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Analysis of Trends in Security Vetting of Ministry of Internal Affairs Personnel in the Context of the Implementation of the Law on Classified Information (2019–2024)

Abstract: *This paper analyzes trends and key drivers in Serbia's security clearance process from 2019 to 2024, focusing on human resource development, data management, and legal enforcement. By examining clearance issuance data, it assesses the influence of international standards, shifting security policies, and institutional reforms. The analysis identifies persistent challenges, particularly in implementing legislation and achieving process transparency, highlighting gaps in data quality and interpretive capacity. It proposes targeted improvements, including procedural digitization, stronger interinstitutional coordination, and standardized reporting. The paper concludes by exploring the implications of pending legal reforms and recommending measures to enhance personnel capacity and specialized training for effective implementation of new standards.*

Keywords: *national security, protection of classified information, personnel security, eligibility determination process.*

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Introduction

Ensuring national security and safeguarding classified information are essential to Serbia's stability (The National Security Strategy, 2019). Therefore, members of the Ministry of Internal Affairs (hereinafter: MOIA) who access such data must undergo proper vetting in line with the Law on Classified Information (Law on Classified Information, 2009, Art. 48) and its by-laws².

In Serbia, information classification is regulated by the 2009 Law on Classified Information and accompanying regulations from 2011 and 2013. The system defines four levels —TOP SECRET, SECRET, CONFIDENTIAL, and RESTRICTED — designed to prevent misuse or unauthorized access to sensitive data that could threaten national interests.

Security vetting for access to TOP SECRET and SECRET information is conducted exclusively by the Security Information Agency (hereinafter: BIA). However, for SECRET-level information, both BIA and MOIA may carry out vetting, depending on the specific roles and responsibilities of MOIA personnel (Law on Classified Information, 2009, Art. 54, para 5). For CONFIDENTIAL-level information, security vetting is conducted solely by MOIA. No formal vetting is required for information classified as RESTRICTED (Mijalković, 2015: 195-208). Instead, employees sign a statement of responsibility and undergo a briefing to become familiar with their duties (Matić, Milošević; 2021: 207-213)

The MOIA is not authorized to issue security clearances. This function is exclusively performed by the Office of the National Security Council and Classified Information Protection (hereinafter: National Security Council Office), which initiates and conducts clearance procedures upon formal request from the MOIA. (Law on Classified Information, 2009, Art. 51).

² Regulation on Detailed Criteria for Determining Classification Levels TOP SECRET and SECRET, Official Gazette of the Republic of Serbia, No. 46/2013 and the Regulation on Detailed Criteria for Determining classification levels CONFIDENTIAL and RESTRICTED, Official Gazette of the Republic of Serbia, No. 105/ 2013

In addition to initiating procedures, the National Security Council Office maintains records of all security clearances issued in Serbia. For this study, data on MOIA personnel is especially relevant, forming the core of trend and practice analysis in classified information protection.

This study analyzes trends in security vetting for MOIA personnel between 2019 and 2024, with comparative insight into the Ministry of Defense (hereinafter: MOD). It focuses on implementing the Law on Classified Information and procedures for protecting data marked TOP SECRET, SECRET, and CONFIDENTIAL. In addition to tracking protection patterns, the study identifies systemic shortcomings and opportunities for improvement. Its findings aim to support more efficient clearance procedures and strengthen security awareness, especially among MOIA personnel (Dragišić et al., 2018: 172).

Methodological approach

In this research, data from the official records of issued security clearances maintained by the National Security Council Office were used for the period from 2019 to 2024. (Regulation on the content, form and method of maintaining records for access to classified information, 2010). Official records offered a reliable foundation for analyzing trends in MOIA security clearances under the Law on Classified Information. Combining quantitative (e.g., case volume and duration) and qualitative methods (e.g., identifying systemic challenges), the analysis revealed key patterns. Visualizations like histograms and pie charts supported the identification of problem areas and informed practical recommendations, such as reducing processing times and enhancing transparency.

The research encompassed all MOIA members who, in accordance with the Law on Classified Information, completed the full security clearance process (Matić, 2019: 27-116). The eligibility determination process includes several stages, starting with the completion of questionnaires (Regulation on forms of security questionnaires, 2010) and submitting requests to the National Security Council Office, conducting

security vetting, taking decisions and issuing security clearances. Data were collected for each phase of the process to identify trends, key timing factors, and procedural variations in issuing security clearances.

The methodology examines how vetting procedures vary by classification level (TOP SECRET, SECRET, and CONFIDENTIAL), alongside a review of relevant legal frameworks. It also addresses practical challenges—such as delays and procedural obstacles—that impact the efficiency and quality of clearance decisions. Visual tools, including graphs and tables, are used to highlight trends, expose system weaknesses, and identify areas for improvement within MOIA's eligibility determination process.

The analysis drew on data managed by the National Security Council Office regarding security clearances issued to public authorities, MOIA, and MOD personnel. These records supported the study's conclusions and recommendations for improving eligibility determinations and strengthening classified information protection. Beyond trend tracking, the data also contributes to enhancing transparency, efficiency, and strategic planning.

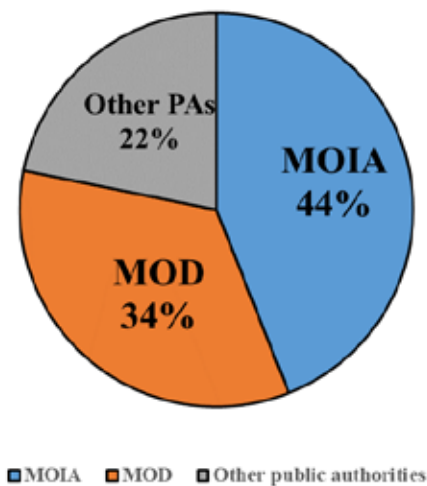
Results and discussion

This section presents findings from the analysis of security clearances issued between 2019 and 2024, based on official records from the National Security Council Office covering MOIA personnel, Ministry of Defense staff, and other public authorities. Between 2011 and 2024, the National Security Council Office conducted security vetting and issued clearances for 21,214 individuals and 485 legal entities⁵. Between 2019 and 2024 — the core period analyzed in this study — a total of 18,781 security clearances were issued, distributed as follows:

⁵ The data were taken over from the NSC Office website on 14 April 2025.

Table 1. Overview of issued security clearances by public authorities for the period 2019-2024, for all authorities, for specific categories (MOIA and MOD) and other public authorities

Year	2019	2020	2021	2022	2023	2024	Total No. by authority
TOTAL	938	697	1591	6760	4306	4489	18781
MOIA	271	120	141	5404	1229	1101	8266
MOD	221	240	303	737	2156	2763	6420
Other public authorities	446	337	1147	619	921	625	4095



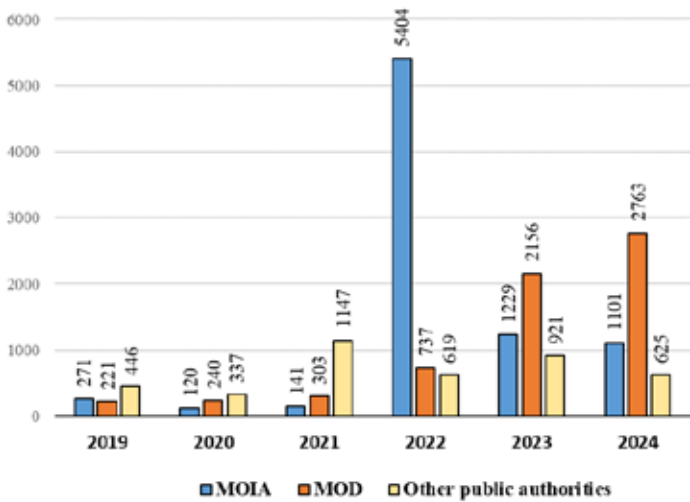
Graph 1. Ratio of issued security clearances by public authorities from 2019 to 2024 in percentages

Comparison by institutions

Including data on MOD clearances provides a valuable benchmark for comparing trends across security sectors. Given the MOD’s consistent and formalized vetting procedures, it serves as a control group for assessing the pace and patterns of clearances issued to MOIA personnel, public authorities, and legal entities. This comparative approach enables more precise evaluation of institutional differences in security vetting practices.

Table 2. Overview of issued security clearances by public authorities for the period 2019-2024

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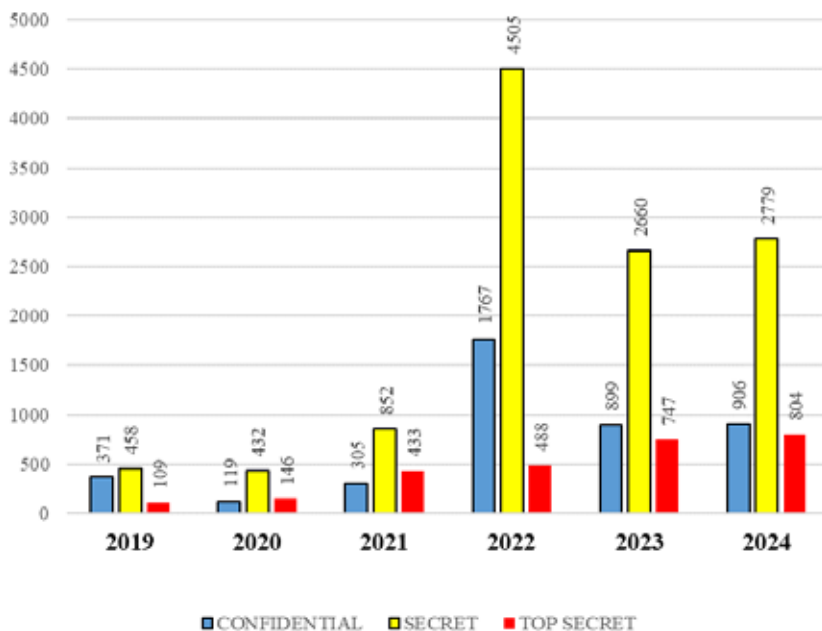


Graph 2. Ratio of issued security clearances by public authorities for the period 2019-2024, by years

Security clearances issued by years – comparative review

Table 3. Overview of number of security clearances issued to all public authorities and legal entities by years and by c. levels (2019-2024)

Year	2019	2020	2021	2022	2023	2024
CONFIDENTIAL	371	119	305	1767	899	906
SECRET	458	432	852	4505	2660	2779
TOP SECRET	109	146	433	488	747	804
TOTAL	938	697	1590	6760	4306	4489

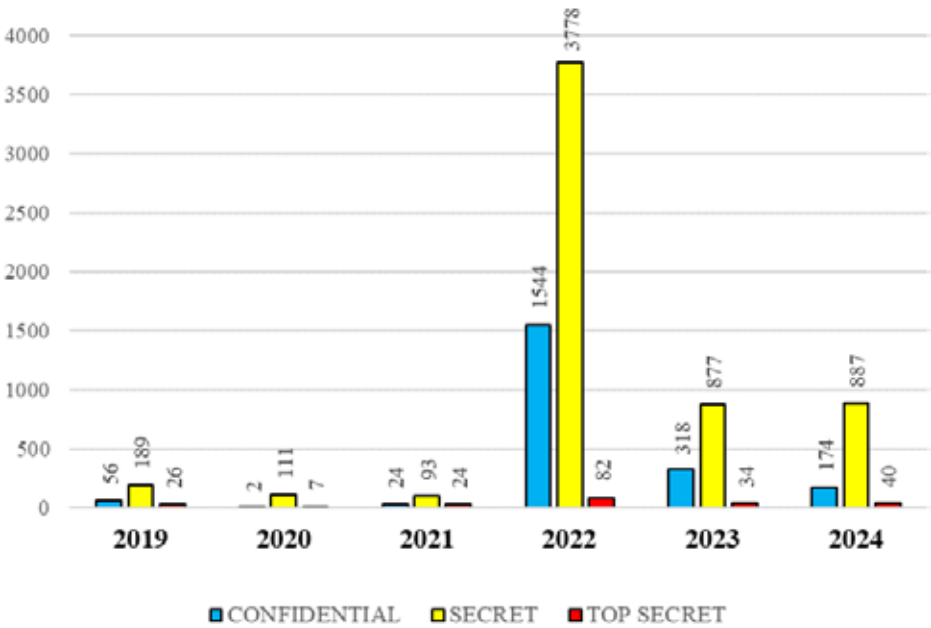


Graph 3. Ratio of issued security clearances by classification levels from 2019 to 2024

Overview of number of issued security clearances at MOIA
by years and classification levels (2019–2024)

Table 4. Overview of issued security clearances at MOIA by classification levels from 2019 to 2024

Year	2019	2020	2021	2022	2023	2024
CONFIDENTIAL	56	2	24	1544	318	174
SECRET	189	111	93	3778	877	887
TOP SECRET	26	7	24	82	34	40
TOTAL	271	120	141	5404	1229	1101

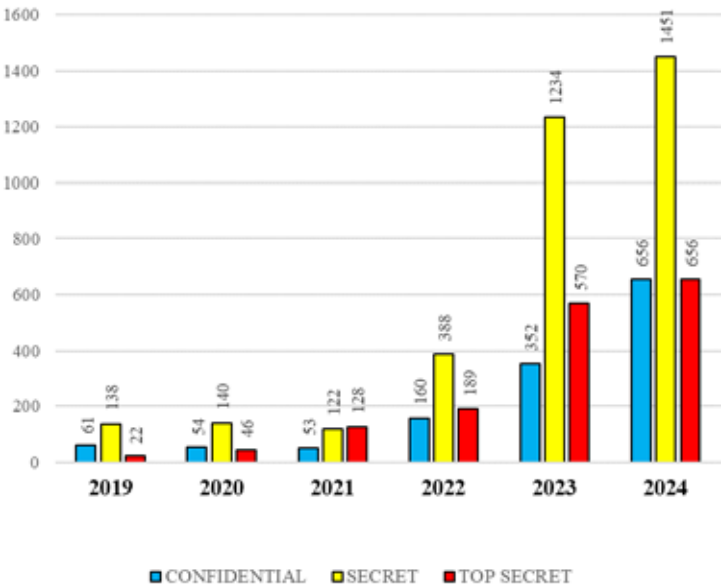


Graph 4. Ratio of issued security clearances by classification levels within MOIA for the period 2019 – 2024

Overview of issued security clearances by years and classification levels within MOD (2019–2024)

Table 5. Overview of issued security clearances by classification levels within MOD (2019-2024)

Year	2019	2020	2021	2022	2023	2024
CONFIDENTIAL	61	54	53	160	352	656
SECRET	138	140	122	388	1234	1451
TOP SECRET	22	46	128	189	570	656
TOTAL	221	240	303	737	2156	2763



Graph 5. Ratio of issued security clearances by security levels within MOD for the period 2019-2024

Methodological observations

The 2019–2024 security clearance data reveal several methodological considerations for accurate interpretation. A striking spike occurred in 2022, when MOIA issued 5,404 clearances—over 38 times the 2021 figure. The MOD saw similar growth, issuing 2,156 clearances in 2023 and 2,763 in 2024, up from just 303 in 2021. These increases likely reflect changes in security policy, institutional reforms, and efforts to align with international standards, particularly in cooperation with NATO, the EU, and other partners. They may also result from the launch of classified projects or re-vetting of personnel with prior clearances.

An additional methodological note concerns occasional discrepancies—or, in some cases, precise matches—between total clearances issued and their breakdown by classification level. For example, the MOD's 2,763 clearances in 2024 match the combined total of level-specific data (656 + 1,451 + 656), while MOIA's 5,404 clearances in 2022 align exactly with its respective category totals (1,544 + 3,778 + 82). Minor discrepancies in earlier data likely stem from administrative delays, retroactive entries, data entry errors, or timing gaps between issuance and registration in the National Security Council Office's database. Accordingly, aggregate statistics should be interpreted with caution—particularly when assessing the effectiveness and responsiveness of Serbia's classified information protection system. Complementing quantitative findings with qualitative insights into regulatory, institutional, and political developments provides a more balanced understanding of clearance trends.

Trends in the number of issued security clearances for MOIA and MOD members

Between 2019 and 2024, security clearance trends for MOIA and MOD personnel reflected institutional and regulatory shifts. The MOIA experienced a sharp rise in 2022, issuing 5,404 clearances — up from just 141 in 2021. While numbers declined in 2023 (1,229) and 2024 (1,101), they remained well above earlier years, possibly indicating the completion

of a major vetting cycle or expanded access to classified information.

The MOD followed a similar trajectory: moderate clearance numbers from 2019 to 2021 (ranging from 283 to 314) surged to 2,156 in 2023 and 2,763 in 2024. These spikes may result from new operational mandates, growing international cooperation, or efforts to align with NATO, EU, or other collective security standards.

The data reveal two key dynamics: (1) a sharp, short-term surge in clearances, likely signaling institutional changes such as new systems, revised protocols, or expanded roles; and (2) a subsequent stabilization, suggesting the end of large-scale vetting, improved efficiency, or a shift to routine renewals. These patterns should be interpreted within a broader institutional and security context—reflecting internal reforms and international obligations—rather than in isolation.

Reforms, institutional framework and trends in the process of issuing security clearances to MOIA and MOD (2019–2024)

Ministry of Internal Affairs — Between 2019 and 2024, the security clearance process for MOIA personnel evolved significantly due to legislative, institutional, and technological changes. Clearances peaked in 2022 with 6,760 issued, then declined and stabilized in 2023 (4,306) and 2024 (4,489).

Legislative reforms - During the period from 2019 to 2024, the important legislative reforms in the Republic of Serbia had an impact on the eligibility determination process of MOIA members (The Law on Police, 2018). The key legislative interventions in that period included the adoption of the Law on Information Security in 2019, amendments to the Law on Police, as well as the adoption of the Law on Records and Data Processing in the Area of Internal Affairs in 2018, which resulted in the procedural improvements in the sphere of security and classified information protection. These changes have defined the rights and obligations of police officers working with sensitive information – both personal data and classified information – and also precisely determined procedures for eligibility determination and security vetting.

Institutional and Technological Drivers — The rise in security-sensitive roles stems from expanded digital operations, advancing e-governance, and upgraded security infrastructure. New procedures and technologies have increased the number of positions requiring classified access, driving up demand for clearances.

Heightened Security Awareness — Increasing cyber threats and evolving internal and external risks have bolstered the MOIA's security culture. This has led to more rigorous vetting practices and a corresponding rise in issued clearances.

Post-2022 Stabilization — The decline in clearance numbers during 2023 and 2024 likely reflects the conclusion of a major vetting cycle and growing institutional maturity. Streamlined procedures have led to a steadier, more sustainable volume of new clearances.

Ministry of Defense – During the observed period, the number of issued security clearances within the defense system increased significantly, reflecting strategic and legislative actions, along with growing national and international security challenges.

Legislative and institutional reforms – Amendments to the Law on Defense and the Law on the Serbian Armed Forces in 2018, as well as by-laws, regulating the area of security vetting (The Rulebook on Personnel Security Vetting conducted by the Military Security Agency, 2015), classified information protection (Regulation on Detailed Criteria for Determining Classification Levels CONFIDENTIAL and RESTRICTED within the Ministry of Defense, 2014) and the organization of the defense system laid the foundation for strengthening mechanisms for controlling access to classified information. The introduction of new information protection measures within the defense sector required broader implementation of eligibility determination procedures for individuals and legal entities accessing classified information.

Security and Defense Infrastructure — The adoption of advanced technologies, upgraded command systems, and domestic and international security initiatives has expanded roles involving classified data, significantly increasing demand for cleared personnel.

Geopolitical and Security Challenges — Rising cyber and hybrid threats have driven efforts to reinforce Serbia's defense system through a stable, standardized vetting framework. The surge in clearances, followed by declines in 2023 and 2024, likely marks the completion of the initial phase of implementing these enhanced procedures.

Analysis of Security Vetting by Data Type — From 2020 to 2024, MOIA and MOD personnel experienced a surge in security clearance activity, peaking in 2022 before stabilizing. Within the MOIA, the issuance of 6,760 clearances in 2022 was driven by legislative reforms and internal digitalization. Subsequent declines in 2023 (4,306) and 2024 (4,489) suggest the conclusion of mass vetting and improved procedural efficiency. The MOD followed a similar path. Amendments to the Defense Law in 2018 expanded classified positions, prompting steady clearance growth through 2022, followed by stabilization in 2023 and 2024—indicating institutional consolidation in the eligibility process. These trends highlight a deepening institutional commitment to safeguarding classified data. What began as a period of high-volume clearance issuance has matured into a phase of sustainable development. This shift reflects increased awareness of emerging security threats—cyberattacks, hybrid warfare, and digital vulnerabilities—and the adoption of a more integrated approach to data protection. Looking forward, advances in information technology, the integration of artificial intelligence, and continued alignment with international standards are expected to strengthen Serbia's national security through more robust vetting frameworks.

Duration of eligibility determination process

Duration and Procedural Dynamics of Security Vetting — The time required for vetting procedures varies by classification level. Higher-level clearances, especially for TOP SECRET information, involve more extensive assessments—covering personal, professional, and familial backgrounds—resulting in longer processing times than those for CONFIDENTIAL access. The application of the Law on General Administrative Procedure further extends the process, as a separate

decision confirming the fulfillment of conditions must be issued and become legally effective before a clearance is granted. While legally necessary, this step can lengthen timelines, particularly during peak demand periods.

The 2022 surge in clearances placed temporary pressure on institutional capacity, leading to delays in some cases. Still, it also signaled stronger coordination and greater urgency around national information protection. In response, authorities introduced reforms—recruiting additional personnel, enhancing interinstitutional coordination, and upgrading technology through digitalization and integrated databases. These changes contributed to a more stable and efficient system in 2023 and 2024.

The trends highlight the need for ongoing refinement of vetting procedures and a strategic, resource-driven approach to ensure timely processing, legal compliance, and consistency with both national standards and Serbia's international security obligations.

Challenges and obstacles in eligibility determination process

Despite previous increases in MOIA security clearances, the eligibility determination process still faces major efficiency challenges. Contributing factors include limited staffing, weak coordination—particularly between MOIA and the National Security Council Office—and underuse of modern digital tools. Processing delays, communication gaps, and resource constraints likely contributed to the decline in clearances issued in 2023 and 2024, despite rising demand amid growing institutional and security complexity. Security vetting remains a cornerstone of national security. Addressing systemic barriers requires targeted action across three key areas:

1. Human Resource Strengthening — Investing in recruitment, training, and retention — supported by favorable work conditions — can expand operational capacity and reduce bottlenecks in the clearance process.

2. Adoption of Digital Tools — Implementing centralized electronic platforms, automating workflows, and integrating databases would improve transparency, accuracy, and institutional efficiency.
3. International and Regional Cooperation — Aligning with modernized international vetting frameworks through training exchanges and policy benchmarking would further refine Serbia's classified information protection system.

The success of these reforms hinges on coordinated institutional action, defined responsibilities, and ongoing evaluation. Only through a strategic, resource-driven approach can Serbia build a resilient, legally sound, and future-ready security clearance system.

Research problems and limitations

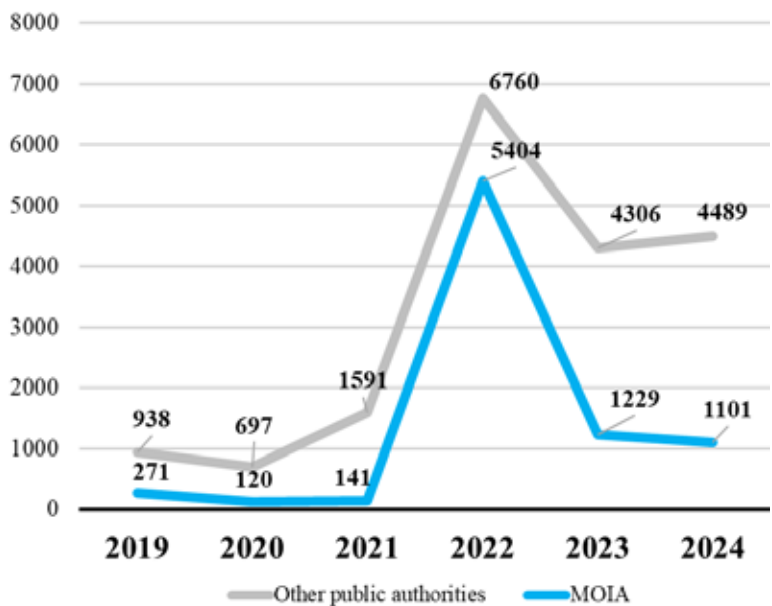
While official statistics support baseline trend analysis, they are predominantly quantitative and lack contextual depth. Missing elements—such as employee profiles, job roles, educational backgrounds, and classified-related responsibilities—limit the scope for more nuanced interpretations. Additionally, the absence of data on negative vetting outcomes and their causes restricts risk assessment and the development of targeted preventive measures. These gaps emphasize the need to strengthen data collection, especially in qualitative dimensions, to improve understanding of the security clearance landscape.

Despite these limitations, available data offers a valuable foundation for tracking long-term trends, establishing benchmarks, and institutional comparisons—particularly between MOIA and MOD. Such analysis not only supports strategic planning and procedural refinement but also enables targeted resource allocation to areas of heightened vulnerability, like MOIA's clearance framework.

Conclusion

The 2019–2024 analysis of eligibility determinations reveals a pivotal shift, with a 2022 peak in clearances driven by legislative reforms, expanded

sensitive roles, and heightened security demands. The stabilization seen in 2023 and 2024 reflects the end of an intensive vetting cycle and the rise of a more efficient, optimized system. Looking ahead, sustained investment in digital modernization, institutional coordination, and human and technical capacity is vital to ensure long-term effectiveness. Strengthening personnel vetting—both for individuals and entities—is key to safeguarding sensitive data. With these measures, Serbia can build a resilient, adaptive, and accountable clearance system that meets national security needs while aligning with international standards.



Graph 6. Growth rate of the number of issued security clearances from 2019 to 2024, correlation between MOIA and other public authorities

Sustained implementation of these efforts—alongside the proposed strategies—will be pivotal in enhancing the efficiency of vetting and clearance procedures while reinforcing Serbia’s overall framework for classified information protection and national security.

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Анализа трендова у безбедносним проверама припадника Министарства унутрашњих послова у контексту спровођења Закона о тајним подацима (2019–2024)

Апстракт: Овај рад анализира трендове и кључне чиниоце у процесу издавања безбедносних сертификата у Републици Србији у периоду од 2019. до 2024. године, са посебним освртом на развој људских ресурса, управљање подацима и примену правног оквира. Кроз анализу података о изданим безбедносним сертификатима, процењује се утицај међународних стандарда, измена безбедносне политике и институционалних реформи на осигурање безбедносних провера. Истраживање указује на постојеће изазове, нарочито у примени законодавства и осигурању транспарентности процеса и открива недостатке у квалитету и интерпретацији података. Рад предлаже циљана побољшања, укључујући дигитализацију процедура, јачање међуинституционалне сарадње и стандардизовано извештавање. Закључно, размишљају се ефекти предстојећих правних реформи и дају препоруке за јачање кадровских капацитета и увођење специјализованих обука ради ефикасније примене нових стандарда.

Кључне речи: национална безбедност, заштитна тајних података, персонална безбедност, процес издавања безбедносних сертификата.