



Local Self-Government Transparency Index 2019 (Local Transparency Index – LTI) Final Report

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Executive Summary

The Local Transparency Index (LTI) 2019 represents Transparency Serbia's research¹, evaluation and ranking all cities, municipalities and city municipalities in Serbia. The research covers 145 units of local self-government² and 25 in-city municipalities.

Municipalities and cities are ranked on the basis of **transparency criteria**, determined by 95 indicators. The Index scores range from **0 to 100**, though in practice, **municipalities and cities scored between 12 and 67 along the Index**.

Indicators are grouped in 8 categories – “Assembly and Council”, “Budget”, “Municipality and Citizens”, “Free Access to Information”, “Public Procurements”, “Information Booklet”, “Public Enterprises and Institutions” and “Public Debates”, with 14 indicators related to other (not grouped) areas.

Given the differences in the scope of their competencies, **cities and municipalities are ranked** in comparison, while 25 city-municipalities are graded, but not ranked.. The average score is 40, which is relatively low. However, it is the same as in 2015, when the research of transparency level was conducted using the same methodology and sample, with slightly modified indicators. Seventy (70) local self-governments (LSGs) scored above the average, while 8 scored 60 points or higher. Interestingly, in 2015, the number of LSGs scoring over 60 was the same.

The Municipality of Plandište scored the highest (67), while second place is shared between Paraćin and Novi Pazar at 66, then VelikoGradišteand Užice (64), Vrnjačka Banja (62) and Leskovac and Vranje (60). The lowest ranking municipalities are SmederevskaPalanka (LTI 12), Preševo (13), Svilajnac (18), Bogatić (19), Ub (20), Bela Crkva (21) and the city of Jagodina (21).

Six LSGs improved their scores by 20 points or more in the last four years and five saw declines. Pancevo and BackaTopola, who were among the best performers in the previous index, lost as much as 16 points. Improvements were greatest in several LSGs that had a low starting point. For example, the city of Bor more than doubled its score over the last four years, but this was sufficient only to reach an overall score that placed it close to average on the Index. The dedication of civil servants and systemic reforms most visibly improved VelikoGradiste and Novi Pazar. On the other hand, 11 LSGs lost more than a third of their 2015 points. In total, 76 LSGs worsened their scores, six remained the same and 63 showed improvements.

¹Project “Local Self-Government Transparency Index” TS conducted thanks to the support of the USAID.

²As prescribed by Law on Territorial Organization of the Republic of Serbia (Official Gazette of the Republic of Serbia, no. 129/2007, 18/2016 and 47/2018), except those from Kosovo („the territory of autonomous province Kosovo and Metohija“).

Key Findings

Transparency Serbia's Local Transparency Index (LTI) 2019 shows that dedicated civil servants **can make a difference** and significantly improve the transparency of local administrations. However, they do this without the benefit of a **nation-wide policy**, which would ensure that transparency reforms are sustained with a change in local governments. The average LTI score of Serbian cities and municipalities **remained unchanged from 2015 to 2019** (40, out of a possible 100), but municipalities have shifted upward or downward on the Index, depending upon their individual efforts. This research proves that a transparency level once achieved is by no means a guarantee of sustainable good practice.

Only 8 out of 145 municipalities have a score greater than 60, thus, significant and continuous efforts are necessary to improve and maintain transparency even among best performers. Far **better results are recorded** in areas where transparency is clearly prescribed by laws. Therefore, introducing more legal obligations by the central government authorities would certainly contribute to the transparency of local governments. However, regardless of legal provisions, **local governments' commitment to openness is the key determinant** of their transparency, having in mind the inability of the central government to effectively oversee implementation of legal provisions. For example, in some areas, even if a legal obligation to publish documents exists, a significant number of municipalities failed to meet that duty, such as is the case with the Law on Public Enterprises.

This cycle of research noted some **positive changes** or novelties which might bring increased transparency in the future. More LSGs are publishing the **citizens' budget**, and also are publishing **comprehensive pages or even separate websites with data about budget or public procurements**. More than half of LSGs are adopting **Local Anti-Corruption Plans (LAP)**. Full implementation of LAPs would increase the LTI score as well, since the LAP concept relies largely on transparency as a corruption prevention mechanism.

Most of the **negative findings identified in the LTI 2015 persist**: failure to regularly update **Information Booklets** or to publish all mandatory information; lack of information on **decision-making processes**; and, lack of information on **real estate** and other municipal property.

Methodology

The transparency index of the local self-government (LTI) is a tool for measuring and evaluating transparency levels and ranking municipalities and cities which was designed by Transparency Serbia.³ TS applied it for the first time in 2015, when 168 cities were evaluated. The survey was then repeated on a small sample of 15 municipalities and cities, two years later, in 2017.

Transparency Serbia, since 2015, believed that regular measurement of this kind would enable comparison of the current results between various cities and municipalities, tracking of improvement or declines over a period of time, and identifying “weak spots of transparency. It could also motivate changes in regulations and practice in areas that are problematic in a large number of units of the local self-government. Besides that, continuous monitoring encourages competition among LSGs, as confirmed in the previous two cycles. Transparency Serbia is therefore very pleased that LTI will be made in the next three years,⁴ as this would certainly help not just to measure transparency level, but also to improve it.

According to the Transparency Serbia methodology, the index of transparency is calculated as the sum of the points calculated on the basis of responses to indicator questions and range from 0 to 100. This year there were 95 indicators (indicator questions). The negative answer yields 0 points, and the positive 1 or 2. Specifically, questions regarding the five most important indicators of transparency (the “basic indicators”) yield 2 points for a positive answer and 0 for a negative answer, while 90 others bring 1 or 0.

Answers to the indicator questions were collected by reviewing the official website presentations of the cities, municipalities and city municipalities. Another method was direct insight, by visiting all of service centers and premises of the local administration. The third source group was responses of cities and municipalities on the basis of the requests for information of public importance. The fourth source group is data obtained from the other relevant bodies (Commissioner for Information of Public Importance, the Anti-Corruption Agency). The ranking covers a total of 145 cities and municipalities and 25 “city municipalities”. Only the city municipality of Petrovaradin (Novi Sad city) was not covered by the research, as it was not functional when the research began⁵. For the purposes of this report, both municipalities and city municipalities are collectively referred to as units of local self-government (LSG) (though this is not formally the case for city municipalities).

One hundred and forty five (145) cities and municipalities are ranked together, while 25 city municipalities are evaluated but not ranked. Namely, city municipalities do not have the same jurisdiction as the municipalities, as their scope of duties depend solely on decisions of relevant city statutes and that practice differs from city to city. Furthermore, some of the indicators are not applicable to the city municipalities. For example, some of the city municipalities do not have “local communities”, do not have public institutions under their control, do not lease property. Eventual calculation of the relative index (according to real competences and activities) of city municipalities would significantly complicate the development of the LTI and could never be fully correct from a methodological point of view. Therefore, we opted to assign to the city municipalities 0 points whenever certain information

³ When designing the LTI, similar previous experiences of members of the Transparency International network were used, especially the Slovak branch, and the GONG organization from Croatia, whose methodology was used by TI BiH.

⁴ TS signed the contract with USAID

⁵ City of Novi Sad changed its statute in March 2019 and even formally abolished its in-city municipalities.

is missing, even if in some instances such municipalities did not have the duty/ability to produce the information. It would be therefore incorrect to compare their ranks and indexes with the indexes of the other LSGs. To a greater extent, comparisons are possible among municipalities within the same city. However, caution would be necessary here as well. Even when working in a similar legal framework, municipalities may work in a very different environments, and some indicators could be irrelevant (e.g. whether the municipality established its institutions or not).

Therefore, the trend of transparency for these municipalities can be observed best through several cycles of evaluation by identical indicators.

When comparing results with LTI 2015, when all cities and municipalities were rated last time, one should have in mind that Transparency Serbia adjusted indicator questions. The reasons were the results and experiences from the research, changes in regulations, and introducing the new legal obligations related to corruption prevention and increasing the transparency. Namely, following LTI 2015 results, the research team established that data for some indicators were not sufficiently clear or that results may be interpreted in different ways and some of them were adjusted already in pilot research on a smaller sample of municipalities in 2016 and 2017. Furthermore, the adoption of new legislation in areas such as public enterprises, inspections, urban planning, local anti-corruption plans and lobbying was addressed by indicators that are relevant for LTI 2019 and will be even more relevant in future years.

Compared to 2015, this year research, 77 indicators (indicator questions) remained unchanged. In both 2017 and 2019, we formulated nine new indicators. The full overview of indicators included in the LTI 2015 and LTI 2019 and their assigned weight (i.e. 1 or 2 points) is provided in Annex 5 of this report. In general, results of LTI 2019 point out that the new indicators might influence to a certain extent the overall score, but not significantly. Namely, the average score that LSGs earned with respect to indicators added in LTI 2019 as compared to the LTI 2015 was 47.6% of maximum scores for these indicators, which is higher than the average score in LTI 2019 (40). However, when weighted, this influence could be approximated to 1.5 of the overall score.

In the work on data collection, researchers of Transparency Serbia have thoroughly reviewed the websites of all 170 LSGs. After that, the research coordinator, before entering the collected data into the master table, again reviewed all indicated web sources of information. However, in order to overcome eventual omissions, and to prevent some LSGs from being downgraded, all of them received the list of missing information. That would be an opportunity for LSGs to provide TS with the exact link to the information researched, if that information exists after all. Four years ago, 74 LSGs responded to those queries, their websites were reviewed again and information verified. However, if an LSG provided only a claim that the information exists on its web site, but did not provide clear evidence, the score remained unchanged. This year, 70 cities, municipalities and city municipalities responded on time⁶, their remarks were reviewed, sites reviewed again and indexes corrected in the second

⁶ Due to short deadlines, although letters were not formally requests for free access to information, TS was forced to internally set a deadline (40 days, until May 6th 2019), until which will wait for correspondence before closing the table. After that deadline, the answers from the other four JLS - Čuprija, Kovačica, Kraljevo and Kanjiža arrived. It is certain that LTI for these JLS would be larger and their ranking would be better if the answers arrived earlier.

phase of the verification, with results reflected in this final report. This year, the same as in past years, some LSG used that opportunity to post additional information on the websites, which resulted with the better grade. Some announced that they will do so during the next period, which should result in an increase in the index in the next survey in 2020.

We sent 170 letters to cities, municipalities and city municipalities aimed at providing LSGs the chance to verify first research round data and 850 requests for access to information of public importance, in order to collect the data for several indicators. Two sets of data (340 requests) contained questions related to the issues of public debates⁷ and public-private partnership. Another 340 requests were sent in order to collect additional information on implementation of procedures related to the selection of public enterprises' and public institutions' directors.

We also sent to all municipalities one request for free access to information using the "secret shopper" strategy. In this concept, instead of TS as an organization, the request was signed by an individual citizen, who provided a private mail address for answers. Within this indicator we did not want to measure transparency about any particular information, but to establish if the units of the local self-government would respond equally to the requests of an ordinary citizen, as they do when receiving a request from a civil society watchdog organization. We were positively surprised that 150 units of the local self-government responded to the citizen's request and provided the requested information.

The results after the second and final verification therefore **presents the status of transparency as assessed at the moment when the verification was finalized**. The actual transparency of LSGs, i.e. on their web-sites and in their premises may therefore differ from the status at the moment of this report's publication. It is, however, worrying the number of units of the local self-government that have not responded to the requests regarding some specific indicator questions. Five LSGs did not respond to any of seven requests or letters elaborated above. Two questions regarding the election process for directors of the public enterprises and public institutions remained unanswered by 19 LSGs (out of which five are city municipalities).

There were 20 LSGs (14 municipalities and cities and 5 city municipalities) that failed to respond to both of those requests. A total of 44 LSGs (33 municipalities or cities and 11 city municipalities) did not respond to at least one request⁸. Some of them, however, responded subsequently, in response to a letter in the second phase of the verification, since they were told in the letter that we did not receive their response.

Transparency Serbia did not appeal to the Commissioner for information because the time required to decide on the appeal would probably be longer than the deadline for finishing the

⁷ In LTI there are several indicators regarding public debates and transparency of related information. Additional requests are aimed to assess some qualitative aspects of organized public debates.

⁸ Requests were not answered by:

- Both requests: Paraćin, PožegaLoznica, Kučevo, Žabalj, GornjiMilanovac, MaloCrniće, Mali Zvornik, Lebane, Medveđa, Jagodina, Ub, Svilajnac, SmederevskaPalanka, Palilula (Bgd), Rakovica, Sopot, Pantelej, Vranjska Banja, Kostolac
- The set of 7 questions from various areas: Čajetina, Aleksinac, Beograd, Šid, Nova Crnja
- Two questions about the election process of the directors of the public enterprises and public institutions: Požarevac, Vranje, BačkiPetrovac, Ruma, Pančevo, Bečej, Despotovac, Prokuplje, Niš, Opovo, Lučani, Vlasotinca, Alibunar, Bela Crkva, Vračar, Medijana, Palilula (Niš), CrveniKrst, Sevojno.

final research report⁹. If there is no response, nor indirect evidence of information's existence¹⁰, the score is zero within this category. This is significantly worse than in 2015, when 6 LSGs did not respond.

While collecting the information from the websites, we found no major problems with accessibility. In some instances, LSGs recently created new websites, but significant parts were not populated with information (which is indicated in letters). One municipal website has been unavailable for a long period of time, but by the end of the first phase of the research we succeeded to review it. In several cases we identified that two parallel official websites were available, after moving to a new domain. In those situations, Transparency Serbia reviewed new web presentations only.

Associates of the Transparency Serbia have crossed over 10,000 kilometers in this research, and visited all 170 local self-governments. We visited municipal administrations, more precisely, LSGs' service centers. In that way, we established the state on-the-spot for 7 indicators.

While visiting the premises on several occasions TS researchers were confronted with the suspicion of employees in service centers or security workers. As the researcher should determine what the citizen sees and can find there, the problem occurred when our associates tried to document observed situations by photographing a noticeboard or other documents. Another problem occurred when a researcher declared his role and was asked "who allowed him/her to search the premises of the municipality". In one case, a member of the security staff called the police; in another, security insisted that the researcher be taken to the head of administration. In one municipality, a member of the municipal council threatened to fire the security worker because the researcher took a photo of the noticeboard, so the security worker asked the researcher to delete the photo "because he has a pregnant wife."

However, the majority of employees of local governments that we interacted with during the research were attentive and helpful.

⁹ Due to huge number of appeals and low level of capacities, Commissioner's decisions on appeals are usually delayed for several months.

¹⁰ For example, if the website has a call for a public debate about the budget and/or the report from the public debate, even without the response from the LSG, it will be evident that the public debate was organized.

General observations

General evaluation of LSG transparency and perspectives for improvement

The most general observation of the researchers about the state of transparency is the same as before – **transparency is higher in those fields in which the law prescribes explicitly a duty to publish information and sanctions for their violation**. A typical example of this are many documents related to the public procurement. At the same time, a legal obligation to publish information does not always mean that this information will be made public. Even though the Law on Public Enterprises prescribes the obligation and penalties for unpublished data, **a high number of public enterprises still lack even a website**.

There are very few cases of taking measures for improving the transparency level and prevention of corruption which are not mandatory. However, what gives us hope is that the **Model Local Anti-Corruption Plan (LAP)** of the Anti-Corruption Agency anticipated numerous measures and activities previously proposed by Transparency Serbia. Some of those measures are ranked within the LTI as indicators¹¹. All LSG's have to adopt their Local Anti-Corruption Plans in accordance with that model, and more than half have already complied. Therefore, it will be interesting to monitor the changes in scores in years to come, with particular focus on measures foreseen by the LAP.¹²

Even though this year the **research identified a higher number of examples of individual good practices in comparison with LTI 2015, bad practices persist**, in particular when it comes to the content of websites. These include insufficient budget information, unavailable or inaccessible information on the decisions of the local assemblies, insufficient information about the management of public enterprises, and inaccurate information booklets. It is reasonable to expect some progress to occur here in years to come with the adoption of recommendations for the content of the LSG websites, where experts are engaged within the USAID project "Government Accountability Initiative"¹³ or within similar initiatives of the Standing Conference of Cities and Municipalities.

Selected systemic problems and observations

LTI 2019 shows how **the lack of transparency decreases possibilities to hold local government accountable**. For example, the agenda of the upcoming session of the Assembly can be found on less than 60 websites, and the decisions made at those sessions on 34 websites. That is worrying regarding the fact that 55 local self-governments have no official

¹¹ Some of the foreseen Model LAP measures that coincide with LTI indicators relate to the state of the websites, information booklets, information available in the service centers and working premises of the administration, on acting upon the requests for access to information, regulation of the procedures and practice regarding the work of the Assembly, regarding budget, public debates, public enterprises, etc.

¹² TS recommends that in the following period, an analysis of the matching of certain measures foreseen with LAPs with LTI indicators is carried out. This would include an analysis of which units of the local self-government were negatively assessed on these indicators, and whether, and within what period, LAPs envisaged measures that would at the same time mean a positive mark for the LTI indicator.

¹³ <https://www.usaid.gov/sr/serbia/fact-sheets/usaid-government-accountability-initiative>

Gazette of the town or even a link to it. In combination, the lack of transparency for these indicators makes monitoring of city/municipal regulation significantly harder.

Financial transparency is still an issue and the **implementation of budget system rules is not ensured**. The budget for 2019 was not published on the websites of 34 local self-governments. Many budgets are not published in a machine-readable format. Furthermore, many of them are also published in non-searchable form (images in PDF). It is encouraging, on the other hand, that the “citizens’ budget” is published on 60 observed websites. Four years ago, it was possible to find citizens’ budgets on only six websites. With newly introduced duties to organize public debates on certain budget issues and commitments for open government, it is reasonable to expect progress in years to come. However, in this research we identified that existing practice of “public debates” about the budget in some municipalities was highly problematic. An announcement was made one day, a public debate (a stakeholder debate) was scheduled for the next day and a deadline to submit written proposals scheduled in the next day or two. Another good practice identified within this research was publication of the analytical plan of expenditures of “indirect budget users” within the budget. If this practice was widespread, a significant contribution to transparency, having in mind that from the basic municipal budget a citizen may find out only information about the overall value of transfers from the budget to these entities, but no information about their own income and structure of expenditures¹⁴.

LSGs are not making sufficient and systemic efforts to address suspicions of wrongdoing in the management of public enterprises and other public institutions. The practice of appointing managers of these entities is frequently criticized as being motivated by party affiliation instead of individuals’ competencies. However, no LSG decided to address that concern through increased transparency. Similarly, party-based and excessive employment in the public sector is frequently suspected. LSGs do have the number of employees in the administrative bodies published. The number of employees of indirect budget users can be found in the corresponding tables of the budgets of some municipalities. This is progress in transparency, but it would be even more transparent to display such information on the website in a comparative tabular format, including not just employment in administration but in all public institutions on the local level and comparison of actual situation with the envisaged number of employees according to the staffing plans (for example, Aleksinac had such tables in 2012 and 2013). When asked directly through the request for information about the accessibility of employment data, many of municipalities responded that the maximum allowed number of employees can be found in the Official Gazette of 2017 or 2018, but have not made any effort to proactively publish such information in a user-friendly format.

The **absence of a systemic approach in ensuring transparency** is visible in several groups of related indicators. For example, only 23 local self-governments published reports about their property leases, even though the public calls were found on the websites of as many as 131 municipalities and cities. Similarly, there are significantly more public competitions, calls, and advertisements on websites than reports and decisions for those competitions and calls in other areas, such as project funding.

¹⁴ Indirect budget users are public sector entities that do not receive funds directly from the municipal budget, but through the relevant department of LSG administration (e.g. for culture or education). In many instances, indirect budget beneficiaries may be entitled to generate their own income, e.g. sports centers from the ticket sale, schools from renting of premises etc.

The most comprehensive way to provide proactive transparency in the Serbian legal system is the publishing of accurate and comprehensive Information Booklets. However, even 15 years after the beginning of implementation of the Law on Free Access to Information of Public Importance, **information booklets are often of low quality**. These documents are often bulky, with unnecessary information (such as complete budgets from a few years ago), with a huge number of hard-to-read images (scanned documents) instead of text or tables (a typical example are public procurement reports), with data 5-6 years old, although the information booklets are allegedly "updated", according to a note in the booklet itself. Furthermore, LSGs do not even publish within these documents information that they are ready to publish on other sections of the web page. In upcoming years, the development of information booklets in the context of LSGs web pages would depend on implementation of the Law on E-Government adopted in 2018 and eventual amendments to the Law on free access to information. The first law and related by-laws regulate content of public authorities' web-sites in general and provide Informative Directory its integral part. Envisaged changes of Law on free access to information would widespread number of institutions that would have to publish such documents (including local utilities) and provide for e-forms. This all is expected to result in a fewer number of mistakes in preparation of Informative directories and better connection with the rest of web-site content. However, such rules could not help if there is no willingness to provide full amount of data or to update it regularly.

The structure and maintenance policy of websites should be significantly improved. Within this research, we identified a large number of LSGs that have a formal framework for raising transparency to a higher level (appropriate sections) on their websites, but do not publish or update the content of relevant sections. Similarly, banners from the front pages frequently directed users towards information that is several years old or obsolete. In general, it may be concluded that LSGs do not have strict policies on what will be published in the "info" and "news" section of the websites. Some publish information about events in the city, a large number of sports information about local clubs, schedules of worship during religious holidays, and similar things. There was even one case where the official web presentation of LSG has the appearance of an informative media portal, with daily news from the country and the world. There are also good examples of separating service information from news. In spite of the recommendations and guidelines (now also provided through the government's Decree on Conditions for the Design and Maintenance of the Website of the Authority – Official Gazette 10/18), LSGs continue to use various domains for their web presentations – one may find.rs (in the largest number of cases), but also org, gov.rs, co.rs, and .info.

The format and layout of published information is an issue, even when data are generally transparent. For example, we identified several models for editing a page dedicated to public procurement that could serve as a positive example nationwide. Unfortunately, there are also websites where all information on public procurements are sorted chronologically, so there are new calls, along with old decisions, notifications, and questions answered, all mixed. In such cases, file names are an additional problem, as they do not indicate to which public procurement the document refers. Aside from public procurement, separate portals or web-pages have been identified as a good practice, for budget, urban planning, regulation and administrative services.

E-registers are helpful. They are useful not just for the sake of "user-friendliness" and search facility, but also for providing a greater amount of information. For example, there are a few instances where deadlines are announced for resolving requests and cases unless there is an electronic register of administrative procedures on the website. Such information may be

found where the law mandates the information (e.g. in the area of planning and construction). A detailed description of jurisdictions, necessary forms, notifications for citizens on who is in charge were found on numerous websites (and especially in Informative booklets). However, information about deadlines are mostly omitted.

Transparency is not always considered useful, but rather as an additional burden. For example, in direct contacts with researchers some LSG representatives claimed that it is not necessary to post details about the services that they provide to citizens because "even when there is such information, citizens rarely read it and always ask." Similarly, several reports of public hearings were found, stating that no one would want to participate. It indicates the existence of a broader problem – lack of trust in participatory mechanisms and their effectiveness. On the other hand, employees in LSGs, especially the managers with whom the researchers were in contact, expressed a desire to better regulate these areas, but they complained of a lack of capacity.

The amount of information is significantly higher online than in the premises of LSGs, which is not always justifiable. Researchers found only in several cases that LSGs inform citizens on the spot about their rights and ways of accomplishing their rights (procedures, deadlines, necessary documentation). That type of information does not appear on the noticeboards. Some municipalities published brochures, but these are often incomplete. From the contacts of researchers with employees while visiting the LSG premises, the impression is that corruption is a taboo. Information is missing even about ways to report such a phenomenon. Employees of LSGs are relaxed with their answers to the questions, but when corruption reporting mechanisms are mentioned, they immediately claim their "incompetence" to answer such a question. Anyhow, corruption is not reported. On the other hand, citizens complain about alleged work irregularities of civil servants, usually when they think their interests were harmed in administrative procedures.

Opportunities for cooperation with citizens are not sufficiently used. There are innovative mechanisms of cooperation that may be helpful both for citizens to fulfill their needs and administration to perform their role. So, on several web-sites the mechanisms of "citizen inspectors" for reporting to the communal inspection were out through that channel possible violations of regulations by other citizens or business entities.

Published information is incomplete. For example, citizens may find in an Information Booklet a citation to a legal provision that the sessions of the assembly are public and that the chair of the assembly will decide about granting an individual request to attend the session, based on stated criteria. However, there is no information on how and whom citizens can contact to get information on the time and location of the sessions or the outcome of the sessions.

Performance of LSGs in the specific areas of the research

Overview

Transparency is higher when the law explicitly prescribes a duty to publish information, and provides sanctions for non-compliance. For example, the law requires the publication of many documents related to public procurement. At the same time, a legal obligation to publish information does not always mean that this information will be made public. Even though the Law on Public Enterprises prescribes the obligation and establishes penalties for unpublished data, **many public enterprises still do not even have their own website.**

Few effective measures for improving transparency and preventing corruption are voluntary. However, one positive innovation is the Anti-Corruption Agency's **Model Local Anti-Corruption Plan (LAP)**, which foresaw numerous measures and activities. Some of those measures are ranked within the LTI, as indicators¹⁵. All LSG's have to adopt their Local Anti-Corruption Plans in accordance with that model. Therefore, it will be interesting to monitor the changes in scores in years to come, with particular focus on measures planned in the LAP.¹⁶

Even if this year the **research identified a higher number of examples of good practices, bad practices persist, in particular when it comes to the content of web-sites:** insufficient budget information, unavailable or inaccessible information on the decisions of the local assemblies, too little information about public enterprise management, and inaccurate information booklets. However, progress could be expected here with the adoption of recommendations for the content of the local self-government websites, where experts are engaged within the USAID project "Government Accountability Initiative"¹⁷ or within similar initiatives of the Standing Conference of Cities and Municipalities. For example, the agenda of the upcoming session of the LSG's Assembly can be found on less than 60 websites, and the decisions made at those sessions on 34 websites. That is worrying regarding the fact that 55 local self-governments have no e-version of official Gazette of the town on their websites, or even a link to the local Gazette's website.

The **budget for 2019 is not published on websites of 34 LSG's.** It is encouraging, on the other hand, that the **"citizens' budget" is published on 60 observed websites.** Four years ago, it was possible to find citizens' budget on only six websites.

No LSG published the complete documentation from the election process of directors of public enterprises, and only three published documents which can provide relatively high level of transparency. Only 23 units of the local self-government published the reports about

¹⁵ Some of the foreseen Model LAP measures that coincide with LTI indicators relate to the state of the websites, information booklets, information available in the service centers and working premises of the administration, on acting upon the requests for access to information, regulation of the procedures and practice regarding the work of the Assembly, regarding budget, public debates, public enterprises, etc.

¹⁶ TS recommend that in the following period, an analysis of the matching of certain measures foreseen with LAPs with LTI indicators is carried out. This would include an analysis of which units of the local self-government were negatively assessed on these indicators, and whether, and within what period, LAPs envisaged measures that would at the same time mean a positive mark for the LTI indicator.

¹⁷ <https://www.usaid.gov/sr/serbia/fact-sheets/usaid-government-accountability-initiative>

property leases, even though the public calls were found on the websites of as many as 131 municipalities and cities.

As in the previous research, the best scores municipalities and cities have are in the field of public procurements. Between 148 and 160 local self-governments have positive score on the three indicators from this segment. As mentioned earlier, the sole reason for this is legal duty to publish most of related documents on the web-site.

LSGs also performed relatively well in the area of “free access to information” which was the second best area. Namely, they complied in two third of cases **with duty to inform citizens on how to submit requests** and in responding to requests. Still, there are huge problems in this area as well, as **three-quarters of municipalities did not follow the deadlines** for responding to requests for information in a timely manner in the previous year, and **30 % did not follow all Commissioners’ decisions** to provide information.

Third best performances were in the budget category, where LSGs earned almost half of the possible points. While current municipal budget documents are usually available on the webpage, in most instances in MS Excel (which was the case in $\frac{2}{3}$ of instances), **performance worsens when it comes to the availability of data on budget spending**, where only one third of LSGs published at least those reports that they have to share with the Ministry of Finance. Audit reports were discussed less than 20% of the time. It is encouraging, however, that **some form of public consultation about the budget was held in two thirds of LSGs.**

Publishing and updating of the “Information Booklet”, a Serbian-specific channel of pro-active citizen information launched in 2005, **proved a serious challenge for LSGs in 2019.** Even if almost 60% of them had the Booklet published on the internet and updated during the last three months, only one third of them published the two types of mandatory information that are included in LTI. This confirms the findings of previous TS researches on non-compliance of Information Booklets with applicable law.

An even **greater problem for transparency than the city administration and assembly are local public enterprises and institutions.** Most LSGs (around 70%) decided to open special sections on their websites for these two entities that are founded and supervised by the LSG, which is a matter of good practice. Mandatory by law, public competitions for directors were published in 70% of cases for enterprises, and in 57% only for other public institutions. However, documents on the competition process were almost non-existent on LSG web pages. The internal transparency of these institutions is very weak; their systematization acts (staff plans) are visible on 11%, of observed public enterprises’ websites and 7.5% of observed public institutions’ websites. **Even information about the number of employees was hidden** in 95% of public enterprises and in 80% of other public institutions. Work plans and reports are also weak points from the perspective of transparency, and the situation is again better with public enterprises (approximately one-quarter published) than in public institutions working in the field of culture, sports, social care etc. (10%), probably as a matter of more strict legal rules applicable to public enterprises. The list of prices for their services is available in 46% of LSGs, but these prices were discussed with the citizens through an advisory body in 13% LSGs only, even if that kind of consultation is envisaged in the Law on Consumer Protection.

When it comes to public debates, **only 60% of LSGs published information of some hearing/debate held during the last 12 months**. However, these are still far from fully consultative processes. Namely, only one fifth of them published a report on public debate that contained information on the received proposals of citizens and reasons for acceptance/refusal of those proposals. Even higher is the disproportion between the announced leasing of municipal property, and the published information about the outcome of that announcement. Performance improves when it comes to the publishing of information about the distribution of municipal funds for media and CSO projects, where we found both announcements and results in more than 60% of LSGs.

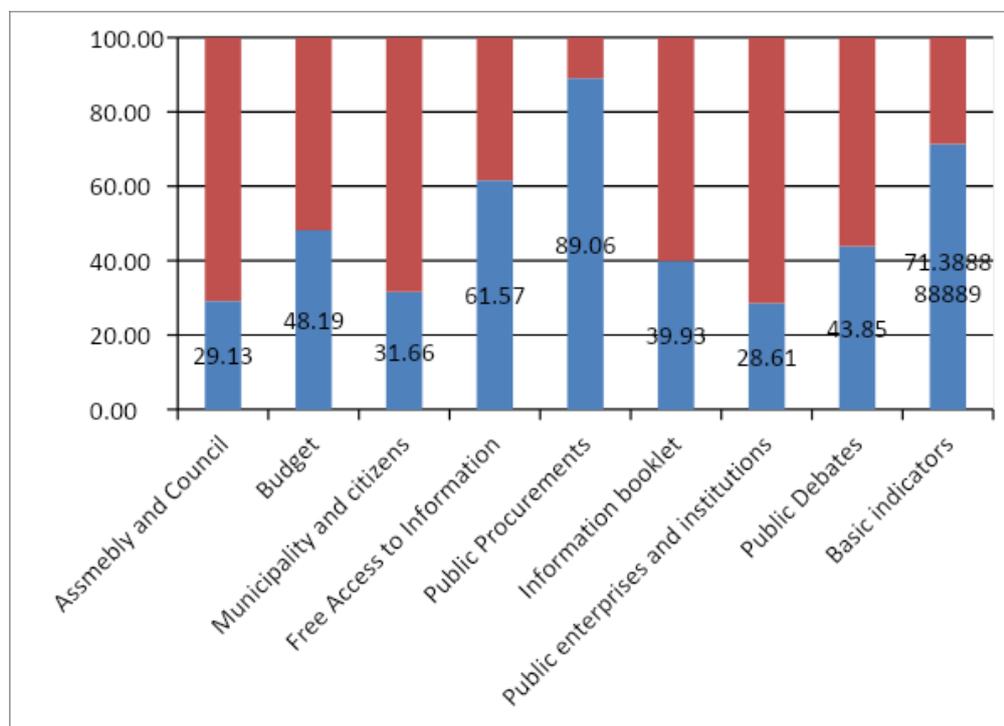
When it comes to the **relationship between the municipality and citizens**, nearly all LSGs publish information on working hours. **LSGs also largely following the requirement to publish inspection lists** (these are published in more than 80% of municipalities) and **establish service centers for communication with the citizens**. However, citizens may easily obtain contacts of their local community councilors, information about attending local assembly sessions or meeting with the mayor in only 50% of municipalities. **One fifth of LSGs evaluated citizen satisfaction** with services during the last four years, and a similar share **provide an opportunity to report wrongdoing in person or on the web page**. An even greater problem for citizens is the fact that **only 5.5% of LSGs publish deadlines for issuing of documents in the service centers** or premises of administration and only 9% provide access to the status of the case on the web-site. **Mayors are often visible in the local press, but only 15% of them hold regular press-conferences** on a monthly basis.

The only aspect of transparency where assemblies and councils performed well was the publishing of the list of their members (86%). **Even the agenda of the next Assembly's session is not visible in two thirds of LSGs**, while voting results and amendments submitted are available in less than 10% of cases. In addition, only half of those publishing agendas also publish draft documents to be discussed at the session of local parliament. City/municipality council decisions are available in 11% of LSGs only, and those of assemblies are available in slightly more than 20%.

In other, non-categorized indicators, **LSGs performed best** when it comes to the **publishing of local development strategy** (two thirds). Systematization act of municipal administration was available in 57% of LSGs. There was **no activity whatsoever when it comes to the Council for implementation of Ethical code of public officials**, even if such Codes are in place for almost 15 years. Code of Ethics for civil servants was available on the web in one third of cases. **Preventive anti-corruption documents**, although mandatory for all LSGs, **were identified in 54% of cases (integrity plan) and 41% (local anti-corruption plan)**. **Spatial plans and urban plans are mostly published** on the web page (80%, 67%), but the **information of municipal property leased to other entities is not**.

It is important to mention, that **poor scores** in some categories **does not necessarily mean that corruption is widespread** in the related areas. Similarly, **good scores by no means guarantee that the process is free from corruption**. Transparency is just a mechanism for easier detection or for prevention of corruption; the ultimate success of these mechanisms depend on many other factors as well. Also, a low LTI score does not necessarily mean that a municipality is more corrupt than another having a higher LTI, and vice versa. The fact is that a low LTI should "wake up the public", as well as local administration and management, while high LTIs mean that corruptive behavior will be more difficult to conceal and easier to detect.

Graph no 1: Percentage of successful performance of LSGs per fields



Legend:

“Basic indicators” refers to the indicators from various categories weighted with 2 points.

“Successful performance” refers to the percentage of maximum possible points that LSGs could have earned for indicators within the certain category (blue), while the rest of the column presents the percentage of maximum points that LSGs failed to earn.

Fields of the research

Overview

The LTI observes transparency within seven broad areas. Nine questions are not grouped within the broader categories, as they are focused on rather narrow areas, such as transparency of municipal service local plans, codes of ethics, special plans etc. Within those seven categories, by far the best performance was identified in the area of public procurements (89% of maximum score). Between 148 and 160 local self-governments have positive score on the three indicators from this segment.

As noted elsewhere in the report, this result is a consequence of more clear legal duties in that area, and the fact that LSGs are required to publish similar information on the central government's public procurement portal under penalty of sanctions for non-compliance. However, in all such instances where indicators relate to items that are required by law to be made available, and while average scores are high, it also means that those municipalities and cities **that do not comply with these requirements are in violation of the law.**

Aside from public procurements, LSGs in average obtained more than half of possible maximum points only in the area of free access to information, and close to half of possible points only in the budget category.

Table no. 1: Successful achievement of LSGs in various fields (categories)

Area	Assembly and Council	Budget	LSG and citizens	Free Access to Information	Public Procurements	Information booklet	Public enterprises and institutions	Public Debates
Average score	5.24	7.23	5.38	3.69	3.56	1.60	4.29	3.07
Max Score	18	15	17	6	4	4	15	7
% of Max score	29.13	48.19	31.66	61.57	89.06	39.93	28.61	43.85

Legend: Score range 0 to Max score for certain category

The full list of indicators covered within the fields (categories) is provided in annexes.

When it comes to the public debates and public competitions and with information booklets, the score was slightly over the overall average (40). On the other hand, performance was worst in categories "municipality and citizens", "assembly and council" and "public enterprises and public institutions".

When it comes to the individual indicators, only in two out of 95 did cities and municipalities excel, with more than 90% of those publishing LTI relevant information. On the other hand, with four indicators, LSGs in Serbia earned a score of zero.

The individual performance of LSGs within the categories may differ significantly from the overall one, although in most of the cases, LSGs performed good or bad more or less consistently.

Public procurements

The category of “**public procurements**” was generally the best one, where as many as 121 LSGs scored maximal 4 points. However, this finding is limited only to availability of select procurement related documents as the scope of the analysis does not entail assessment of the procurement processes themselves.

Mostly transparent information

LSGs have separate sections on their websites, dedicated to public procurement in 94.48% of cases. Namely, the Law on Public Procurements in 2012 made it mandatory for LSGs to publish this information on the web, it is easy to do, and it represents at the same time a good practice.

The very high average score for the indicator “Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers) -87.59 %– indicates at the same time that as many as 12% of cities and municipalities **actually violated the Public Procurement Law**.

Free access to information

LSGs performed relatively well also in the area of “free access to information”, by complying in two third of cases with the duty to inform citizens on how to submit requests and in responding to requests. Still, there are huge problems in this area as well, as three-quarters of municipalities did not respect deadlines for responding with information in a timely manner in the previous year and 30% did not follow all Commissioners’ decisions to provide information.

In the category of “**Free access to information**” are found very positive results - a maximum score of 6 in three municipalities: Trstenik, Blace and Kikinda and a very good score of 5 in municipalities: Negotin, Petrovac, Indija and others, among which is an interesting example of the municipality of Medveđa, that is ranked 134th in overall LTI 2019 list.

Mostly transparent information

A surprisingly good result is that municipalities provide the requested information (FOI request) to the “mystery shopper” 90.34% of the time. Having in mind that the request submitted for the purpose of this research was not signed by Transparency Serbia, but by a common citizen the response rate was much better than expected.

As transparency may never be fully ensured through proactive publishing of information, it is essential for LSGs to provide access to their documents also on the basis of free access to information requests. It is also possible that in some cases access would not be provided, based on the grounds recognized in the Law on Free Access to Information of Public Importance. In these cases, the issue should be resolved in an appeal procedure, before the Commissioner for Information. We looked for the compliance of municipalities with final Commissioner’s decisions and identified more that 70% of those who fulfilled their legal duty in all cases. However, the percentage of those who illegally failed to comply is worrying.

The very basic requirement, necessary to enable implementation of the Law on free access to information, has been met by 86.21% of LSGs. Namely, that percentage of LSG's informed website visitors on how to submit a request for free information.

Budget

Performance in the “budget” category is third best, where LSGs earned almost half of all possible points. While current budget documentation is usually available on the webpage, in most instances in MS Excel (2/3), the situation is significantly worse when it comes to the availability of data on budget spending, where only 1/3 of LSGs published at least those reports that they have to share with the Ministry of Finance. Audit reports were discussed in less than 20% instances. It is encouraging, however, that some form of public consultation about the budget was held in two thirds of LSGs.

In the category of “**Budget**”, the municipality of VelikoGradište had the maximum score of 15. The municipalities of Užice, Paraćin, Temerin, Bosilegrad, Krupanj, Nova Varoš, Pirot, and Ljubovija are very well ranked with a score of 13. Among surprisingly good performers here are also Tutin and Žabalj, whose overall ranks are 97 and 92.

Mostly transparent information

The most important “law” for cities, their budget, should also be available on their web pages. We looked for clearly identified budget information, in the form of a separate banner, web page, section, or document, and not just for general links to the Official Gazette, where the budget must exist. However, almost one quarter of LSGs did not have their budgets published in a way that would make it transparent for web-site visitors, or at least information for last year's budget did not exist on the website.

Since budget decisions of municipalities are large documents, it is also essential to provide budget information in a machine readable format on the website, so those interested may search for, assess and compare data as they want. That is also in line with newly adopted legislation on e-government, the Government's commitment to the Open Government Initiative and ongoing Open Data Initiative. In the current moment, budgets were available in a machine readable format, i.e. in MS Excel files, in 68.97% of cases, while the other municipalities published PDF documents or scanned pages.

Non-transparent areas

When it comes to the budget execution, that is crucial information for holding the local government accountable, yet the level of transparency is still rather low. In almost all cases, monthly spending and income reports are missing. Public debates during the budget process are sometimes organized, but reports on that activity are usually missing. The level of compliance with the standard to publish and discuss the annual budget audit in an assembly session during the last 12 months was surprisingly low (17.93%).

Information Booklets

The publishing and updating of the “Information booklet”, a Serbian-specific channel of pro-active informing of citizens since 2005, was a serious challenge for LSGs in 2019. Even if

almost 60% had the Booklet published on the internet and updated during the last three months, only one third of them published two types of mandatory information that are included in LTI. This confirms the findings of previous TS research on non-compliance of Information Booklets with Commissioner's Instructions for creating and publishing information about the work of the state body.

Examples of good practice are also found in the category of "**Information booklet**", where several of municipalities have the maximum score of 4, and among the municipalities with a score of 3 is Opovo, whose overall rank is 108.

Mostly transparent information

The very good score when it comes to the updating of the public procurement chapter in the Information Booklet or elsewhere on the website is also an indication of a problem. More than 13% of LSG's did not update this information for more than a year, while **the law mandates the publication of accurate information** of that kind, at least on a monthly basis (Commissioner's Rulebook on Information Booklets).

Public Debates and Public Competitions

When it comes to public debates, more than 60% of LSGs published information of some hearing/debate held during the last 12 months. However, it is still far from a fully consultative process. Namely, only one fifth of them published reports on public debates, that contains information on proposals received from citizens and reasons for the acceptance/refusal of those proposals. Even greater is the disproportion between the announced leasing of municipal property and published information about the outcome of those announcements. The situation is significantly better when it comes to the publishing of information about the distribution of municipal funds for media and CSO projects, where we found both announcements and results in more than 60% of LSGs.

In this category, two municipalities – Paraćin and Krupanj- have the maximum score of 7, Senta, Leskovac, Vrnjačka Banja and some others have very good score of 6 and among the very well- ranked municipalities whose score is 5 is the municipality of Brus, whose overall score (35) and rank is low (101).

Mostly transparent information

LSGs in a high percentage of cases regularly announce a call for leasing property in their possession (86.90) on their web pages. It is theoretically possible that the rest of LSGs did not have such leasing in a recent period, but it is not very likely, having in mind that some of mid-size cities earned zero points under this category.

Non-transparent areas

The report on public debates usually does not contain information on proposals made by citizens and the reasons for their acceptance / refusal.

Rental or lease reports for commercial premises and agricultural land are rarely published on municipal or city websites, although it is reasonable to believe that most of the LSGs have such contracts.

While all LSGs distribute part of their budgets to the NGOs implementing projects of public interest, few published reports on the realization of NGO projects financed by the municipality.

In Serbia, there is no legal requirement for municipal administrations to produce their annual work plans. However, we considered that matter to be part of good internationally recognized practice. Furthermore, such plans exist on the central government administration level. Only two LSGs however published such document in this research round.

A huge issue in Serbia exists with respect to the management of public property, both on the central and local government levels. Many of the recommendations of the Supreme Audit Institution are aimed to resolve problems of public property registers and usage and to prevent eventual abuses. There are efforts of central and local government to establish accurate registers of real estate and other property. However, even if such information is potentially subject to abuse, only one LSG provided its own citizens with information about the real estate possessed by them that is leased to the citizens and business entities. Even in that case, the information does not contain all elements we searched for (date, price and duration of lease).

Mayors perform many activities in the public interest which are broadcasted. However, activities are usually published only after the fact. Only in one case are LSG citizens and journalists able to obtain information in advance through the official webpage.

LSGs and citizens

When it comes to the relationship between the municipality and citizens, the most transparent aspect is information on working hours (almost everywhere). LSGs also largely followed the duty to publish inspections' lists (which was the case in more than 80% of instances) and to establish service centers for communication with the citizens. In only 50% of municipalities, citizens may easily obtain contacts of their local community councilors, information on attending local assembly sessions or meeting with the mayor. One fifth of LSGs conducted research on satisfaction with their services during the last four years, and a similar number of them provide the possibility to report wrongdoing in their premises or on their web page. An even greater problem for the citizens is the fact that only 5.5% of LSGs publish deadlines for the issuing of documents in the service centers or the premises of the administration and only 9% provide access to the status of citizens' requests on their web-site. Mayors are often visible in local press, but only 15% of them hold regular press-conferences on a monthly basis.

While no municipality reached a maximum score in the category of “**Municipality and citizens**”, the best ranked were Novi Pazar and Sombor, with scores of 12. There is a positive example of Kladovo in this category, whose overall score (28) and rank is very low (127).

Mostly transparent information

Working hours of municipal administration were published on the web or at least the telephone number where such information could be obtained in as much as 97.93% cases. While publishing working hours is the kind of information that predates the internet and other modern tools of transparency, publishing telephone information is a direct consequence of a legal requirement.

For another legal obligation, to publish inspection control lists, as defined in the Law on Inspections, LSGs earned 84.83% of the maximum score. Again, it means that **more than 15% of them did not fulfill mandatory legal requirements** in that field.

Service centers were developed for years at the municipal level. It is also a matter of wider governmental policy, encouraged by donor support. Therefore it is not surprising that almost 80% of LSGs in this research round have such centers.

Municipalities are not required to ensure direct communication with the mayor or with the councilors. However, such practice exists, or at least is published in two thirds of LSGs.

Non-transparent areas

For many citizens a visit to the premises of the LSG is more convenient than obtaining information via a webpage. However, very few service centers published deadlines for issuing documents and instructions in the service center or at the premises of the municipal or city administration. Even worse was the situation with information about reporting of corruption being visible in the service center or administration offices.

Information about the reporting of corruption is not widely published on the website either. It is also not always clear whether mechanisms for reporting allow anonymity. Similarly, there is a lack of information on handling petitions and complaints, the contact of the mayor or deputy with the citizens and submission of a request for free access to information when it comes to their visibility in the service center or at administration premises. In a vast majority of cases a citizen cannot monitor the status of his/her case on the website.

Assembly and Council

The only aspect of transparency where assemblies and councils performed well was publishing of the list of their members (86%). Even the agenda of the next Assembly's session was not visible in two-thirds of LSGs, while voting results and amendments submitted are available in less than 10% of cases. However, only half of those publishing agendas for municipal sessions also publish draft documents to be discussed at the session of the local parliament. City/municipality council decisions are available in 11% of LSGs only, and those of assemblies are available in slightly more than 20%.

In this category, none of the municipalities had the maximum score of 18. The best ranked is the Municipality of Plandište with a score of 15, second place is shared between Novi Pazar, Užice, Vrnjačka Banja and Leskovac, with the score of 14. Among the best ranked are some municipalities whose overall rank is significantly worse, such are Novi Sad and Požega with the score of 12 in this category, whose overall rank is 50, i.e. 69.

Mostly transparent information

The transparency of key office holders' names is relatively high as well. We found names of city councilors in 86.21% of cases. There is no good reason for the rest of LSGs for not publishing it, but there is no legal obligation either.

The basic transparency of rules and regulations issued by municipalities' assemblies and other organs is ensured by publishing them in the Official Gazette. For long time, it has been technically possible to ensure a greater level of transparency by publishing these rules on the web as well. More than 70% of municipalities achieved that standard by enabling free on-line access to these papers (75.86).

Non-transparent areas

City assemblies are not required to publish individual voting results. However, that information could significantly increase the accountability of city councilors, which is not considered very high in any case. In practice, citizens may learn from the news or TV broadcasts of the assembly's plenary session how a particular political party or representatives of citizens' groups voted for decisions of their particular interest, but the only way to establish individual accountability would be to provide information about the actions of each and every councilor, as they are not legally bound to obey the party leadership's decision. Another reason for greater transparency on the local government level is the fact that this type of information already exists on the central government level, i.e. for the Serbian Parliament.

City councils discuss and decide on many important issues. Unlike assemblies, their sessions are not broadcast by the local media. That is why it is important to ensure the transparency of their decisions in other ways. However, the vast majority of municipalities failed to do this, either currently or for decisions made during the last two years.

While LSGs largely publish information related to the submission of information on their web-sites, most of them failed to visibly post such information in their service centers or administrative premises, even if such information would be highly relevant for citizens that are not satisfied with the information provided by civil servants on the spot. It shows that reforms aimed to facilitate citizens' communication with municipal administrations do not sufficiently address their legal right to obtain LSG documents on the basis of requests and not only to obtain information that civil servants consider relevant for their case.

Although the work of the Assembly may be followed through news or direct broadcasting, the quality of these transparency and accountability mechanisms is very limited due to inability to access and analyze in advance the proposed documents before these are considered at the session of the Assembly. We found this in 83.5% of LSGs. Similarly, LSGs usually do not publish previous voting results nor amendments proposed during the parliamentary debate and explanations for these amendments. Even if citizens have the possibility to get in contact with the councilors, information about this mechanism is mostly not presented on the web page.

Public Enterprises and Public Institutions

An even greater problem for transparency than the city administration and assembly are local public enterprises and institutions. Around 70% of LSGs decided to open a special section of their websites for those two kinds of entities that are founded and supervised by the LSG, which is a matter of good practice. While required by law, public competitions for directors

were published in 70% of cases for enterprises and only in 57% of cases for other institutions. However, documents on the competition process were almost non-existent on LSG web pages. The internal transparency of these institutions is very weak; their systematization acts are visible on 11%, of observed public enterprises' websites and 7.5% of observed public institutions' websites. Even information about the number of employees was hidden in 95% of public enterprises and in 80% of other public institutions. Work plans and reports are another weak points from the perspective of transparency, and the situation is again better with public enterprises (app. ¼ published) than in public institutions working in the field of culture, sports, social care etc. (1/10), probably as a matter of more strict legal rules applicable to public enterprises. The list of prices for their services is available in 46% of LSGs, but these prices were discussed with the citizens through an advisory body in only 13% of LSGs, even if that kind of consultation is envisaged in the Law on protection of customers.

In the category “**Public enterprises and Public institutions**” the best ranked are the municipalities of Plandište with the score of 12 of a maximum of 15, Novi Pazar and Užice with the score of 10, but also municipality Knić with the score of 7, whereas Knić's overall rank is 132.

Mostly transparent information

Another legal duty of LSGs is to hold an open competition for the selection of public enterprise directors. Evidence of such procedure was found on 70% of municipal web pages only.

Having in mind that citizens are receiving some key services not directly from municipal administration, but from public enterprises, it is important for LSGs to present information on public enterprises established by the LSG assembly. That kind of information was available on special segment of municipal web pages in more than three quarters of LSGs.

Similarly, many services for the citizens are provided by other public institutions, established by the LSG, in areas such as education, sports, culture and health. Those institutions are overseen to a certain extent by LSGs, and there are good reasons to provide citizens with information about the work of such institutions through a centralized section on the LSG website. That was the case in 68.28% of the municipalities.

Non-transparent areas

Another area of complete non-transparency is the procedure for the election of the directors of public institutions established by the city, i.e. those in institutions such as pre-schools, cultural centers and alike. This lack of transparency fosters an already widespread perception of politically based appointments.

The systematization act is the basic act of local administration that explains its structure, jobs and number of employees. However, it is still rarely publically available, although some information of that kind is presented within municipal or city information booklets. Even worse is the situation with the publication of the acts of municipal public institutions, in health, education and culture sectors.

For public enterprises it is rarely possible to find information on the procedure that preceded the selection of the director, but is still somehow better than the information of the selection of directors in other public institutions.

The level of transparency is extremely low when it comes to the annual work plans of public institutions, and the number of employees in public enterprises. Similarly, we found no consultations with the citizens when determining the prices of the services of PIs and PEs, through consultative meetings, surveys or through an advisory body that would be based on Consumer Protection Act, Art. 83.

Other indicators

In other, non-categorized indicators, LSGs performed best when it comes to the publishing of local development strategy (two thirds). The systematization act of municipal administration was available in 57% of LSGs.

While there was no activity whatsoever when it comes to the Council for implementation of Ethical code of public officials, in one third of cases the code of ethics for civil servants was available on the municipal website. Preventive anti-corruption documents, although mandatory for all LSGs, were identified in 54% of cases (in the case of integrity plans) and 41% (in the case of local anti-corruption plans).

Spatial plans and urban plans are mostly published on the web pages (80% publish spatial plans and 67% publish urban plans), but the information of municipal property leased to other entities is not.

Mostly transparent information

Good performance is found in the category: “Has the mayor submitted a declaration of assets to ACAS?”. However, what would otherwise constitute very good result (88.97), also must take into account that all **mayors have to submit these declarations according to the law** and that failure constitutes a misdemeanor or even a criminal offence.

Spatial plans are another category with a relatively high transparency level, as four fifths of LSG’s published them. However, the lack of these documents in 20% of the cases, constitute a serious problem as well, considering that those documents are possessed by all LSGs and thus should be easy to provide on web pages.

Similarly to spatial plans, urban plans were available on the site in three-quarters of LSGs (75.17).

Aside from regulation adopted by the LSG, it is also important to publish information on key policy documents adopted by the city or municipality. Among various strategies, the most important one on municipal level is its actual development strategy. Such documents were published on the website in almost two thirds of cases.

The very last indicator where LSG on average published information in more than 60% of instances, are the salaries of officials and employees. This issue of high interest of the public was addressed by publishing information in the Information booklets.

Non-transparent areas

A useful initiative brought by the Standing Conference of Serbian Towns and Municipalities to adopt Ethical Codes of Conduct of municipal officials was followed by the huge wave of LSG assemblies beginning in 2005 that adopted the Codes. The Codes cover a broad spectrum of issues, including conflict of interest, relations with the citizens and civil servants, accountability in dealing with budget and municipal assets and the like¹⁸. The text of such Codes is still seen in many of LSG offices all around Serbia. However, only a minority of LSGs established a separate body (committee, board, council) to oversee Code implementation. In recent years, the activity level of established monitoring boards decreased. This year's research did not identify any information on the activities of such bodies.

Lobbying in Serbia is a newly regulated activity and the implementation of the Law on Lobbying will start in August 2019. However, I some form of unregulated lobbying always existed both on the central and local government levels. Contacts of registered lobbyists and interested individuals with the municipal administration, mayor and councilors are matters of high public interest, due to the potential influence to the content of general and individual acts that LSGs adopt. None of the municipalities provided that kind of information in advance of the envisaged start date of implementation of the Law.

¹⁸<https://www.osce.org/sr/serbia/108495?download=true>

Selected individual examples

Assembly and Council

Good practices

- Krupanj - information on all members of parliamentary working bodies were found; <http://www.krupanj.org.rs/index.php?id=65>
- Pozarevac - has an electronic register of regulations; <https://pozarevac.rs/wp-content/uploads/2019/05/Registar-Propisa-2019.pdf>
- Plandiste - useful pages on the work of the municipal assembly and municipal council; <http://plandiste-opstina.rs/lokalna-vlast/skupstina-opstine/sednice-so/>
- BačkiPetrovac – the content of each Official Gazette issue is visible before opening or downloading the document; <http://www.backipetrovac.rs/dokumenti/sluzbeni-list-opstine-backi-petrovac>
- Novi Sad - designed an android app for reviewing the assembly materials; <https://play.google.com/store/apps/details?id=vpetrovic.skupstinans>
- Vrnjacka Banja - displays announcements of the municipal assembly sessions, with agendas and complete materials, which include the minutes from previous session; <http://vrnjackabanja.gov.rs/aktuelnosti/skupstina-opstine>
- Kraljevo – provides a database of regulations, but the last update is from December 2018; http://79.101.44.220:82/intranet_base/odluke.php
- Novi Pazar – features an e-assembly <http://www.eskupstina.novipazar.rs> – on which one may see agendas and the minutes of sessions;
- Kovin - publishes a register of employees for each month <https://www.kovin.org.rs/gradjani-meni/eobrasci/reg-zaposlenih-doc/2019-g-din-1/2104-r-gis-r-z-p-sl-nih-un-2019> and "a record of commissions formed by the Municipal Assembly of Kovin and the Peace Council of local communities 1.07-31.12.2017" <https://www.kovin.org.rs/gradjani-meni/eobrasci/s-v-i-isi-ir-vn-v-c>
However, this has not been updated since the beginning of 2018;

Problematic issues

- Belgrade - the site has is no section for decisions, documents and news with links to the published decisions. The website provides is assembly sessions, summarized presentations, announcements of the session, summaries of what will be discussed, but without the official agenda and materials; <http://www.beograd.rs/>
- Niš - still has no Official Gazette on the website; <https://www.ni.rs/>

Budget

Good practices

- Ljubovija - budget portal established, enabling citizens better information about their money; <http://109.92.31.60/bportal/client/dashboard>
- Šabac - direct voting in the local communities of projects that will be financed from the return of property tax (noted in several other units of local self-

government); <http://sabac.rs/aktuelnosti/neposredno-izjasnjavanje-o-predlozima-projekata-mesnih-zajednica.htm>

- Lajkovac - citizens' budget made from a presentation for public budget debate; <http://www.lajkovac.org.rs/gradjanski-vodic-kroz-budzet/>
- Ub - monthly information booklets on the spending of budget funds, though this practice was discontinued in March; <https://www.opstinaub.org.rs/sr/dokumenti/9be6e328-7cef-45f6-80c2-6ad414af5698/>
- Pozarevac - an invitation to discuss the draft of the capital investment plan; <https://pozarevac.rs/poziv-za-ucesece-u-javnoj-raspravi-o-nacrtu-zakljucka-o-donosnju-plana-kapitalnih-ulaganja-grada-pozarevca-za-period-2019-2022-godina/>
- Titel - a good example - monthly data on execution of the budget; <https://www.opstinatitel.rs/e-uprava/budzet-opstine/budzet-2019-godina/>
- Palilula (Nis) - a citizens' budget was published in October aimed to assess more easily the draft budget act; http://palilula.eu/wp-content/uploads/gopBudzet/Gradjanski_vodic_kroz_nacrt_Odluke_o_buzdetu_2019.pdf
- Vrnjačka Banja – a good example of the budget page: everything is on it, including calls on public debates about the budget and reports on public debates; <http://vrnjackabanja.gov.rs/dokumenta/budzet>
- Kula – has monthly reports on the budget execution; <http://kula.rs/budzet-opstine-kula/izvrsenja-budzeta/>
- Tutin – there is a special portal, within the menu “Online budget of the municipality“, that consists of two columns: Reports” (there is a six month item about the president’s activity. On the page “Budget 2019” calls for public debate were found and the public debate report. This report is a good example of the citizens’ activity in the public debates on the presentation for public debates is actually the citizens’ budget and it would be good to publish it by that name on the page; <http://212.200.77.161:8081/#/portal/home>
- Pirot – <http://jbp.pirot.rs/> is with details about participatory budgeting;
- <https://www.pirot.rs/index.php/pb-2https://www.pirot.rs/index.php/pb-2/3568-rezultati-ankete-za-2019-Year-2>
- Zaječar – on-line monitoring of budget execution through monthly reports published in PDF <http://www.zajecar.info/files/document/2019/2/final-februar-2019.pdf>; However, the separate "Budget" page does not exist;
- Sokobanja - has a "Execution of the Budget" banner that provides monthly and daily reports <http://www.opstinasokobanja.com/budzet>;
- Vranje – there are updated monthly reports on the implementation of the budget. <http://www.vranje.org.rs/dokumenta.php?id=11354> However, the link to them is named “Realization of the Budget 2017/2018”;
- Indjija provides access to its monthly execution data; <http://www.indjija.net/Page.aspx?id=23>

Problematic issues

- Sokobanja – Even though budget execution data are available, the adopted Budget Act for 2019 is not, even on “most important decisions” web-page;
- Belgrade - there is no budget page, and the current budget is very difficult to find. On the Secretary of Finance page there is a citizen's guide through the budget, actual budgets and revision of the budget for 2019 and final budget for 2017. The current

budget is non-searchable - it is in PDF format, with pictures instead of text.<http://www.beograd.rs/>

- Smederevo - a bad example of a public debate on the budget. On the 11th of December a decision was made to publish the draft on the website, so citizens can submit proposals and remarks by 1:00 PM December the 13th.http://www.smederevo.org.rs/OPSTINA-SMEDEREVO-Gradski-budzet_3172_2_27_cir

Public enterprises and public institutions

Good practices

- In Ljubovija we found on the website names of members of the managerial boards and supervisory boards appointed by the municipal assembly;<http://www.ljubovija.rs/lokalna/66>
- Nis has a page "Commission for Implementation Competition for the Selection of the Directors of public companies in the city of Nis", where readers can find the decisions of appointing and rank lists, but cannot find any minutes from the commission meeting;<http://www.ni.rs/komisija-za-sprovodjenje-konkursa-za-izbor-direktora-javnih-preduzeca-grad-a-nisa/>
- Plandiste – there is an overview of public enterprises and public institutions;<http://plandiste-opstina.rs/lokalna-vlast/javna-preduzeca-ustanove/>
- Novi Sad – has information about directors and members of the managerial board and supervisory committee of public enterprises, public utility enterprises, public institutions, and school councils;<http://www.novisad.rs/articles/45>
- Novi Pazar - the page on the public enterprises is very good, but in the time of review the reports for 2018 and plans for 2019 were not yet published;<https://www.novipazar.rs/lokalna-samouprava/javna-preduzeca>
- Vrnjacka Banja - all public enterprises and public institutions are presented as well, with basic data and links <http://vrnjackabanja.gov.rs/privreda/javna-preduzeca-i-budzetski-korisnici>

Municipality and citizens

Good practices

- Šabac – enables citizens to track status of their administrative cases;<http://sabac.rs/usluge/proverite-status-predmeta.htm>
- Ada - all services and deadlines are listed; <http://www.ada.org.rs/sr/usluzni-centar/poprava-dec-dodatak>
- Stari Grad (Beograd) enables citizens to track status of their administrative cases <http://www2starigrad.org.rs/PretPred.htm>

- Sombor – enables citizens to track status of their administrative cases, <http://wp.sombor.rs:8180/opisportal/>

Problematic issues

- In Indjija a number of other good practices, known for years, were discontinued in 2015 and 2016.
- Obrenovac – there is an automated chat-bot on the website. It does not offer a live contact with the operator, but help through the automatic options for the orientation on the website. If the topic of interest is not among the options, a request is made to one of the civil servants. https://obrenovac.rs/?page_id=10785 However, when tested, TS found that the chat-bot is not functional.

Public debates and Public competitions

Good practices

- Nova Crnja – good example of publishing reports from the public debates <http://www.sonovacrnja.org.rs/images/2018/Vesti/IJR.pdf> ;
- Krupanj - a report on realization of media projects was found (a rarity); http://www.krupanj.org.rs/index.php?id=97&file=tl_files/css/izvestaj%20o%20realizaciji%20sufinansiranih%20projekata%20na%20konkursu%20za%20sufinansiranje%20projekta%20proizvodnje%20medijskih%20sadrzaja%20u%20oblasti%20javnog%20inf.%20u%202018.god..doc
- Sokobanja – provides a tabular presentation of the competitions opened by the municipality with accompanying documents; <http://www.opstinasokobanja.com/%D0%BE%D1%83/%D0%B0%D0%BA%D1%82%D1%83%D0%B5%D0%BB%D0%BD%D0%B8-%D0%BA%D0%BE%D0%BD%D0%BA%D1%83%D1%80%D1%81%D0%B8>
- CrnaTrava – provides an excellent example of responding on proposals made on the public debate <http://www.opstinacrnatrava.org.rs/assets/izvestaj-sa-javne-rasprave-povodom-nacrta-novog-statuta-opstine-crna-trava.pdf>;
- Bečej - there is a mechanism to send questions to the councilors, who respond via email <http://www.skupstina.becej.rs/%D0%BF%D0%B8%D1%82%D0%B0%D1%98%D1%82%D0%B5-%D0%BE%D0%B4%D0%B1%D0%BE%D1%80%D0%BD%D0%B8%D0%BA%D0%B0/>

Public procurements

Good practices

- Medijanaand Pantelej (Nis) – have interesting pages on public procurement (tabular review of documents); <http://medijana.rs/javnehttp://www.pantelej.org.rs/cir/dokumenta/Javne%20nabavke/>
- Belgrade - provides a special city portal on public procurements; <https://nabavke.beograd.gov.rs/>

Access to information and Information Booklet

Good practices

- Bečej – Lists very detailed instructions about access to information of public importance, including all public authority entities in that municipality that information may be requested from (including the local community, public institutions and public enterprises);
<http://www.becej.rs/%d1%81%d0%b5%d1%80%d0%b2%d0%b8%d1%81-%d0%b3%d1%80%d0%b0%d1%92%d0%b0%d0%bd%d0%b0/%d0%b8%d0%bd%d1%84%d0%be%d1%80%d0%bc%d0%b0%d1%86%d0%b8%d1%98%d0%b5-%d0%be%d0%b4-%d1%98%d0%b0%d0%b2%d0%bd%d0%be%d0%b3-%d0%b7%d0%b0%d0%bd%d0%b0%d1%87%d0%b0%d1%98%d0%b0/>
- Varvarin – Provides a good example of an Information Booklet. It lists deadlines for the services provided by the municipality; officials' salaries, and a review of the fees paid in the previous period <http://varvarin.org.rs/wp-content/uploads/2019/06/Informator-31.05.2019.pdf>
- Plandište - Also provides a good example of an Information Booklet, by publishing deadlines for action <http://plandiste-opstina.rs/dokumenti/informator-o-radu/>

Problematic issues

- Negotin – The information booklet has no interactive content, although this badly needed for its 900 pages;
http://www.negotin.rs/resources/informatori/opstinska_uprava_/INFORMATO_R_O_RADU_-_11.06.2018.pdf ; <http://www.negotin.rs/informatori-javneustanove.htm>
- Kuršumlija – delayed providing the access to information by requesting “to address the Secretary of the Assembly or the service of the municipal protocol”, even though the Law does not require information seeker to identify an individual or department that is in charge to deal with the request.

Other issues, miscellaneous

Good practices

- Osečina - Demonstrates a good example of organizing and providing municipal website. There is also special news from the assembly; <https://osecina.com/>
- Žabari – This is a user friendly website with spatial plans and general and detailed regulation plans; <https://zabari.org.rs/>
<https://zabari.org.rs/dokumenti/category/planska-dokumenta/>
- Bač – Has an excellent search option of documents by categories and years;
<https://www.bac.rs/sr/dokumenta>

- Stari Grad (Beograd) On the website "Register of real estate in the state ownership of which is the city municipality Stari Grad" was also found, but from 2011 only. <http://www.starigrad.org.rs/category/201> . There is no data on the user (it states that the owner is the state, and the user is city municipality Stari Grad, but there is no data on whether it has been leased and to whom and under what conditions). This database is a good starting point for further editing and updating;

Problematic issues

- Sjenica – the site looks technically advanced; however, the majority of chapters remained unfilled; <http://sjenica.rs/>
- Bor – The website is interesting because of its name. Bor got the status of the city, but the official presentation is still at www.opstinabor.rs. The site www.bor.rs exists, but also redirects to this address;
- Sopot - This site has no Information Booklet, budget, and no official Gazette on the website. It is full of information about the activities of the president of the municipality and the meetings of citizens in the local communities, where the president of the municipality informs what has been done and listens to the problems of citizens. No information was found about how public debates on the budget were organized. <http://www.sopot.org.rs/>

Comparisons with previous LTI's

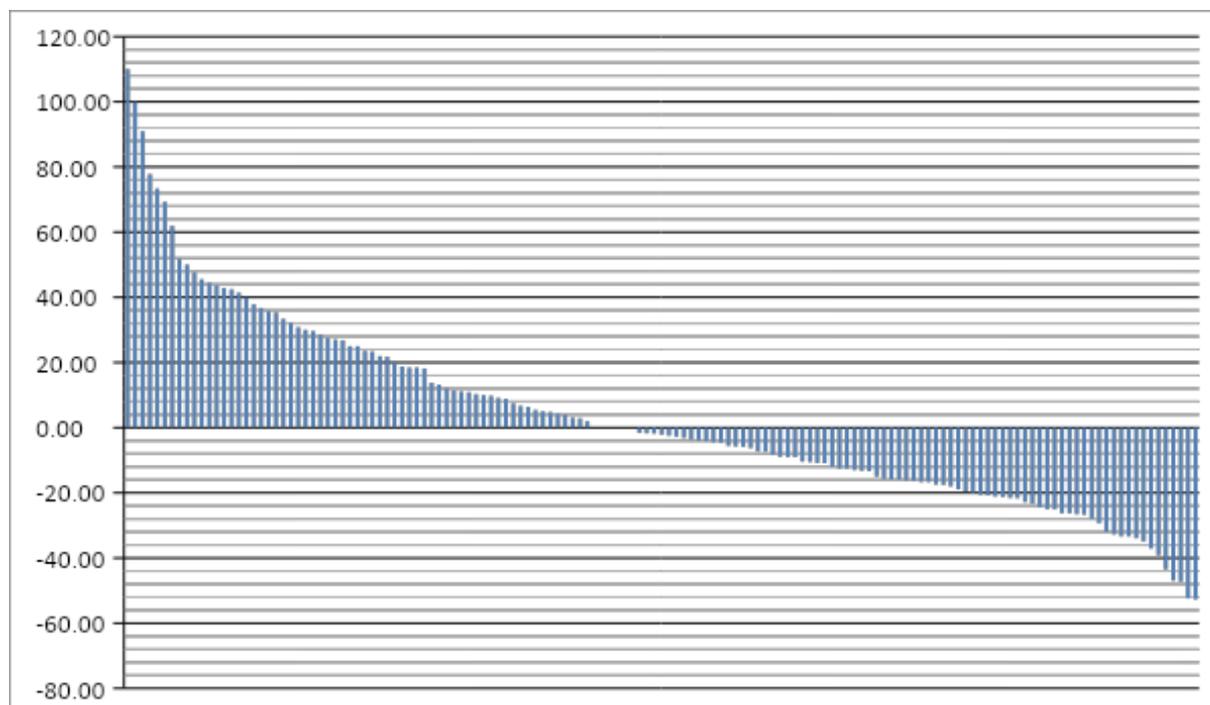
It is interesting that the overall average LTI score did not change from 2015 – it is exactly the same (40). However, only six cities and municipalities have the same score as four years ago. The majority of LSGs (75) worsened their score over time, which is a worrying conclusion. It doesn't seem that such a trend could be attributed to changes in indicators. Namely, the overall performance of LSGs with respect to the newly added indicators in comparison to the LTI 2015 is actually higher than the average and should therefore be reasonably expected to increase the overall score by approximately 1.5 points.

The fact that 64 LGS, which have better scores than 4 years ago, achieved additional points in the same value as 75 LGSs, with worsened score, which lost points, indicates that the space for improvements is still very large, including the possibility to make significant progress through dedicated engagement in a relatively short time.

The best ranked is the municipality of Plandište, with a score of 67, second place is shared between Paraćin and Novi Pazar with the index 66, followed by Veliko Gradište and Užice (64), Vrnjačka Banja (62), and Leskovac and Vranje (60).

At the bottom of the table are the municipalities of Smederevska Palanka (LTI 12), Preševo (13), Svilajnac (18), Bogatić (19), Ub (20) and Bela Crkva (21) and city of Jagodina (21).

Graph 2: Percentage of score improvement 2015/2019 for 145 LSGs



Legend:

x-axis: LSGs' score improvement/deterioration in LTI 2019 as compared with LTI 2015 as a basis

y-axis: % of score improvement/deterioration in LTI 2019 as compared with LTI 2015 as a basis

Six LSGs that improved their scores by 20 points or more in the last four years: VelikoGradiste, Novi Pazar, Bor, Irig, Uzice and Vrnjacka Banja, while the champion for 2019, Plandiste, raised its score by 18 points. On the other hand, five municipalities lost 20 points or more since 2015: Knic, Ub, Svilajnac, Ada and Coka. Worrying trends are also identified in Becej, GornjiMilanovac, Zitiste, Bogatic and Cuprija. Pancevo and BackaTopola, who were among the best performers in earlier research, lost as much as 16 points. That is another proof that a **transparency level that has been once achieved, is by no means a guarantee of sustainable good practice. It may be a matter of political prioritization or individual effort of one civil servant.** On the contrary, **written procedures and independent monitoring could help to maintain good results.**

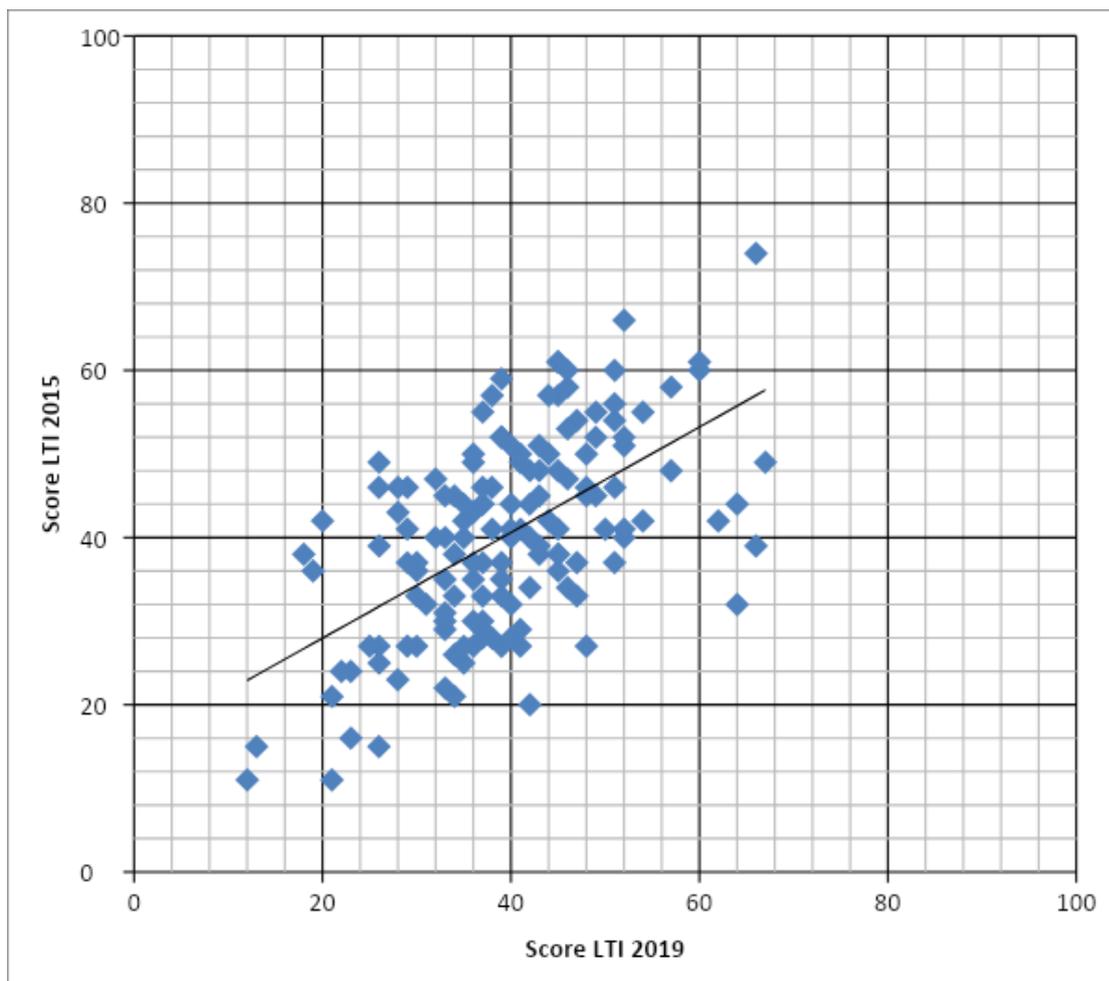
On the other hand, 11 LSGs lost more than a third of their 2015 points. In total, 76 LSGs worsened their scores, six remained the same and 63 improved their scores. The prevalence of negative over positive performers, while keeping the same average score (40) in both LTI 2015 and LTI 2019, clearly indicates the **lack of country-wide policy** to improve transparency of local governments and/or its implementation. On the other hand, it also shows that **individual efforts can make the change.**

Improvements were greatest in several LSGs that have very low starting points. For example, the City of Bormore than doubled its score over the last four years, but this was sufficient only to achieve an overall score that is close to the country's average.

Similarly, Bela Crkva increased its score by 90%, Secanj 73% and Trgoviste 62%, but they remained among the less transparent municipalities.

On the other hand, **VelikoGradiste doubled its score and Novi Pazar increased its score by 69%, enough for both of them to become two of the most transparent municipalities.** The dedication of civil servants and **building of the system that includes internal regulation aimed to ensure greater transparency** most visibly improved situation in these two LSGs. Irig made significant progress as well. Unfortunately, the score of some municipalities significantly declined: Svilajnac, Ub, Bogatic and Knic lost close to half of their points from 2015. Another seven LSGs lost one-third of their previous result. Such negative trends could probably be attributed to the personal changes of persons in charge for publishing of documents, loss of their enthusiasm, overall lack of capacities in municipal administration and more than anything, **absence of internal procedures in local administration that could ensure sustainability of transparency efforts.**

Graph 3: Distribution on LSGs according to their LTI 2015 and LTI 2019 Score



Comparisons of results in various research fields

Table no. 2. Successful achievement of LSGs in various fields (categories) in LTI 2015

Area	Assembly and Council	Budget	LSG and citizens	Free Access to Information	Public Procurements	Information booklet	Public enterprises and institutions	Public debates
Average score	7.35	6.37	4.67	2.28	3.32	2.96	5.64	2.52
Max Score	15	16	15	5	4	6	18	8
% of Max score	49.01	39.83	31.13	45.52	83.10	49.31	31.34	31.47

Legend: Score range 0 to Max score for certain category

When comparing to the LTI 2015 to the LTI 2019, the results are mixed. The results are now significantly worse in the area of transparency of cities' assemblies and councils, where the overall score decreased from 49% to only 29% of possible points.

On the other hand, transparency has improved when it comes to the budget information, in the area of free access to information (but not when it comes to the accuracy and comprehensiveness of information booklets) and public debates. It remained largely on the same level in relations of LSG with citizens and transparency of public enterprises.

These differences could not be easily explained with any particular change in the legislation. It is, however, probable that the improvement of budget performance might be related to good examples from the central government and donor support, e.g. in the area of "citizens budget" preparation and encouraging to organize public debates based on the Law on the Planning System and CSO initiatives. On the other hand, weaker discipline in the area of "information booklets" might be connected with insufficient capacities of the Commissioner to perform oversight and of the municipal administration to fulfill duties related to the preparation of that document.

Recommendations

Transparency Serbia with certain modifications, repeats the following recommendations made in the previous research:

Most important information on the website (about the budget, decisions of municipality assembly, council, information about public enterprises, public procurement etc.) **should be systematized:**

- LSGs should open the special webpage on the site **dedicated to the activities of the assembly** (as well as the activities of the mayor and the council) containing all relevant documents and information, such as announcements for the next session with the agenda and materials (including the minutes from previous sessions), reports from the sessions, with adopted decisions or exact links to the Official Gazette issue in which the decisions are published;
- LSGs should open a **special "Budget" page**, which would include not just adopted budget decision, but all information and documents related to the budget - periodical reports on execution, final accounts (annual report), rebalances, citizens' budgets, calls for public budget discussions and reports from public debates;
- Information on **public competitions and calls should be published along with information on the results of the competition**. Transparency Serbia recommends publishing of reports on the implementation of NGOs / media projects funded by LSGs as well;

Electronic register of administrative procedures should be introduced in all cities and municipalities, and **information** on procedures and deadlines for municipal administrations published **in service centers** enabling citizens to access the register of administrative procedures on the computer in the LSG premises;

Contact information of councilors (e-mail addresses, telephone numbers, time and place for regular meetings with citizens, if defined) should be published on websites, along with the lists of councilors;

Those LSGs, who have technical and financial capacities, should **establish mechanisms to enable citizens to track their administrative cases** and to receive data on the handling of appeals, complaints and grievances. If there are no such capacities, TS recommends publishing phone numbers of civil servants that would provide this information on visible places. This would be regulated also by the electronic registry of administrative procedures;

LSGs should clearly notify citizens on their **mechanisms for reporting irregularities** and mechanisms for reporting the suspicion of corruption. They should post such information on websites and in service centers (premises of administration);

LSGs should prepare their Information Booklets in full compliance with the mandatory Instruction (Rulebook), prescribed by the Commissioner for Information of Public Importance, and to update them in accordance with the Instruction (at least once a month);

LSGs should **edit their pages dedicated to public enterprises, public utilities company and other public institutions..** Within the page, Transparency Serbia recommends LSGs to create the segment devoted to the work of the Commission for the Election of the Directors of

Public Enterprises and Public Utilities Companies and on which all the documents regarding the work of the Commission should be published. This especially applies to the sessions' minutes. The purpose would be to see how candidates are scored and rank list created. Transparency Serbia recommends LSGs to publish on these pages also the plans of work of PE and PI (or the link to them), systematization act and the data about the actual number of employees (or links to these data on the websites of the public enterprises/public utilities companies and public institutions);

LSGs should **make transparent data on property owned by them** (e.g. business premises, apartments, other facilities, construction land, agricultural land) with the data about users and rents which is paid by users. They may either create their own database or use the application prepared by the Republican Directorate for property register.

Conclusions

The Local Transparency Index (LTI) 2019 represents Transparency Serbia's research, evaluation and ranking all cities, municipalities and city municipalities in Serbia. The research covers 145 units of local self-government and 25 in-city municipalities. TS applied it for the first time in 2015.

The average score is 40, which is relatively low. However, it is unchanged from 2015, the last time the research of transparency level was conducted using the same methodology and sample, with slightly modified indicators.

LTI 2019 shows that dedicated civil servants can make a difference and significantly improved transparency of local administration. However, they do this without the benefit of a nation-wide policy, which would ensure that transparency reforms are sustained with a change in local governments. This research also proves that a transparency level once achieved is by no means a guarantee of sustainable good practice.

Only 8 out of 145 municipalities have LTI greater than 60, thus, significant and continuous efforts are necessary to improve and maintain transparency even among best performers. Far better results are recorded in areas where transparency is clearly prescribed by laws. However, even if legal obligation to publish documents exists, significant number of municipalities failed to meet that duty, such as is the case with the Law on Public Enterprises.

This cycle of research noted some positive changes or novelties which might bring such changes in the future. More LSGs are publishing the citizens' budget, and also are publishing comprehensive pages or even separate websites with data about budget or public procurements, More than half of LSGs are adopting Local Anti-Corruption Plans (LAP). Full implementation of LAPs would increase LTI score as well, since the LAP concept relies largely on transparency as a corruption prevention mechanism.

Most of the negative findings identified in the LTI 2015, persist: failure to regularly update Information Booklets or to publish all mandatory information; lack of information on decision-making processes, and a lack of information on real estate and other municipal property.

This report identifies both good practices and opportunities for improvement. It is therefore dedicated to the local self-governments to use it as a tool to advance the transparency of their work.

Annexes

Annex 1. Average score per indicator

Indices	% of max score
36. Is the information on the working hours of administration available on the website or telephone number through which it is possible to get this information?	97.93
53. Is there a section on the website dedicated to public procurements?	94.48
48. Did the municipalities provide requested information (FOI request) in time?***	90.34
95. Has the mayor submitted a declaration of assets to ACAS?	88.97
54. Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers ...)? **	87.59
55. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?	86.90
77. Does the municipality regularly announce a call for leasing property in its possession?	86.90
12. Is the list of councilors published on the site?	86.21
51. Are information on the submission of a request for free access to information on the site?	86.21
39. Are there inspections controlling lists on website?	84.83
17. Is the budget for the current year available on the site? **	81.38
89. Are spatial plans published on the site?	81.38
31. Does the municipal administration have a service center through which it provides all the services?	79.31
60. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?	76.55
14. Is the local Official Gazette available on the site? **	75.86
90. Are the urban plans published on the site?	75.17
62. Have public competitions for the selection of directors of public enterprises been conducted?	74.48
50. The municipality has no unresolved decisions of the Commissioner?	71.03
82. Has the municipality's development strategy been published on the website?	70.34
19. Is budget published in machine readable format on the website?	68.97
15. Do rules of procedure envisage public questions of the councilors to the mayor and/or the city council?	68.28
61. Is there a special segment on the site dedicated to public institutions with PI data?	68.28
27. Has the final budget account been considered?	67.59
79. Have the public calls/ results of the competition for media allocation in the last 12 months been published on the website?	66.90
24. Has a public debate on the budget been held - citizen surveys or consultation meetings? **	66.21
75. Are there data on the website about the conducted public hearings/debates in the last 12 months (except for the budget)?	63.45
58. Does the Information Booklet contain information about salaries of officials and employees?	62.76
85. Is the rulebook on internal organization and systematization of administration posted on the site?	62.07
18. Is the explanation of the budget available on the site?	60.69
30. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users	60.00

63. Has there been a public competition for the selection of the director of public institutions?	60.00
80. Have the public calls/ results of the competition for the allocation for NGOs been published on the website?	60.00
56. Is Information Booklet published on the site and updated in the last 3 months? **	58.62
28. Has the proposal for the final budget account been published in the last 12 months or the adopted budget account?	57.93
42. Are there contact information of local community councilors on the municipal website?	55.86
93. Has the Integrity Plan been adopted?	54.48
43. Is there information on the website or in the Information Booklet that citizens can attend the assembly sessions and instructions on how to apply?	51.72
25. Has a public call for public debate on the budget been published on the website?	48.28
73. Is the list with prices of services provided by PEs and PIs available on the website of the municipality or PI/PE website?	46.21
16. Are the Assembly sessions broadcasted live or are there transcripts published, or footage from the sessions o broadcasted, or recordings of the whole session available on the website?	44.83
87. Is there a code of ethics for employees and is it available on the site?	44.14
44. Are there defined permanent terms for meeting of the mayor with citizens?	41.38
94. Has the Local anticorruption plan been adopted?	41.38
23. Is there a citizens' budget published and available on the site?	37.24
20. Are 6-month and 9-month reports on budget execution available on the site?	34.48
11. Is the agenda of the next session of the Assembly published on the website?	33.79
68. Have the annual work plans and reports on the work of PEs been published on the website of the PE (or municipality)?	26.90
49. No complaints were filed against municipalities in 2016 due to ignoring requests for information of public importance?	26.21
36. Is there a possibility on the website for citizens to report irregularities or violation of laws?	25.52
1. Are the decisions adopted by the Assembly published and available on the website? **	22.76
59. Does the Information Booklet contain information on the services provided by the municipality and deadlines for their provision?	22.07
3. Are decisions adopted by the assembly in the past 24 months available on the website?	20.69
47. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?	20.69
71. Are the data on the number of employees in the municipality and the public institutions posted on the site?	20.69
34. Is there a possibility for citizens to report irregularities in the work or violation of the law in the service center or in the premises of the administration?	18.62
26. Has the report on the public debate on the budget been published on the website?	17.93
29. Has the audit of the final budget account been published and reviewed at the session in the last 12 months?	17.93
57. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?	17.24
5. Have the proposed documents been published on the website before being considered at the session of the Assembly? **	16.55
21. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?	16.55

46. Are regular press conferences held (at least once a month) by the mayor?	15.17
78. Are the rental lease reports (commercial premises, agricultural land) published on the site?	14.48
84. Has a report on the work of the administration for the previous year been published?	14.48
70. Are annual work plans of PIs published on the website of public institutions or on the municipal website?	13.10
74. Are there consultations with the citizens when determining the prices of the services of PIs and PEs, through consulting meetings, surveys or through an advisory body (Consumer Protection Act, Art. 83)?	13.10
2. Are decisions adopted by the city council published and available on the website? **	11.72
4. Are decisions adopted by the city council in the past 24 months available on the website?	11.72
64. Is the systematization of PE published on the website of municipality or PE?	11.72
6. Have the results of the voting at the last session of the Assembly been published on the website?	11.03
13. Are there data for citizens' contact with councilors published on the website?	9.66
22. Are monthly reports (or cumulative monthly reports) on budget execution available on the site?	9.66
45. Are data on the contact of the mayor or deputy with the citizens visible?	9.66
76. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?	9.66
37. Do (both/all) mechanisms for reporting allow anonymity?	8.97
40. Can a citizen monitor the status of his case on the website?	8.97
69. Are there reports on the work of public institutions on the website of the municipality or PI?	8.28
9. Are the amendments submitted on the draft acts, that were considered at the last session, published on the website?	7.59
65. Is the systematization of PI published on website of municipality or PI?	7.59
8. Have the results of the voting of the Assembly in the past 24 months been published on the website?	6.90
52. Is information on the submission of a request for free access to information visible in the service center or administration premises?	6.21
32. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration? **	5.52
35. Are there mechanisms for reporting corruption on the website?	5.52
41. Are there data on handling complaints, petitions and complaints?	5.52
72. Are the data on the number of employees in PEs published on the municipal website?	5.52
81. Have the reports on the realization of NGO projects financed by the municipality been published on the website?	5.52
10. Are justifications/explanations regarding the amendments published?	4.83
33. Are there information about reporting of corruption visible in the service center or administration offices?	3.45
66. Have the documents from the selection procedure of the director of PE been published on the website?	2.07
83. Is the annual plan of work of municipal administration published on the site?	1.38
88. Has the record of the property (real estate) owned by municipality which is leased published on the website, with data on leases, price and duration of lease?	0.69
92. Is there a daily or weekly schedule of mayor's activities published on the website?	0.69

7. Has information been posted on individual members of parliament votes on legislation debated?	0.00
67. Have the documents from the procedure for the election of the director of the PI been published on the website?	0.00
86. Are there information on the activities of the Council for the implementation of Ethical codes and its contacts with citizens on the website?	0.00
91. Is there a report on contact with lobbyist published on the web site?	0.00

Annex 2. Final scores of municipalities compared to the LTI 2015

Full list

(Improvement or deterioration ratio higher than 30% highlighted)

No	City or municipality	LTI 2019	LTI 2015	Improvement points	Improvement ratio %
1	Plandište	67	49	18	36.73
2	Paraćin	66	74	-8	-10.81
3	Novi Pazar	66	39	27	69.23
4	Veliko Gradište	64	32	32	100.00
5	Užice	64	44	20	45.45
6	Vrnjačka Banja	62	42	20	47.62
7	Leskovac	60	61	-1	-1.64
8	Vranje	60	60	0	0.00
9	Požarevac	57	48	9	18.75
10	Kraljevo	57	58	-1	-1.72
11	Knjaževac	54	55	-1	-1.82
12	Čačak	54	42	12	28.57
13	Sombor	52	52	0	0.00
14	Temerin	52	51	1	1.96
15	Indžija	52	66	-14	-21.21
16	Kruševac	52	40	12	30.00
17	Bosilegrad	52	41	11	26.83
18	Subotica	51	56	-5	-8.93
19	Senta	51	60	-9	-15.00
20	Bački Petrovac	51	54	-3	-5.56
21	Petrovac	51	37	14	37.84
22	Varvarin	51	46	5	10.87
23	Topola	50	41	9	21.95
24	Kikinda	49	55	-6	-10.91
25	Bač	49	45	4	8.89
26	Ruma	49	52	-3	-5.77
27	Novi Bečej	48	45	3	6.67
28	Irig	48	27	21	77.78
29	Krupanj	48	50	-2	-4.00
30	Priboj	48	46	2	4.35
31	Kanjža	47	54	-7	-12.96
32	Trstenik	47	33	14	42.42

33	Babušnica	47	37	10	27.03
34	Srbobran	46	60	-14	-23.33
35	Sokobanja	46	58	-12	-20.69
36	Ivanjica	46	47	-1	-2.13
37	Gadžin Han	46	34	12	35.29
38	Pirot	46	53	-7	-13.21
39	Bačka Topola	45	61	-16	-26.23
40	Pančevo	45	61	-16	-26.23
41	Kula	45	48	-3	-6.25
42	Sremska Mitrovica	45	38	7	18.42
43	Ljubovija	45	36	9	25.00
44	Negotin	45	38	7	18.42
45	Nova Varoš	45	57	-12	-21.05
46	Kuršumlija	45	41	4	9.76
47	Zrenjanin	44	50	-6	-12.00
48	Arandelovac	44	42	2	4.76
49	Raška	44	57	-13	-22.81
50	Novi Sad	43	38	5	13.16
51	Zaječar	43	48	-5	-10.42
52	Čajetina	43	51	-8	-15.69
53	Svrljig	43	39	4	10.26
54	Vladičin Han	43	45	-2	-4.44
55	Vršac	42	44	-2	-4.55
56	Kragujevac	42	48	-6	-12.50
57	Bor	42	20	22	110.00
58	Ćićevac	42	40	2	5.00
59	Surdulica	42	34	8	23.53
60	Apatin	41	49	-8	-16.33
61	Odžaci	41	50	-9	-18.00
62	Šabac	41	41	0	0.00
63	Bojnik	41	27	14	51.85
64	Crna Trava	41	29	12	41.38
65	Kovin	40	41	-1	-2.44
66	Vrbas	40	28	12	42.86
67	Valjevo	40	51	-11	-21.57
68	Boljevac	40	40	0	0.00
69	Požega	40	32	8	25.00
70	Aleksinac	40	44	-4	-9.09
71	Novi Kneževac	39	52	-13	-25.00
72	Čoka	39	59	-20	-33.90
73	Smederevo	39	52	-13	-25.00
74	Lapovo	39	37	2	5.41
75	Rekovac	39	33	6	18.18
76	Arilje	39	35	4	11.43
77	Bela Palanka	39	27	12	44.44
78	Bečej	38	57	-19	-33.33
79	Loznica	38	41	-3	-7.32

80	MaloCrniće	38	28	10	35.71
81	Dimitrovgrad	38	46	-8	-17.39
82	Žitište	37	55	-18	-32.73
83	BačkaPalanka	37	33	4	12.12
84	Mionica	37	46	-9	-19.57
85	Žabari	37	28	9	32.14
86	Despotovac	37	30	7	23.33
87	Prijepolje	37	44	-7	-15.91
88	Aleksandrovac	37	37	0	0.00
89	Blace	37	29	8	27.59
90	Prokuplje	37	44	-7	-15.91
91	Mali Idoš	36	30	6	20.00
92	Žabalj	36	50	-14	-28.00
93	Vladimirci	36	49	-13	-26.53
94	Mali Zvornik	36	37	-1	-2.70
95	Velika Plana	36	27	9	33.33
96	Batočina	36	43	-7	-16.28
97	Tutin	36	35	1	2.86
98	Beočin	35	40	-5	-12.50
99	Lajkovac	35	44	-9	-20.45
100	Žagubica	35	25	10	40.00
101	Brus	35	27	8	29.63
102	Vlasotince	35	42	-7	-16.67
103	Rača	34	38	-4	-10.53
104	BajinaBašta	34	26	8	30.77
105	Sjenica	34	33	1	3.03
106	Niš	34	45	-11	-24.44
107	Trgovište	34	21	13	61.90
108	Opovo	33	29	4	13.79
109	Osečina	33	40	-7	-17.50
110	Golubac	33	30	3	10.00
111	Kučevo	33	35	-2	-5.71
112	Lučani	33	31	2	6.45
113	Doljevac	33	45	-12	-26.67
114	Ražanj	33	22	11	50.00
115	Majdanpek	32	40	-8	-20.00
116	Bujanovac	32	47	-15	-31.91
117	Alibunar	31	32	-1	-3.13
118	Beograd	30	36	-6	-16.67
119	Šid	30	33	-3	-9.09
120	Kosjerić	30	37	-7	-18.92
121	Žitorađa	30	27	3	11.11
122	Titel	29	37	-8	-21.62
123	Pećinci	29	41	-12	-29.27
124	Ljig	29	27	2	7.41
125	Čuprija	29	46	-17	-36.96

126	Kovačica	28	43	-15	-34.88
127	Kladovo	28	23	5	21.74
128	Gornji Milanovac	28	46	-18	-39.13
129	Sečanj	26	15	11	73.33
130	Ada	26	46	-20	-43.48
131	Stara Pazova	26	39	-13	-33.33
132	Knić	26	49	-23	-46.94
133	Merošina	26	25	1	4.00
134	Medveđa	26	27	-1	-3.70
135	Lebane	25	27	-2	-7.41
136	Nova Crnja	23	24	-1	-4.17
137	Koceljeva	23	16	7	43.75
138	Sremski Karlovci	22	24	-2	-8.33
139	Bela Crkva	21	11	10	90.91
140	Jagodina	21	21	0	0.00
141	Ub	20	42	-22	-52.38
142	Bogatić	19	36	-17	-47.22
143	Svilajnac	18	38	-20	-52.63
144	Preševo	13	15	-2	-13.33
145	Smederevska Palanka	12	11	1	9.09

Cities that lost more than 10 points since 2015

City or municipality	LTI 2019	LTI 2015	Improvement points	Improvement ratio %
Knić	26	49	-23	-46.94
Ub	20	42	-22	-52.38
Čoka	39	59	-20	-33.90
Ada	26	46	-20	-43.48
Svilajnac	18	38	-20	-52.63
Bečej	38	57	-19	-33.33
Žitište	37	55	-18	-32.73
Gornji Milanovac	28	46	-18	-39.13
Čuprija	29	46	-17	-36.96
Bogatić	19	36	-17	-47.22
Bačka Topola	45	61	-16	-26.23
Pančevo	45	61	-16	-26.23
Bujanovac	32	47	-15	-31.91
Kovačica	28	43	-15	-34.88

Indija	52	66	-14	-21.21
Srbobran	46	60	-14	-23.33
Žabalj	36	50	-14	-28.00
Raška	44	57	-13	-22.81
Novi Kneževac	39	52	-13	-25.00
Smederevo	39	52	-13	-25.00
Vladimirci	36	49	-13	-26.53
Stara Pazova	26	39	-13	-33.33
Sokobanja	46	58	-12	-20.69
Nova Varoš	45	57	-12	-21.05
Doljevac	33	45	-12	-26.67
Pećinci	29	41	-12	-29.27
Valjevo	40	51	-11	-21.57
Niš	34	45	-11	-24.44

LSG's that improved score for more than 10 points since 2015

Overall rank	City or municipality	LTI 2019	LTI 2015	Improvement points	Improvement ratio %
4	Veliko Gradište	64	32	32	100.00
3	Novi Pazar	66	39	27	69.23
57	Bor	42	20	22	110.00
28	Irig	48	27	21	77.78
5	Užice	64	44	20	45.45
6	Vrnjačka Banja	62	42	20	47.62
1	Plandište	67	49	18	36.73
21	Petrovac	51	37	14	37.84
32	Trstenik	47	33	14	42.42
63	Bojnik	41	27	14	51.85
107	Irgovište	34	21	13	61.90
12	Čačak	54	42	12	28.57
16	Kruševac	52	40	12	30.00
37	Gadžin Han	46	34	12	35.29
64	Crna Trava	41	29	12	41.38
66	Vrbas	40	28	12	42.86
77	Bela Palanka	39	27	12	44.44
17	Bosilegrad	52	41	11	26.83
114	Ražanj	33	22	11	50.00

129	Sečanj	26	15	11	73.33
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Annex no. 3. Results of LSG's per indicator groups

City or municipality	Assembly and Council (max 18)	Budget (max 15)	Municipality and citizens (max 17)	Free Access to Information (max 6)	Public procurements (max 4)	Information Booklet (max 4)	Public enterprises and institutions (max 15)	Public Debates and Public Competitions (max 7)	Basic indicators (max 10)
Plandište	15	12	6	5	4	3	12	3	10
Paraćin	11	13	10	2	4	2	9	7	8
Novi Pazar	14	7	11	4	4	4	10	4	10
VelikoGradište	10	15	6	5	4	4	7	4	10
Užice	14	13	5	3	4	2	10	5	10
Vrnjačka Banja	14	12	9	4	4	0	5	6	10
Leskovac	14	11	5	3	4	3	5	6	10
Vranje	11	12	10	3	4	2	4	6	10
Požarevac	8	11	9	4	4	3	5	4	8
Kraljevo	12	9	9	4	4	4	4	3	10
Knjaževac	5	11	6	5	4	2	7	5	8
Čačak	13	9	7	3	1	3	8	4	8
Sombor	6	7	11	4	4	2	5	5	8
Temerin	11	13	4	4	4	0	4	4	10
Indija	10	9	8	5	4	3	6	1	10
Kruševac	6	12	6	4	4	2	6	4	8
Bosilegrad	9	13	5	3	4	2	5	4	10
Subotica	10	9	8	3	4	2	6	3	10
Senta	6	12	5	5	4	1	7	6	8
BačkiPetrovac	13	7	5	5	4	1	4	4	10
Petrovac	3	11	8	5	4	1	6	5	8
Varvarin	4	12	6	5	4	4	5	4	8
Topola	9	12	3	3	4	3	6	4	10
Kikinda	5	10	9	5	4	1	7	2	8
Bač	6	10	7	4	4	3	4	5	8
Ruma	9	10	8	4	4	3	2	5	8
Novi Bečej	4	11	6	4	4	1	5	4	8
Irig	8	8	6	4	4	3	5	3	8
Krupanj	7	13	5	4	2	2	2	7	6
Priboj	10	7	10	3	4	1	5	3	10
Kanjiža	12	8	4	4	4	2	7	4	8
Trstenik	5	9	5	6	4	1	5	4	8
Babušnica	4	11	6	5	4	1	4	4	8
Srbobran	6	9	6	4	4	2	6	3	8
Sokobanja	6	9	6	4	4	1	5	4	8

Ivanjica	5	9	5	4	4	3	5	5	8
Gadžin Han	11	9	5	3	4	0	4	3	8
Pirot	3	13	5	3	4	2	7	3	6
Bačka Topola	8	8	6	4	4	1	4	4	8
Pančevo	6	9	6	4	4	2	4	4	8
Kula	5	9	5	4	4	1	9	3	8
Sremska Mitrovica	3	9	7	4	4	3	7	3	8
Ljubovija	3	13	3	3	4	4	6	3	6
Negotin	5	12	8	5	1	2	5	1	6
Nova Varoš	5	13	5	2	4	3	3	4	6
Kuršumlija	4	9	5	5	4	2	6	3	8
Zrenjanin	11	9	5	4	4	2	3	2	10
Arandelovac	4	8	8	4	4	2	5	3	8
Raška	6	11	4	4	4	2	2	3	8
Novi Sad	12	6	7	3	0	3	7	2	8
Zaječar	3	8	8	5	4	3	5	3	8
Čajetina	3	9	6	2	4	2	6	5	6
Svrljig	3	6	7	4	4	2	6	3	6
Vladičin Han	6	10	5	5	1	1	4	4	6
Vršac	6	5	5	4	4	2	6	3	8
Kragujevac	9	6	6	4	3	1	6	2	8
Bor	5	9	7	4	4	1	5	3	8
Ćićevac	4	10	5	4	4	1	5	5	8
Surdulica	2	6	4	3	4	2	7	5	6
Apatin	4	9	4	5	4	2	5	3	8
Odžaci	6	7	5	2	4	3	6	4	8
Šabac	4	6	7	3	4	1	6	4	8
Bojnik	5	7	8	5	3	2	4	3	8
Crna Trava	5	7	6	4	3	2	6	4	8
Kovin	3	10	7	5	4	1	4	2	8
Vrbas	5	6	9	2	4	1	6	3	8
Valjevo	5	7	4	3	4	0	6	3	8
Boljevac	4	5	8	3	4	1	5	4	8
Požega	12	5	5	2	4	1	3	3	8
Aleksinac	5	5	5	4	4	3	5	4	8
Novi Kneževac	5	10	4	4	4	1	5	3	8
Čoka	4	6	4	5	4	3	8	1	6
Smederevo	2	8	9	4	4	2	3	0	6
Lapovo	4	6	5	4	4	2	6	3	8
Rekovac	4	10	3	4	4	1	3	2	8
Arilje	9	5	5	4	4	2	2	3	8
Bela Palanka	1	9	5	4	4	0	5	4	6
Bečej	5	7	8	3	4	1	3	2	8
Loznica	6	6	6	3	4	3	5	0	10
Malo Crniće	3	9	2	4	4	1	4	4	8
Dimitrovgrad	8	0	4	4	4	0	7	4	8
Žitište	5	2	6	4	4	2	5	4	6

BačkaPalanka	5	8	4	4	4	2	4	2	8
Mionica	7	4	3	5	4	4	4	3	8
Žabari	4	9	5	4	4	1	4	2	8
Despotovac	9	8	3	5	4	3	0	3	10
Prijepolje	5	8	5	3	4	0	3	3	8
Aleksandrovac	2	10	5	4	4	2	0	4	6
Blace	3	6	5	6	4	0	2	3	8
Prokuplje	5	8	5	4	4	0	2	4	8
Mali Idoš	3	3	4	5	4	2	6	3	8
Žabalj	4	12	6	4	2	2	2	2	6
Vladimirci	3	4	5	4	4	2	5	3	4
Mali Zvornik	5	5	5	4	4	1	2	4	6
Velika Plana	5	7	4	3	4	1	4	3	8
Batočina	3	6	3	5	4	2	4	3	8
Tutin	3	13	7	5	1	0	1	2	6
Beočin	4	1	6	1	4	2	9	1	4
Lajkovac	6	7	5	5	4	1	2	1	8
Žagubica	4	6	5	4	4	2	2	4	8
Brus	3	7	6	4	4	1	1	5	8
Vlasotince	6	8	4	3	3	0	1	4	8
Rača	5	1	8	2	4	1	3	4	4
BajinaBašta	3	4	4	5	4	2	5	3	8
Sjenica	3	6	4	5	4	1	2	2	8
Niš	5	9	5	2	4	1	3	3	4
Trgovište	2	7	6	4	4	1	3	2	6
Opovo	3	2	4	5	4	3	3	3	6
Osečina	5	7	3	3	2	2	3	3	2
Golubac	1	10	5	3	4	0	4	2	6
Kučevo	6	9	4	1	4	0	3	2	8
Lučani	3	8	3	3	4	2	4	2	8
Doljevac	4	4	4	3	4	1	1	4	6
Ražanj	4	8	3	4	4	0	3	3	8
Majdanpek	4	4	8	3	4	2	3	2	8
Bujanovac	7	7	8	4	0	1	0	3	6
Alibunar	3	6	4	3	4	2	2	4	8
Beograd	3	5	3	1	4	2	5	1	6
Šid	3	3	4	4	4	2	4	2	6
Kosjerić	6	2	4	3	4	0	6	2	6
Žitorađa	2	7	3	1	0	1	6	3	2
Titel	4	10	2	4	4	2	1	0	8
Pećinci	0	5	5	4	4	2	5	1	6
Ljig	5	6	2	3	1	2	2	2	6
Ćuprija	5	3	3	2	4	0	6	4	6
Kovačica	4	1	3	4	4	2	1	2	6
Kladovo	1	7	11	2	4	1	2	0	6
GornjiMilanovac	3	0	4	5	4	1	3	3	6

Sečanj	1	8	4	3	3	1	3	1	6
Ada	3	0	2	3	4	1	6	1	6
StaraPazova	2	6	6	3	4	1	3	0	6
Knić	4	1	5	4	1	0	7	1	4
Merošina	1	0	5	5	4	0	2	4	4
Medveđa	2	7	4	5	0	2	1	1	4
Lebane	1	5	2	4	4	1	0	4	6
Nova Crnja	2	0	3	4	4	1	4	3	6
Koceljeva	1	6	1	4	4	0	2	1	6
SremskiKarlovci	3	1	3	3	4	0	0	3	6
Bela Crkva	2	0	4	0	0	2	6	2	0
Jagodina	1	0	3	3	4	2	3	3	4
Ub	5	0	5	2	2	0	2	0	2
Bogatić	1	0	3	4	1	2	4	0	2
Svilajnac	1	2	5	2	0	2	0	3	0
Preševo	1	1	4	3	0	0	2	2	2
SmederevskaPalanka	0	0	4	2	3	0	2	0	4

Annex 4: Best performers in categories

Assembly and Council

Overall rank	City or municipality	Assembly and Council (max 18)
1	Plandište	15
3	Novi Pazar	14
5	Užice	14
6	Vrnjačka Banja	14
7	Leskovac	14
12	Čačak	13
20	Bački Petrovac	13
10	Kraljevo	12
31	Kanjiža	12
50	Novi Sad	12
69	Požega	12
2	Paraćin	11
8	Vranje	11
14	Temerin	11
37	Gadžin Han	11
47	Zrenjanin	11

Budget

Overall rank	City or municipality	Budget (max 15)
4	Veliko Gradište	15
5	Užice	13
2	Paraćin	13
14	Temerin	13
17	Bosilegrad	13
29	Krupanj	13
45	Nova Varoš	13
38	Pirot	13
43	Ljubovija	13

97	Tutin	13
1	Plandište	12
6	Vrnjačka Banja	12
8	Vranje	12
23	Topola	12
16	Kruševac	12
19	Senta	12
44	Negotin	12
22	Varvarin	12
92	Žabalj	12
7	Leskovac	11
9	Požarevac	11
49	Raška	11
11	Knjaževac	11
27	Novi Bečej	11
33	Babušnica	11
21	Petrovac	11

Municipality and Citizens

Overall rank	City or municipality	Municipality and citizens (max 17)
3	Novi Pazar	11
13	Sombor	11
127	Kladovo	11
2	Paraćin	10
8	Vranje	10
30	Priboj	10
6	Vrnjačka Banja	9
9	Požarevac	9
24	Kikinda	9
10	Kraljevo	9
73	Smederevo	9
66	Vrbas	9

Free Access to Information

Overall rank	City or municipality	Free Access to Information (max 6)
32	Trstenik	6
89	Blace	6
24	Kikinda	5
44	Negotin	5
21	Petrovac	5
15	Indija	5
51	Zaječar	5
63	Bojnik	5
97	Tutin	5
65	Kovin	5
4	VelikoGradište	5
1	Plandište	5
22	Varvarin	5
11	Knjaževac	5
33	Babušnica	5
19	Senta	5
54	Vladičin Han	5
46	Kuršumlija	5
20	BačkiPetrovac	5
99	Lajkovac	5
133	Merošina	5
60	Apatin	5
134	Medveđa	5
72	Čoka	5
105	Sjenica	5
104	BajinaBašta	5
91	Mali Idoš	5
108	Opovo	5
128	GornjiMilanovac	5
86	Despotovac	5
96	Batočina	5
84	Mionica	5

Information Booklet

Overall rank	City or municipality	Information Booklet (max 4)
4	VelikoGradište	4
22	Varvarin	4
84	Mionica	4
3	Novi Pazar	4
10	Kraljevo	4
43	Ljubovija	4
15	Indija	3
51	Zaječar	3
1	Plandište	3
72	Čoka	3
108	Opovo	3
86	Despotovac	3
9	Požarevac	3
26	Ruma	3
25	Bač	3
42	Sremska Mitrovica	3
28	Irig	3
36	Ivanjica	3
70	Aleksinac	3
79	Loznica	3
7	Leskovac	3
23	Topola	3
45	Nova Varoš	3
61	Odžaci	3
12	Čačak	3
50	Novi Sad	3

Public enterprises and Public institutions

Overall rank	City or municipality	Public enterprises and Public institutions (max 15)
1	Plandište	12
3	Novi Pazar	10
5	Užice	10
2	Paraćin	9
98	Beočin	9
41	Kula	9
72	Čoka	8
12	Čačak	8
4	VelikoGradište	7
42	Sremska Mitrovica	7
50	Novi Sad	7
11	Knjaževac	7
31	Kanjiža	7
38	Pirot	7
59	Surdulica	7
24	Kikinda	7
19	Senta	7
81	Dimitrovgrad	7
132	Knić	7

Public debates and public competitions

Overall rank	City or municipality	Public Debates and Public Competitions (max 7)
2	Paraćin	7
29	Krupanj	7
19	Senta	6
7	Leskovac	6
6	Vrnjačka Banja	6

8	Vranje	6
5	Užice	5
11	Knjaževac	5
59	Surdulica	5
52	Čajetina	5
21	Petrovac	5
36	Ivanjica	5
13	Sombor	5
58	Ćićevac	5
25	Bač	5
26	Ruma	5
101	Brus	5

Annex no. 5. The list of LTI 2015 and LTI 2019 indicators

Indices	19	17	15
1. Are the decisions adopted by the Assembly published and available on the website? **			
2. Are decisions adopted by the city council published and available on the website? **			/
3. Are decisions adopted by the assembly in the past 24 months available on the website?			
4. Are decisions adopted by the city council in the past 24 months available on the website?			/
5. Have the proposed documents been published on the website before being considered at the session of the Assembly? **			
6. Have the results of the voting at the last session of the Assembly been published on the website?			
7. Has information been posted on individual members of parliament votes on legislation debated?		/	/
8. Have the results of the voting of the Assembly in the past 24 months been published on the website?			
9. Are the amendments submitted on the draft acts, that were considered at the last session, published on the website?			
10. Are justifications/explanations regarding the amendments published?		/	/
11. Is the agenda of the next session of the Assembly published on the website?			

12. Is the list of councilors published on the site?			
13. Are there data for citizens' contact with councilors published on the website?			
14. Is the local Official Gazette available on the site? **			
15. Do rules of procedure envisage public questions of the councilors to the mayor and/or the city council?			
16. Are the Assembly sessions broadcasted live or are there transcripts published, or footage from the sessions o broadcasted, or recordings of the whole session available on the website?			
17. Is the budget for the current year available on the site? **			
Is the budget published on 6 digits of the economic classification?	/	/	
18. Is the explanation of the budget available on the site?			
19. Is budget published in machine readable format on the website?		/	/
20. Are 6-month and 9-month reports on budget execution available on the site?			/
21. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?			
Are the data on budget execution in the last three months available on the site?	/	/	
Are the data on budget execution updated in the last 30 days and available on the site?	/	/	
22. Are monthly reports (or cumulative monthly reports) on budget execution available on the site?			/

23. Is there a citizens' budget published and available on the site?			
24. Has a public debate on the budget been held - citizen surveys or consultation meetings? **			
25. Has a public call for public debate on the budget been published on the website?			
26. Has the report on the public debate on the budget been published on the website?			
27. Has the final budget account been considered?			
28. Has the proposal for the final budget account been published in the last 12 months or the adopted budget account?			
29. Has the audit of the final budget account been published and reviewed at the session in the last 12 months?			
30. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users?			
31. Does the municipal administration have a service center through which it provides all the services?			
32. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration? **			
33. Are there information about reporting of corruption visible in the service center or administration offices?			
34. Is there a possibility for citizens to report irregularities in the work or violation of the law in the service center or in the premises of the administration?			
35. Are there mechanisms for reporting corruption on the website?			

36. Is there a possibility on the website for citizens to report irregularities or violation of laws?			
37. Do (both/all) mechanisms for reporting allow anonymity?		/	/
38. Is the information on the working hours of administration available on the website or telephone number through which it is possible to get this information?			
39. Are there inspections controlling lists on website?		/	/
40. Can a citizen monitor the status of his case on the website?			
41. Are there data on handling complaints, petitions and complaints?			
42. Are there contact information of local community councilors on the municipal website?			
43. Is there information on the website or in the Information Booklet that citizens can attend the assembly sessions and instructions on how to apply?			/
Assembly allows the presence of citizens at sessions?	/	/	
44. Are there defined permanent terms for meeting of the mayor with citizens?			
45. Are data on the contact of the mayor or deputy with the citizens visible?			
46. Are regular press conferences held (at least once a month) by the mayor?			
47. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?			

48. Did the municipalities provide requested information (FOI request) in time? **		/	/
49. No complaints were filed against municipalities in the last year due to ignoring requests for information of public importance?			
50. The municipality has no unresolved decisions of the Commissioner?			
51. Are information on the submission of a request for free access to information on the site? **			
52. Is information on the submission of a request for free access to information visible in the service center or administration premises?			
53. Is there a section on the website dedicated to public procurements?			
54. Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers ...)? **			
55. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?			
56. Is Information Booklet published on the site and updated in the last 3 months? **			
57. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?			
58. Does the Information Booklet contain information about salaries of officials and employees?			
Does the Information Booklet contain rulebook on salaries of officials?	/	/	
59. Does the Information Booklet contain information on the services provided by the municipality and deadlines for their provision?			

60. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?			/
61. Is there a special segment on the site dedicated to public institutions with PI data?			/
62. Have public competitions for the selection of directors of public enterprises been conducted?			
63. Has there been a public competition for the selection of the director of public institutions?			
64. Is the systematization of PE published on the website of municipality or PE?			
65. Is the systematization of PI published on website of municipality or PI?			
66. Have the documents from the selection procedure of the director of PE been published on the website? **			
67. Have the documents from the procedure for the election of the director of the PI been published on the website? **			
68. Have the annual work plans and reports on the work of PEs been published on the website of the PE (or municipality)?			
69. Are there reports on the work of public institutions on the website of the municipality or PI?			/
Are reports on consideration of reports on the work of PE published on site?	/	/	
Are reports on consideration of reports on the work of PI published on site?	/	/	
70. Are annual work plans of PIs published on the website of public			

institutions or on the municipal website?			
71. Are the data on the number of employees in the municipality and the public institutions posted on the site?			/
72. Are the data on the number of employees in PEs published on the municipal site?			/
Are the data on the number of employees in municipality, PEs and PIs published on site? **	/	/	
73. Is the list with prices of services provided by PEs and PIs available on the website of the municipality or PI/PE website?			
74. Are there consultations with the citizens when determining the prices of the services of PIs and PEs, through consulting meetings, surveys or through an advisory body (Consumer Protection Act, Art. 83)?			
75. Are there data on the website about the conducted public hearings/debates in the last 12 months (except for the budget)?			
Is the public debate about the increase in the rate and the amount of public revenues conducted?	/	/	
76. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?			
77. Does the municipality regularly announce a call for leasing property in its possession?			
78. Are the rental lease reports (commercial premises, agricultural land) published on the site?			
79. Have the public calls/ results of the competition for media allocation in the last 12 months been published on the website?			

80. Have the public calls/ results of the competition for the allocation for NGOs been published on the website?			
81. Have the reports on the realization of NGO projects financed by the municipality been published on the website?			
Is the data on the amount of funds allocated annually to local communities published?	/	/	
82. Has the municipality's development strategy been published on the website?			
83. Is the annual plan of work of municipal administration published on the site?			
Is the annual plan of work of municipal administration prepared and adopted in accordance with the planned dynamics?	/	/	
84. Has a report on the work of the administration for the previous year been published? **			
85. Is the rulebook on internal organization and systematization of administration posted on the site? **			
86. Are there information on the activities of the Council for the implementation of Ethical codes and its contacts with citizens on the website?			
87. Is there a code of ethics for employees and is it available on the site?			
88. Has the record of the property (real estate) owned by municipality which is leased published on the website, with data on leases, price and duration of lease?			/
Does the administration have a public register with data on the assets of the local self-government unit and the way of its using?	/	/	

89. Are spatial plans published on the site?			
90. Are the urban plans published on the site?			
91. Is there a report on contact with lobbyist published on the web site?		/	/
92. Is there a daily or weekly schedule of mayor's activities published on the website?		/	/
93. Has the Integrity Plan been adopted?			
94. Has the Local anticorruption plan been adopted?		/	/
95. Has the mayor submitted a declaration of assets to ACAS?			