSOs monitor and evaluate the results and impact of their work.	48
SO 3.5 CSOs use research and evidence to underpin their work.	48
SO 3.6 CSOs work in fair and respectful partnership to achieve shared goals.	49
SO 3.7 CSOs have a diversified funding base.	51
SO 3.8 CSOs have effective, empowered and developed human resources.	52
Bibliography	55
List of Laws Consulted	57
Table of IPA beneficiary Scores per Indicator 2021-2025	58

List of Abbreviations

AML/CFT	Anti-Money Laundering and Countering the Financing of Terrorism
ASCS	Agency for the Support of Civil Society
BBA	Beyond Barriers Association
BCSDN	Balkan Civil Society Development Network
BIRN	Balkan Investigative Reporting Network
CAF	Charities Aid Foundation
CERV	Citizens, Equality, Rights and Values programme
CIVICUS	World Alliance for Citizen Participation
CSO	Civil Society Organisation
DG ENEST	Directorate-General for Enlargement and Eastern Neighbourhood
DG NEAR	Directorate-General for Neighbourhood and Enlargement Negotiations
DIMI	Domestic Information Manipulation and Interference
EC	European Commission
ECF	European Civic Forum
ECHR	European Convention on Human Rights
ECPMF	European Centre for Press and Media Freedom
EU	European Union
EUD	European Union Delegation
FIMI	Foreign Information Manipulation and Interference
HR	Human Resources
ILO	International Labour Organisation
IPA	Instrument for Pre-accession Assistance
KII	Key Informant Interview
LGBTIQ+	Lesbian, gay, bisexual, transgender, intersex and queer
MHSP	Ministry of Health and Social Protection
NAC	National Accounting Council
NAS	National Accounting Standard
NCCS	National Council for Civil Society
NPO	Non-Profit Organisation
NRC	National Resource Centre for Civil Society in Albania
OGP	Open Government Partnership
PA	Partners Albania for Change and Development
RCC	Regional Cooperation Council
RSF	Reporters Without Borders
SASPAC	State Agency for Strategic Programming and Aid Coordination
SCiDEV	Center for Science and Innovation for Development

SIGMA	Support for Improvement in Governance and Management
SLAPP	Strategic Lawsuit Against Public Participation
SO	Specific Objective
TACSO	Technical Assistance to Civil Society Organisations
VAT	Value Added Tax

Methodology

Common methodology (Western Balkans and Türkiye)

This assessment applies the common methodology used across the seven targeted countries to assess the DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027, Hajde4EU's principal recurring analytical product, delivered annually as seven national reports and one regional report. It is an upstream advisory exercise for DG ENEST B1 and the EU Delegations and EU Office in Kosovo*, in which CSOs and independent media are subjects of analysis and dialogue partners, not direct beneficiaries.

The 2025 cycle applies the official, slightly revised methodology, retained to preserve comparability with the 2021 baseline and the 2023 and 2024 TACSO assessments. Assessment is organised around three Specific Objectives, scored through approximately 55-59 indicators, each combining an indicator-based grade with a qualitative narrative:

SO	Dimension assessed	What it measures
SO1	Legal and financial enabling environment	Registration, operation, freedoms of association/assembly/expression; state funding, fiscal framework, financial viability.
SO2	Public authority - civil society cooperation	Consultation and cooperation mechanisms, their mandate and effectiveness, inclusiveness (incl. HRBA-inclusive composition).
SO3	CSO capacity, sustainability and effectiveness	Organisational capacity, accountability, networking, and effectiveness in influence and service delivery.

Prior-year scores (2021-2024), particularly under SO3, are reference points only, not comparison baselines, due to inter-year methodological changes that widened the assessment's scope. For 2025, regional summary reports from the FRA Civic Space Update, ECF Civic Space Watch and the BCSDN Monitoring Matrix are appended where available for comparability, but not merged into the scoring.

Coordinators for IPA beneficiaries (and dedicated enabling-environment experts where needed) gather country-level evidence through a mixed-methods design: legal and desk review; structured online questionnaires targeting three groups (general CSOs, expert CSOs competent in the enabling environment, and public administration); key informant interviews; and focus groups. Evidence is processed through indicator-based scoring and qualitative narratives, verified through national validation meetings in June 2026 and internal Key Expert review, with working-draft consultation where agreed with EUDs. Internal or restricted Commission documents may inform data collection but are not cited.



* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence

Albania - country-specific approach to the methodology

The 2025 assessment for Albania is based on targeted desk review, survey data, specialised CSO input, key informant interviews and validation feedback. These sources are read together rather than in isolation. The General CSO Survey provides quantitative CSO percentages, the Specialised CSO Survey provides qualitative expert input used to confirm, nuance or challenge wider survey and desk-review findings, and the Public Institutions Survey provides an institutional perspective and a means of triangulation, not a substitute for CSO experience.

Evidence base at a glance

Instrument	Responses	Notes
General CSO Survey	70 / 67	70 in final export; 67 Albania-coded in the raw file, used for respondent-level aggregation; denominators vary by question
Specialised CSO Survey	6	Circulated to 8 expert organisations; 6 substantive responses
Public Institutions Survey	36	28 central, 2 regional, 6 local; 2 test/invalid entries excluded
Key informant interviews	4	Qualitative triangulation; not statistically representative
Validation meeting	1	Online, 18 June 2026

Survey data

The General CSO Survey, which was publicly available and open to all CSOs was distributed from 20 May to 5 June 2026 via the Hajde4EU email database and platforms (LinkedIn¹, facebook²) the Civil Society Resource Centre³, the EU Delegation to Albania and national CSO networks, with targeted outreach to grassroots and local organisations. It was further disseminated to grassroots and local organisations through direct invitations and one-to-one follow-up by the Coordinator for Albania. The questionnaire was anonymous and consisted for the most part of closed questions. As not every re-spondent answered every question, the number of valid answers typically decreases as the question-naire progresses. Unless stated otherwise, the percentages in this report are calculated against the valid responses to each question rather than the full sample. In total 67 valid responses from general CSOs in Albania were recorded and used where respondent-level aggregation was required.

The Specialised CSO Survey was addressed to 8 expert organisations and networks working on civil society enabling environment, governance, civic space and LGBTIQ+ rights. Its purpose was qualitative: to let expert voices confirm, qualify or push back against what the General CSO Survey and the desk review suggested. The 6 substantial responses received were used for triangulation and validation of the General CSO survey findings and desk-review analysis.

¹ Hajde4EU, LinkedIn: <https://www.linkedin.com/company/hajde4eu/>

² Hajde4EU, facebook: <https://www.facebook.com/Hajde4EU>

³ National Resource Centre for Civil Society in Albania: <https://resourcecentre.al/>

The Public Institutions Survey, in turn, went to central, regional or entity-level and local bodies with experience of working with CSOs. The 36 responses received (28 from central institutions, 2 from regional or entity-level institutions and 6 from local government) offer the institutional side of the picture and a point of triangulation, but it is not a stand-in for the experience of civil society itself.

Respondent profile and reach

CSO respondents were concentrated in Tirana (67%), but also included organisations from Elbasan, Librazhd, Shkodra, Vlora, Përmet, Pogradec, Fier, Bulqizë, Fushë-Arrëz and Korçë. Around two-thirds (67%) of identifiable CSO respondents were women. Outreach intentionally included municipalities and local administrations; however, the aggregate survey export did not allow systematic cross-tabulation by level of administration for all indicators.

Other relevant respondent information:

(Percentages as reported; totals may not sum to 100 due to rounding or multiple response options.)

Albania	
Type of CSO	74% registered association; 16% registered foundation; 3% vocational, professional organisation or union; 1% unregistered platform/network; 6% other
Scope of work	65% national; 16% regional/sub-national/entity; 10% local; 10% international
Position in the CSO	44% Executive director; 14% President; 13% Project/programme director or coordinator; 9% Manager; 4% Expert/adviser; 16% other
Thematic fields: top 5	53% youth and youth rights; 51% human rights; 49% social inclusion; 41% community building and development; 39% socio-economic development
Thematic fields: bottom 5	4% public administration reform; 4% amateur sports; 3% transport and urban development; 2% open data; 2% animal rights
Age	16% between 18-35; 74% between 36-65; 7% 66+

Key informant interviews

Four key informant interviews were integrated into the report. They were used as qualitative triangulation and are not treated as statistically representative evidence.

An interview was held with SCiDEV in June 2026, focusing on civic space, consultations, media freedom and disinformation. Two interviews were held with representatives of the EU Delegation on 15 June 2026, covering the CSO and media portfolios respectively. A further interview was held with Partners Albania, the National Resource Centre, covering legal, fiscal, administrative and capacity issues of CSOs.

Validation

A validation meeting was held online on 18 June 2026, facilitated by the Hajde4EU Coordinator for Albania. Participants included representatives of the EU Delegation (CSO Portfolio), SCiDEV and Partners Albania as the National Resource Centre. Following a walkthrough of the methodology and evidence base, the session addressed five substantive blocks: public transparency and organisational standards; funding, sub-granting and administrative capacity; civic-space pressures and protection mechanisms; CSO-government cooperation and the attitude of public officials; and the National

Council for Civil Society and other dialogue mechanisms. Feedback was used to clarify the report's treatment of transparency, distinguishing formal compliance from practical implementation and noting that standards are likely stronger among larger and more established organisations; to confirm sub-granting as a significant administrative burden even where organisations are formally compliant, alongside a shortage of funding calls in 2025; to confirm that SLAPP-like pressure, smear campaigns, disinformation and harassment against watchdog, rights-based and media-related CSOs are relevant to indicator scoring; to validate the recorded decline in the supportive attitude of public officials as consistent with sector experience; and to confirm the interpretation of formal dialogue mechanisms. Participants were given until 22 June 2026 to submit further written comments on the shared draft. The draft was validated by SCiDEV and further comments were provided by PA/NRC, which were addressed in the final version.

Interpretation and context

Survey results are interpreted as indicative findings and read together with desk review, interview evidence and validation feedback. The findings should be read in the context of 2025 as a parliamentary election year in Albania, with partial local by-elections held later in the year, which may have affected institutional responsiveness, public rhetoric and CSO perceptions of the enabling environment.



Executive Summary

This report presents the findings of the 2025 assessment of Albania's civil society environment against the DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021–2027. The reporting period was shaped by an intensive EU-accession-driven legislative agenda, the temporary ban on TikTok later struck down by the Constitutional Court, a coordinated disinformation campaign targeting LGBTIQ+ and gender equality organisations around the adoption of the Gender Equality Law, and the continued absence of a valid civil society cooperation strategy since the Road Map 2019–2023 expired. Against this backdrop, the assessment finds a civil society sector operating under tightening practical constraints despite a largely sound legal framework: Albania recorded genuine progress in specific areas, notably a long-awaited VAT exemption for donor-funded projects and a new law on volunteering, while institutional cooperation mechanisms weakened significantly, the government continued to operate without a valid civil society cooperation strategy or budgeted action plan, and CSOs reported growing pressure, weaker institutional support and persistent gaps in funding transparency and financial sustainability.

Specific Objective 1 - Conducive Environment for Civil Society

Specific Objective 1 examines whether the legal, institutional and financial environment enables civil society organisations to operate freely, independently and sustainably. It assesses the protection of the fundamental freedoms of association, peaceful assembly and expression, safeguards against undue interference, the proportionality of regulatory requirements, access to domestic and foreign funding, public financial and non-financial support, taxation, philanthropy and volunteering, as well as the overall enabling environment for both registered organisations and informal civic initiatives.

Albania's legal framework for freedom of association, assembly and expression remained formally unchanged in 2025, and Albania recorded the region's **most significant gain in the RSF World Press Freedom Index, rising from 99th to 80th place**. However, implementation gaps persisted: the Electronic Register for Non-Profit Organisations remained non-operational, and a December 2025 legislative amendment addressed only part of Constitutional Court Decision No. 62/2023 on registration fines. **Defamation reform advanced only partially**, introducing a narrow exemption for registered journalists while leaving insulting a criminal offence and providing no SLAPP safeguards. The November 2025 adoption of the Gender Equality Law was preceded and accompanied by a coordinated disinformation campaign specifically targeting LGBTIQ+ and gender equality organisations, and a **new Law on Lobbying raised concerns among CSOs about its potentially broad definition capturing ordinary civic advocacy**. CIVICUS Monitor continued to rate Albania's civic space as "narrowed" (68/100).

Access to effective remedies remained structurally adequate, illustrated by the successful constitutional challenge to the TikTok ban, though the long-pending draft Law on Class Action remained stalled in Parliament for a fourth consecutive year. In 2025, 9% of surveyed CSOs reported government decisions negatively affecting their rights, up from 5% in 2024. Protection from threats and attacks deteriorated, with the relevant compliance score downgraded from 4 to 3: Strategic Lawsuits Against Public Participation continued, and desk review and interviews confirmed delegitimising narratives, smear campaigns and disinformation targeting watchdog, rights-based, gender equality, LGBTIQ+ and media-related organisations. However, **in the CSO survey, 80% of respondents reported no threats, attacks, property damage, unlawful searches or interference with communications**.

These findings are not contradictory: the survey captures self-reported direct incidents affecting individual CSOs, while the desk review and interviews also identify broader patterns of legal intimidation, reputational pressure and coordinated disinformation. The 20% of respondents reporting at least one such incident, together with the qualitative evidence, supports the downgrade while indicating that these pressures remain concentrated rather than experienced uniformly across the sector.

The AML/CFT framework remained formally unchanged, though a draft amendment introducing the concept of “non-profit organisations with high risk” raised concerns among civil society stakeholders about disproportionate future burdens. In practice, restrictions increased: 86% of CSOs reported no judicial harassment, discriminatory funding restrictions or banking access issues in 2025, down from 91% in 2024, with discriminatory restrictions tied to funding sources rising sharply to 9% (from 1% in 2024) and banking-related restrictions rising to 11% (from 6% in 2024).

Albania’s legal and regulatory framework **continued to treat CSOs equitably with businesses** in reporting, inspection and taxation matters. **Small and unregistered community** groups and civic initiatives remained free to operate without registration, including the **right to apply for public and donor grants on equal footing with registered CSOs**. In practice, however, participation in consultation and working groups remained less accessible for informal and grassroots actors, particularly outside Tirana.

The legal framework for CSO funding remained broadly permissive, allowing income from a wide range of domestic and foreign sources. A major 2025 development was the **entry into force of a 0% VAT rate for goods and services used in EU IPA III and other donor-funded projects**, described by civil society stakeholders as a long-awaited milestone for the sector’s fiscal sustainability. **Albania continued to lack any law defining an overall level of public funding for CSOs**, and public funds remained distributed across multiple uncoordinated schemes: the Agency for the Support of Civil Society disbursed ALL 103 million (EUR 1.08 million) in 2025, and the National Youth Agency ALL 90 million (EUR 942,704), with no single, unified figure available for total public funding reaching CSOs across all institutions. CSO perceptions of transparency and fairness improved modestly, with 23% rating public funding as sufficiently transparent and fair in 2025. **Tax incentives for giving remained limited and unchanged**, with no deductibility for individual donations and corporate deductibility capped at 3-5% of pre-tax profit.

Volunteering saw a modest legislative improvement, with the new Law No. 94/2025 “On Volunteering” adopted in June 2025 and published in the Official Gazette on 18 December 2025, recognising volunteering as work experience and introducing state compensation for insurance contributions, though it did not amount to a comprehensive reform of registration and implementation arrangements. **Albania continued to lack any national volunteering strategy or dedicated government programme**, a gap unaddressed across all four assessment cycles. Only 6% of CSOs reported benefiting from state employment programmes in 2025, down from 12% in 2024, and no responding CSO reported benefiting from a government volunteering programme.

Specific Objective 2 - Cooperation and Partnership between CSOs and Public Institutions:

Specific Objective 2 assesses whether civil society organisations are meaningfully involved in public decision-making processes and whether institutional mechanisms enable regular, transparent and inclusive dialogue between civil society and public authorities. The assessment covers the legal framework governing public consultations, the quality of consultation processes, participation in policy development

and EU accession processes, as well as the effectiveness of institutional structures established to support government-civil society cooperation.

Public consultation remained formally regulated through Law No. 146/2014 “On Notification and Public Consultation” and the konsultimipublik.gov.al portal, **but quality remained weak in practice**. Only 22.9% of CSOs reported participating in any type of working group in 2025, and while 68% reported involvement in at least one consultation process, only 4% reported a consultation that met both effectiveness criteria of full draft access and at least 15 days to comment, down from a comparable 32% single-criterion measure in 2024. Because the 2025 methodology combined two criteria, this result is not directly comparable with the 32% recorded in 2024 under a different measure. **Feedback loops remained weak**, with CSOs frequently left uninformed of how their comments were treated, and participation continued to be concentrated among larger, older and Tirana-based organisations.

Albania continued to operate without a valid civil society cooperation strategy throughout 2025: the Road Map for Government Policy towards a More Enabling Environment for Civil Society Development 2019-2023 expired at the end of 2023, and despite a completed evaluation submitted to the responsible Ministry in June 2024 with detailed recommendations for a successor framework, **no formal, visible or inclusive process to adopt a new strategy was initiated during the year**. This represents the largest single-indicator score change recorded in the assessment, from full compliance in 2023 to non-compliance in 2024 and 2025, and consequently no budgeted action plan for civil society cooperation exists, a gap recorded across all four assessment cycles.

The National Council for Civil Society (NCCS) remained formally active, with published minutes confirming one documented meeting in 2025, down from three in 2024, but showed no clear evidence of an agreed annual programme of work, systematic follow-up to conclusions, or strategic influence over the missing successor cooperation strategy. The Agency for the Support of Civil Society, which serves as the Council’s secretariat, remained focused mainly on grant administration rather than broader coordination, and the relevant compliance score was downgraded from 3 to 2.

Specific Objective 3 - CSO Capacities and Resilience:

Specific Objective 3 assesses the organisational capacity, sustainability and resilience of civil society organisations. It examines internal governance, strategic and financial management, accountability, organisational learning, communication, evidence-based work, stakeholder engagement and financial sustainability, recognising that resilient civil society organisations require not only an enabling legal environment but also sound governance systems, professional management, diversified resources and the capacity to adapt to changing political, economic and social circumstances.

Internal governance indicators improved in 2025, partly reflecting revised survey methodology: 70% of CSOs reported having both a governing body and a governing document, up from 59% in 2024, and 74% reported conducting regular conflict-of-interest checks, up sharply from 29%. **Transparency in sharing governance information also improved but remained limited**, with 29% of CSOs making governance information publicly accessible via website or social media, up from 16% in 2024. Organisational strategies were widely adopted, reported by 88% of CSOs, up from 73% in 2024, while gender equality policies remained stable at 52%.

Communication and evidence-based practice remained strong. Nearly all CSOs used at least one online communication channel, led by Facebook (97.7%), Instagram (84.1%), organisational websites (77.3%) and a growing use of LinkedIn (68.2%). Media partnerships rose to 41% in 2025, from 23% in

2024. Some 80% of CSOs conducted at least one type of research, and stakeholder consultation or partnership engaged 98% of respondents when both practices were combined. **Network membership remained very high at 96%** (90% in 2024), one of the sector's strongest capacities, while cross-sectoral partnerships with academia, social partners and the private sector stood at 59%, with academia the strongest single partner.

Funding diversification improved, but concentration risk and donor dependency remained significant concerns. Some 66% of CSOs reported a diversified donor base in 2025, up from 48% in 2024, though 32% of respondents still relied on bilateral donors for more than half their budget and the EU remained the most frequently reported funding source, cited by 66% of CSOs. Interview evidence flagged donor withdrawal and reduced bilateral support as a growing risk to staff retention and operational capacity, particularly for smaller and regional CSOs working on governance, media freedom and human rights. Funds from sources other than donors remained limited, reported by 57% of CSOs, below the 61% and 69% recorded in 2023 and 2021 respectively. Staffing levels rose to 94% of CSOs employing at least one paid staff member, up from 85% in 2024, but with a pronounced geographic gap: **Tirana-based organisations reported a median of 5 paid staff compared with 2.5 outside the capital**, and 13.8% of non-Tirana respondents operated with no paid staff at all. Comprehensive human resources policies remained the sector's clearest weakness, reported by only 7% of CSOs, up marginally from 4% in 2024.



IPA beneficiary Assessment

Specific Objective 1: A conducive environment for civil society to carry out its activities is in place.

SO 1.1 | All individuals and legal entities in the Enlargement Region can establish, join and participate in non-formal and/or registered organisations, can assemble peacefully and can express themselves freely.

Indicator 1.1.a – Extent to which relevant domestic legislation provides that:

- ➔ Associations can be established or registered without discrimination on any grounds.
- ➔ No unlawful restrictions are placed on the scope of their activities or pursuit of their objectives.
- ➔ Their termination may only occur following a decision by an independent and impartial court.
- ➔ No unlawful restrictions are placed on freedom of peaceful assembly.
- ➔ Freedom of expression is exercised by all, and no unlawful restrictions are imposed.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

The constitutional and legal framework for CSO establishment in Albania remained formally unchanged during 2025. Law No. 8788 On Non-Profit Organisations and Law No. 80/2021 On the Registration of Non-Profit Organisations⁴ provide the foundation. No discriminatory legal provisions or systematic discriminatory registration practices were identified in 2025. CSOs can legally register as associations, foundations or centres. However, registration is not yet fully easy or accessible in practice, as the process remains court-based and the Electronic Register for Non-Profit Organisations was still non-operational in 2025, creating administrative costs, delays and procedural complexity, especially for smaller and local organisations.

No unlawful legal restrictions were identified in 2025 on the scope of CSO activities or on the pursuit of their statutory objectives. CSOs may operate across fields of public interest, provided their activities remain lawful and consistent with their registered purpose. However, organisations working on sensitive public-interest issues, including watchdog, rights-based, gender equality, LGBTIQ+, environmental and media-freedom work, continued to face pressure in practice. The legal framework also provides that involuntary termination or dissolution of a registered CSO may occur only through a court-based procedure, rather than by discretionary administrative decision. No evidence was identified in 2025 of CSOs being unlawfully terminated, dissolved or banned by administrative authorities. Two outstanding implementation failures persisted throughout 2025. First, Constitutional Court Decision

⁴ Law No. 80/2021 On the Registration of Non-Profit Organisations, Official Gazette [Qendra e Botimeve Zyrtare](#)

No. 62/2023⁵ invalidated provisions of Law No. 80/2021 relating to the Chancellor's powers, administrative fines and registration deadlines. A legislative amendment adopted on 12 December 2025 addressed part of this decision, but issues relating to administrative fines remained unresolved and further secondary legislation is still required for full implementation. Second, the Electronic Register for Non-Profit Organisations at the Tirana Judicial District Court remained non-operational due to insufficient resources at the High Judicial Council and the Ministry of Justice, as well as unresolved database standardisation challenges.

No major legislative changes or new unlawful restrictions affecting freedom of peaceful assembly were identified in 2025. The constitutional and legal guarantees for peaceful assembly remained in place, and the European Commission Albania 2025 Report notes that freedom of assembly and association continued to be generally respected.

On freedom of expression, 2025 was marked by contradictory developments. Albania improved from 99th to 80th in the RSF World Press Freedom Index 2025⁶, the most significant gain in the region, attributed to preparatory steps on defamation reform and journalist safety measures. However, the TikTok ban imposed by Council of Ministers Decision No. 151 in March 2025⁷, without parliamentary scrutiny or a proportionality assessment, represented one of the most significant restrictions on freedom of expression identified during 2025. The ban was challenged before the Constitutional Court by BIRN Albania, the Albanian Journalists Association, and civil society organisations, who described it as an extreme restriction on freedom of expression and a chilling effect on digital civic space.

Defamation reform advanced partially in late 2025. A cross-party initiative to decriminalise defamation progressed through Parliament, though amendments adopted in late 2025 and early 2026 introduced only a sector-specific exemption for 'registered and recognised journalists', leaving insult as a criminal offence and failing to provide SLAPP safeguards. The ECPMF and SCiDEV criticised this for failing to meet European standards. Full decriminalisation, as required by the EU accession process, was not achieved.

The Gender Equality Law, Law No. 64/2025 (adopted 6 November 2025)⁸ was preceded and accompanied by a coordinated disinformation campaign specifically targeting LGBTIQ+ and gender equality CSOs. SCiDEV documented this as a clear case of FIMI/DIMI designed to polarise public opinion and silence civil society. The UN in Albania expressed deep concern about personal attacks against women activists and international civil servants. Parliamentary intervention at the last moment removed core terminology from the law relating to gender identity. This episode illustrates the vulnerability of CSOs working on rights issues to orchestrated disinformation attacks.

Law No. 12/2026 "On Lobbying in the Republic of Albania" was drafted and consulted in 2025 before being adopted on 28 January 2026. Partners Albania and SCiDEV raised formal concerns during consultation that the law's overly broad definition of lobbying risks classifying ordinary civil society advocacy - consultations, policy analysis, awareness campaigns - under the same regulatory framework as commercial lobbying, creating disproportionate administrative burdens and deterring CSO participation in public life.

⁵ [Qendra e Botimeve Zyrtare](#)

⁶ Reporters Without Borders- World Press Freedom Index 2025; [Index | RSF](#)

⁷ Council of Ministers' Decision No. 151, dated 06.03.2025- Decision on "Taking Temporary Measures to Avoid the Negative Impacts of the Online Platform TikTok"

⁸ <https://qbz.gov.al/eli/ligj/2008/07/24/9970>

CIVICUS Monitor continued to rate Albania as “narrowed” in 2025 (68/100)⁹. However, the combined evidence from the desk review and interviews with key stakeholders points to intensified practical constraints: the CSO registration framework remained unresolved, the TikTok ban restricted digital civic space until judicial review, defamation reform remained incomplete, the lobbying framework created future risks for civic advocacy, and rights-based CSOs faced documented disinformation and delegitimising attacks. The stakeholders interviewed cautioned that the improvement in the RSF ranking should not be read as structural progress, given ongoing concerns about media ownership, political influence, disinformation, SLAPPs, and self-censorship. The score remains 3, as despite the existence of core legal guarantees, implementation and practice continue to constrain the enabling environment.

SO 1.2 | Public authorities protect CSOs from interference and attacks and respect their right to privacy.

Indicator 1.2.a – Extent to which CSOs have access to an effective remedy to challenge or seek review of decisions affecting the exercise of their rights.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

The legal framework that provided CSOs with remedies to challenge government decisions remained in place in 2025. Constitutional guarantees of access to courts and administrative appeal mechanisms were unchanged. The Commissioner Against Discrimination continued to handle cases involving CSOs and marginalised communities, with decisions covering discrimination on the grounds of race, gender, disability, and community membership, against municipalities, public and private entities, banks, and transport operators.

The most significant 2025 illustration of an effective judicial remedy was the TikTok ban case¹⁰. BIRN Albania, the Albanian Journalists Association, and civil society organisations successfully challenged Council of Ministers Decision No. 151/2025 before the Constitutional Court¹¹. The ruling held that restricting access to an entire digital platform for all users, without a proportionality assessment, parliamentary scrutiny, or public consultation, violated the Constitution and the ECHR. This demonstrates that the Constitutional Court can function as a credible check on executive overreach and that CSOs have meaningful access to this remedy.

Conversely, the draft Law “On Class Action”¹² prepared by CSOs in 2021 as a tool for collective legal action to protect shared interests remained pending before the Parliamentary Commission throughout 2025, completing its fourth year without substantive discussion. This represents a persistent structural

⁹ <https://monitor.civicus.org/country/albania/>

¹⁰ Council of Ministers’ Decision No. 151, dated 06.03.2025

¹¹ Council of Ministers ruled in their favour, later on 11 March 2026.

¹² Draft Law ‘On Class Action’, Republic of Albania Assembly (pending, in preparation since 2021)

gap in collective remedy mechanisms that prevents CSOs from efficiently challenging decisions affecting entire constituencies.

No legislative, policy or institutional developments were identified in 2025 that would alter the structural 2024 assessment. The 2025 general CSO survey nevertheless indicates that 9% of responding CSOs reported that government authorities had made decisions that negatively affected their ability to exercise their rights, while 91% reported no such decisions. This broadly confirms the stability of the legal-remedy framework, while showing that a small but relevant share of organisations continued to experience adverse administrative or institutional decisions.

The overall score remains at 3, reflecting the structural adequacy of the framework tempered by the persistent Class Action gap and the broader judicial efficiency constraints.

	% CSOs saying the government did not take any decisions that negatively impacted their ability to exercise their rights	% CSOs saying the government took decisions that negatively impacted their ability to exercise their rights
2025	91%	9%
2024	86%	5%
2023	81%	14%
2021	79%	13%

Note: (Totals may not sum to 100 due to rounding and non-responses.)

Indicator 1.2.b – Extent to which CSOs are protected by law from threats, attacks, judicial harassment and discriminatory treatment, in particular:

- ➔ threats, including intimidation, harassment, defamation, as well as hate speech online and offline
- ➔ attacks including acts of violence, physical abuse, searches and damage to property
- ➔ judicial harassment including arbitrary arrest and detention, unlawful interference with communications, and abuse of criminal, civil and administrative proceedings, or threats thereof
- ➔ discriminatory treatment, including disproportionate reporting requirements for CSOs.

Year	Compliance
2025	3 – moderately meets standards
2024	4 – meets most standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The legal framework for protection against threats relies exclusively on general provisions of the Crim-

inal Code and Civil Code applicable to all legal persons. No dedicated legal framework specifically protecting CSOs from threats, attacks, or judicial harassment was adopted or proposed in 2025. This situation is unchanged from previous assessment cycles.

However, the de facto situation deteriorated in 2025. Desk review and interviews with key stakeholders confirm a more negative climate for public-interest organisations, including delegitimising narratives, smear campaigns, online targeting, SLAPP-like pressure and disinformation against watchdog, rights-based, gender equality, LGBTIQ+ and media-related actors¹³. The Gender Equality Law debate illustrated how disinformation and personal attacks can restrict participation even where formal freedoms remain in place.

Strategic Lawsuits Against Public Participation (SLAPPs) remain a growing, concrete, and unmitigated threat to CSOs. The Zall-Gjoaj case continued in 2025: the Administrative Court of Appeal in Tirana upheld hydropower construction permits in October 2025, and community activists continued to face defamation lawsuits from Seka Hydropower, a pattern the EC 2025 Rule of Law Report confirms is consistent with the use of SLAPPs against those challenging public-interest decisions. Albania committed to aligning domestic legislation with the EU Anti-SLAPP Directive by June 2027, but no draft was released for public consultation in 2025. Criminal defamation remained in force throughout 2025. The EC 2025 Rule of Law Report explicitly confirmed that verbal and physical attacks, smear campaigns, and SLAPPs targeting journalists are a continued cause for concern, and that the legal framework provides no safeguards against SLAPPs. Under this indicator, such evidence is used only where it concerns investigative journalists, non-profit media, media-rights organisations or watchdog actors relevant to the civil society enabling environment, and not professional journalists in general.

The Specialised CSO Survey corroborates this assessment: 50% of expert respondents said CSOs mostly operate without threats, while 33% said only partially and 17% rarely – and none said “fully”. Of the six expert respondents, three reported awareness of harassment or intimidation affecting CSOs in the sector, and three reported interference with communications at some level.

The score is downgraded from 4 (2024) to 3 (2025). The legal framework remains broadly in place, but the 2025 evidence shows a tangible deterioration in practice: coordinated disinformation, pressure against sensitive public-interest work, insufficient protection against SLAPPs and weak institutional support for targeted CSOs and activists.

Indicator 1.2.c – Proportion of CSOs that operate effectively without threats, attacks, judicial harassment in terms of:

- ➔ number of complaints concerning lack of protection of CSOs;
- ➔ number of attacks on CSOs and their members;
- ➔ number of instances of damage to property;
- ➔ number of instances of discriminatory treatment in reporting;
- ➔ number of instances when CSO offices were unlawfully searched, or subjected to inspections;
- ➔ number of instances of interference with the communications of CSOs.

The 2025 general CSO survey confirms that most responding CSOs operated without direct physical attacks, but it also shows higher exposure to pressure than in 2024. In the 2025 CSO survey, 80% of CSOs did not report any verbal threats, physical attacks, property damage, unlawful searches or interference with communications. This is slightly lower than previous years; it was 82% in 2024, 88% in 2023 and 84% in 2021.

13 EC 2025 Rule of Law Report - Albania Chapter; EC Albania 2025 Report; Transparency International EU, 2025 Rule of Law Brief: Albania; European Civic Forum, Civic Space Report 2025; SCiDEV, Fact Forward; CIVICUS Monitor Albania.

However, the proportion of CSOs reporting such instances increased considerably for verbal threats or physical attacks. 9% of responding CSOs reported that their organisation or its members had been subject to verbal or physical threats or attacks. All reported incidents in this category concerned verbal threats; no physical attacks against organisations or their members were recorded in the survey. Interference with communications was reported by 11% of respondents, broadly comparable to previous years. The 2025 survey did not record any instances of physical damage to CSO property, unlawful searches of CSO offices, or discriminatory treatment in CSO reporting obligations; these sub-standards showed no reported incidents in 2025. Overall, 20% of responding CSOs reported facing at least one of the following situations: verbal threats towards the organisation or their members, unlawful searches, property damage, interference with communications.

A total of 13% reported submitting an official complaint concerning one of the situations covered by the indicator.

Stakeholder interviews also indicated that many organisations do not submit complaints because they lack trust in institutional remedies, have limited legal capacity, or fear further exposure. Specialised CSO survey respondents corroborate this: four of six (67%) said complaints by CSOs were submitted only partially, rarely or not at all, and those who gave reasons for not submitting cited a lack of trust that authorities would provide an effective response. The 2025 results therefore point to a deterioration in the practical operating environment, particularly through verbal threats, pressure and communication-related interference, even though direct physical attacks were not reported in the survey.

	% CSOs saying that their organisation or its members were NOT subject to threats or physical attacks, property damage, unlawful searches and interference with communications	% CSOs that submitted an official complaint	% CSOs saying that the authorities interfered with the communications of their CSO
2025	80%	13%	11%
2024	82%	2%	11%
2023	88%	1%	7%
2021	84%	2%	8%

SO 1.3 | Measures used to fight extremism, terrorism, money laundering or corruption are targeted and proportionate in line with the risk-based approach, and respect human rights standards on freedom of association, assembly and expression.

Indicator 1.3.a – Extent to which laws to combat extremism, terrorism, money-laundering and corruption do not unduly restrict legitimate activities of CSOs.

Year	Compliance
2025	4 – meets most standards
2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

No 2025 legislation materially changed the regulatory environment for CSOs in counter-terrorism financing, anti-money laundering or anti-corruption. Instruction No. 19/2019 on CSO surveillance for AML/CFT purposes and Instruction No. 16/2009 on prevention of money laundering and terrorism financing in the tax system remained in force. Notably, a draft amendment to the Law on the Prevention of Money Laundering and Terrorism Financing was circulated for consultation in 2025, introducing the concept of “non-profit organisations with high risk”, a provision that raised concerns from Partners Albania¹⁴ about its potential to disproportionately burden legitimate civil society activity. The Financial Intelligence Agency retained its oversight mandate over non-profit organisations, including review of accounting reports and financial statements where relevant.

The Intersectoral Anti-Corruption Strategy 2024–2030 entered implementation in 2025 and includes civil society participation through the planned Coalition Against Corruption and consultation forums with CSOs. These measures are enabling rather than restrictive. No new CSO-targeted or disproportionate AML/CFT provisions were identified. A practical constraint remains in bank account-opening procedures, where some commercial banks apply burdensome due-diligence requirements; this is assessed under Indicator 1.3.b.

Indicator 1.3.b – Proportion of CSOs whose ability to undertake legitimate activities is not restricted by the implementation of laws to combat extremism, terrorism, money-laundering and corruption, and in particular by:

- ➔ Being judicially harassed for their alleged connections with extremism, terrorism, money-laundering and corruption
- ➔ Discriminatory restrictions placed on funding
- ➔ Authorities or banks preventing them from opening bank accounts, sending or receiving money

¹⁴ <https://www.partnersalbania.org/News/legal-opinion-on-the-amendment-of-the-draft-law-on-some-additions-and-amendments-to-law-no-9917-dated-19-5-2008-on-the-prevention-of-money-laundering-and-financing-of-terrorism/>

No new de jure restrictions were introduced in 2025. However, the 2025 general CSO survey confirms that implementation-related barriers remain relevant in practice. 86% of respondents were able to undertake legitimate activities without judicial harassment, discriminatory restrictions as a consequence of receiving funding from a particular source, and restrictions on opening bank accounts or sending/receiving money. This is slightly lower than previous years (91% in 2024, 87% in 2023, 90% in 2021).

A total of 2% of responding CSOs reported judicial harassment for alleged links with money laundering or corruption, while no respondent reported harassment for alleged links with extremism or terrorism. Discriminatory restrictions resulting from receiving funding from a particular source were reported by 9% of respondents, which is considerably higher than 2024 (1%), 2023 (4%), and 2021 (5%).

11% of CSO respondents reported that they were prevented from opening bank accounts or faced restrictions on sending/receiving money. 89% of CSOs did not experience this situation, which is lower than 2024 (94%), 2023 (95%), and 2021 (95%). Compared with previous cycles, these findings suggest that AML/CFT-related implementation barriers remain limited but not negligible, with the most relevant concerns linked to banking due diligence and funding-source-related restrictions rather than direct judicial harassment.

	% CSOs saying their members were subject to judicial harassment	% CSOs saying their organisation had been subjected to discriminatory restrictions	% CSOs saying they could not open a bank account or faced restrictions on sending/receiving money
2025	2%	9%	11%
2024	2%	1%	6%
2023	2%	4%	5%
2021	2%	5%	5%

SO 1.4 | Public authorities treat all CSOs equally with regards to their operations, and equitably with other entities (such as businesses).

Indicator 1.4.a – Extent to which laws:

- ➔ Do not require CSOs to submit more reports and information than businesses.
- ➔ Do not subject CSOs to more inspections and sanctions than business entities, all else being equal.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The legal framework on taxation, reporting and inspections remained entity-neutral in 2025. Under

Law No. 29/2023 “On Income Tax”¹⁵ CSOs are treated as entities for income tax purposes. CSOs are subject to a dedicated National Accounting Standard (NAS for NPOs¹⁶), developed by the National Accounting Council (NAC)¹⁷, which adapts accounting requirements to the non-profit nature of their activities, including the presentation of contributions, restricted and unrestricted net assets, and CSO-specific financial statements. This standard is different from business accounting, but the available evidence does not indicate that it imposes a heavier reporting burden than that applicable to commercial entities; rather, it provides a sector-specific framework, including simplified reporting for smaller CSOs. CSOs submit information to the tax administration and AML/CFT authorities on the same basis as other legal persons, and no higher reporting burden, inspection regime or sanction framework specific to CSOs was identified.

Law No. 79/2025 “On Tax Procedures”¹⁸, effective from January 2026, introduces automated VAT return filing and electronic communication requirements that apply uniformly to all taxpaying entities. This is considered a positive development during 2025, although it may create practical compliance challenges for CSOs subject to VAT. No 2025 change alters the 2024 assessment; the indicator continues to fully meet standards.

SO 1.5 | Central and/or local public authorities have enabling policies and rules for small community organisations and civic initiatives (grassroots organisations)

Indicator 1.5.a – Small community/local organisations and civic initiatives are allowed to operate by law without registering.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The Albanian legal framework does not impose any obligation on community groups or civic initiatives to register as formal organisations in order to operate. This fundamental principle remained entirely unchanged in 2025. Law No. 8788/2001 “On Non-Profit Organisations”¹⁹ and the constitutional framework provides the legal basis for informal groups to engage in social life, take legislative initiatives such as local referendums, organise community activities, and engage in advocacy without formal registration requirements. Informal groups are explicitly permitted to apply for public and donor grants on equal footing with registered CSOs, thus eliminating a key practical barrier that exists in some other jurisdictions.

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¹⁵ <https://qbz.gov.al/eli/ligj/2023/03/30/29/e0b4e6c5-bf37-4102-a57c-fd51244a2d5f>

¹⁶ NPO- short form used for Non Profit Organisations in Albania

¹⁷ <https://kkk.gov.al/wp-content/uploads/2025/03/SKK-per-OJF-Udhezuesi-per-zbatim-i-Standardit-Kombetar-te-Kontabilitetit-per-OJF-te.pdf>

¹⁸ Law No. 29/2023 On Income Tax; Law No. 79/2025 On Tax Procedures; NRC Albania FAQ 2025; EC Albania 2025 Report.

¹⁹ Law No. 8788/2001 On Non-Profit Organizations; Constitution of Albania; NRC Albania FAQ 2025; EC Albania 2025 Report.

No legislative proposals or government initiatives affecting the right of unregistered groups to operate were identified in 2025. The legal basis, Law No. 8788/2001 “On Non-Profit Organisations,” and the constitutional framework, confirm that there is no legal obligation for community groups to register. This standard has been fully met across all four assessment cycles (2021, 2023, 2024, 2025) and remains one of the strongest performers among the legal framework indicators.

Indicator 1.5.b – In law, unregistered small community/local organisations and civic initiatives enjoy the same right to participation in decision-making processes as registered CSOs.

Year		Compliance
2025		4 – meets most standards
2024		4 – meets most standards
2023		4 – meets most standards
2021		4 – meets most standards

Law No. 146/2014 “On Notification and Public Consultation” formally gives citizens, interest groups, and experts access to consultation processes without requiring registration as a CSO²⁰. The central consultation portal also distinguishes between citizens, interest groups and experts, supporting equal legal access for informal groups and local initiatives. This legal basis remained unchanged in 2025. In practice, participation remains less accessible for informal and grassroots actors, especially outside Tirana. The evidence collected for this assessment points to limited information, weak digital access or skills, low trust in the outcomes of consultations, and insufficient feedback on how comments are used. Municipal-level consultation also appears weaker than central-level consultation in the 2025 survey. No 2025 measure specifically addressed these structural barriers. The indicator continues to meet most standards legally, with persistent de facto participation gaps.

²⁰ Law No. 146/2014 On Public Notification and Consultations; OGP Albania Results Report 2023-2025; SIGMA/OECD, Public Administration in Albania 2024; EC Albania 2025 Report; Cross-Cutting PAR Strategy 2025-2030.

SO 1.6 | All CSOs are free to solicit and receive funding.

Indicator 1.6.a – Extent to which relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions as regards

- ➔ cash and in-kind donations from all sources
- ➔ funding from domestic public bodies
- ➔ funding from institutional, corporate or individual donors
- ➔ funding from foreign governments or multilateral agencies

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The legal framework continued to allow CSOs to seek and receive funding from a broad range of legitimate sources in 2025, including membership fees; grants and donations from public or private, domestic or foreign entities, income from economic activity; and income from assets owned by the organisation. No foreign-agent law, funding-source restriction or special authorisation requirement for foreign or multilateral funding was adopted in 2025.

Two issues require monitoring, but did not alter the 2025 legal assessment. First, the Law on Lobbying was drafted and consulted on in 2025; if interpreted broadly, it could impose administrative burdens on public-interest advocacy by CSOs²¹. Second, donor withdrawal reduced the de facto availability of funding, but this is a sustainability constraint rather than a legal restriction. The 2024 score is therefore maintained.

Indicator 1.6.b – Proportion of CSOs that can access a broad range of funding without undue government interference.

The 2025 general CSO survey does not show direct legal restrictions on CSOs' right to seek funding, but it confirms practical constraints in access to funding: 9% of respondents reported discriminatory restrictions linked to funding sources. Under the broader question on pressures and restrictions, 9% of respondents reported negative consequences (arbitrary audits or inspections and unlawful freezing of assets), while 91% stated that they did not experience these situations. This percentage is the same as in 2024 (91%), higher than in 2023 (86%) and slightly lower than in 2021 (92%). Donor withdrawal, lack of core funding, bank-related compliance barriers and weak public funding nevertheless reduced de facto access to a broad and sustainable funding base. The score remains unchanged, as no new legal restriction was introduced, while practical barriers are reflected in the narrative.

²¹ Law No. 8788/2001; Law No. 12/2026 On Lobbying; Partners Albania and SCiDEV comments on the draft Law on Lobbying; Transparency International EU, 2025 Rule of Law Brief: Albania; EC Albania 2025 Report.

SO 1.7 | Public financial and non-financial support to CSOs is available in IPA beneficiaries, and provided in a transparent, accountable, fair and non-discriminatory manner.

Indicator 1.7.a – The level of public funding available for CSOs and associations is clearly articulated in laws and regulations, and the rights and duties of the state body invested with the ability to set and revise the level of public funding available is clearly defined in law.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

Albania continues to lack any law or regulation that explicitly defines the level of public funding available to support CSOs, or that clearly establishes the mandate, rights, and duties of a state body responsible for setting and revising this level. Public funding for CSOs is distributed through multiple state agencies and line ministries, primarily the Agency for the Support of Civil Society (ASCS), the National Youth Agency, the State Agency for Support of Start-ups, and various line ministries, each operating under its own individual regulatory basis without a unified overarching legal framework. There is no single place in the state budget or government reporting where consolidated data on all public funding directed to CSOs can be found.

The absence of a unified legal framework was noted consistently in DG NEAR Guideline Assessment Reports since 2021 and remains unaddressed in 2025. The Albanian Helsinki Committee²² has repeatedly noted that this gap makes it difficult to assess the total amount directed to CSOs across all ministries and agencies. No legislative initiative to address this gap was identified in 2025. The government's 2025 reform agenda²³, implemented under the EU's Western Balkans Growth Plan, does not include a specific measure to codify public funding levels for civil society in law²⁴.

This indicator has not met standards across all assessment cycles (2021, 2023, 2024, 2025), making it the most persistent unresolved legal gap in the public funding framework.

Indicator 1.7.b – Percentage of public budget actually disbursed to CSOs in a year.

The Agency for the Support of Civil Society (ASCS), as the primary state body providing financial grants to CSOs, disbursed ALL 103.00 million in 2025²⁵, equivalent to approximately EUR 1,078,872. This represents a modest increase compared with 2024, when ASCS disbursed ALL 99.75 million, equivalent to approximately EUR 1.01 million, and confirms broadly stable public financial support through the main CSO grant agency.

The National Youth Agency disbursed ALL 90.00 million in grants to CSOs in 2025, equivalent to approximately EUR 942,704. This represents an increase compared with 2024, when the Agency disbursed ALL

²² [Contribution and challenges of Civil Society in Albania](#)

²³ [Reform-agenda-Albania.pdf](#)

²⁴ EC Albania 2025 Report; EC 2025 Rule of Law Report - Albania Chapter; BCSDN/Partners Albania, Monitoring Matrix Albania 2023.

²⁵ ASCS and Youth National Agency 2025 budget data; Bank of Albania exchange rate, May 2025.

62.34 million, equivalent to approximately EUR 631,610. Other budget lines supporting municipalities or youth infrastructure are not included here, as the indicator concerns public funds actually disbursed to CSOs.

State Agency	2023 (EUR)	2024 (EUR) ²⁶	2025 (EUR)
ASCS	EUR 975,000 ALL 96.20 million	EUR 1,010.000 ALL 99.75 million	EUR 1,078,872 ²⁷ ALL 103.00 million ²⁸
National Youth Agency	EUR 548,226 ALL 54.11 million	EUR 631,610 ALL 62.34 million	EUR 942,704 ALL 90.00 million

The available data allow an indicative comparison between selected public grant schemes and total planned public expenditure, but they do not allow a precise calculation of the percentage of the state budget disbursed specifically to CSOs across all public institutions.

Indicator 1.7.c – Extent to which legal provisions regulating the award of public funding to CSOs ensure that:

- ➔ funding criteria are clearly defined, objective and publicly announced
- ➔ evaluation of proposals is clear and impartial
- ➔ conflict of interest is clearly regulated
- ➔ reporting requirements are clear and proportionate

Year	Compliance
2025	4 – meets most standards
2024	4 – meets most standards
2023	4 – meets most standards
2021	3 – moderately meets standards

The ASCS maintained its established grant procedures in 2025, including open calls, publicly available criteria, selection procedures, conflict-of-interest provisions and contractual reporting requirements. Other public bodies continued to apply their own procedures, usually regulated through specific Council of Ministers decisions or institutional rules²⁹.

The main weakness remains the absence of a unified regulatory framework that requires all public bodies to apply the same standards, criteria, and procedures for CSO funding. Transparency and accountability, therefore, vary across institutions, and available public information still does not consistently allow assessment of project objectives, geographic distribution, results or follow-up. The ASCS continued to publish call and award information, but no 2025 initiative addressed the systemic framework gap. The score remains 4, as in 2024.

²⁶ Using the exchange rate 1 Euro = 98,7 ALL, referring to the exchange rate of the Bank of Albania on 1 May 2025.

²⁷ Bank of Albania, exchange rate: 1 EUR = 95.47 ALL (May 2026)

²⁸ ASCS Annual Report 2026, Page 30; <https://amshc.gov.al/wp-content/>

²⁹ ASCS 2025 call documentation; EC Albania 2025 Report; BCSDN/Partners Albania

Indicator 1.7.d – Central governments make the information on awards publicly available and sufficiently detailed to identify individual awards.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	1 – does not meet standards
2021	1 – does not meet standards

On the websites of most public institutions, lists of awarded CSOs continued to be published in 2025, containing information on three elements: (1) the name of the receiving CSO, (2) the size of the award, and (3) the project title. This represents an improvement compared with 2023 and earlier, when even this basic information was not consistently published. The ASCS and other relevant agencies maintained this practice, and information was available online within a reasonable time after grant contracts were signed³⁰.

Four elements that would constitute sufficiently detailed disclosure remained absent from most publications in 2025: (4) project description and objectives, (5) thematic area of the project, (6) geographical area of implementation or expenditure, and (7) duration of the grant.

The absence of these elements means it is not possible for the public, other CSOs, or independent monitors to assess whether awards are consistent with stated policy priorities, equitably distributed geographically, or aligned with thematic calls. The Albanian Helsinki Committee confirmed that this lack of detailed information remains a significant obstacle to stronger accountability in the overall public funding process for CSOs. No new legislative or policy measure introducing enhanced disclosure requirements was identified in 2025. The indicator remains at 2, reflecting an improvement over 2021-2023, but still significantly falling short of the expected transparency standards.

Indicator 1.7.e – Proportion of CSOs indicating that the provision of domestic public funds is transparent, fair and non-discriminatory.

Year	Compliance
2025	2 – minimally meets standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	2 – minimally meets standards

The 2025 general CSO survey confirms a predominantly negative perception of domestic public funding. While no respondent assessed public funding as very transparent and fair, 23% assessed it as sufficiently

³⁰ ASCS 2025 award information; EC Albania 2025 Report; BCSDN/Partners Albania

transparent and fair, while 77% assessed it as insufficiently transparent/fair or not transparent/fair at all. These are higher than previous years: 14% rated public funding as transparent and fair in 2024 and 21% in 2021.

Regarding applications, 32.1% of respondents did not apply for public funding, 37.7% applied but were unsuccessful, and 30.2% were successful. Among unsuccessful applicants, 70% believed that authorities funded their preferred organisations.

Specialised CSO Survey respondents were divided on public funding transparency: three of six (50%) assessed it as sufficiently transparent, while three (50%) described it as not transparent at all. On fairness, three rated it as sufficiently fair, while two found it not fair at all and one found it insufficiently fair.

Public institutions assessed their own procedures more positively: 88% of responding institutions described information on awards as fully or sufficiently public, and 80% said award criteria were publicly available, a finding confirmed by the desk review data. Ministries and state Agencies publish their funding calls, rules, procedures, and lists of awards on their public official websites. The divergence between CSO and institutional perceptions confirms that the main weakness lies not only in the existence of procedures but also in trust, transparency, and perceived fairness in their implementation.

Indicator 1.7.f – Public funding does not exclude CSOs on the basis of constituency representation

On the indicator's core question of constituency-based discrimination, only one respondent among the 20 unsuccessful applicants (5%) attributed rejection to the view that authorities do not fund work with the people they serve and represent. In 2025, 68% of responding CSOs reported applying for public funding, a higher share than in previous assessment years. Among those that applied, 44% reported being successful and 56% were not successful. This indicates an improvement over 2024, when 40% applied and only 15% of applicants reported success.

A thematic breakdown of survey responses on public funding applications reveals a notable concentration pattern. Among CSOs that secured public funding, the highest concentrations were in human rights (50%), youth and youth rights (44%), and social inclusion, community building, environment and climate, public participation, and socio-economic development (all 38%). Labour rights (0% win rate, 83.3% rejection), gender equality and LGBTIQ+ rights (0% win rate), and fight against poverty (0% win rate) organisations applied but failed to secure funding, a potential pattern of exclusion. A second, quieter form of exclusion is visible among organisations working on the rule of law (35% did not apply), transparency (43%) and the conducive environment for CSOs (46%), which frequently chose not to apply for public funds, with the dominant reason given being “no realistic chance of winning”. By contrast, anti-corruption (60% success rate among applicants) and public participation (54.5%) organisations reported high rates of acceptance. With due attention to the fact that the survey was not representative, these potential exclusion areas deserve further analysis and monitoring.

However, the result should be interpreted with caution due to potential differences in sample size and respondent profiles. Compared with 2024, when 40% applied and only 15% of applicants reported success, the 2025 figures suggest a higher application rate and a higher success rate, though these should be interpreted with caution given differences in sample composition across years. It does not, by itself, indicate a structural improvement in the public funding framework, which remains fragmented, insufficiently predictable and perceived by many CSOs as politically sensitive.

Year	% CSOs that did not apply for public funding	% CSOs that applied for public funding	% applicants that were not successful	% applicants that were successful
2025	32%	68%	56%	44%
2024	59%	40%	82%	15%
2023	47%	51%	76%	22%
2021	48%	50%	77%	19%

SO 1.8 | Individuals and corporations enjoy tax benefits for their donations to CSOs.

Indicator 1.8.a – Tax legislation allows for tax relief as regards:

- ➔ Individual giving
- ➔ Corporate giving

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

The tax framework for individual and corporate giving to CSOs remained unchanged in 2025. Under Albanian income tax law, donations made by private individuals to CSOs are not recognised as tax-deductible expenses for income tax purposes. Individual philanthropic activity, therefore, receives no fiscal incentive, which the Albanian Helsinki Committee has consistently highlighted as an impediment to the development of a culture of giving. No legislative initiative in 2025 proposed to introduce individual donation tax deductibility.

For corporate giving, Law No. 29/2023 “On Income Tax”³¹ maintains marginal deductibility limits: up to 5% of profit before tax for press publishers and publications of literary, scientific and encyclopaedic works, as well as for cultural or artistic activities; up to 5% of profit before tax for sports activities, subject to specific conditions; and up to 3% of profit before tax for sponsorship of any other activities. Amounts exceeding these limits are non-deductible. These limits provide only minimal incentive for corporate philanthropy, as consistently noted by the Albanian Helsinki Committee in its assessments of domestic resource mobilisation for civil society. No changes to these limits were adopted or proposed in 2025. Albania thus continues to lack meaningful individual donation tax incentives and to provide only marginal corporate giving incentives, representing a structural constraint on domestic resource mobilisation for civil society across all assessment cycles.

³¹ Law No. 29/2023 On Income Tax; BCSDN/Partners Albania, Monitoring Matrix Albania 2023; EC Albania 2025 Report.

Indicator 1.8.b – Proportion of private individuals who have given money to a CSO.

No directly comparable 2025 population-level figure on private individuals donating money to a CSO was available at the time of assessment. The 2025 CSO survey includes information on whether organisations receive individual donations, but this cannot serve as a substitute for a population-level indicator. The latest comparable reference, therefore, remains the 2024 CAF World Giving Index figure, and no 2025 trend assessment is made for this indicator.

Year	% of individuals donating to a CSO	Source
2025	Not available	CAF World Giving Report 2025 does not provide a directly comparable country figure in the report table
2024	39%	CAF World Giving Index ³² 2024
2023	25%	CAF World Giving Index 2023
2021	31%	CAF World Giving Index 2021

SO 1.9 | Tax benefits are available to CSOs.**Indicator 1.9.a** – Extent to which applicable tax laws provide for the following:

- ➔ CSO income generated from grants, donations, and membership dues, income from economic activities, investment income, real property, gifts and inheritance is not subject to taxation;
- ➔ Any excess revenue or profit generated through economic activity and used for mission-related purposes by CSOs is not subject to corporate income/profit tax.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

Law No. 29/2023 “On Income Tax”³³, as amended, continued to exempt CSOs from income tax on grants, donations, membership fees, gifts and inheritance not used for the benefit of founders or members. The favourable VAT treatment for donor-funded projects remained in force in 2025. However, under the procedure administered by State Agency for Strategic Programming and Aid Coordination (SASPAC) and the General Directorate of Taxation, the exemption applies to foreign-funded projects where tax exemption is foreseen in the relevant agreement and where the project is registered with

³² CAF World Giving Index 2024. https://www.cafonline.org/docs/default-source/inside-giving/wgi/wgi_2024_report.pdf

³³ Law No. 29/2023; Law No. 79/2025; Instruction No. 27/2023 on VAT; Partners Albania letters on VAT exemption; EC 2025 Rule of Law Report - Albania Chapter; NRC Albania FAQ 2025.

SASPAC before implementation³⁴. Following verification, SASPAC issues a project registration certificate, on the basis of which the General Directorate of Taxation issues the VAT exemption certificate. This certificate serves as the operational basis for applying the 0% VAT treatment to domestic supplies and imports of goods within the project. Law No. 29/2023 “On Income Tax” is not the legal basis for this treatment, as VAT is regulated separately under Albania’s VAT framework.

The 0% VAT rate for goods and services used in projects funded by foreign donors or grants remained in force, replacing the previous end-of-project reimbursement procedure. CSOs engaged in general-interest economic activities may benefit from VAT exemptions where the statutory criteria are met.

Interviews with key stakeholders, as well as the desk-review evidence, confirm a significant and long-awaited improvement in 2025 in the VAT treatment of EU IPA III and other international donor-funded projects, a development Partners Albania has characterised as a major milestone in the fiscal framework for civil society following years of sector advocacy. Stakeholders also reported somewhat better reimbursement practices under earlier funding arrangements. This is a major accomplishment for the CSO sector, as it allows them to reclaim VAT, which, especially during a difficult time with donors retracting, is very meaningful for all CSOs.

However, implementation of Instruction No. 27/2023 on VAT remained administratively demanding and uneven in practice. CSOs remain liable to profit tax on income from economic activities on the same basis as commercial entities unless the general-interest exemption applies. The indicator, therefore, remains at 3: the legal exemption framework exists, but practical implementation gaps persist.

SO 1.10 | The policies and legal environment provide incentives and facilitate volunteering for and employment in CSOs.

Indicator 1.10.a – Laws regulating volunteering are adopted.

Year	Compliance
2025	3 – moderately meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

Limited legislative development was recorded in 2025 in the field of volunteering. The newly proposed law on volunteering, Law 94/2025 On Volunteering³⁵, was adopted in June 2025 and published in the Official Gazette in December 2025, also repealing the prior Law No. 45/2016 “On Volunteering”. The amendment introduced two relevant improvements: the recognition of volunteering as work experience in recruitment procedures and provisions for state compensation for insurance contributions paid by volunteer providers. These changes address two longstanding concerns raised in previous assessment cycles and justify a moderate improvement compared with 2024.

³⁴ <https://saspac.gov.al/procedura-e-perjashtimit-nga-tvsh/>

³⁵ <https://qgbz.gov.al/eli/ligj/2025/12/18/94>

However, the law did not amount to a comprehensive reform of the volunteering framework. The main structural problems identified in the 2024 assessment remain only partly addressed, including the practical burden of volunteer registration, unresolved implementation arrangements, unclear institutional responsibilities, and the law's limited capacity to support volunteering as a civic activity in practice. Throughout the final stage of the parliamentary process, a coalition of civil society organisations, facilitated by the National Resource Centre (Partners Albania) and Beyond Barriers Association (BBA), which has advocated for improvements to the legal framework for volunteering for several years, continued to actively pursue these issues. The coalition advocated for a parliamentary hearing and engaged in a series of discussions with the relevant parliamentary committees and public institutions, submitting additional recommendations for consideration. While these efforts contributed to further dialogue during the parliamentary process, the recommendations were ultimately not reflected in the adopted law. Further secondary legislation and effective implementation measures will be necessary before the new provisions can achieve their intended impact. The broader revision process initiated in 2022, including consultations on a more comprehensive draft law, had not resulted in a fully reformed and operational framework by the end of 2025. Implementing mechanisms linked to volunteer registration and recognition also remain weak or insufficiently operationalised.

The score is therefore upgraded from 2 in 2024 to 3 in 2025 to reflect the legal development. The new law initiative represents a concrete legal improvement, but the overall framework continues to meet standards only moderately, as volunteering remains difficult to implement in practice and is not yet supported by a comprehensive, enabling legal and institutional framework.

Indicator 1.10.b – Government volunteering strategies and programmes support volunteering for CSOs and have sufficient resources allocated for implementation.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

There is no national volunteering strategy or government volunteering programme with dedicated resources in Albania³⁶. This situation was unchanged in 2025. The EC 2025 Rule of Law Report confirmed the absence of such a programme, and no government announcement of a new volunteering strategy or dedicated funding programme was identified during the assessment. The ILO/ILOSTAT³⁷ Albania country profile on volunteering likewise notes that there is no mention of volunteering in development plans, policies, or strategies. The indicator continues not to meet standards across all four assessment

³⁶ EC 2025 Rule of Law Report - Albania Chapter; EC Albania 2025 Report;

³⁷ <https://knowledge.unv.org/country/albania#:~:text=Paragraphs%20that%20mention%20the%20integration,policies%20and%20strategies%20No%20mention>

cycles (2021, 2023, 2024, 2025), making this one of the most persistent gaps in Albania's enabling environment framework.

Indicator 1.10.c – Proportion of CSOs that benefit from state employment strategies and programmes. The 2025 general CSO survey indicates that 6% of responding CSOs benefited from government employment programmes, compared with 12% in 2024, 11% in 2023 and 6% in 2021. A further 11.5% stated that no such programme exists, while 82.7% did not benefit. The result suggests that access to state employment programmes remains marginal for CSOs and may have declined compared with the previous assessment cycle.

	% CSOs saying they benefit from state employment strategies and programmes
2025	6%
2024	12%
2023	11%
2021	6%

Indicator 1.10.d – Proportion of CSOs that benefit from state volunteering strategies and programmes.

No national volunteering strategy or dedicated government volunteering programme with allocated resources was in force in 2025. The indicator therefore records 0% / not applicable for 2025. The 2025 amendment to the volunteering law was a positive legislative step, but it did not amount to a funded state programme supporting volunteering for CSOs.

The 2025 general CSO survey confirms that no responding CSO benefited from a government volunteering programme. This is consistent with the desk-review finding that Albania has no national volunteering strategy or dedicated government volunteering programme with resources allocated for implementation.

Indicator 1.10.e – Proportion of employees in CSOs in relation to the total workforce.

No official labour-force data disaggregating CSO employment as a proportion of Albania's total workforce were identified for 2025. Available labour-market statistics do not provide a separate category that would allow employment in CSOs to be calculated as a share of the national workforce. The general CSO survey provides self-reported information on whether responding organisations employ staff, but it cannot be used to estimate the sector's total employment or its proportion of the overall labour force. The indicator therefore cannot be quantitatively updated for 2025.

Indicator 1.10.f – Percentage of people who have volunteered to give their time to an organisation.

No directly comparable 2025 population-level figure on people volunteering their time to an organisation was available at the time of assessment. The CSO survey confirms that organisations continue to work with volunteers, but it does not measure volunteering at the population level and cannot replace the indicator source used in previous cycles. The 2025 value, therefore, remains unavailable.

	% population who have volunteered their time to an organisation
2025	Not available
2024	11% ³⁸
2023	8%
2021	11%

Specific Objective 2: Strengthened cooperation and partnership between CSOs and public institutions.

SO 2.1 | Public authorities and institutions include CSOs in decision and policy-making processes.

Indicator 2.1.a – Laws, by-laws, strategies, other acts of public interest and policy reforms are effectively consulted with CSOs in that:

- CSOs have access to the draft document from the beginning of the drafting process to the end of the adoption procedure;
- At least 15 days are allowed for commenting before the draft document enters the adoption procedure;
- The use of extraordinary/expedited procedures to adopt legislation without allowing for consultation is an exception and duly justified;
- Reports on results of public consultations, including reasons for rejection of comments, are published in a timely fashion;
- Working groups members from CSOs are selected based on a public call, clear criteria and in line with equal treatment;
- Working group members from CSOs include representatives of society as a whole, including women's groups, LGBTIQ groups, migrant groups, minorities, disability groups, and others as appropriate, in line with the Human Rights Based Approach.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

The primary legal basis for public consultation in Albania is Law No. 146/2014 “On Notification and Public Consultations”. The central e-consultation portal, [konsultimipublik.gov.al](https://www.konsultimipublik.gov.al), remained operational in 2025. According to the Government’s Annual Performance Report³⁹, 96 documents were published for consultation during the year. Within the narrower group of 45 completed and monitored consultations on draft laws, strategies and policy documents, 44 were published through the electronic register and all 45 reportedly remained open for at least 20 working days.

The 2025 CSO survey nevertheless reveals a substantial gap between formal compliance and consultation quality. Although 68% of CSOs participated in at least one consultation, only 4% reported a process that provided both access to the draft from the outset and at least 15 days to comment. For central-government consultations, 44% reported having at least 15 days to comment and 14% reported early access to drafts. The corresponding figures were 34% and 10% at Parliament and 22% and 12% at the municipal level. Only 7% of national-government consultations, or two of 27, met both criteria, compared with 5%

³⁹ https://www.konsultimipublik.gov.al/documents/reports/Raporti%20Vjetor%20i%20Performances%20per%20Konsultimet%20Publik%202025_Qendra%20e%20Qeverisjes.pdf

at Parliament, or one of 21, 6% at the municipal level and 5% for civil-society cooperation strategies and EU accession processes.

Parliament adopted 91 laws in 2025. Its official statistics record two laws adopted under accelerated procedure, representing approximately 2.2% of all laws adopted. Accelerated procedure was therefore quantitatively exceptional. However, the aggregate parliamentary information does not provide case-specific reasons for its use or demonstrate whether opportunities for public consultation were retained. The requirement that accelerated procedures be duly justified therefore cannot be fully verified.

The Government reported that consultation-result reports were published for all 45 completed and monitored consultations. It also recorded 2,228 participating stakeholders and 1,131 comments or reactions, of which 67.72% were accepted fully or partially. A manual review undertaken for this assessment identified visible comments from 12 CSOs on nine of the 96 portal publications. Eight of these processes had a consultation or feedback report available, while one remained ongoing. This is a portal-only minimum because it does not capture participation through meetings, working groups, email or other channels. While the evidence demonstrates strong formal publication of consultation reports, it does not establish that every report was timely or contained clear reasons for every rejected comment. Survey and interview evidence continues to indicate weak feedback from the perspective of CSOs.

CSO participation in working groups remained limited and largely ad hoc. In the general CSO survey, 8.6% participated in a government working group, 8.6% in a parliamentary working group and 12.9% in a municipal working group; overall, 22.9% participated in at least one type of working group. Two of six specialists described CSO inclusion as occasional and four as rare. Among public institutions responding to the relevant question, 12 of 24 reported using ad hoc working groups and six of 24 permanent working groups. The assessment did not identify systematic evidence that CSO representatives were selected through public calls, clear criteria and equal-treatment procedures.

Participation also remained uneven. Organisations working on gender equality, LGBTIQ+ rights and the enabling environment were among the most active, while disability-rights, humanitarian-aid and rural-development organisations reported lower engagement. Tirana-based, larger and older organisations were more likely to participate. Public institutions assessed engagement more positively: 20 of 29 reported using public consultation and 16 of 29 reported consulting CSOs in law- or policy-making. Overall, the score remains at 3 – moderately meets standards, reflecting a functioning legal and administrative framework but persistent weaknesses in early access to drafts, substantive feedback, transparent working-group selection, inclusive representation and the influence of CSO input.

Since the survey methodology changed in 2025, the resulting figures cannot be directly compared with previous years. The score remains at 3 - moderately meets standards, reflecting the existence of a legal consultation framework and some CSO participation in consultation and working groups, but also persistent weaknesses in early access to drafts, adequate feedback on consultation results, inclusive representation, and the practical influence of CSO input on final decisions.

	% CSOs saying they were effectively consulted by authorities
2025	68% (4% when both criteria are fully met)
2024	32%
2023	34%
2021	31%

Indicator 2.1.b – CSOs are effectively included in oversight mechanisms.

This indicator was not assessed.

Indicator 2.1.c – Proportion of CSOs that have participated in consultations during the preparation of state reports under international human rights and other legal obligations, and the implementation of treaty body recommendations.

This indicator was not assessed.

SO 2.2 | Public authorities and institutions acknowledge the importance of civil society in societal policy debate and EU integration processes.

Indicator 2.2.a – Extent to which CSOs assess the attitude of public officials towards civil society as supportive.

Year	Compliance
2025	1 – does not meet standards
2024	3 – moderately meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

The score is downgraded from 3 (2024) to 1 (2025). The 2025 general CSO survey shows a sharp decline in perceived support: only 14% of responding CSOs described the attitude of public institutions as very or mostly supportive, while 32% described it as mostly negative or hostile and a further 54% as neutral. Comparisons with previous years should be interpreted carefully, as the indicator measured attitudes of public institutions towards CSOs in 2025, whereas earlier assessments focused on public officials' attitudes. In addition, in previous years the 'neutral' option was not offered to respondents, and its addition in the 2025 survey appears to have changed the shares of CSOs describing the approach of public institutions as supportive or not supportive.

Public institutions assessed their own attitude more positively: 77% of responding institutions rated it as very or sufficiently supportive, compared with only 14% of surveyed CSOs. Specialised CSO Survey respondents corroborate the CSO perspective: 5 of 6 (83%) described public institutions as insufficiently or not at all supportive. Desk review and interviews with key stakeholders explain this divergence: respondents pointed to a more negative public climate, delegitimising narratives and pressure exerted

on watchdog, accountability-oriented, gender equality, LGBTIQ+, and media-related organisations⁴⁰. The decline is therefore not only a perception shift but is supported by qualitative evidence of a less enabling climate for independent civil society voices.

	% CSOs that assess the attitude of public institutions as supportive	% CSOs that assess the attitude of public institutions as not supportive
2025	14%	32% (+54% neutral)
2024	41%	52%
2023	38%	57%
2021	34%	55%

SO 2.3 | Public authorities contribute to civil society strengthening by cooperating with civil society through strategic policy frameworks and relevant institutional mechanisms.

Indicator 2.3.a – Proportion of CSOs that were effectively consulted in the preparation of civil society cooperation strategies.

There is no formal civil society cooperation strategy in force, and no formal consultation process for a new one was publicly initiated in 2025. Line Ministries have mechanisms for CSO cooperation, and some consultation tables and PPIE-related processes do provide structured interaction between government and civil society at the sector level; however, these remain fragmented and do not constitute a coherent national-level cooperation framework as envisaged by this indicator. The strategic framework expired in 2023, with a new one still pending. No action was taken following the submission of the Road Map evaluation to MHSP in June 2024.

The 2025 CSO survey confirms the absence of a meaningful consultation process for a new civil society cooperation strategy. Although 40% of respondents reported some involvement in processes described as civil society cooperation strategies, only 12% reported access to draft documents from the beginning of the process, and 60% selected N/A.

The public institutions survey also shows uncertainty: 62.5% of responding institutions did not know whether a process to develop a new strategy had taken place. This supports the desk review finding that no formal, visible, and inclusive process for a successor strategy was effectively implemented in 2025.

⁴⁰ Transparency International EU, 2025 Rule of Law Brief: Albania; European Civic Forum, Civic Space Report 2025; BCSDN 2025; SCiDEV, Fact Forward; CIVICUS Monitor Albania; EC Albania 2025 Report.

Indicator 2.3.b – IPA beneficiaries have adopted currently valid civil society cooperation strategies.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	5 – fully meets standards
2021	5 – fully meets standards

Albania had no valid civil society cooperation strategy in force in 2025. The Road Map for Government Policy towards a More Enabling Environment for Civil Society Development 2019-2023 expired at the end of 2023. The evaluation of this Road Map was commissioned by the MHSP, conducted with support from EU TACSO 3, and submitted to the Ministry in June 2024. Despite the evaluation report providing detailed recommendations for the next Road Map, including priorities, methods, and institutional arrangements, the MHSP took no further steps to initiate development of a successor strategy.

Both the EC Albania 2025 Report and the EC 2025 Rule of Law Report⁴¹ confirmed the absence of a valid strategy. Transparency International EU specifically identified this gap in its 2025 Rule of Law Brief⁴², noting that “the main governmental strategic document designed to support civil society expired in 2023, with a new strategic framework still pending” as part of its broader concerns about civic space under pressure. This represents the largest single-indicator change in the assessment, from 5 (2023) to 1 (2024 - 2025), reflecting the expiry of the Road Map and the absence of any steps to adopt a successor strategy. The indicator continues not to meet standards.

Indicator 2.3.c – Civil society cooperation strategies are accompanied by adopted budgeted action plans.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

No civil society cooperation strategy is in force; therefore, no accompanying action plan exists. Even during the Road Map 2019-2023 period,⁴³ no annual action plans with budgeted allocations were adopted. This indicator has not met standards across all four assessment cycles.

Indicator 2.3.d – Proportion of CSOs that rate civil society cooperation strategies as relevant and effective.

No valid civil society cooperation strategy was in force in 2025; therefore, the standard relevance and effectiveness rating is not applicable.

⁴¹ EC Albania 2025 Report; EC 2025 Rule of Law Report - Albania Chapter; Road Map evaluation submitted to MHSP, June 2024.

⁴² <https://transparency.eu/2025-rule-of-law-brief-albania/>

⁴³ EC Albania 2025 Report.

Indicator 2.3.e – Public structures responsible for the implementation of civil society cooperation strategies are appropriately resourced.

No valid civil society cooperation strategy was in force in 2025, and no accompanying budgeted action plan existed.

Indicator 2.3.f – Mechanisms for dialogue between civil society cooperation councils and central governments meaningfully include CSOs in that:

- ➔ they have an agreed programme of work
- ➔ they have agreed rules of procedure
- ➔ they meet regularly
- ➔ rules allow CSOs to call the meetings and contribute to agenda setting
- ➔ there is adequate follow-up to conclusions and recommendations

Year	Compliance
2025	2 – minimally meets standards
2024	3 – moderately meets standards
2023	4 – meets most standards
2021	4 – meets most standards

The National Council for Civil Society (NCCS)⁴⁴ continued to exist formally in 2025 and had at least one publicly documented meeting, as the official NCCS website lists minutes for a meeting held in April 2025. The same website lists three meetings in 2024 and one further meeting in January 2026, indicating that the Council remains formally active and that meeting documentation is publicly available. However, the evidence does not show that the Council served as a meaningful or regular mechanism for dialogue in 2025. Only one 2025 meeting is listed on the official website, and there is no clear evidence of an agreed annual programme of work, systematic follow-up to conclusions, or visible influence on the civil society cooperation framework. Beyond the number of meetings, the NCCS has not demonstrated a strategic role in shaping policy developments affecting civil society: in particular, it has not influenced the preparation of a successor civil society cooperation strategy, nor has it provided a platform for structured CSO input into the key policy gaps identified in this assessment.

Interviews with key stakeholders also provide evidence that the Council does not currently provide an effective dialogue function, while the Agency for the Support of Civil Society, which serves as the secretariat of NCCS, remains limited mainly to grant administration rather than broader coordination or support. The absence of a valid civil society cooperation strategy further weakens the programmatic basis for the Council's work. The score is therefore assessed at 2, reflecting a formally active mechanism with published minutes, but limited regularity, follow-up, visibility and practical influence in 2025.

⁴⁴ <https://kkshc.gov.al/mbledhjet-e-keshillit-procesverbale/>

Specific Objective 3: CSOs' capacities and resilience in carrying out their activities are strengthened.

SO 3.1 | CSOs' internal governance structures follow the principles of good governance.

Indicator 3.1.a – Proportion of CSOs that have an independent and effective governing body, with clear terms of reference to oversee the organisation's strategic goals, impact, management, legal compliance, and accountability.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	4 – meets most standards
2021	3 – moderately meets standards

This indicator was assessed differently in 2025. In previous years, the relevant survey question treated an “effective governing body” as one appointed by the assembly. This was a relatively narrow interpretation, as it did not fully account for unregistered or smaller organisations, or for organisations that use different internal methods to select, appoint or decide on their governing bodies. In 2025, the question was reformulated to ask whether the organisation has a governing body, such as an assembly, board or council, responsible for oversight, legal compliance and accountability.

The 2025 general CSO survey shows that formal governance structures are widespread among the organisations that responded. Of the 50 CSOs that answered the question, 49 reported having a governing body, representing 98% of respondents. All 50 respondents reported having a governing document, such as a statute, articles of association or memorandum of understanding. Taking the full survey sample of 70 organisations as the denominator, 49 organisations had both a governing body and a governing document, corresponding to 70%. For comparability with previous cycles, the full survey sample is used as the denominator for this indicator, in deviation from the general valid-response rule described in the methodology. This indicates broad formal compliance with the requirement to have governance structures in place.

However, the available evidence does not assess the actual effectiveness, independence or regular functioning of these bodies in practice, including whether they meet regularly, provide strategic oversight, ensure accountability or exercise independent control over management. For this reason, the compliance score remains unchanged at 3, reflecting broad formal compliance but insufficient evidence of consistently effective governance practice across the sector.

	% CSOs saying they have an independent and effective governing body (respondents with both a governance board and a governance document)
2025	70%
2024	59%
2023	61%
2021	56%

Indicator 3.1.b – Proportion of CSOs that regularly check potential conflicts of interest with regard to the political, economic and personal relationships of their governing body.

Year	Compliance
2025	3 – moderately meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	1 – does not meet standards

This indicator was assessed differently in 2025. In previous years, the relevant CSO survey question asked how often governing body members signed conflict-of-interest declarations. This was a relatively narrow interpretation of the indicator standard, as it could exclude unregistered CSOs and organisations that use other internal mechanisms to identify and manage potential conflicts of interest. In 2025, the question was reformulated to ask more broadly how often organisations check for potential conflicts of interest concerning the political, economic and personal relationships of governing body members.

Among responding CSOs, 66% reported checking for potential conflicts of interest every year or more frequently, while a further 8% did so every two years. This means that 74% conduct regular checks. 16% reported checking only once, upon entry into the governing role, and 4% only in the context of project grants. Only 4% stated that they never conduct such checks, while Compared with 2024, when 29% of respondents reported requiring annual conflict-of-interest declarations, the 2025 results suggest an improvement in internal accountability practices, though the indicator was interpreted more broadly this year.

Taking into account the change in methodology and the broader interpretation of the indicator, the compliance score is raised to 3, as a clear majority of respondents report regular conflict-of-interest checks, although the practice is not yet universal.

Indicator 3.1.c – Proportion of CSOs that share relevant information on their organisation, using the means and channels that are accessible to all stakeholders in terms of publishing.

Year	Compliance
2025	2 – minimally meets standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	2 – minimally meets standards

The 2025 general CSO survey included a broader question on how CSOs publish or share organisational information, including governance documents, governing body structure, names of governing body members, annual reports, financial statements, funding information, strategies and organisational policies. When combining the three governance transparency elements, governance document, governing body structure and names of governing body members and limiting to the two means of open public access (website and social media), 29% of responding CSOs made their governance information publicly accessible in 2025. 27% of these were via websites and 2% via social media. Sharing this information on the website was 16% in 2024, 13% in 2023 and 22% in 2021. The 2025 results suggest some improvement in transparency practices, but not consistent public accessibility. For example, 50% of responding CSOs reported publishing information on their governing structure on their website, 52.3% published the names of governing body members on their website.

However, a significant share still relies on hard-copy sharing with members, donors or partners, rather than public channels accessible to all stakeholders. Related SO3.3 findings also show that proactive publication of annual reports, financial statements and funding information remains uneven. The score is therefore assessed at 2: transparency practices exist and appear stronger than in 2024, but relevant organisational information is still not consistently published through accessible public channels.

Indicator 3.1.d – Proportion of CSOs that have an organisational gender equality policy.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

The 2025 general CSO survey indicates that 52% of responding CSOs had an organisational gender equality policy in effect. This is broadly consistent with previous cycles, where the share stood at 50% in 2024, 45% in 2023 and 56% in 2021. The score remains at 3 because slightly more than half of the surveyed organisations report having such a policy, but adoption is still far from sector-wide.

Indicator 3.1.e – Proportion of CSOs that have an organisational strategy, including vision, mission and goals.

Year	Compliance
2025	4 – meets most standards
2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

The 2025 general CSO survey indicates that 88% of respondents had an organisational strategy, strategic plan, or similar document. This is considerably higher than previous years: 73% in 2024, 64% in 2023 and 65% in 2021. This confirms that strategic planning is becoming increasingly widespread among surveyed organisations and supports maintaining the score at 4. The result is self-reported and should be interpreted with some caution, as the survey does not assess the quality, implementation or updating of those strategies.

SO 3.2 | CSOs are able to communicate the results of their activities to the public.

Indicator 3.2.a – Proportion of CSOs that have at least one online channel of communication.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The 2025 general CSO survey confirms that CSOs widely use online communication channels. Facebook was used regularly by 97.7% of respondents, Instagram by 84.1%, websites by 77.3%, and LinkedIn by 68.2%. Compared with previous years, a larger share of organisations has started actively using LinkedIn as a communication channel. Since at least one major online channel was used by nearly all respondents, the indicator remains fully met. The finding also confirms that CSOs continue to rely strongly on digital communication despite broader concerns about digital civic space.

Indicator 3.2.b – Proportion of CSOs that have specialised communication staff.

This indicator was not assessed.

Indicator 3.2.c – Proportion of CSOs that cooperate with the media.

The 2025 general CSO survey indicates some recovery in CSO-media cooperation: 41% of responding CSOs reported partnerships with media. This result exceeds 2024 (23%), 2023 (31%), and the baseline year 2021 (37%).

In previous years, the question related to this indicator asked only about partnerships with the media. This year however, in addition to partnership, CSOs were also asked if they consulted with the media or not. 39% of responding CSOs stated that they consulted the media in 2025. Interview evidence confirms that cooperation has improved among some media-related organisations and on journalist safety, but remains fragile, uneven, and dependent on personal/professional relationships, especially outside Tirana.

	% CSOs saying they cooperate with the media
2025	41%
2024	23%
2023	31%
2021	37%

SO 3.3 | CSOs are transparent about their programme activities and sources of funding.**Indicator 3.3.a** – Proportion of CSOs that publish their annual reports and financial statements.

Year	Compliance
2025	3 – moderately meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

In the 2025 CSO Survey, 41% of respondents reported publishing both their annual activity reports and financial statements on their website, representing a considerable increase compared with previous years (26% in 2024, 23% in 2023 and 25% in 2021).

Among responding CSOs, 63.6% reported publishing annual activity reports on their website, while 34.1% reported publishing financial statements on their website.

The findings suggest that activity reporting is more common than financial disclosure. While many CSOs make some organisational information available, the joint publication of both annual reports and financial statements, although showing a considerable increase, is still not a sector-wide practice. Taking this year's increase into consideration, the score is now raised to 3 - moderately meets standards.

Indicator 3.3.b – Proportion of CSOs that publish information on their sources of funding and amounts received in the previous year.

Year	Compliance
2025	3 – moderately meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

In the 2025 CSO survey, 59% of respondents reported publishing information on their sources of funding and amounts received on their website or in hard copy. This is considerably higher than previous years: 26% in 2024, 31% in 2023, 23% in 2021. Of these, 30% published the information on their websites, while the remainder reported publishing it either on the website or in hard-copy.

Among responding CSOs, 22% reported publishing both their sources of funding and the amounts received from each, meeting the full transparency standard for this indicator. Separately, 30% reported publishing sources of funding and 32% the amounts received. Despite the considerable increase, this transparency and accountability measure is still not a broadly implemented measure. However, due to the limitations of the survey, the findings should be treated as indicative rather than as a strict indicator value. The score is raised to 3, with due attention to be paid in upcoming cycles.

Indicator 3.3.c – Degree of public trust in CSOs.

No directly comparable 2025 population-level figure on public trust in CSOs was available from the standard source used in previous assessment cycles. Previous values for this indicator were based on the RCC Balkan Public Barometer⁴⁵, which provides population-level public opinion data, including confidence in institutions and organisations. The 2025 CSO and public institution surveys capture organisational and institutional perspectives, but they do not measure trust among the general public and therefore cannot replace the population-level source used in previous years. As the 2025 Balkan Barometer publication was not yet available at the time of assessment, no 2025 value can be reported for this indicator. The latest comparable value therefore remains the 2024 reference, and no 2025 trend assessment is made.

⁴⁵ <https://www.rcc.int/balkanbarometer/home>

SO 3.4 | CSOs monitor and evaluate the results and impact of their work.

Indicator 3.4.a – Proportion of CSOs that have carried out an evaluation of their work in the last year.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The 2025 general CSO survey indicates that 88% of responding CSOs carried out at least one type of evaluation in 2025, including project-level evaluation, evaluation of a strategy, evaluation of an internal process or another form of evaluation. Only 12% reported not having carried out any evaluation. This broadly confirms the high level recorded in previous cycles, with 83% reporting carrying out an evaluation in 2024, 81% in 2023, and 85% in 2021. The score remains at 5, while recognising that the survey measures whether an evaluation took place, not its depth, independence, or quality of evaluation practice.

SO 3.5 | CSOs use research and evidence to underpin their work.

Indicator 3.5.a – Proportion of CSOs whose work is based on evidence generated through research.

Year	Compliance
2025	4 – meets most standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The 2025 general CSO survey indicates that 80% of responding CSOs conducted at least one type of research to inform their work, while 20% reported not conducting any research. The most frequently reported methods were focus group discussions (63.6%), desk research (40.9%), field research (38.6%) and surveys with specific groups (29.5%). This confirms that the use of evidence remains widespread among surveyed organisations, although the quality and methodological robustness of the research are not assessed. The score is assessed at 4, as the share of CSOs reporting research-based work, while still high, no longer supports a finding that the standard is fully met; this change should also be read in light of the revised 2025 survey structure.

Indicator 3.5.b – Proportion of CSOs whose work is informed through consultation with people who have a stake in their current or future work.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

This year, the relevant question for this indicator was designed differently from previous years, with a view to obtaining a more detailed understanding of CSOs' engagement practices. In the 2025 survey, the question asked about engagement in two separate forms, consultation and partnership, whereas previous years covered consultation only.

The 2025 general CSO survey confirms that CSOs continue to inform their work through consultation and engagement with relevant stakeholders. The comparable value for this indicator is 86%, meaning that respondents consulted at least one of the following stakeholders: organisation's members, local communities and constituencies, national government, local government, public institutions, private sector, academic institutions. This is slightly lower than percentages of previous assessments: 91% in 2024, 93% in 2023 and 91% in 2021. An additional 7% of responding CSOs stated that they were engaged with them only in partnerships. When consultation and partnership practices are combined, nearly all (98%) of responding CSOs were engaged with people and groups who have a stake in their work. The score therefore remains 5 – fully meets standards.

Disaggregated 2025 results show that direct consultation was most frequently reported with local communities or constituencies and members, both at 59.1%, followed by public institutions at 52.3%, and national government authorities at 47.7%. Partnerships were most frequent with local governments or municipalities (52.3%).

In addition, this year's survey included a question on CSOs' engagement practices with other CSOs: 48% of responding CSOs reported consulting other CSOs, and 73% reported partnerships with other CSOs (see SO 3.6 for the breakdown by thematic field).

SO 3.6 | CSOs work in fair and respectful partnership to achieve shared goals.

Indicator 3.6.a – Proportion of CSOs taking part in local, central and international CSO networks.

The 2025 general CSO survey indicates that 96% of responding CSOs were members of at least one civil society network. National networks were the most common, reported by 70.5% of respondents, followed by international networks at 63.6% and local networks at 36.4%. This confirms that network participation remains very high and broadly stable compared with the already high 2024 baseline of 90%. The finding should be interpreted as indicative, as the 2025 survey sample may include more established and networked CSOs, but it nevertheless confirms that networking remains one of the stronger areas of CSO capacity in Albania.

	% CSOs taking part in local, central and international networks.
2025	96%
2024	90%
2023	86%
2021	76%

A further relevant finding on networking concerns partnership practices with other CSOs in the country: 73% of respondents to the 2025 CSO Survey reported partnerships with CSOs working in the same thematic field, while 50% stated that they acted in partnership with CSOs from other thematic fields.

Indicator 3.6.b – Proportion of CSOs engaged in cross-sectoral partnerships with academia, social partners and the private sector.

This year, the relevant question for this indicator was designed differently from previous years, with a view to obtaining a more detailed understanding of CSOs' engagement practices. In the 2025 survey, the question asked about engagement in two separate forms, consultation and partnership, whereas previous years covered consultation only. For this indicator, the data below provide statistics on partnership only.

The 2025 general CSO survey shows that 59% of responding CSOs engaged in at least one cross-sectoral partnership with academia, social partners or the private sector. Although this seems to be lower than previous years (68% in 2024, 72% in 2023, 77% in 2021), when the additional 23% CSOs reporting that they consulted with at least one of these stakeholders is also considered, overall, the findings are not much different; with due attention to the differences in question structure and respondent base. The strongest individual result was partnership with academic institutions, reported by 47.7% of respondents, followed by partnerships with private businesses at 29.5% and social partners at 9.1%. Evidence from stakeholder interviews suggests that relatively stronger cooperation with academia may be linked to CSOs' reliance on EU-funded programmes, such as Erasmus+ and CERV, in which cooperation with students, universities, and educational institutions is often encouraged or expected. The findings indicate that academia remains the most common cross-sectoral partner, while structured cooperation with social partners remains weak.

	% CSOs engaged in cross-sectoral partnerships
2025	59%
2024	68%
2023	72%
2021	77%

SO 3.7 | CSOs have a diversified funding base.

Indicator 3.7.a – Proportion of CSOs whose sources of donor income are diversified.

Year	Compliance
2025	4 – meets most standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	4 – meets most standards

Based on the CSO survey, 66% of the respondents had a diversified funding base. This is considerably higher than previous years (48% in 2024, 50% in 2023 and 63% in 2021). 9% of responding CSOs reported not having any donor funding, while 23% not having diversified funding (meaning that more than 50% of their annual income comes from only one donor).

Bilateral donors were the most frequently reported dominant source, with 31.8% of respondents stating that they provided more than half of the organisation's annual budget, followed by international CSOs at 20.5%, foreign private foundations at 13.6% and the European Commission at 11.4%. This suggests that diversification of donor funding is improving, but the risk of concentration on a single donor persists for a considerable share of CSOs.

CSOs reported mostly to receive funding from the EU (66%), followed by bilateral government donors (61%), international CSOs (50%), foreign private foundations (37%), national government (32%), domestic private foundations and local governments (both 20%).

Interview and country-brief evidence flag the risk of donor withdrawal and reduced bilateral support, increased competition, weakened staff retention, and significantly reduced operational capacity among smaller and regional CSOs, particularly in the governance, media freedom, and human rights fields.

As the percentage is 66% this year, the score is raised to 4 - meets most standards.

Indicator 3.7.b – Proportion of CSOs raising funds from sources other than donors (e.g. membership fees, corporate/individual giving and income-generating activities)

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	4 – meets most standards
2021	4 – meets most standards

The 2025 general CSO survey shows that non-donor income sources remain, but are limited in scale. In total, 57% of responding CSOs raised funds from at least one non-donor source in 2025 (selecting at least one of: private businesses, individual donations, income from own business or services, income from assets, membership fees or crowdfunding). This is higher than 2024 (50%), lower than 2023 (61%), and 2021 (69%). In addition, 5% of responding CSOs do not raise funds from any source, whether donors or other sources, while 39% receive donor funding but do not raise funds from other sources.

Among individual sources, individual donations were the most frequently reported at 32% (15% in 2024, 27% in 2023 and 22% in 2021), followed by private businesses at 23% (18% in 2024), own-business income at 21% (14% in 2024) and membership fees at 16% (25% in 2024). These figures confirm that non-donor income exists but remains fragmented and does not yet provide a stable alternative to project-based donor funding for most organisations.

The score remains at 3, reflecting moderate but still insufficient diversification beyond donor funding.

SO 3.8 | CSOs have effective, empowered and developed human resources.

Indicator 3.8.a – Proportion of CSOs that employ paid staff

The 2025 general CSO survey indicates that 94% of responding CSOs employ at least one paid staff member, compared with 85% in 2024, 88% in 2023 and 88% in 2021. This suggests a high level of formal staffing among survey respondents. However, the result should be interpreted cautiously, as the survey sample may over-represent more established organisations.

The data also reveal a notable geographic gap in staffing capacity. Among the 70 Albanian respondents, 41 are headquartered in Tirana, and 29 are based elsewhere. Tirana-based organisations report a median of 5 paid staff, compared with a median of 2.5 among organisations outside Tirana. None of the Tirana-based organisations reported having no paid staff, while 4 of 29 non-Tirana organisations, or 13.8%, operate entirely without paid employees. The largest Tirana-based organisation reported 80 paid staff, while the largest organisation outside the capital reported 30. These findings point to a significant geographic concentration of organisational capacity in Tirana, with CSOs outside the capital more likely to be volunteer-driven and smaller in structure.

Key stakeholder interviews confirm that staff retention remains a major challenge, especially outside Tirana, where organisations often depend on a small number of individuals and struggle to retain legal, policy and advocacy expertise.

	% CSOs that employ staff
2025	94%
2024	85%
2023	88%
2021	88%

Indicator 3.8.b – Proportion of CSOs that have organisational human resources policies.

Year	Compliance
2025	1 – does not meet standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

The 2025 general CSO survey provides new evidence on organisational policies relevant to human resources. Only 7% of responding CSOs reported having all the policies required for this indicator, compared with 4% in 2024 and 2% in 2021. This indicates a slight improvement, but the overall level of comprehensive HR policy coverage remains very low. Around one in ten respondents reported having none of the listed organisational policies.

Individual policy adoption is more common than comprehensive HR systems. The most frequently reported policies were performance appraisal policies (54.5%), diversity, equality and inclusion policies (52.3%), gender equality policies (52.3%) and recruitment policies (45.5%). Lower shares reported disciplinary complaints, bullying and harassment, redundancy and safeguarding policies. Evidence from stakeholder interviews also points to capacity gaps in fundraising, legal analysis and digital skills, particularly among smaller and local organisations.

The score therefore remains at 1, as only a very small share of CSOs have the full set of HR policies required by the indicator. While many organisations have adopted some relevant policies, comprehensive HR systems remain limited and uneven across the sector.

Indicator 3.8.c – Proportion of CSOs that have advertised publicly their staff and volunteering vacancies in the last year.

This indicator was not assessed.

Indicator 3.8.d – Proportion of CSOs that have organisational policies encouraging recruitment of a diverse workforce.

This indicator was not assessed.

Indicator 3.8.e – Proportion of CSOs whose staff and volunteers have attended a training course in the past year.

This indicator was not assessed.



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2	Civil Code of the Republic of Albania, Law No. 7850, dated 29 July 1994, as amended
3	Criminal Code of the Republic of Albania, Law No. 7895, dated 27 January 1995, as amended
4	Law No. 8788, dated 7 May 2001, “On Non-Profit Organisations”, as amended
5	Law No. 80/2021, dated 24 June 2021, “On the Registration of Non-Profit Organisations”, as amended, including by Law No. 90/2025
6	Law No. 146/2014, dated 30 October 2014, “On Notification and Public Consultation”
7	Law No. 94/2025, adopted in June 2025 and published in the Official Gazette on 18 December 2025, “On Volunteering”, repealing Law No. 45/2016
8	Law No. 12/2026, adopted on 28 January 2026, “On Lobbying in the Republic of Albania” (consulted in draft form during 2025)
9	Law No. 64/2025, dated 6 November 2025, “On Gender Equality”
10	Draft Law “On Class Action”, pending during 2025
11	Law No. 92/2014, dated 24 July 2014, “On Value Added Tax in the Republic of Albania”, as amended
12	Law No. 29/2023, dated 30 March 2023, “On Income Tax”, as amended
13	Law No. 9920, dated 19 May 2008, “On Tax Procedures in the Republic of Albania”, as amended, including by Law No. 79/2025, dated 11 December 2025
14	Law No. 9917, dated 19 May 2008, “On the Prevention of Money Laundering and Financing of Terrorism”, as amended
15	Instruction No. 16, dated 16 February 2009, “On the Prevention of Money Laundering and Combating the Financing of Terrorism in the Tax System”
16	Instruction No. 19, dated 9 July 2019, “On the Supervision of Non-Profit Organisations by the Tax Authorities for the Prevention of Money Laundering and Financing of Terrorism”
17	Instruction No. 27, dated 13 September 2023, amending Instruction No. 6, dated 30 January 2015, “On Value Added Tax in the Republic of Albania”
18	National Accounting Standard for Non-Profit Organisations and related implementation guidance
19	Decision of the Council of Ministers No. 151, dated 6 March 2025, “On Taking Temporary Measures to Avoid the Negative Effects of the Online Platform TikTok”
20	Decision of the Council of Ministers No. 62, dated 3 February 2026, “On the Removal of Temporary Measures for the Online Platform TikTok”, repealing Decision No. 151/2025
21	Decision of the Council of Ministers No. 859, dated 26 December 2024, approving the Intersectoral Anti-Corruption Strategy 2024–2030, its Action Plan 2024–2026 and the Performance Indicator Passport
22	Constitutional Court Decision No. 62, dated 20 November 2023, concerning Law No. 80/2021 on the registration of non-profit organisations
23	Constitutional Court Decision No. 31, dated 11 March 2026, concerning Decision of the Council of Ministers No. 151/2025 and restrictions on access to TikTok

❖ Comparative Scores Table per Indicator 2021-2025

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
		SO1 - Enabling Environment for CSOs																											
1.1.a	Extent to which relevant domestic legislation provides for freedoms of association, assembly and expression	3	3	4	4	4	2	1	3	3	4	4	4	2	1	3	3	4	4	4	2	1	3	4	4	4	4	3	1
1.2.a	Extent to which CSOs have access to an effective remedy to challenge or seek review of decisions affecting exercise of their rights	3	4	4	3	4	2	2	3	4	4	4	4	3	2	3	4	4	4	4	3	2	3	4	3	4	4	3	2
1.2.b	Extent to which CSOs are protected by law from threats, attacks, judicial harassment and discriminatory treatment	3	2	4	3	4	2	1	4	2	4	4	4	3	1	5	2	4	4	4	3	1	5	3	4	4	4	3	1

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.3.a	Extent to which laws to combat extremism, terrorism, money laundering and corruption do not unduly restrict legitimate activities of CSOs	4	3	4	4	4	3	1	4	3	4	5	4	3	1	4	2	4	5	4	3	1	4	2	4	5	4	3	1
1.4.a	Extent to which laws (1) do not require CSOs to submit more reports and information, and (2) do not submit CSOs to more inspections and sanctions, than business entities	5	5	5	5	5	3	1	5	4	5	5	5	4	1	5	4	5	5	5	4	1	5	5	5	5	5	4	1
1.5.a	Small community/local organisations and civic initiatives are allowed to operate by law without registering	5	4	5	5	5	5	2	5	4	5	5	5	5	2	5	4	5	5	5	5	2	5	4	5	5	5	5	2
1.5.b	In law, unregistered small community/local organisations and civic initiatives enjoy the same right to participation in decision making processes as registered CSOs	4	4	4	3	4	4	2	4	4	4	3	4	4	2	4	4	4	3	4	5	2	4	4	4	3	4	5	2

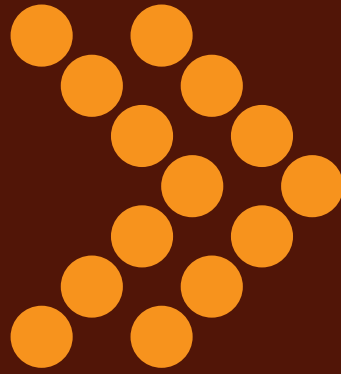
		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.6.a	Extent to which relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions	5	3	5	5	5	4	2	5	3	5	5	5	5	2	5	3	5	5	4	5	2	5	4	5	5	4	5	2
1.7.a	The level of public funding available for CSOs and associations is clearly articulated in laws and regulations, and the rights and duties of the state body invested with the ability to set and revise the level of public funding available is clearly defined in law	1	2	4	5	2	2	1	1	1	4	5	2	2	1	1	1	4	5	2	2	1	1	1	4	5	1	2	1
1.7.c	Extent to which legal provisions regulating the award of public funding to CSOs ensure that it is clear, impartial and well regulated	4	2	4	3	2	2	1	4	3	4	3	2	2	1	4	3	4	3	2	2	1	3	3	4	3	2	2	1
1.7.d	Central governments make the information on awards publicly available and sufficiently detailed to identify individual awards	2	2	4	5	2	2	2	2	2	4	5	2	3	2	1	2	4	5	2	2	2	1	2	4	5	2	2	2

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.7.e	Proportion of CSOs indicating that the provision of domestic public funds is transparent, fair, and non-discriminatory	2	1	3	2	2	1	1	1	2	2	1	1	1	1	1	1	2	1	1	1	1	2	1	1	1	1	1	1
1.8.a	Tax legislation allows for tax relief as regards individual and corporate giving	2	3	5	5	3	3	2	2	3	5	3	3	3	2	2	3	5	4	3	3	2	2	3	5	4	3	3	2
1.9.a	Extent to which applicable tax laws provide for appropriate tax benefits for CSOs	3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
1.10.a	Laws regulating volunteering are adopted	3	4	1	2	3	2	1	2	4	1	2	3	2	1	2	4	1	2	3	2	1	2	4	1	2	3	2	1
1.10.b	Government volunteering strategies and programmes support volunteering for CSOs and have sufficient resources allocated for implementation	1	1	2	3	3	3	1	1	1	2	1	3	3	1	1	3	2	1	3	3	1	1	3	2	1	3	2	1
SO 2 - Cooperation Between Government and CSOs																													
2.1.a	Laws, bylaws, strategies, other acts of public interest and policy reforms are effectively consulted with CSOs	3	2	3	3	2	2	1	3	2	3	4	2	2	1	3	2	3	4	2	1	1	3	2	3	4	2	2	1

		2025							2024							2023							2021							
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	
2.2.a	Extent to which CSOs assess the attitude of public officials towards civil society as supportive	1	1	2	3	1	1	1	3	1	2	1	1	1	2	2	2	2	1	2	1	2	2	1	2	1	1	1	1	
2.3.b	Currently valid civil society cooperation strategies are adopted	1	2	1	5	5	5	1	1	1	1	5	5	5	1	5	1	5	5	5	5	1	5	1	5	1	1	1	1	
2.3.c	Civil society cooperation strategies are accompanied by adopted budgeted action plans	1	2	1	5	4	4	1	1	1	1	5	3	1	1	1	1	5	5	3	5	1	1	1	5	1	1	1	1	
2.3.f	Mechanisms for dialogue between civil society cooperation councils and central governments meaningfully include CSOs:	2	1	1	3	5	2	1	3	4	1	1	1	3	1	4	4	3	1	1	4	2	4	4	3	3	5	1	2	
SO 3 - Capacity and Accountability of CSOs																														
3.1.a	Proportion of CSOs that have an independent and effective governing body with clear terms of reference	3	4	4	4	4	4	4	3	3	3	2	3	3	2	4	3	3	3	3	3	3	3	3	3	3	3	2	3	2
3.1.b	Proportion of CSOs that regularly check potential conflicts of interest with regard to the political, economic and personal relationships of their governing body	3	2	3	3	2	2	3	2	1	2	1	1	1	1	2	1	2	1	1	1	1	1	1	1	2	1	2	1	1

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
3.1.c	Proportion of CSOs that share relevant information on their organisation using means and channels that are accessible to all stakeholders	2	1	2	3	2	1	3	1	2	1	2	2	1	3	1	1	1	1	3	1	3	2	2	2	2	2	1	3
3.1.d	Proportion of CSOs that have an organisational gender equality policy	3	3	3	2	3	3	3	3	2	3	2	2	3	3	3	2	3	2	2	2	3	3	2	3	2	2	3	3
3.1.e	Proportion of CSOs that have an organisational strategy, including vision, mission, and goals	4	4	4	3	5	4	4	4	4	4	4	4	4	3	4	4	4	3	4	3	4	4	3	4	3	5	4	3
3.2.a	Proportion of CSOs that have at least one on-line channel of communication	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
3.3.a	Proportion of CSOs that publish their annual reports and financial statements	3	3	2	4	4	3	3	2	2	1	2	3	2	2	2	3	2	2	3	2	2	3	3	3	3	4	3	3
3.3.b	Proportion of CSOs that publish information on their sources of funding and amounts received in the previous year	3	3	2	3	3	2	2	2	2	2	2	2	2	1	2	2	1	2	2	1	2	2	2	2	2	2	2	2
3.4.a	Proportion of CSOs that have carried out an evaluation of their work in the last year	5	5	4	4	5	5	5	5	5	4	5	4	4	4	5	5	4	4	5	4	5	5	4	4	4	4	5	5

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
3.5.a	Proportion of CSOs whose work is based on evidence generated through research	4	5	4	4	4	4	5	5	4	5	4	4	4	4	5	5	4	5	4	4	5	5	4	5	4	4	5	5
3.5.b	Proportion of CSOs whose work is informed through consultation with people who have a stake in their current or future work	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
3.7.a	Proportion of CSOs whose sources of donor income are diversified	4	4	3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	4	3	4	4	4	4	4	3	3	3	4
3.7.b	Proportion of CSOs raising funds from sources other than donors	3	5	3	3	4	4	5	3	4	3	3	4	4	4	4	4	3	3	4	4	5	4	4	4	3	5	4	5
3.8.b	Proportion of CSOs that have organisational human resources policies	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1



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