



Home Office

To: 1. Security Minister  
2. Home Secretary

SCS: Jay McGann, Head  
Date: [12 July 2022]

## NON-CONDUCTIVE EXCLUSIONS FOR HIGH-PROFILE ALBANIAN NATIONALS WITH LINKS TO ORGANISED CRIME AND CORRUPTION

### Issue

Whether to exclude BERISHA *[and other Albanian national/s redacted for relevance]* from the UK on the grounds that their presence in the UK is not conducive to the public good due to their involvement in serious and organised crime and corruption. This action would form part of the Crime State Nexus Project, the pilot for which was agreed by FCDO ministers in November 2020 and Home Office ministers in March 2021, as a joint FCDO-HO project.

### Timing

- **Priority** – There is significant cross-governmental and international interest in this decision. As it has been planned to be the start of a long-term project, and forms the start of a co-ordinated strategy, a **response by Thursday 21 July 2022** would be helpful.

### Recommendation

We recommend that you (Home Secretary):

- issue a direction** that BERISHA *[and other Albanian national/s redacted for relevance]*, be excluded from the UK on the basis that their exclusion from the UK would be conducive to the public good because of their involvement in serious organised crime and corruption (paragraph 30);
- certify** under section 2C of the Special Immigration Appeals Commission Act 1997 that your decision was made partly in reliance on information which you consider should not be made public in the public interest on the grounds of the prevention of crime and disorder (paragraph 31);

and that you (Home Secretary and Security Minister) **note the following**:

- that the Foreign Secretary firmly supports the policy of taking a more robust approach to tackling links between organised crime and politics in Albania (paragraph 25), and this action is consistent with that policy which you (Home Secretary) have also approved, and is consistent with US policy (with individuals also subject to US sanctions) (paragraph 24);
- that while each case must be considered on its own merits, these exclusions have been chosen to ensure UK action does not disproportionately target a particular political party;

- (v) that the exclusion of BERISHA will require particularly careful diplomatic handling as he is de facto leader of the Albanian opposition and while unlikely, could potentially resume a leading government role in future years (paragraphs 23 and 24)
- (vi) that, while this must not constitute a reason for exclusion, managing US expectations will be critical if we do not exclude these individuals and not doing so could partly impact, adversely, future operational co-operation on such issues;
- (vii) the plans for communicating the policy around this decision (paragraphs 40 and 41);
- (viii) that an Information Note has been sent to the Foreign Secretary in parallel informing her that you (Home Secretary) have received this submission;
- (ix) if excluded, the individuals' details will be provided to the to refuse carriers authority to carry them to the UK under the Authority to Carry Scheme 2021; and
- (x) if excluded, information about their exclusions would be shared with our Irish counterparts.

**Devolution implications:** No

**Has the use of analysis/ evidence/ data/ statistical information in this submission been agreed by Home Office Analysis and Insight?** N/A

**Has relevant legal advice been received?** Yes

**Media interest:** Medium in the UK. Very high in Albania.

#### **Annexes**

**Annex 1:** Crime State Nexus (CSN) Project's referral report for Sali BERISHA, undated.

**Annex 2:** Duncan Norman's Information to Note regarding the CSN Project, 14 January 2022.

**Annex 3:** CSN Project Policy Justification, undated.

**Annex 4:** Public Sector Equality Duty Impact Assessment, 11 July 2022.

## Discussion

### *Background and Immigration History*

1. **BERISHA [and other Albanian national/s redacted for relevance] are Albanian nationals referred to us by the Crime State Nexus (CSN) Project (a joint HO/FCDO initiative) due to their involvement in serious organised crime and corruption.** The CSN Project forms part of the Western Balkans Organised Crime Group Campaign and seeks to disrupt the links between politics and crime in the Western Balkans. The five overarching project aims are to: weaken the threat posed to the UK by Western Balkans OCGs; protect the UK's interests in the Western Balkans; support efforts to strengthen democracy in the region; reduce the public perception that OCGs and criminals can operate with impunity; and strengthen the UK's reputation and credibility as a partner in tackling high level corruption. The CSN Project selected Albania as the pilot location because UK intelligence suggests that Albanian OCGs present the greatest immediate and direct threat to the UK when compared to other Western Balkan OCGs. A submission was sent to you (Home Secretary) in March 2021 outlining the need to combat the state-crime nexus in the Western Balkans, identifying potential levers to do so, and outlining the intention to establish the CSN Team.
2. **In January 2022, you (Home Secretary) were updated on the CSN project by Duncan Norman, the former HM Ambassador to Albania, outlining the intention to recommend an initial batch of exclusions, to be ready during the first half of 2022.** The proposed exclusions of these individuals now form part of that first package of measures designed to achieve the overall CSN project aims (See further, Annexes 2 and 3).
3. **In compliance with the Public Sector Equality Duty (PSED), the CSN Project Team completed an Equality Impact Assessment (EIA) attached as Annex 4.** This EIA identified a risk of indirect discrimination with respect to a number of protected characteristics – in particular, race. However, the CSN Team has assessed this to be objectively justified due to the project being a proportionate means to achieve the legitimate policy objective of reducing the threat of SOC and corruption to the UK and the UK's interests. A further risk of a secondary negative impact on the fostering of good relations between persons of different races was also identified. On the other hand, by reducing the threat of SOC and corruption to the UK and the UK's interests, the project may advance equality of opportunity, given that individuals with a number of protected characteristics are disadvantaged by crime. In line with PSED obligations, the CSN Team will keep this EIA under review as the project progresses.

### The individuals

4. **The exclusions in this first batch comprise of the following individuals:**
  - i) **Sali BERISHA (15 October 1944):** incumbent chairman of the Democratic Party of Albania, as well as the former Albanian President and Prime Minister; designated by the US in May 2021. Although he remains an MP and still has a strong following, he lacks the support of the Democratic Party's parliamentary group and his membership (and therefore leadership) of the Party is subject to an ongoing legal challenge (Annex 1, Paragraphs 1, 3, 17, and 21). He has been issued nine visas to enter the UK, most recently in 2013 (valid for six months).

### *Detailed exclusion considerations*

5. **An individual's exclusion from the UK must be considered to be conducive to the public good, that is, it would be undesirable to admit the person to the UK because**

**they pose a threat to UK society. This applies to conduct in the UK and overseas.** Under the exclusion policy (version 5.0, 2021), corruption and involvement in criminality can constitute grounds for exclusion. Corruption includes, but is not limited to, tax evasion, money laundering, and fraud. When considering excluding someone on the grounds of criminality, exclusion will be deemed to be necessary where the level of criminality, or the threat the individual poses, is so serious that it warrants exclusion. The policy is also clear that a conviction is not necessary for an individual to fall for exclusion under either ground, provided that – for exclusions on the grounds of corruption – there is substantive, reliable information that an individual has been involved in corruption. To exclude someone on the basis of criminality who has not received a conviction, their activities must be capable of falling within the scope of UK criminal legislation (or conduct prohibited by law). Exclusion decisions must be reasonable, consistent with decisions taken in similar circumstances, and proportionate to the threat posed to the UK. There must also be a rational connection between the exclusion and the legitimate aim being pursued.

6. **In considering the non-conductive test, the seriousness and nature of each of the individuals' conduct has been carefully considered and significant NCA reporting shows that Albanian Organised Crime groups pose a risk to the public. The NCA assesses that Albanian organised criminals operate highly efficient, reliable and ruthless cooperative cells.** They have established themselves in key locations across the UK and Europe to facilitate their criminal activities. They are involved in a range of criminal activities, including organised immigration crime and Class A drug trafficking. As a result they generate considerable cash proceeds that are smuggled or transferred out of the UK.
7. **The threat to the UK from Western Balkans OCGs is highly likely to remain unless political and social change occurs in these nations, including Albania. As will be discussed, BERISHA [and other Albanian national/s redacted for relevance] as Politically Exposed Persons (PEP) have contributed to the creation and maintenance of an environment in Albania which allows serious and organised crime to flourish.** In these nations, OCGs are embedded within governance structures and are key to national and regional political settlements. They provide financial and physical support to help individuals or parties get into power, and in return are given political protection for criminal activities, jobs, and other favours. The state capture and extent of serious and organised crime in the Western Balkans undermines attempts to combat serious and organised crime and corruption as those with power and influence seek to prevent investigations or remove investigators. This serious and organised crime then directly negatively impacts upon the UK.
8. **There is a strong connection between organised crime and politics in Albania, and state and political protection can assist OCGs' operations.** A key element of the link between organised crime and politics is the relationships created around the electoral process where powerful criminals are essential for influencing their constituencies to vote for a party and to buy votes. In many areas, connections with criminals are vital for obtaining power. In response, political figures (or party representatives) offer protection for criminal actors or look to offer jobs or tenders to representatives of criminal groups. One of the factors allowing long-term criminal groups to take root in Albania is the ability to avoid state attention through corruption or political protection. For example, two of the most powerful criminal groups in Albania are in Elbasan and have strong political connections so that their success varied with political changes. As these groups are likely to be key players in the cocaine trade to the UK, this demonstrates how politically exposed persons (such as BERISHA [and other Albanian national/s redacted for relevance]) who enable OCGs directly contribute to behaviour negatively impacting the UK. The fact that international pressure or partnerships are needed for investigations and prosecutions further highlights the need for disruptive action, which these exclusions contribute to.

9. **The threat posed by Albanian OCGs to the UK and the involvement of Albanian public officials in enabling these groups is further supported by publicly available resources.** Research from the Global Initiative Against Transnational Organized Crime<sup>1</sup> outlines that by 2015 Albanians had become key players in the cocaine market across the UK. The report further outlines Albanians' involvement in human trafficking and migrant smuggling to the UK and their involvement in cannabis production in, and supply of heroin to, the UK. This is further supported by the FCDO<sup>2</sup> who outlined that *'Albanian crime groups have established a high-profile influence within UK organised crime, and have considerable control across the UK drug trafficking market, with particular impact and high-level influence on the cocaine market'*. Despite anti-corruption laws, the US Department of State<sup>3</sup> outlines that corruption was pervasive across government in Albania, with officials often acting with impunity and investigations often undermined by (amongst other factors) real and perceived political pressure. Moreover, higher-level crimes are rarely prosecuted due to a fear of retribution, insufficient resources, and corruption. A report<sup>4</sup> from the Open Society Foundation for Albania identifies how corruption amongst public officials can facilitate organised crime in Albania. The report notes that criminal groups involved in trafficking hard drugs seek sustainable ties with corrupt members of the police, prosecutors and the judiciary so that they obtain inside information which assists their operations. Therefore it is clear that corruption is a significant problem in Albania, and that this can be used to facilitate organised crime within the country which then negatively impacts the UK. Exclusions in these cases would clearly signal to the political elite that ties to criminality and corruption will not be tolerated in the UK.

Sali BERISHA

10. **The CSN Team assess that BERISHA has clear links to organised crime groups and criminals who have presented a threat to public safety in Albania and in the UK, and that he is willing to use these links to further his political ambitions, thus demonstrating his participation in the entanglement of politics and serious and organised crime which allows the latter to flourish (Annex 1, Paragraph 22).**
11. **Reporting by Balkan Insight<sup>5</sup> and other news media indicates that suspect economic transactions have benefitted those closest to BERISHA.** A BIRN investigation revealed that BERISHA's daughter benefitted from suspicious transactions involving her father's former election adviser. BIRN indicates that his daughter and her business associates may have earned up to €1.2 million through selling land to the adviser on the edge of an energy park for over four times the market value which BERISHA then included into the energy park, thus immediately increasing its value. (Annex 1, Paragraphs 9-12).
12. **Evidence from multiple sources<sup>6</sup> indicates that BERISHA and his former election adviser had a mutually beneficial relationship which demonstrated the impact of state capture outlined by the NCA.** BERISHA interceded in a formal money laundering

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<sup>1</sup> Transnational Tentacles: Global Hotspots of Western Balkan Organized Crime (July 2020, funded by the UK's Conflict, Stability and Security Fund).

<sup>2</sup> In evidence included in the House of Lords' report: The UK and the future of the Western Balkans', published January 2018.

<sup>3</sup> 2019 Country Reports on Human Rights Practices: Albania (Executive Summary).

<sup>4</sup> Organized Threat Assessment in Albania, 2015.

<sup>5</sup> Balkan Insight outline that they have been relied on by bodies such as the Council of Europe and the European Parliament in reports, as well as being referenced by leading UK universities (and their staff) including Oxford University, the London School of Economics, and University College London. It is also the Balkan Investigative Reporting Network's (BIRN) English-language website. BIRN is a network of non-governmental organisations promoting freedom of speech, human rights, and democratic values in Southern and Eastern Europe. As such, we assess that BIRN and Balkan Insight are a reliable source of information.

<sup>6</sup> Including Balkan Insight and BIRN Source

investigation into his former adviser, declaring him to be a family friend and making him 'untouchable' for prosecution purposes, frustrating attempts to combat serious criminality. The investigation was dropped when, alongside BERISHA's pressure, the Bosnian and Cypriot authorities refused to share information. BERISHA may also have helped his adviser flee Albania. Conversely, BIRN indicates that BERISHA also benefitted from this relationship through his former adviser seeking money donations to the Democratic Party. The CSN Team assess that this evidence strongly suggests that BERISHA used his position to engage in corruption and criminal behaviour to enrich himself and his inner circle, whom he then protected when evidence of criminality emerged (Annex 1, Paragraphs 9, 13-15).

- 13. Reporting from multiple news media has linked BERISHA to criminals, including a known leader of an organised criminal group whom you (Home Secretary) excluded from the UK.** Video footage from 21 December 2021 shows BERISHA with Fation DAUTI (also known as Fation DAUTAJ) who helped BERISHA enter the Democratic Party's headquarters. DAUTI was deemed by the National Crime Agency (NCA) to be capable of extreme violence and you (Home Secretary) excluded him from the UK in September 2019 based on intelligence from the NCA indicating that he was the leader of a London-based Albanian criminal network involved in importing cocaine, cannabis production, people smuggling, and money laundering. Additionally, in January 2022 BERISHA's supporters attempted to violently seize the Party's headquarters. Video footage shows the presence of several individuals known to UK law enforcement agencies at this protest which turned violent (with force from both sides) and reporting by A2 CNN (including photos) outlines that BERISHA, who organised the protest, was also present (See further Annex 1, Paragraphs 18-20).

#### Assessment

- 14. While the sources relied upon as part of this exclusion assessment predominantly stem from newspaper articles, the CSN Team have provided substantive, reliable information on which we can rely to indicate that these individuals' presence in the UK would not be conducive to the public good.** The case for each individual relies on Albanian language media reporting as well as English-language Albanian media outlets, such as Albanian Daily News, Exit News, and the Balkan Investigative Reporting Network (BIRN), all of which the CSN Team view as generally reputable, despite that media reporting globally can be subject to some politicisation (see further, Annex 3). We view Balkan Insight and Euronews Albania as reliable. In addition, the case against each individual is supported by reputable organisations such as Transparency International, the European Observatory of Crimes and Security, the Organised Crime and Corruption Reporting Project, the US State Department, and the Organisation for Security and Co-operation in Europe, some of which have UK membership. Where particular reliance is placed on news outlets, they often stem from multiple sources, thus indicating that – even where it has not been possible to determine the reputability of the sources – it is reasonable to rely on the information. Moreover, the reliability of the evidence is further supported by the US' designation of BERISHA [*and other Albanian national/s redacted for relevance*].
- 15. Consequently, considering the above, we assess that the available evidence clearly demonstrates that the individuals have been involved with corruption and serious and organised crime. Whilst some of these individuals have not been charged with or convicted of offences (largely due to the local criminal justice system), they are not necessary for the purposes of our UK exclusion assessment.** According to the exclusion guidance, serious criminality and corruption can constitute grounds for exclusion without the need for convictions, provided that there is substantive, reliable information (for allegations of corruption), and the individual's conduct is capable of falling within the scope of UK criminal legislation or conduct prohibited by law. We assess that, based on their alleged conduct, the individuals have engaged in behaviour which, if proven, would

most likely be capable of falling within UK criminal legislation, or would otherwise be prohibited by law. For example, BERISHA abused his position to enrich himself and his inner circle. Furthermore, the allegations indicate that the behaviour of the individuals (if proven) can be viewed as misconduct in public office.

16. **In light of the above, and considering the information found at Annexes 1 – 4, we assess that BERISHA's [and other Albanian national/s redacted for relevance] exclusion from the UK would be conducive to the public good due to their involvement in serious and organised crime and their engagement with corrupt activity.**

#### *Other options considered*

17. **We have considered retaining BERISHA's [and other Albanian national/s redacted for relevance] details as an alternative to exclusion so that we would be notified if they applied for a visa to enter the UK.** Given the threat that Albanian OCGs pose to the UK and the individuals have contributed to a permissive environment where these OCGs can flourish and inflict harm on the UK, We believe that exclusion from the UK sends a stronger message to these individuals that their behaviour will not be tolerated in the UK and may help to disrupt their connections which facilitate OCGs. It will also ensure that they are not given the opportunity to make or develop connections to individuals who can inflict harm to the public directly from inside the UK. In light of this, exclusion is deemed a proportionate response to the threat that these individuals pose to the UK through contributing to an environment that facilitates OCGs in Albania.

#### *ECHR considerations*

18. **As BERISHA [and other Albanian national/s redacted for relevance] are outside of the UK, they fall outside of the UK's jurisdiction for the purposes of Article 1 ECHR (obligation to respect human rights) and their rights are therefore not engaged.**
19. **BERISHA is not known to have family members in the UK whose Article 8 rights (right to respect for private and family life) could be engaged by his exclusion, nor close ties to the UK.** In the alternative, if BERISHA's Article 8 rights were successfully argued as being engaged by his exclusion, we assess that the above argument would apply, as any such interference would be proportionate due to their involvement in corruption and serious and organised crime.
20. **Article 8 is a qualified right and is subject to restrictions that are in accordance with the law and necessary in a democratic society, including in the interests of public safety and the prevention of disorder or crime.** Article 8 does not oblige any state to give individuals a completely free choice about where they pursue their private or family life.

#### *Stakeholder Views*

##### **FCDO & British Embassy Tirana Views**

21. **The risk that UK exclusions will have a detrimental effect on UK-Albania relations is assessed to be generally low.** The US has already taken public action against BERISHA [and other Albanian national/s redacted for relevance] by designating them "persona non grata"<sup>7</sup>. International action off the back of convictions in Albania will largely be welcomed by the Albanian population and improve accountability. The impact on other UK objectives is partly mitigated as the US have already set a precedent for international action and by

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<sup>7</sup> Thereby excluding them from the US.

how we have been indicating that we will be using such accountability tools ourselves and by expectations set by UK action in Russia and other Western Balkan countries.

22. **The exception to this assessment is action against BERISHA, which is assessed to carry a medium risk.** Despite the US “non grata” designation in 2021, BERISHA has maintained political influence within the Democratic Party of Albania (DP) and was elected head of the DP again in May 2022 (although this is subject to a legal challenge). The UK currently has a policy in not engaging directly with BERISHA and an exclusion decision against him would be in line with our current approach. There could however be media and political fallout if he publicises the decision (as happened recently when we confirmed he had not been invited to our national day event). Discussions are ongoing with BE Tirana to mitigate potential impact of a UK exclusion against BERISHA. HMA Tirana and FCDO’s Western Balkans Department support the action.
23. **BERISHA’s resumption of the role as leader of the DP is problematic for us politically.** The DP is a legitimate party that the UK works with and BERISHA was re-elected as an MP at the last election in April 2021 and now leads the opposition in Parliament. Consequently, the UK will need to consider how best to communicate and engage with the DP and opposition in Parliament while headed up by a *persona non grata*. There are sensitivities which require careful diplomatic handling, for example, agreeing which DP officials are appropriate interlocutors. However, we assess that these are manageable.
24. **There is also a low probability risk that BERISHA could resume a government position, potentially as Prime Minister or President again.** While the FCDO and BE Tirana assess the DP is unlikely to be successful in elections in the near future, we cannot exclude the possibility this could occur while BERISHA is still DP Chairman. BERISHA is 77 years old, so may be replaced by someone younger by the time of the next elections in 2025, but that is not guaranteed.
25. **Implementing these exclusions is expected to strengthen UK-US relations and cooperation.** These exclusions replicate similar measures on BERISHA and other individuals by the US and would signal UK support for the US’s stance. In the expectation of these UK exclusions, US counterparts have already shown themselves willing to share intelligence with the UK and to coordinate future action.
26. **The Foreign Secretary firmly supports this policy of taking a more robust approach to tackling links between organised crime and politics in Albania, and this action is consistent with that policy. She is being updated and consulted on this issue in parallel.**

#### Potential risk to Home Office equities

27. **There is a risk that these exclusions negatively impact other Home Office equities with Albania, should Albanian politicians seek to leverage UK-Albanian cooperation in other areas to discourage further UK action.** The CSN Team have taken action to mitigate this risk, including engaging Home Office stakeholders (e.g. Illegal Migration Unit, International Strategy, Engagement and Devolution (ISED)) and BE Tirana to raise awareness of these exclusions and developing a narrative emphasising that the UK’s disruptive action is about the UK working with Albanian authorities to take action against corrupt and criminal Albanian individuals, rather than against the Albanian people or state. As a result, collectively the CSN Team are confident they can mitigate this.
28. **ISED and Home Office International Operations (HOIO) do not anticipate the exclusions will have an impact on their daily work. Returns Logistics Operations confirmed no objection based on this assessment.** They (ISED and HOIO) agree with



the joint assessment of the Home Office's Crime-State Nexus Team, FCDO Western Balkans Department and British Embassy Tirana that the risk of a tangible impact on UK-Albania cooperation at a political and operational level is low. The precedent set by similar US action on exclusions demonstrates that the Government of Albania is likely to accept the Home Office's actions and to continue business-as-usual cooperation

29. **ISED and HOIO are confident that the CSN's team preliminary work to ensure targets are from across the political spectrum, engage the Albanian authorities, and establish robust media handling plans have already mitigated the risk of a negative impact.** Should there be an unexpected impact on our work, the Home Office will work with BE Tirana to leverage our diplomatic tools (including senior and potentially ministerial engagement) to address any concerns raised by the Government of Albania.

#### Recommendation(s)

30. **In light of the above, we recommend that you (Home Secretary) direct that BERISHA [and other Albanian national/s redacted for relevance] be excluded from the UK as their presence in the UK is not conducive to the public good on grounds of their involvement in serious organised crime and corruption.**

#### Do you agree?

31. **This recommendation relies partly on sensitive material that should not be made public in the public interest on the grounds of the prevention of crime and disorder. If you (Home Secretary) agree to exclude, we would recommend that you (Home Secretary) certify the decisions under Section 2C of the Special Immigration Appeals Commission Act 1997. This would ensure that any challenges against the exclusions would be heard in the Special Immigration Appeals Commission (SIAC), allowing us to rely on, and protect, the sensitive material.**

#### Do you agree?

#### Next steps

32. **If you (Home Secretary) decide to exclude BERISHA [and other Albanian national/s redacted for relevance], we would look to notify them through the embassy in Tirana. Their notifications will be sent to their last known addresses. BERISHA's notification letter will also be sent to his private office.**

#### *Appeal Rights*

33. **BERISHA [and other Albanian national/s redacted for relevance] do not have a statutory right of appeal against a decision to exclude them from the UK, however the decision can be challenged by way of an application for judicial review.**

#### Financial Implications

34. **There are no costs associated with this submission apart from the defence of any judicial reviews challenge should any be launched, which would be met from the existing budget.**

#### Media handling advice

35. **As detailed throughout this submission, there is extensive reporting (largely in Albanian media) of these individuals, their connections to serious and organised**

**crime, and alleged corruption.** If you (Home Secretary) agree to the recommendation contained in this submission, we would not expect the information to enter the public domain, unless communicated by the individuals themselves or those connected to them. We would anticipate that should the public or media become aware, the move would be welcomed in UK media. The level of seemingly clear evidence of corruption is such to justify the action, which is on par with US counterparts. Their profile indicates that there will also be significant media interest in these exclusions in Albania should they be made public. If the decision was taken to not exclude them, and the individuals subsequently travelled to the UK, there is a risk that the UK Government had not taken immigration action against individuals clearly connected to serious organised crime.

36. **As part of a full CSN Project comms strategy and implementation plan, the CSN Team will release proactive comms in Albanian media, without naming the individuals, to raise awareness that the UK has taken disruptive action against individuals with links to criminality and corruption.** This will generate interest in UK action, amplify the political messages behind that UK action, and strengthen the UK's reputation as a reliable partner in fighting corruption and serious and organised crime in the Western Balkans region.
37. **The CSN Team plan to do so via an op-ed written on behalf of Sir Stuart Peach, the PM's Special Envoy to the Western Balkans region.** As agreed with Sir Stuart Peach, this will be released on Albanian media outlets in parallel to the exclusions being served. This will be supported with other in-country comms, including social media activity and interviews of HMA Tirana by Albanian media outlets.
38. **If approached for further information, the Home Office press office would work closely with FCDO counterparts to respond reactively.** It is our long-standing policy not to comment on individual cases. However broader lines may outline that decisions will be taken to exclude people if their presence in the UK is deemed not conducive to the public good due to their involvement in serious and organised crime. Ahead of the decision being communicated, Home Office comms will continue to work with Home Office and FCDO policy and comms colleagues to ensure top lines and a Q&A document are in place. We would expect HMA Tirana in Albania to handle queries in country, in line with a cross-government position. All lines and handling would be sent for clearance in the usual manner.

### **Copy list**

Minister for Future Borders and Immigration, Minister for Future Borders and Immigration Private Office, SPADS Private Office, Permanent Secretary, Second Permanent Secretary, DG Homeland Security, Homeland Security Directors, , DG UKVI, Press Office SMT, Border Force Chief Operating Officer, Border Force NCC, Comms-CT, Comms-New Plan for Immigration, Oscar Ramudo, Chris Jones, Jae Samant, Suzie Daykin, Yvette Bosworth, Duncan Norman.