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Local Self-Government Transparency Index 2024 (Local Transparency Index – LTI) Final Report

Transparency Serbia, October 2024

Disclaimer: This report is made possible by the support of the – *Swiss Agency for Development and Cooperation (SDC)*. The contents of this report are the sole responsibility of Transparency Serbia and do not necessarily reflect the views of SDC or Swiss Government.

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Executive Summary

The Local Transparency Index (LTI) 2024 is Transparency Serbia's research¹, evaluation and ranking of 145 cities and municipalities and 25 in-city municipalities in Serbia. This is the seventh year (sixth consecutive) that Transparency Serbia is conducting the LTI in all cities and municipalities.

Municipalities and cities are ranked based on 95 various indicators - criteria that evaluate transparency. The Index scores may range from 0 to 100. In LTI 2024, municipalities and cities scored between 9 and 97.

The **average score** for 145 LSGs in the 2024 LTI is 52, which is the same as LTI 2023 score. This is the first research cycle since 2019 that does not record increase in the average score.

Table no. 1: Highest, lowest and average score by year

Score/Year	2015	2019	2020	2021	2022	2023	2024
Max	74	67	83	90	87	94	97
Average	40	40	46	48	49	52	52
Minutes	11	12	18	21	9	25	9

Only two-fifths (43%) of municipalities and cities improved their performance², while half (50%) recorded a decrease compared to the previous year.³ In nine cases, the index remained unchanged. This is significantly worse than in 2023, when almost two-thirds of local self-government units achieved better results than a year earlier. If, in addition to municipalities and cities, we also look at city municipalities, the picture is even worse – out of total of 25, six of them achieved growth, and as many as 18 recorded a decline in the index.

When it comes to the categories of indicators, an increase was recorded in five areas, with a significant increase of index in one of them after years of negative trend. "Free Access to Information" has an average of 62.8%, while a year earlier it was 58.9%. This year's result, however, is still worse than the one from three years ago. Small growth was recorded in the category "LSGs and citizens" from 44.7% to 44.8%, "Information Booklets" from 73.3% to 73.6%, "Public debates and public competitions" from 52.5% to 54% and "Public companies and public institutions" from 51.3% to 53%, which continued the growth trend from 2019. However, this growth has been slow and "Public Enterprises and Public Institutions" continue to be among the most non-transparent areas.

"Budget", which crossed the 60% threshold for the first time last year and had an average of 63.2% in LTI 2023, has now returned below that threshold to 59.9%. "Public procurements" continues the negative trend which started after the abolition of the obligation for contracting authorities to publish

¹ Project "Local Self-Government Transparency Index" TS conducted thanks to the support of the Swiss Agency for Development and Cooperation (SDC).

² 63 out of 145, in-city municipalities excluded

³ 73 out of 145.

data on their websites, so now this category is 59% (62.2% in LTI 2023). The traditionally worst-rated category "Assembly and Council" decreased even more, from 39.5% to 37.8%.

Out of all 170 cities, municipalities of in-city municipalities, only five of them recorded an increase of 10 or more points compared to the previous ranking (22 in LTI 2023). One piece of data gives reason for mild optimism – the number of municipalities and cities that record very good and excellent results is increasing: 36 out of 145 have a higher LTI than 60⁴, of which 12 are above 70 (11 in LTI 2023), and six local self-government units above 80 (four in LTI 2023). This year, only Novi Pazar achieved a result of more than 90 – with an index of 97 it approached the absolute maximum and is at the top of the table for third year in a row.

Overall, the results of LTI 2024 cannot be seen as encouraging, but they are not unexpected either, considering that local elections were held in December 2023 and June 2024 in almost all municipalities and cities. Elections imply additional involvement of the administration, and it usually means neglecting activities which are not explicit legal obligation.

Despite the fact that many local self-governments were in the temporary financing regime, which is why many did not publish citizens' budget (decrease of indicator from 58.6% to 47.6%), did not publish reports on the public debate on the budget (the number of those that did publish this report fell from 67 to 58), the invitation to the public debate (from 105 to 86), i.e. they did not organize a public debate at all (this year 87 LSGs organized compared to 106 in previous year), the average score for the "Budget" area decreased less than expected – from 63.3% to 59.9%. The increased number of LGUs that have budget portals contributed to keeping the decline from being greater. Also, this is an area where several dozen municipalities are implementing donor programs that contribute to increasing transparency.

After the introduction of the Portal for Information Booklets (2022) and significant progress in this area, the good result (by far the best average score of all areas) is maintained.

"Public companies and public institutions" is an area that is poorly regulated, and area where we witnessed many years of unaddressed non-compliance with certain provisions of the law (such as the duration of the acting status of directors, management that does not meet the legal requirements, and even the absence of websites of public companies, which entails the violation of all prescribed obligations in terms of transparency of public work). This area, however has a positive trend. LTI, however, is still barely above 50% (53%) after five years of continuous growth, but one cannot argue that this is remarkably better than 29%, from 2019.

A further reduction in the transparency of information on public procurement on the websites of LSGs is a consequence of the abolition of the obligation to publish information both on the Public Procurement Portal and on the website of LSGs, as well as the lack of will (in some cases administrative capacity) of most municipalities and cities to do more than the law obliges them to do.

The sustainability of the index, i.e. the absence of sudden drops, indicates that transparency is maintained systematically, not only for the purposes of public promotion of research results, as part of the process of verification of results, and that it does not depend on individuals in the government or administration. Therefore, it is important to know how many LSGs had growth or at least stagnation in several consecutive research cycles. This time, 36 municipalities and cities had growth (or stagnation) in the last two research cycles (LTI 2024/2023 and LTI 2023/2022), 22 maintained or

⁴ There were 30 in LTI 2023, 21 in LTI 2022, 20 in LTI 2021 and 13 in LTI 2020 ranking.

increased transparency in the last three cycles (LTI 2024/2023, LTI 2023/2022 and LTI 2022/2021), and 12 in four cycles (LTI 2024/2023, LTI 2023/2022, LTI 2022/2021 and LTI 2021/2020).⁵

By comparing not only the publicly available final tables, but also the preliminary scoring, before the verification process (more on verification in the chapter "Methodology"), TS noticed that some municipalities and cities maintain a high level of LTI for a long time, often through well-organized mechanisms that function throughout the year. Some of them do this periodically, only when the TS, in the verification process, "reminds" them of the information we are looking for as part of the research. However, over time, until the next research cycle, these data remain non-updated or disappear from the sites. It should be emphasized, however, that there are local self-government units that maintain at least minimal continuous progress, even if they are in the lower part of the table. If this can be named the sustainable growth (or maintaining the achieved, even average, transparency) for a limited number of LSGs, fluctuations spoil the picture at the level of the whole country. As in previous years, we note that some solidly rated LSGs from previous LTI cycles performed worse in this survey, neglected updating their websites or abandoned good practices, and some municipalities and cities that had excellent results three or four years ago have had a steady decline since then.

Transparency may be a consequence of awareness of its importance, concern for the well-being of citizens and a desire to respond to corruption risks associated with local governments and administration. It can also be achieved by setting obligations through regulations and written procedures (at the local or national level), but also by working with local authorities and administrations, through projects that bring together civil society organizations, donors and local self-government units. It is important to get local governments to comply with their legal obligations, but also to encourage them to go one step further. The result will be equally welcomed, whether they come from the sincere desire for the benefit of citizens, whether the authorities want to score political points, presenting themselves as open and transparent, especially in the run-up to elections, or from competitive reasons to be better than the rival and/or neighbouring municipalities and cities.

The main conclusion of LTI 2024 is that there is no progress in transparency, but also that, given the circumstances, the same score as in LTI 2023 is not disappointing. It is necessary to continue working on establishing sustainable mechanisms, primarily by adopting regulations that will precisely prescribe procedures and obligations, but more importantly – responsibilities for the implementation of these procedures. TS is ready to support local self-government units in the adoption of an act that would regulate the presentation of local self-government units and public institutions on the websites of local self-government units and an act that generally regulates the editing and maintenance of the local self-governments' websites⁶. TS also offers support for the improvement of existing acts, adopted according to the models of Standing Conference of Towns and Municipalities and other organizations⁷.

The introduction of legal obligations related to the transparency of local self-governments at the national level could raise the level of transparency, provided that the regulations are respected and their implementation is monitored. Numerous studies, including the LTI itself, show that better results

⁵ In LTI 2023, it was noted that 50 local self-government units had growth or at least stagnation in the two previous cycles, and 25 municipalities in three cycles.

⁶ Novi Pazar, which has been at the top of the LTI table for three years, has adopted such acts.

⁷ The Standing Conference of Towns and Municipalities of Serbia has made a significant contribution through trainings and model acts for local self-government units.

are expected when laws prescribe transparency. When the obligations are abolished (as in the case of public procurements), a small number of LSGs will continue to implement good practices.

The influence of political and administrative will, as well as capacities and priorities (especially in the pre-election period) could be seen through research, and even through the results.

Therefore, the TS once again emphasizes the importance and appeals for the adoption, implementation and improvement of permanent mechanisms that guarantee that the improvement of transparency (as well as the attitude towards corruption, corruption risks and mechanisms for their elimination) does not depend on the political will or enthusiasm of individuals.

The LTI itself, as a long-term monitoring mechanism, is proven, cycle after cycle, as an incentive and guidance to local self-governments that are ready to increase the transparency of their work. Also, LTI and the publicity it receives is to help citizens understand in which areas and how the performance of their municipalities can be improved and to encourage them to demand steps in that direction.

Individually, in 2024, there were no significant changes among the ranking of the top 10 municipalities and cities. Novi Pazar remained at the top, Veliko Gradište rose from 3rd to 2nd position, and Kanjiža from 4th to 3rd. Sombor dropped from second place to fifth. In the top five, Leskovac is in 4th place.

Sokobanja, Bor and Tutin remained among the top 10, and they were joined by Vranje (jump from 12th position) and Zaječar (was 22nd in LTI 2023). A noticeable jump was recorded by Čačak – from 39th to 12th place and Negotin – from 52nd to 17th.

The largest cities in Serbia are still far from the top. Novi Sad came the closest, with a jump from 46th to 24th place (LTI from 56 to 62), Niš recorded a drop from 43rd to 48th (LTI from 57 to 56th), Kragujevac fell from 16th to 24th (LTI from 66 to 62), while Belgrade improved its score by two points (from 46 to 48) and ranking from 98th to 89th place.

Table no. 2: The best placed LSGs in LTI 2024 and their previous scores

LTI rank/score	LTI 2024	LTI 2023	LTI 2022	LTI 2021
Novi Pazar	1/97	1/94	1/87	78
Veliko Gradište	2/88	3/82	7/76	9/71
Kanjiža	3/87	4/81	5/79	3/83
Leskovac	4/83	7/77	8/74	5/75
Sombor	5/82	2/84	2/85	2/88

This year, TS cross-referenced the evaluations of municipalities and cities with data on the population, their budgets and capacities, i.e. expenditures for employees. We found that the size of the municipality is not a decisive factor for the transparency, although it is not completely without importance. Namely, all cities and municipalities with more than 65,000 inhabitants, with the exception of Belgrade and Pančevo, recorded in this year's survey a score higher than 50, and in the category of very small municipalities (less than 20,000 people), the majority are grouped around average values, but the number of those with lower scores is slightly higher than the number of municipalities that achieved more than 50 points. However, examples from this category, where two municipalities with around 15,000 inhabitants were at the very top, with a score above 80, show that

the recognition of the importance of transparency in the work of local self-government is decisively influenced by some other factors.

Even to the question of whether the budget is decisive for the LTI score, cannot be given an unequivocal answer. Cities with expenditures exceeding four billion dinars recorded results above average. Poorer municipalities (under two billion expenditures) are mostly grouped in the zone below the average (between 40 and 52 points), so it could be concluded that the size of the budget is not without influence on the degree of transparency. However, a few examples prove that the budget is not a decisive factor in transparency - a score of over 80 was recorded by three municipalities whose budget was less than 1.3 billion dinars. As for the lack of capacity, we determined that it cannot be the reason for non-transparency, although it is a factor that has a certain influence.

Finally, we determined the results by regions, that is, by districts. The best average (as much as 71.6) have LSGs from the Raška district, which is mainly the merit of the first-placed Novi Pazar, but it is noticeable that "neighbourly competition" also had an impact - only one out of five LSGs from this area has a result below the average. On the second and third place are municipalities from Bor and Zaječar districts (61.75 and 60, respectively). In both cases, almost all municipalities from the group had very good results, and only one scored below average.

At the back is Pčinjski, with an average score of 42.5. One of seven LSGs from this region recorded an excellent result, another a good result, the remaining five are below average, some of which are at the very bottom of the table.

Finally, it is important to reiterate that **poor performance in whole or in some categories does not necessarily mean that corruption is widespread in these areas and in these LSGs. Similarly, good results by no means guarantee that there is no corruption, but rather reduce the possibility that bad governance or corruption will remain undetected. LTI only measures transparency, as one of the most important anti-corruption preventive mechanism, and the score reflects the situation at the time the research was conducted, i.e. when the results were verified.**

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 Serbia⁸. TS applied this index for the first time in 2015, when 168 cities, municipalities and in-city municipalities were evaluated as part of a project supported by the UK Foreign Office. The survey was repeated on a small sample of 15 municipalities and cities two years later, in 2017 with the support from OSCE Mission in Serbia. In 2019, TS applied nationwide research again, the first out of five in the row, supported by the USAID. It was applied again in 2020, 2021, 2022 and 2023. The 2024 survey, at the national level, in which 170 cities, municipalities and in-city municipalities were evaluated, was supported by the Swiss Agency for Development and Cooperation (SDC).

Since 2015, Transparency Serbia has been convinced that regular research of this kind would enable comparison of the current results between various cities and municipalities, tracking of improvement or decline over a period of time, and identifying "weak spots" of transparency. Its results could also motivate changes in regulations and practice in areas which are problematic in high number of the local self-governments (LSG). Besides that, continuous monitoring proved to encourage competition among LSGs. Transparency Serbia was convinced, and it proved to be true, that sustainable funding for nationwide LTI in the 2019/2024 period helped not just to measure the transparency level of Serbian cities and municipalities but actually to improve it.

According to the Transparency Serbia methodology, the index of transparency is calculated as the sum of the points based on the responses to the indicator questionnaire and it is in a range from 0 to 100. In 2024, same as in LTI 2019, LTI 2020, LTI 2021, LTI 2022 and LTI 2023, 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 transparency indicators (the "basic indicators") yield 2 points for a positive answer and 0 for a negative response, while remaining 90 bring 1 or 0.

Answers to the indicator questionnaire are collected by reviewing the cities, municipalities, and city municipalities' official website presentations. Another method is a direct insight, realized by visiting all service centres and premises of the local administrations. The third source is the request-response method: based on carefully crafted requests to the cities and municipalities for information of public importance. The fourth source represents data obtained from the other relevant bodies (Commissioner for Information of Public Importance and Protection of Personal Data, the Agency for Prevention of Corruption). The ranking covers a total of 145 cities and municipalities and 25 in-city municipalities. For the purposes of this report, cities, 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.

All one hundred and forty-five (145)⁹ cities and municipalities are ranked together, while 25 in-city municipalities are evaluated but not ranked. Namely, they do not have the same jurisdiction as other

⁸ When designing the LTI in 2014/2015, 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.

⁹ As 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").

municipalities, as their scope of duties depends solely on relevant city statutes, and the practice differs from city to city. Furthermore, some of the indicators do not apply to the in-city municipalities. For example, some in-city municipalities do not have "local communities", public utility companies or public institutions under their control and do not lease property. Possible calculation of the relative index (according to real competencies and activities) of city municipalities would significantly complicate the development of the LTI and could never be entirely correct from a methodological point of view. Therefore, we opted to assign 0 points to the in-city municipalities whenever certain information is missing, even if such municipalities did not have the duty/ability to produce the information in some instances. Therefore, it would be 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 is needed here as well. Even when working inside a similar legal framework, a municipality may work in a very different environment, and some indicators could be irrelevant (e.g., whether the municipality established its public institutions and utility companies or not). Therefore, it is the best to observe the transparency trend for each individual municipality through several cycles of evaluation.

When comparing LTI 2024 results with [LTI 2015](#), [LTI 2019](#), [LTI 2020](#), [LTI 2021](#), [LTI 2022](#) and [LTI 2023](#), one should have in mind that Transparency Serbia, in the meantime, slightly adjusted indicator questions¹⁰. Indicators in LTI 2020 were the same as in LTI 2019. However, some indicators were modified between the 2020 and 2021 research. TS did this to get a clearer picture of transparency in some areas (for example, by separating individual indicators that required a positive assessment to meet two obligations into two separate indicators) to make a better balance for the overall assessment in relation to individual areas (categories) and to place greater emphasis on areas that pose a higher risk of corruption (increasing the share of public tenders and public companies)¹¹.

In work on data collection, trained and experienced researchers of Transparency Serbia thoroughly reviewed the websites of all 170 LSGs. After that, the research coordinator reviewed the data before entering it into the master table to further ensure scoring consistency.

In order to collect the data for several indicators, we sent requests for access to information of public importance to all LSGs. Each request contained questions related to six indicator questions. These were not responded to by nine¹² LSGs (three cities, six municipalities), which is almost the same as in 2023 (eight – one city, four municipalities and three in-city municipalities) and far better than 2022, when 24 LSGs (three cities, 18 towns and three in-city municipalities) did not respond. It is even better when

¹⁰ The reasons for the change between 2015 and 2019 were the results and experiences from the research, changes in regulations, and introducing new legal obligations related to corruption prevention and increasing transparency. Namely, following the LTI 2015 results, the research team found 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 were relevant for LTI 2019 but not in previous years. When weighted, the influence of indicator changes in comparison of LTI 2019/LTI 2015 could be approximated to 1.5 of the overall score.

¹¹ More detailed explanation of this change is in the annex "Explanation and justification for changes of indicators/questions" of the LTI 2021 final report - https://transparentnost.org.rs/images/dokumenti_uz_vesti/LTI_2021_-_final_report_ENG.pdf

¹² Five responded within the verification process.

compared to LTI 2021 (total of 46 LSGs or 27% - six cities, 27 towns and 13 in-city municipalities failed to respond).

Same as in previous research, we also sent to all municipalities one request for free access to information using the "mystery shopper" strategy. In this concept, instead of TS as the 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 receive a request from a recognizable civil society watchdog organization. This year, 144 local self-governments responded to citizens' requests and provided requested information. It is better than in previous years (123 in 2023, 124 in 2022, 130 in 2021, 138 in 2020 and 150 in 2019), which reversed the negative trend. The reason for the bad trend could be the low compliance to the obligations from the Law on Free Access to Information of Public Importance in general, but also the content of the request, that is, the political sensitivity of the requested data.

Transparency Serbia and "mystery shopper" 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 final research report¹³. If there is no response, nor indirect evidence of information's existence, the score is zero for the indicator related to the information requested. This is the practice used in all previous research cycles.

Associates of Transparency Serbia have crossed over 10,000 kilometres in this research and visited all 170 local self-government units. We visited municipal administrations, more precisely, LSGs' service centres. In that way, we established the state on the spot for five indicators. These visits took place in April and May 2024.

Same as each year, TS researchers were confronted with the suspicion of employees in service centres or security workers on a few occasions. However, the majority of employees of local governments that we faced during the research were attentive and helpful. It also proved that in most LSGs, employees are aware of the LTI.

All gathered data was finally entered into the master table, and several comparison tables (presented in this report) were produced.

The last step was the verification of the results. To overcome possible omissions and to prevent some LSGs from being downgraded, our researchers sent all LSGs the list of missing information so they could provide TS with the exact link to the required information if it is posted, but the researcher couldn't find it for some reason. This was also an opportunity for LSGs to add missing data to their websites and inform us where it can be found. TS verified all the responses and calculated the final scores. Regarding responses, if an LSG provided only a claim that the information existed on its website but didn't provide clear evidence, the score for that indicator remained unchanged - negative. In 2024 56 LSGs (out of 170, 33%) responded to the call for verification, compared to 61 LSGs in 2023 (36%), 51 LSGs in 2022, 46 LSGs in 2021, 37 in 2020 and 74 in 2019. Verification resulted in growth of average LTI score by two points, compared to preliminary calculation.

This year, TS cross-referenced the evaluations of municipalities and cities with data on the population, their budgets and capacities, i.e. expenditures for employees.

¹³ Due to a huge number of appeals and low level of capacities, Commissioner's decisions on appeals are sometimes delayed.

More than once, in the previous presentations of the LTI results, we have pointed to some regional (for example, one year the three first-placed municipalities were all from Bačka) or, even earlier, "neighboring" patterns - indications that practices are being improved and the score is improving under the influence of a neighboring municipality. The research of these phenomena would require deeper analysis, but this year we decided to take the first step in that direction - we determined the average grades at the level of the administrative districts of Serbia.

On the margin of the LTI research, TS determined data on the representation of genders in leading positions in local self-government - the number of men and women in the position of mayor and in the position of head of the city or municipal administration. These data (chapter in the report) are not directly related to transparency, but the analysis was done because TS operated with a list of top officials in LSGs during the research (sending letters, determining whether property declarations were submitted). Researchers dealing further with this topic can try to establish correlations between certain assessed aspects of transparency and gender representation. The analysis also contains a comparison with the representation at the time of data collection for LTI 2023 (that analysis has not been published), which can be interesting because in the meantime elections were held in almost all LSGs and new mayors were elected.

Finally, it should be noticed that results present **the status of transparency as assessed at the moment when the research was done or when the verification was finalized** - between April and August 2024. The actual transparency of LSGs, i.e., on their websites and in their premises may therefore differ from the status at the moment of this report's submission and/or publication.

General observations

General assessment of the transparency of local self-governments and perspectives for improvement

The average score of 145 local self-government units in 2023 is 52, which is the same as in the LTI 2023 survey. This is the first time since 2019 that the average score has not increased. **Therefore, the main conclusion for LTI 2024 is that there is no progress in transparency, but also that, given the circumstances, the same score as in LTI 2023 is not disappointing.** Namely, during the research, local elections were held, the process of electing new management was underway, a large number of local self-government units were on the temporary financing regime, so these facts influenced several factors that are important for LTI - engagement of employees within the actual obligations and competencies related to the elections, as well as possible engagement in connection with politically imposed obligations, which is why certain obligations have been neglected, the absence of public debates in cases of temporary financing, the failure to implement procedures and procedures of importance for LTI (election of the director of the PE and the Public Institution, etc.) It is necessary **to continue working on establishing sustainable mechanisms, primarily by adopting regulations that will precisely prescribe procedures and obligations, but more importantly – responsibility for the implementation of these procedures.**

On the one hand, the elections can be an explanation for the lack of progress in the average LTI score (for the first time since the beginning of the research), the fact that there was no decline indicates that there was a weight on the other side that preserved the balance. The balance may come from the local self-government units that have had a positive trend for years, but also **the political will** to "cash in", in the political sense, transparency and the fight against corruption in the pre-election period, and by those local self-government units that have not so far expressed interest in increasing transparency.

Also, **competition between local governments is often** an incentive to achieve a good result, which, however, could be questionable from the point of view of sustainability. Rules established at the national level would be most helpful for this goal – sustainability of transparency.

Namely, the introduction of legal obligations regarding the transparency of local self-government at the national level could raise the level of transparency, provided that the regulations are respected and their implementation is monitored. Numerous studies, including the LTI itself, show that better results are expected when laws stipulate clear data disclosure obligations. When the obligations are abolished (as in the case of public procurement), a small number of LSGs will continue to implement good practices.

The results of LTI 2024 also confirm some of the findings from the previous year – the positive impact of the introduction of the Portal of Information Booklets and the negative impact of the abolition of legal obligations (public procurements). The importance of direct support to municipalities and cities through projects aimed at increasing transparency is also visible. The influence of political and administrative will, as well as capacities and priorities (especially in the pre-election period) could be identified through research, and even through the results.

Therefore, the TS once again emphasizes the importance and appeals for the adoption, implementation and improvement of permanent mechanisms that guarantee that the increase of transparency (as well as the attitude towards corruption, corruption risks and mechanisms for their

elimination) does not depend on the political will or enthusiasm of individuals in local administration or local authorities.

The research has **re-identified some good practices, some of which have been going on for years, and some of them have been replicated. On the other hand, some bad practices persist.**

For example, just a few LSGs have published contacts through which citizens can communicate with local assembly members (e-mails, phone numbers). A significant number of LSGs do not have a functional search tool on the website. There is still no register of lobbyists, nor a schedule of mayor's activities (apart from promotional activities or occasional public events that are announced to the media).

Some systemic problems and observations

In order for citizens to be hold government accountable, it is necessary to have an insight into what the government is doing. This especially refers to the decisions that the government makes and that have an impact on the lives of citizens. It is not uncommon for the leaders of local self-governments to present as transparency an insight into the activities of the highest officials or a public promotion of the activities of the bodies of local self-government units, PEs and public institutions that perform their regular duties, provide services to citizens. The basis of transparency in LSGs is providing decisions that were adopted by local authorities available to citizens. This does not include the interpretation of the decisions by officials. Namely, according to the findings of the LTI and the answers in the verification process, instead of decisions being made available on the website and published immediately after the session of the local assembly or council, citizens are often given an interpretation in the form of explanations of the decision-makers, news written by the editor of the local self-government website, or it is considered that the publication of decisions in the Official Gazette is sufficiently transparent. On the other hand, the Official Gazette cannot be found on the websites of all local self-government units, and often this document is not searchable.

Therefore, the lack of adequate transparency in the area of "Assembly and Council" significantly affects the possibility for citizens to recognize the impact that the decisions adopted by the Assembly and the Council will have on their lives. Some local governments decide to publish only certain documents, without clear criteria as to why they publish them, and not the others. The average score in the area of "Assembly and Council" has been the lowest since almost the beginning of the LTI surveys¹⁴, varying between 34 and 39% throughout the last five cycles. After approaching the 40% index for the first time in LTI 2023 (it was 39.5%), this year it has fallen to 37.8%.

The percentage of local self-government units that publish decisions of the local assemblies on their websites decreased (from 46.2%¹⁵ to 44.1% this year), which is alarming, especially when we take into account that 17% of local self-governments still do not have an local official gazette or a link to it on their websites. In such a combination, the lack of transparency for these indicators makes it significantly more difficult to monitor city/municipal regulations.

¹⁴ The rating was 49% in the first survey in 2015, but then the indicators in this area have changed significantly.

¹⁵ All data refer to 145 municipalities and cities, unless otherwise indicated.

The agenda of the next session of the Assembly is published on 56.6% (53.1% in LTI 2023) of the LSGs websites, and the proposed documents for the next session on 23.4% (29.7% in LTI 2023). After last year's increase in these indicators, this decline is a cause for concern. A similar situation is with the transparency of work of the municipal councils – after a significant increase in 2023 (an increase from an extremely low level to a slightly higher, but still low level in absolute terms), a new decline was noted.

Although many LSGs were on temporary financing regime during the survey, temporary budgets were published and TS evaluated all the data related to this area. In fact, temporary financing had the greatest impact on the indicators related to the public debate on the budget and their reporting, while there were no drastic changes in other indicators. The current budget is not published at all on the websites of 4.5% of local self-government units (eight out of 145). Still, many budgets (23%) are not published in a machine-readable or at least searchable format, i.e. they are published as scanned images in PDF. In previous research cycles, it was encouraging that more and more local self-government units published "citizens' budgets", but this trend has now been reversed (from a record-high 58.6% to 47.6% currently).

The number of published public calls for competitions for the allocation of funds to the media and non-governmental organizations has been varying between 82 and 87% for several years, but this year the trend of growth in the number of reports on the distribution of funds to the media has stopped (falling from 75.2 to 68.3%). In the case of public calls for NGOs, the percentage continues to grow slightly (from 74.5 to 76.6%), so the difference in percentages between the indicators that measure how many local self-government units have published competitions and how many have published the results of competitions for NGOs is further reduced.

Steady progress in the field of public enterprises and public institutions started since LTI 2019 has continued this year. Progress, however, is still slow, especially when we take into account that PE and PI are recognized as extremely risky from of abuses and corruption, and that after years of growth, the index is still just above 50%. In LTI 2024, it is 53% (51.3% in LTI 2023). In addition, there is a decline in the indicator that assesses whether procedures for the election of directors have been conducted in all PEs or whether at least the acting directors are in a legal mandate (the expiry date of the acting state status). The practice of appointing directors associated with political parties is a notorious fact, not a secret, but often even competitions are not being organized, at least for the sake of formal reasons. There have been a number of cases of local PEs managed by individuals in acting status for more than five years.

Comprehensive information on the procedures for the selection of directors can be found on the websites of only 5.5% of LSGs (the same as in LTI 2023). The situation is somewhat better, but far from good, when it comes to basic information about these procedures – they are published on the website of 17.2% of LSGs websites (16.6% in LTI 2023).

Almost 15% of the observed PEs still do not have their own websites, although this has been a legal obligation since 2012.

The situation with the publication of work plans and work reports continues to disclose how legal obligations are not being respected and how much this area is neglected – the law is violated, and in 12 years we have not recorded a single case where the director of PE has been punished for this violation. Less than half of the respondents are compliant (49% and 44%, respectively).

The number of local self-government units that have adopted and published development strategies continues to grow. This indicator rose from 34% in 2021 to 73% in LTI in 2023 and 76.6% in 2024.

In the area of free access to information, there has been an increase after a two-year decline, but it is still at or below the levels of the 2020-2021 period. The increase was actually caused by a better score of the "mystery shopper" indicator, while all other indicators remained unchanged. Namely, 26 (out of 170) LSGs ignored the request made by the "mystery shopper" from TS, while there were 47 in LTI 2023 and 45 in LTI 2022. Subotica continues its bad practice; it has a five-year continuity in not responding or not delivering information to TS's "mystery shopper". At the same time, the city responded to the request sent by the TS and to the letter for verification of the results.

On the other hand, the number of examples of good practice is increasing, primarily budget portals, although not all local self-government units that have a budget portal can boast of the comprehensiveness of the content. The TS will consider introducing a new indicator that would assess (to begin with) at least the existence of a budget portal. There are also (good) examples in connection with separate portals of municipal assemblies/cities or portals about urban planning. E-registers of administrative procedures, when regularly updated, are useful not only because they are "easy to use" and easy to search, but also because they provide a greater amount of information. As every year, a special chapter of this report is devoted to good examples.

Results of the LSGs in certain areas of research

Overview

Although laws are often not respected, and non-compliance with the law is rarely punished, many years of experience with assessing the transparency of local self-governments indicate that the results are better and transparency is higher when the obligation to publish information is regulated by law or other regulation, when responsibility and competences are clearly defined, and when sanctions are envisaged for violation of obligations. An additional weight is given to situations where, in addition to all of the above, sanctions are applied.

Therefore, in order to achieve and maintain transparency, it is necessary to adopt clear procedures, prescribe precise duties and responsibilities, and to ensure that the procedures are implemented, i.e. continuously implemented. This is necessary, but unfortunately there are no guarantees that it will be enough. Nevertheless, it is a first step that would lead to a situation in which improving transparency does not depend on the political will or enthusiasm of individuals in the local administration.

While it is unpopular to expect cooperation (especially when it comes to matters that promote good practice and go beyond minimum or satisfactory transparency) and at the same time advocate sanctions for those who should show goodwill, experience shows that **sanctions for violations of rules and mechanisms should not only be prescribed, but also regularly implemented.** At the same time, it has been confirmed (on the example of public procurements, when amendments to the Law abolished the obligation to publish information on public authorities' websites, but only on the Public Procurement Portal) that **the abolition of obligations regularly results in the abolition of good practices provided for in these obligations.**

However, as noted in the introduction, prescribing obligations and penalties does not automatically result in compliance with the law. We have explained already that since 2012, the Law on Public Companies has prescribed obligations in the field of publicity of work, publication of certain data on the websites of PE, and still 15% of PEs from the sample do not have their own websites, so there is no place for publishing the mandatory information. Others have websites, but there are a significant number of PEs that do not publish data, not at all, or not regularly. TS has not recorded a single case where a responsible person has been punished for violating both legal provisions on the transparency of work¹⁶. The average score for the area of "Public Enterprises and Public Institutions" has been growing since 2019, but it is still low (53%), and could have been significantly higher if sanctions in order to implement the prescribed obligations had been used earlier. Also, bad examples to local authorities have been set all the time by the Government of Serbia and public companies at the national level, which have also ignored their obligations.

The research re-identified some examples of good practice (listed in a separate chapter of this report); Some of them persisted for several years, some are replicated, but, on the other hand, some bad practices still exist. This includes insufficient information regarding budget documents (other than the budget itself), such as the justification/explanation of the budget (not available on the website of 54

¹⁶ Public Enterprises Act, Section 78. "A fine of 50,000 to 150,000 dinars will be imposed on a responsible person in a public company if... the public company fails to publish on its website the data prescribed by Article 71 of this Law".

out of 170 LSGs), six-month and nine-month reports on the execution of the budget (not available on the websites of 95 out of 170 LSGs).

As already mentioned and explained, the decline in the area of public procurement continues – almost all local self-government units have a section dedicated to public procurement on their websites (162 out of 170), but they usually publish only PP plans, sometimes data on low-value procurement. The number of LSGs that publish calls for PPs and other documentation, or at least links to the Portal page where documents are published, decreases from 159 in 2021 to 95 in 2022, to 63 in 2023 and 59 in LTI 2024).

Local self-government units are still relatively well rated in the area of "free access to information" – they respected in 100% of cases the obligation to inform citizens about the manner of submitting requests (information published online), but these data in printed form are visible only in seven service centres or administrative premises.

As mentioned in the explanation of the importance of prescribing and implementing sanctions, the transparency of local public enterprises and institutions is weak, and although slow but steady progress has been identified in this area since LTI 2019. The average result is still far below the satisfactory level (53%) and some of the indicators that are among the most important from the point of view of potential abuses and risks of corruption are decreasing. Comprehensive information on the procedures for the selection of directors can be found on the websites of 5.5% of LSGs, and basic information on these procedures is published on the websites of 17.2% of local self-government units.

In 26.2% of LSGs (an increase compared to LTI 2023), there was at least one case where the director of the PE was not elected in a competition, i.e. that he was in office after his mandate as acting director expired. The publication of work plans and reports on the work of the PE is a legal obligation, but we found 49% and 45% of these documents respectively for the observed PE. Finally, what is most concerning is that 21 out of 145 observer PEs **do not have their own website**, 12 years after the introduction of the obligation to publish documents **on the site**.

The percentage of local self-government units that have sections dedicated to PE on their websites varies between 87 and 89%. Such a page can be the first step towards a page with comprehensive information and documents, which TS has proposed in all previous research conclusions, and some LSGs have implemented (examples in the chapter "Examples of good practice").

The number of local self-government websites with data on public debates conducted in the past 12 months (excluding budget debates) has increased to 104, after last year's drop from 103 to 96, and it is encouraging that the number of reports on public debates containing information on citizens' proposals and the reasons for their acceptance/rejection is continuously increasing. (From 38 to 44, then to 50 this year)

A very small number of local self-government units have mechanisms under which citizens can monitor the progress of their case through the website (13 out of 170). Irregularities, illegalities, including suspicion of corruption, can be reported in premises of 43 and on the websites of 83 out of 170 local self-government units. From the point of attitude to citizens, it should be emphasized that only 29 out of 170 LSGs have comprehensively surveyed citizens' satisfaction with administrative services in the last four years or considered evaluation performed by others (NGOs, donors, etc.).

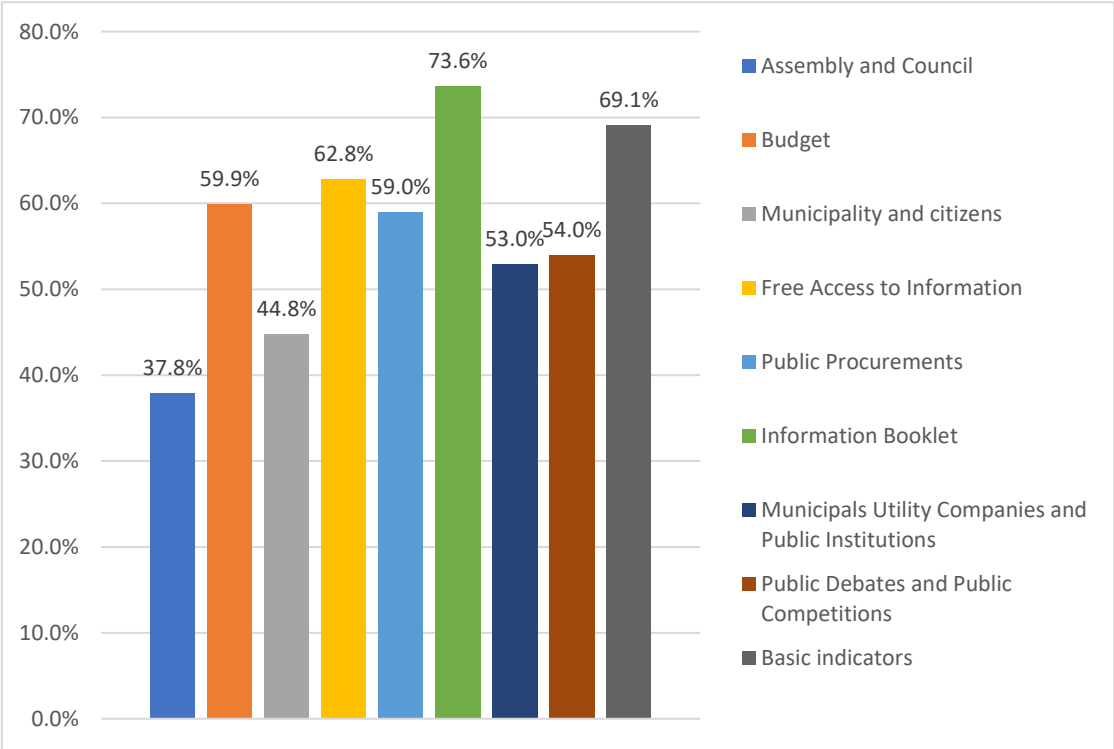
The „Assembly and Council“ is still the worst ranking category. The only indicator with a high score is disclosing the list of deputies (91.8%). However, deputies' contacts (e-mail addresses, phone numbers, direct contact forms) are found only on the websites of 12.9% of local self-governments. The agenda

of the next session of the Assembly is not presented in almost half of the JLS (80 out of 170). Of the 90 that publish the agenda, only 35 publish the materials that will be discussed at the next session. After last year's increase, the number of local self-government units that publish the decisions of the city/municipal council and assembly has fallen again – from 35.2% in LTI 2022 to 46.2% in LTI 2023, then to 44.1% (out of 145) in LTI 2024 for the assembly, and for Council from 14.5% to 26.9% and then to 21.4% in LTI 2024.

In other, uncategorized indicators, LSGs achieved the best results in the publication of spatial/urban plans (98.6%). After the election of new presidents of municipalities and mayors, the percentage of those who filed property declarations decreased to 84.8% (97.9% in the previous year). The act on the systematization of the municipal administrations was available in 90%, and the code of ethics in 59%. According to the Agency for the Prevention of Corruption, local anti-corruption plans, although mandatory, have been adopted by 116 out of 145 (they are mandatory only for cities and municipalities, not for in-city municipalities), which is three more than in 2023.

It is important to note that **poor performance in some categories does not necessarily mean that corruption is widespread in these areas. Similarly, good results do not guarantee that there is no corruption.** Transparency is only a mechanism to facilitate the detection or prevention of corruption; the ultimate success of these mechanisms depends on many other factors. Also, a low LTI score does not necessarily mean that a municipality is more corrupt than another that has a higher LTI, and vice versa. The fact is that a low LTI should "wake up the public" and local administration and management, while a high LTI means that corrupt behaviour will be harder to cover up and easier to detect.

Graph no 1: Percentage of successful performance of 145 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 a certain category.

Research Areas

Overview

Transparency indexes are divided into eight categories. These categories, i.e. areas, are consisted of four to 18 indicators. Thirteen indicators are not inserted into separate categories, as they are focused on rather narrow areas (local anti-corruption plans, submission of property and income declarations, availability of municipal administration work plans, code of ethics, spatial plans, etc.). Among the eight categories mentioned, the best average score was, for the second year in a row, in the area of "Information Booklets" (73.6% of the maximum result, after 73.3% in LTI 2023, which was a sharp increase from 41.7% in LTI 2022). Free access to information rose to 62.8% and took a second place, but this increase was due to the growth of only one double-weighted indicator (responses to the requests of the "mystery shopper") in a segment in which only five indicators were grouped.

"Budget" fell from 63.2% to 59.9%, and "Public Procurements" has continued to decline since some legal obligations were abolished in 2021, and now this category is at 59% (62.2% in LTI 2023, 72.6% in LTI 2022 and 95.5% in LTI 2021).

The high results from previous evaluations for "Public Procurement" were due to clear legal obligations in this area: the fact that local self-governments, under the threat of fines, were obliged to publish information on the Public Procurement Portal and to publish this information on their websites. The obligation to publish on websites was abolished in 2021 and resulted in lower overall results.

In two other areas, the average is above 50% - these are "Public debates and public consultations" (54%, growth from 52.5%) and "Public companies and public institutions" (from 51.3% to 53%).

When it comes to individual indicators, for 14 out of a total of 95, more than 90% of municipalities have positive assessments (in LTI 2023 there were 15, and in LTI 2022 there were 10). For two indicators, the result is 100% (Information on the working hours of the administration available on the website and information on submitting a request for free access to information available on the website). Other indicators with more than 90% of positive scores are: published spatial/urban plans, published inspection checklists, published information on the website (or in the Information Booklets) on services provided by the municipality, the existence of a section on the website dedicated to public procurement (even if only PP plans are published there), published calls for the lease of property owned by local self-government units, published budget, no unresolved decisions of the Commissioner, the Integrity Plan has been adopted, the data on the salaries of officials have been published in the Information Booklet, the list of deputies has been published on the website, the Information Booklet has been published and updated in the past three months, as well as the Rulebook on the internal organization and systematization of the administration.

At the bottom of the table, this year there is no indicator with an overall score of zero, 1.4% (two out of 145 LSGs) refers to the publication of the work plan of the administration, and 3.4% (five LSGs) to the availability of data on processing complaints, data on lobbying and the president/mayor's agenda. The growth of the indicator that assesses the publication of data on how individual deputies voted at the assembly session, from one in 2022, to six in 2023 and to eight in LTI 2024, is encouraging. This is the result of the introduction of e-assembly, and given the responses of some local self-government units to verification letters, a further increase in the number of municipalities and cities is expected, which will provide citizens with much more information about the work of the local parliament.

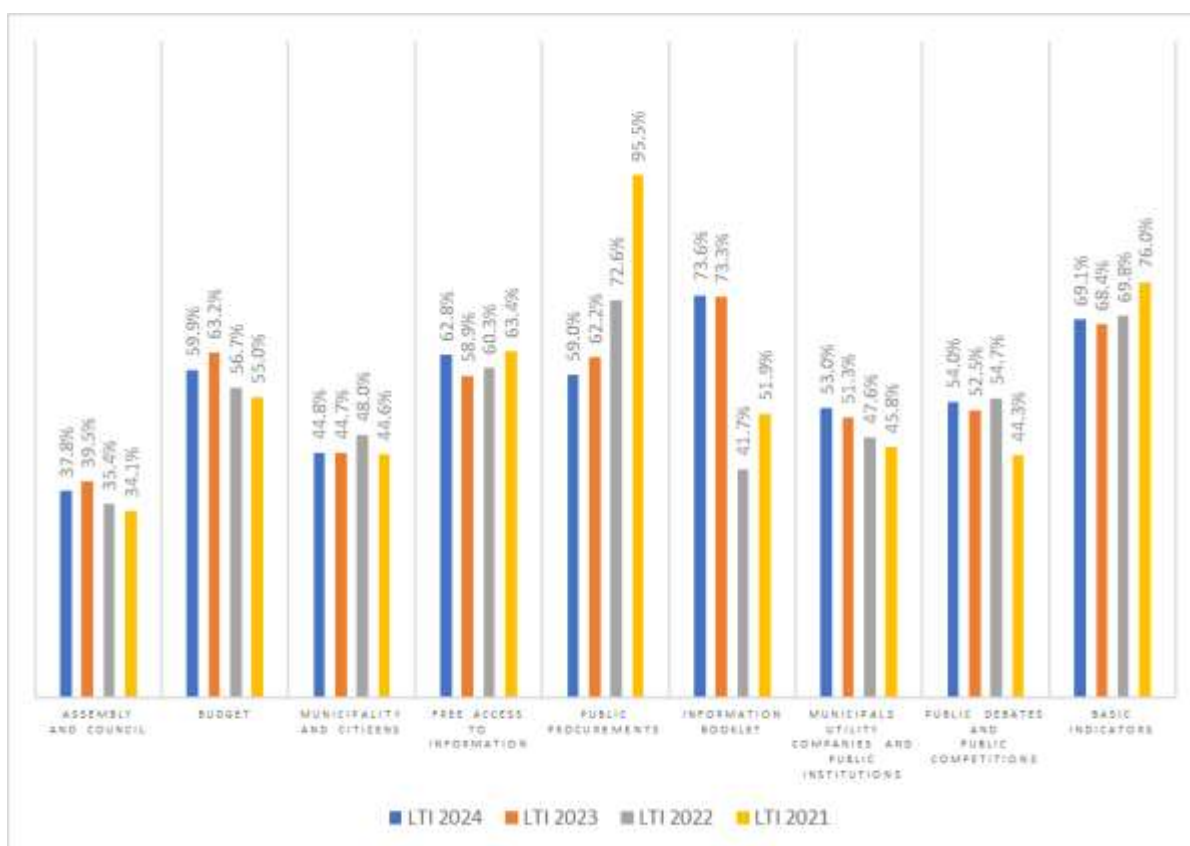
Table no. 3: Successful achievement of LSGs in various fields (categories)

	Assembly and Council	Budget	Municipality and citizens	Free Access to Information	Public Procurements	Information Booklet	Municipals Utility Companies and Public Institutions	Public Debates and Public Competitions	Basic indicators
Average	6.1	8.4	6.7	3.8	2.4	2.9	9.5	5.4	6.9
Max	16	14	15	6	4	4	18	10	10
% of max score	37.8%	59.9%	44.8%	62.8%	59.0%	73.6%	53.0%	54.0%	69.1%

Legend: Score range 0 to max score for certain category
 The full list of indicators covered within the areas (categories) is provided in annexes

As in the previous four years, local self-government units performed the worst in the category "Assembly and Council". In the category "Public Enterprises and Public Institutions" there has been continuous growth in the past three years, but the score is still very weak (53%). A high score in the category "Information Booklets" was preserved, accompanied by a small progress.

Graph No 2. LSGs overall performance by categories in 2024 vs 2023 vs 2022 vs 2021



Legend: Comparison of LSGs overall performance in all fields, 2021 vs 2022 vs 2023 vs 2024

Information booklets

The average score in this area has increased unscientifically, from 73.3% to 73.6%, but it is important that the high level has been maintained after falling from 51.9% to 41.7% in 2022. This proved that the introduction of the Commissioner's portal was a step forward from the point of view of transparency. Some local governments still have word-format or PDF information booklets on their websites, in addition to those on the portal, and some only have links to the portal. It should be recalled that within the LSGs there are four entities that are obliged to issue the Information Booklet - the administration, the assembly, the council and the mayor, while before the legal changes it was allowed and customary to have one common document for all these bodies.

But, while the average score is stagnating, individual indicators in this category vary - the publication and regular updating (at least every three months) of the booklet increased from 73.8% to 90.3% (it was 41.4% only two years ago), and a big drop was recorded by the indicator that tracks the publication of the public procurement plan (or a link to the plan) in the booklet - from 67.6% to 55.9%.

The maximum score of 4 points has 52 JLS.

Free access to information

LSGs still have a relatively good average score in this area. The ratings of individual indicators (there are five of them, one is weighted by two points), however, vary enormously. All (100%) comply with the obligation to inform citizens via the website (or in the booklet) about the manner of submitting the application. However, only 4.1% (the same as in LTI 2023 and 2022) have this information available on their premises. The number of local self-governments that provided the requested information to TS's "mystery shopper" increased, which is the only reason for the increase in the average score compared to LTI 2023.

In this category, 13 JLS have a very good score of 5 points and none of them have a maximum of six.

Budget

The average score in the "Budget" category, after many years of stable growth, has now fallen, from 63.2% to 59.9%. The budget document for the current year is available on the vast majority of local government websites (94.5%), and in almost four-fifths of cases it is available in a machine-readable or at least searchable form. The situation is significantly worse in terms of the availability of budget spending data, where only 47.6% of local self-government units (up from 44% in LTI 2023 and 39.3% in 2022) published at least six-month and nine-month reports. The number of LSGs publishing monthly reports on budget implementation has increased in previous years, reaching 15% in LTI 2023, but has now fallen to 13.8%. Audit reports were reviewed and published in 31% (33% in 2023) of cases. Due to temporary financing, the number of LSGs that organized public debates on the budget (citizen surveys or consultative meetings) and published reports from public debates containing the received proposals and explanations for their acceptance or rejection was drastically reduced. The public debate was organized by 87 LSGs - 60% (106 and 73.1% respectively in 2023, which was a return to the pre-pandemic level), and the report was published by 58 LSGs - 40% (67 in 2023).

In the category "**Budget**", the best result had six cities and municipalities (Kanjiža, Rekovac, Sokobanja, Blace, Zaječar, Vrnjačka Banja) – maximum 14 points, followed by 12 local self-government units with a score of 13.

Public Procurement

In the "**Public Procurement**" category, the average score continues to fall from over 95% for the third year in a row, after the abolition of certain legal obligations, which is why many local self-government units have stopped publishing documents related to public procurements on their websites. Despite this, almost all LSGs have a page on their website dedicated to public procurement (96.6%, the same as in 2023), but only 37.2% of them still publish information on current procurements (compared to 40% in LTI 2023, 62.8% in 2022 and 94.5% in 2021). It should be noted that this finding is limited only to the availability of certain documents and information related to procurements, as the analysis does not include an assessment of the procurement processes themselves. More information on this topic is offered by the Local Public Procurement Index (LPPI), developed by TS.

The maximum score of four points is 52 JLS.

Public Debates and Public Competitions

Given that this category looks at activities in the whole of the previous year, the elections should not affect the score. The average rating has increased, from 52.5% to 54%. The number of local self-government units that published information about a debate held during the previous 12 months (not including the public debate on the budget) increased from 96 to 103, but this is still relatively low and less than two years ago (104). The number of local self-government units that published reports from public debates containing information on citizens' proposals and the reasons for accepting/rejecting these proposals continues to grow – from 44 to 50. There is, however, a huge difference in the number of those who have held a debate and those who have published comprehensive reports. There is still a huge disparity between the number of local self-government units that publish calls for the lease of municipal property (95.2%) and the published information on the outcome of these advertisements (6.2%). This disparity is much smaller, but it exists when it comes to publishing information on the distribution of funds for the media and NGO projects. Public calls for the allocation of funds for media projects were found on 124 websites, and decisions on the allocation of funds on 99, while in the case of NGOs, 126 calls and 111 decisions were found. The progress is minimal in the indicators that assess whether reports or evaluations have been published, how the allocated money has been spent and what are the results of activities – only 12 for the media and 11 for NGOs.

In their responses to verification letters, some LSGs pointed to reports that contain only information on the distribution of funds in competitions (public calls, participants, etc.), but this indicator does not refer only to this information. For positive score, reports of those to whom the money has been allocated and/or reports on project evaluation have been requested. In this category, Leskovac and Sokobanja have a maximum of 10 points, Novi Pazar, Kruševac, Vranje and Aleksinac - nine.

Public Enterprises and Public Institutions

The average score in this category has been rising since 2019 but is still at a relatively low level of 53%. An increase was recorded in 13 of the 18 indicators, and one remained unchanged. It is concerning that the number of local self-government units in which competitions for the election of directors have been conducted (i.e. the maximum term for which the acting director of PE can be appointed has not expired) has decreased. Comprehensive documents on the process of the competition for the election of the director of the PE can be found on several websites of local self-governments (eight or 5.5%), and at least some documents can be found in 25 (17.2%) cases. Almost 90% of LSGs (129) have a special section on the website with information about PE and PI. On the other hand, 12 years after the introduction of the legal obligation to publish certain data on their websites, some PEs do not have a website (21 from the sample, or 14.5%).

In the category "Public Enterprises and Public Institutions", for the second year in a row, the best ranked are Kanjiža, Veliko Gradište and Novi Pazar with a maximum of 18 points, followed by Sokobanja and Subotica with 17, Bečej, Vranje and Sombor with 16.

LSGs and citizens

There were no significant changes in this area compared to LTI 2023. The best outcome regarding indicators is the one that is easiest to meet - the publication of information on working hours (100%) and the one that is a legal obligation - the publication of inspection checklists on websites (97.2%). Service centres have 123 out of 145 local self-government units, and in 28 service centres, deadlines for dealing with administrative procedures are visible (or can be accessed via a service computer). More than half of LSGs provide citizens with the opportunity to report irregularities or violations of the law, including corruption, through the website, but such a possibility exists in less than a quarter of service centres or other premises of LSGs (this includes at least the existence of a book of comments and complaints or a box for comments and suggestions). Only 20 LSGs have conducted a survey on satisfaction with the services of the administration in the last four years or have used the results of surveys of others stakeholders (NGOs, donors).

As in LTI 2023 and 2022, only one local self-government unit (Novi Pazar) achieved the maximum result (15) in this category, while 13 Veliko Gradište and Leskovac scored 13, and Sombor and Kladovo 12.

Assembly and Council

This category has been the worst-ranked for years, and normally the only highly rated indicator is the published list of deputies, although even such list cannot be found on the websites of 11 out of 145 local self-government units. The local official gazette is available on the websites of 83.4% of local governments. The agenda of the next session of the Assembly was not visible in almost half of the local self-government units, and out of 82 that publish the agenda, only 34 presented materials or drafts of documents that will be discussed at the session. Decisions from the sittings of local assemblies are made available on the websites of 44.1% local self-governments. For the second year in a row, there is an increase in the indicator related to whether local self-government units publish information on how individual deputies voted at the Assembly sitting - one in 2022, six last year, and eight this year.

This is still extremely low, but it is an encouraging step resulting from the introduction of e-assemblies and the presentation of data from e-assemblies within the minutes of the sittings.

Individually, Novi Pazar has a maximum of 16, Sombor and Kanjiža 15, and Veliko Gradište, Tutin and Subotica 14 points.

Other indicators

Regarding uncategorized indicators (other), local self-government units performed best when it comes to publishing spatial/urban plans, adopting integrity plans and publishing rulebooks on the systematization of workplaces in administration (all three above 90%). The report on the work of the administration in the previous year was published by only 14 out of 145 LSGs, and the information on municipal property leased to other entities by 10 local self-government units. Lobbyist contact reports (or contact forms, with no contact records) can be found in five cases, as well as weekly or daily schedules of activities of presidents/mayors.

Results of In-city municipalities

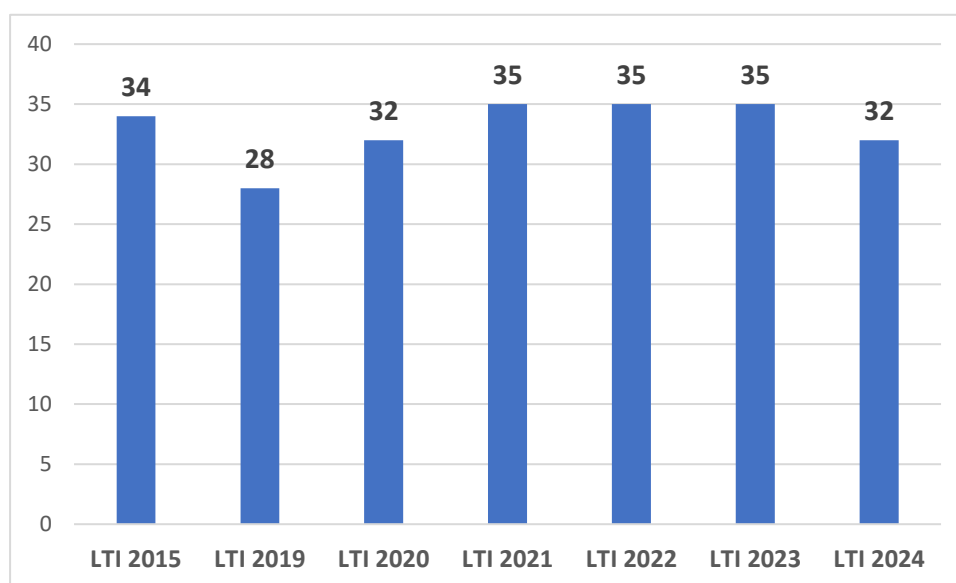
In-city municipalities do not have the same competencies as cities and municipalities because their organization is stipulated by the Statute of the city they belong to, and this practice differs depending on individual cities. In addition, some of the indicators cannot be applied to in-city municipalities (some do not have PE, do not own property, some do not announce competitions for the media, etc.). For this reason, Transparency Serbia evaluated 25 city municipalities comparing their performance in 2024 with the performance from previous surveys (2023, 2022, 2021, 2020, 2019 and 2015), but did not rank them.

Overview

The general impression is that the average performance of in-city municipalities has decreased and that the primary reason for the decline in the average score could relate to local elections. Due to the elections and temporary financing, the index in the area of "Budget" has been significantly reduced. In other areas, there were deviations in both directions – increase and decrease of the average scores.

After a three-year stagnation at the level of 35, the average LTI fell to 32 (the decline is actually slightly lower – 2.4 index points, but rounding off score in LTI 2023, when the score was 34.76, and in LTI 2024, 32.32, resulted in an average drop of three points). In addition, the Index increased in only six municipalities, in one it was unchanged, and in 18 it was reduced. Two municipalities experienced a large drop of 9, one had 8, and the largest increase is only four points, from a very modest initial score, (from 20 to 24).

Graph no. 4. City municipalities' average LTI index 2015 – 2024



In-city municipalities scored the best in the areas of "Information Booklets" (64%, compared to 68% in LTI 2023 and 54% in 2022) and "Free Access to Information" (60%, up from 54.7% in 2023). In the case of free access to information, the increase, as with other local self-government units, is a result of the increase of only one indicator – the response to the request of the "mystery shopper", while all other indicators remain unchanged.

The performance is worst in the category "Assembly and Council", where the index of 25 in-city municipalities is 3.2 out of a maximum of 18 points (19.8%), which is even worse than the already poor rating in LTI 2023 (3.4 out of 18 and 21.3%). The traditionally low score in the area of "Public Enterprises and Public Institutions" is a consequence of the fact that not all city municipalities have public companies (some even do not even have public institutions) under their jurisdiction. The jurisdiction could partly explain the low average in the category "Public Debates and Public Competitions", but this does not explain the multi-year downward trend - from 28.4 in 2022 to 24.4 in 2023 and 22% in LTI 2024.

Comparison of Comparable

There are four categories in which competencies do not play a role and a comparison between in-city municipalities is indeed possible: "Assembly and Council", "Budget", "LSGs and Citizens" and "Free Access to Information".

In the category "**Assembly and Council**" (maximum 16 points), with the worst average index among comparable areas, three city municipalities scored 50% or more - Sevojno, which had an excellent result - 15 out of 16 points. Surčin and Palilula Niš are two with relatively high scores (9 and 8). Currently, only four city municipalities present on their websites the decisions adopted by their assemblies – Sevojno, Niš Palilula, Čukarica and Stari Grad. Twenty-two of the 25 municipalities published a list of deputies.

This category shows that in-city municipalities share the same problems with other LSGs – they do not take seriously their obligations regarding transparency in the category "Assembly and Council".

The performance in the "**Budget**" category has deteriorated significantly (27.7% vs. 41.1%). The best results are in Sevojno with 12 and Surčin with 11 of the maximum 12 points. Followed by Zvezdara with 9, Palilula Niš and Vračar with 8. The current budget or the decision on temporary financing could be found on the websites of 15 (of 25) in-city municipalities, significantly less than in previous year (21). In most cases (13 out of 15) it was presented in machine-readable or searchable form. There is little progress when it comes to the publication of data on budget execution – six (four in 2023) published six-month and nine-month reports.

As for the category "**LSGs and citizens**", there are no significant deviations – the average is 38.9% (it was 39.5%), and the best in-city municipalities are Zvezdara with 11 (out of a maximum of 15), followed by Voždovac and Čukarica, with nine points.

All in-city municipalities have information about the working hours of the administration available on their websites or a telephone number by which this information can be obtained. Twenty-three have a functional service centre that provides all services. Additionally, 20 municipalities publish information on their websites about the services offered by the municipality. On the other hand, only three of them provide the opportunity for citizens to report irregularities or violations of the law on their websites, but ten of them have such mechanisms within their premises.

"**Free access to information**" is a category with increase induced by growth of only one indicator, which is weighted with two points (response to the request of the "mystery shopper") – 15

municipalities responded to such request in LTI 2023, and 19 this year. The obligation to inform citizens on their websites about the submission of requests for free access to information is fulfilled by all 25 in-city municipalities. Only Zvezdara has information about the submission of a request for free access to information visible in the service centre or the premises of the administration.

Year after year

Six in-city municipalities have made progress compared to last year, as many as 18 have scored worse, and one has an unchanged LTI rating. However, the improvements in results are negligible. Sopot has the highest increase rate, but starting from a low base – by four points, from 20 to 24. Čukarica reached 46 from 43, the remaining ones have an increase of one or two points. Of those with negative trends, Rakovica stands out with - 9 (a continuous decline from 37 in LTI 2021 to 20 this year) and Crveni Krst (also a continuous decline from 37 in LTI 2021 to 24) and Voždovac with - 8. The best score is still in Surčin (67), but with a drop of five points compared to LTI 2023.

Table no. 8: LTI Score of city municipalities 2015-2024

City Municipality	2015	2019	2020	2021	2022	2023	2024
Barajevo	51	32	47	42	38	38	37
Voždovac	19	24	22	35	27	33	25
Vračar	48	26	24	31	22	33	34
Grocka	22	31	28	37	33	33	30
Zvezdara	41	38	40	40	43	57	56
Zemun	30	26	38	29	39	35	37
Lazarevac	37	36	36	43	36	34	32
Mladenovac	50	25	33	41	45	34	31
Novi Beograd	35	27	28	25	29	19	19
Obrenovac	42	38	41	35	32	34	31
Palilula	46	29	24	31	23	20	17
Rakovica	35	21	31	37	36	29	20
Savski Venac	36	38	36	39	34	34	29
Sopot	21	13	20	23	16	20	24
Stari Grad	51	23	28	35	28	29	30
Čukarica	47	37	32	43	43	43	46
Surčin	32	42	53	62	69	72	67
Medijana	28	25	24	21	25	26	22
Niška Banja	13	31	35	26	24	21	18
Palilula Niš	32	31	28	33	33	43	39
Pantelej	25	23	39	23	28	26	25
Crveni Krst	28	20	28	37	35	33	24
Vranjska Banja	/	10	25	27	26	29	23
Kostolac	16	23	30	24	36	34	31
Sevojno	/	37	42	52	66	60	61

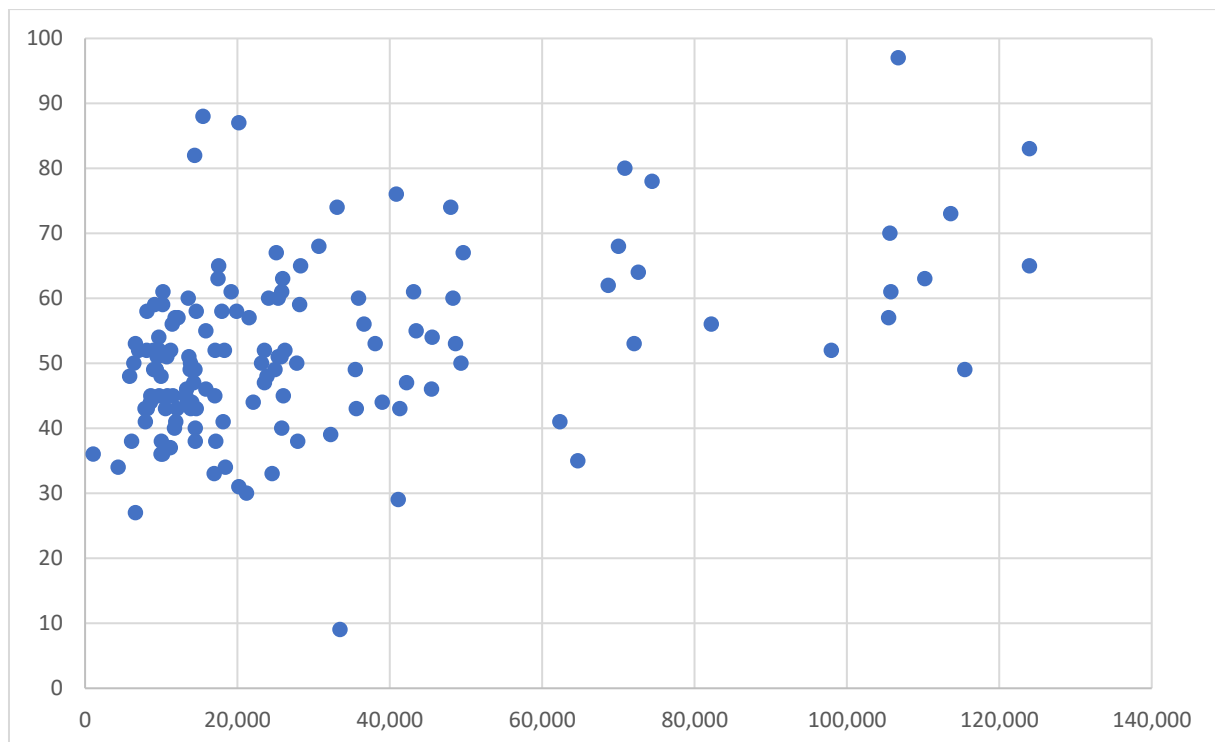
When analysing multi-year trends by individual municipalities, since LTI 2019, Surčin, until this year's decline, had a stable growth (32-42-53-62-69-72-67), Čukarica, after a huge decline in the first year, returned to the starting level (47-32-43-43-43-46), while Sevojno remains the only city municipality with an uninterrupted trend of improving transparency (37-42-52-66-60-61). Zvezdara maintains a solid level, with a minimal decline this year (41-38-40-40-43-57-56). On the other hand, 10 in-city municipalities have a score of 25 or lower, which is extremely concerning even when taking into account their (non)jurisdictions.

LTI score in relation with districts, population, budget and LSGs' capacities

In previous LTI cycles, we mentioned some factors that could influence the LTI score to be better or worse. At the public presentations, we pointed out that many small municipalities, whose budget and personnel capacities are limited, managed to achieve good results, and vice versa, that some of the largest cities, whose services and work are important for significantly larger number of citizens, do not show sufficient interest to ensure the transparency of their work. This year, we decided to support these observations with concrete research.

From the graphic representation, it can be concluded that the size of the municipality is not a decisive factor for the transparency of cities and municipalities, although it is not completely without importance. Namely, all cities and municipalities with more than 65,000 inhabitants, with the exception of Belgrade and Pančevo, recorded a score of more than 50 in this year's survey, and the two above mentioned cities are close to that score. The performance is also above average in the next cluster, where we could classify municipalities with population between 20 and 65 thousand, according to the last census. In the category of very small municipalities (under 20,000), the majority are also grouped around average values, but the number of those with lower scores is somewhat higher than the number of municipalities that have achieved more than 50 points. However, the examples from this category, where two municipalities with around 15,000 inhabitants are at the very top of the LTI 2024 table, with a score greater than 80, shows that transparency in the work of local self-government is decisively influenced by some other factors.

Graph No 5: LTI 2024 score and LSGs' population (without BG, NS, NI, KG)

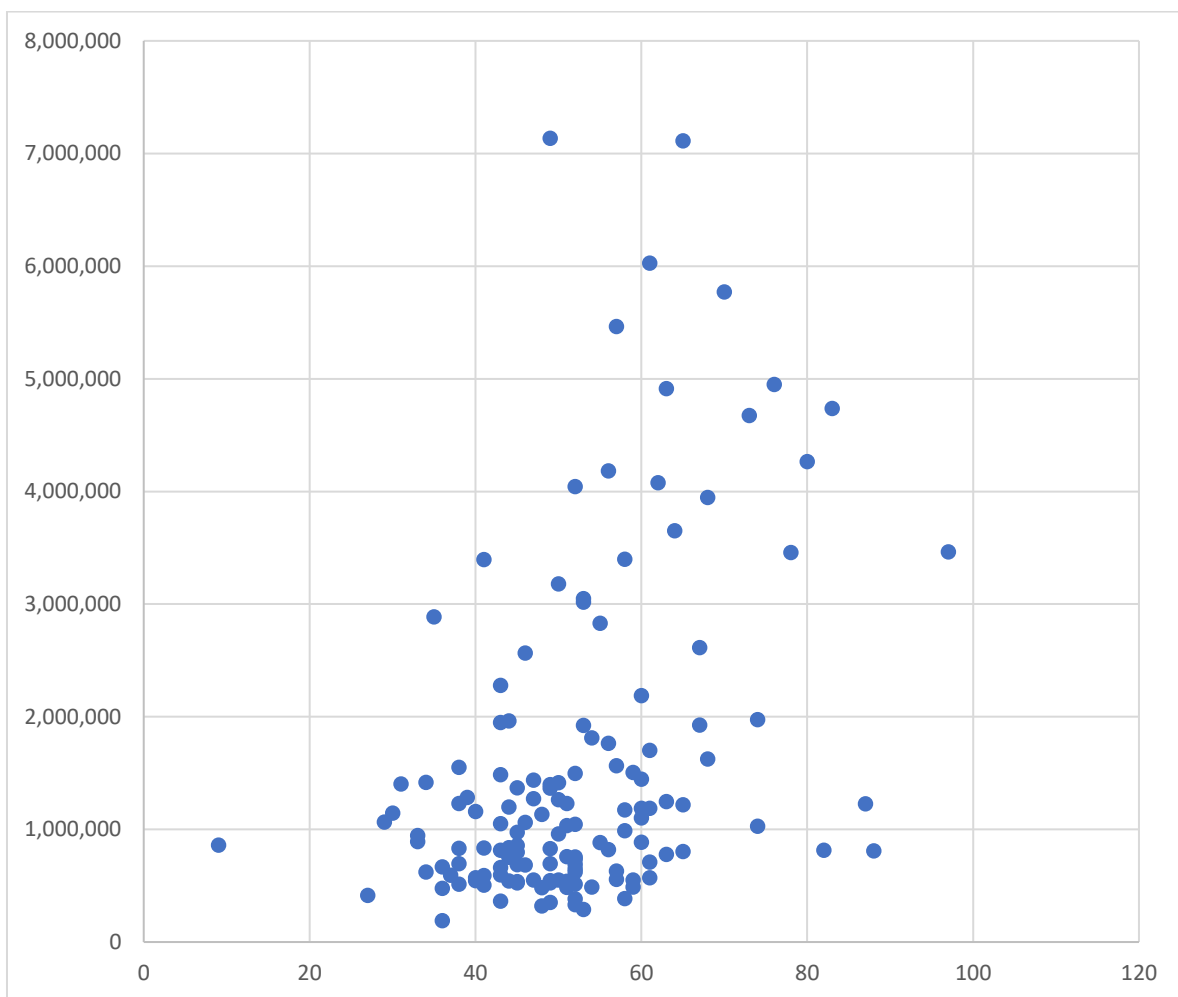


Note: Source of population data: Statistical Office of Serbia. The four most populous cities are omitted from the graphic presentation, for the sake of better visibility of the other data.

In addition to the population, the transparency of municipalities could be affected by their budget. It can be assumed that a larger budget will influence the citizens' need for data insight to be stronger as well. Also, the budget can indicate the capacity of LSGs to meet transparency standards. It has been shown, however, that a bigger budget does not necessarily entail a greater responsibility for showing how the money is spent.

When looking at cities whose expenditures were greater than four billion dinars, the results are better than average. Although there are examples where a score of less than 50 was recorded (including the city of Belgrade, whose budget is by far the largest), most of these cities received 60 or more points, and the best placed among them 83. Slightly above the average are also the municipalities that spent between two and four billion dinars. Poorer municipalities (under two billion expenditures) are mostly grouped in the zone below the average (between 40 and 52 points), so one might rush to conclude that the budget is not without influence on the degree of transparency. However, just a few examples from this comparison prove that the budget is not a decisive factor in transparency - a score of over 80 was recorded by three municipalities whose budget was less than 1.3 billion dinars.

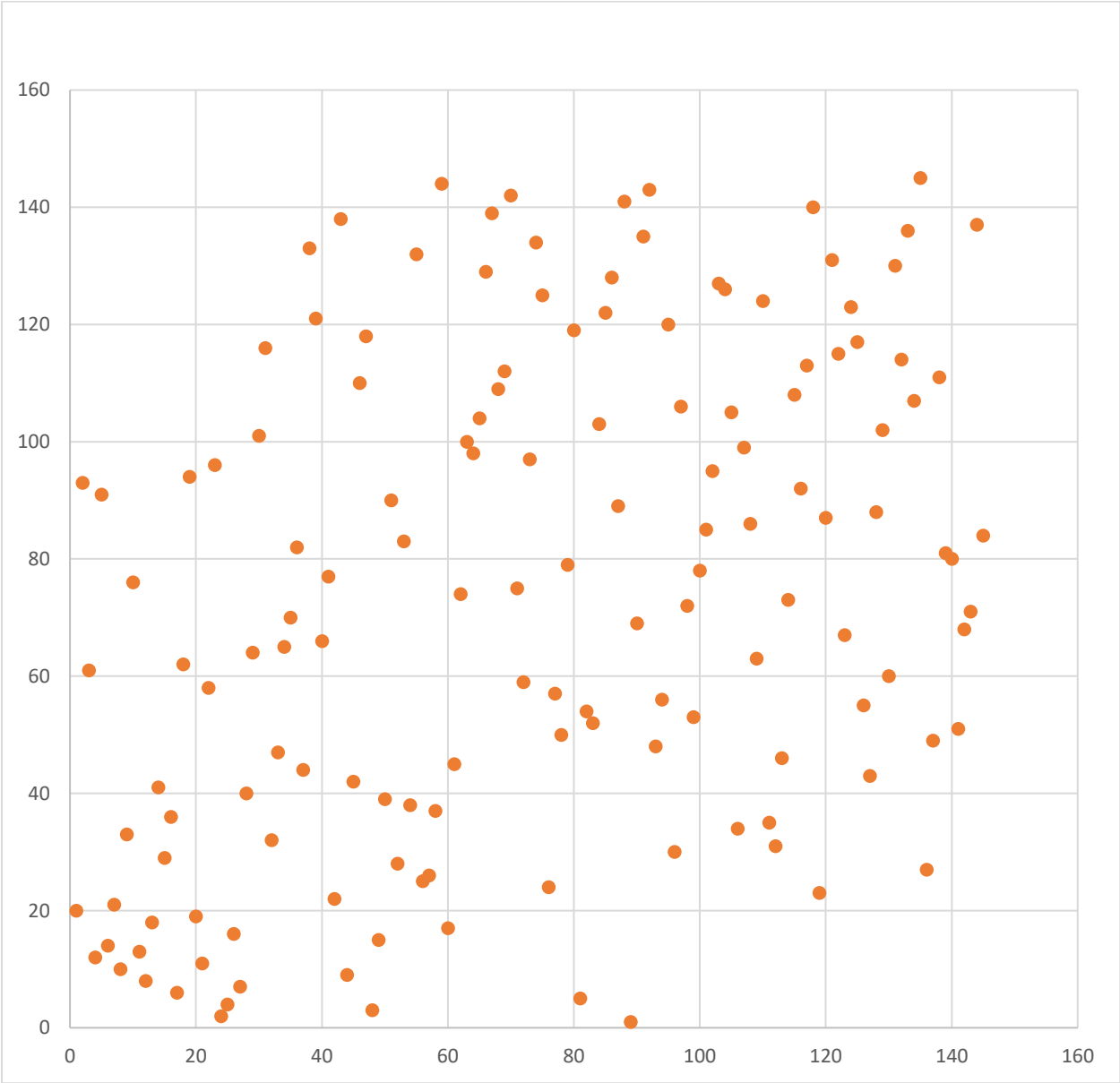
Graph No 6: LTI score and LSGs' budget in 000 RSD (without BG, NS, NI, KG)



Note: Source of data on the amount of budget spending: Public Policy Secretariat, execution for 2022. The four cities with the largest budgets have been omitted from the graphic display, for the sake of better visibility of the other data.

Analyzing the relationship between the size of the budget and the transparency of the LSG can be done in another way, where the ranking - place of the municipality in the LTI table is compared with budget. If it was assumed that the amount of the budget affects the degree of transparency, LSGs would be concentrated exclusively in the quadrants that extend diagonally from the lower left to the upper right corner of the graph. In practice, as it can be seen, the situation is significantly different. A certain regularity is noticeable only when it comes to the poor ranking of the majority of the twenty poorest municipalities. In none of the other groupings, not even the relative majority of LSGs are grouped in the quadrant where one would expect (eg their LTI rank to be between 40th and 60th place and their budget spending rank to be in the same segment).

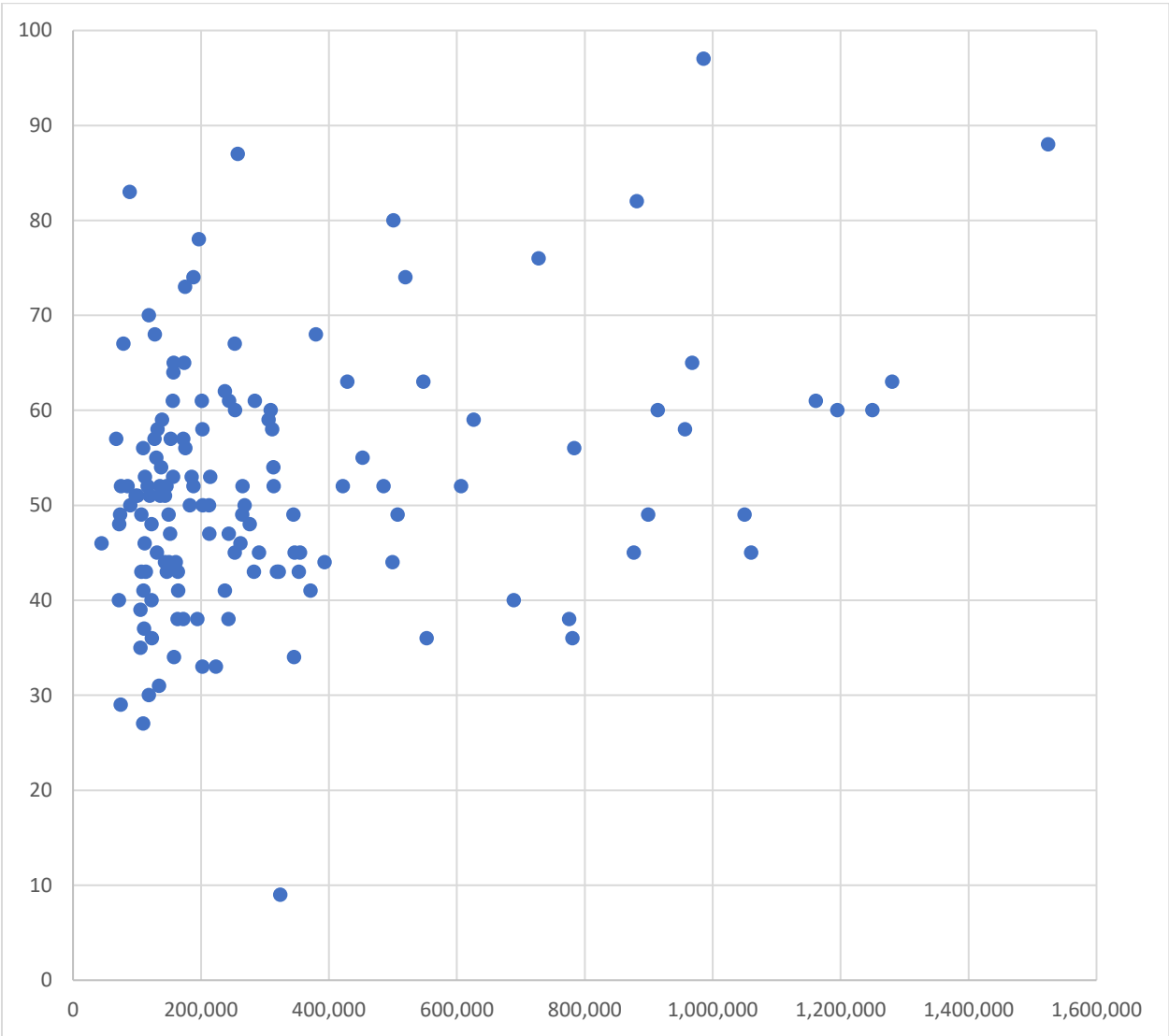
Graph No 7: LTI 2024 LSGs' ranking (vertical) and LSGs' budget (horizontal)



Note: Source of data on the amount of budget spending: Public Policy Secretariat, execution for 2022.

While total budget expenditures can be a significant factor both in terms of responsibilities and capacities, one of the categories of public expenditures provides more precise data on capacities - the one related to expenditures for employees in LGUs. The comparison leads to similar conclusions as in the previous cases. When looking at the cities that spent more than 800 million dinars per year on employees, it can be seen that the result was above 50 points in all but two cases. The recorded score is slightly above the average in municipalities that spent between 400 and 800 million dinars for these purposes. Among the municipalities that spent between 200 and 400 million dinars, those with above-average and worse results are approximately equally represented, but with a significantly greater variety of results (range between 9 and 87). Only in the group of municipalities with the smallest allocations for employees do we note that those with a weaker result predominate. However, as two municipalities stand out in this category with scores nearly over 80, it is clear that the lack of capacity cannot be the reason for non-transparency, although it is a factor that has a certain influence.

Graph No 8: LTI 2024 score and expenses for LSGs' employees in 000 RSD (without BG, NS, NI, KG)



Note: Source of data on the amount of budget spending: Public Policy Secretariat, execution for 2022. The four cities with the largest budgets have been omitted from the graphic display, for the sake of better visibility of the other data.

Results by districts

There is no doubt that the achievements of cities and municipalities that are measured through the LTI are mainly theirs, and that policies implemented (or not implemented at the national level), donor projects implemented throughout the country or in certain regions, the interest of citizens, associations of citizens and the media operating in a certain area can have an additional impact.

More than once, in the presentations of the LTI results, we have also pointed to some regional (for instance, one year the three first-placed municipalities were all from Bačka region) or, even earlier, "neighboring" patterns - indications that good practices are being copied and the score is improving under the influence of a neighboring municipality. The research of these phenomena would require deeper analysis, but this year we decided to take the first step in that direction - we determined the average grades at the level of the administrative districts of Serbia.

These data should be interpreted with great caution. Bearing in mind that the number of municipalities per district is different and in some cases very small, an extremely good or extremely bad result of just one municipality can have a disproportionately large impact on the average score within the administrative district.

The best average (as much as 71.6) has LGUs from the Raška district, which is mainly the merit of the first-placed Novi Pazar, but it is noticeable that "neighborly competition" also had an impact - only one out of five LSGs from this area has a result below the average.

The second and third places are occupied by municipalities from Bor and Zaječar districts (61.75 and 60, respectively). In both cases, almost all municipalities from the group had very good results, and only one scored below average.

An average score of between 52 and 55 points was recorded for the districts of southern and western Bačka, followed by Braničevo, northern Banat, Zlatiborski, Pirotski, Rasinski and Toplički districts.

Just below the average are Jablanički and Severnobački districts, then Nišavski, Šumadijski, Srednjobanatski, Podunavski and Pomoravski, with a score close to 50.

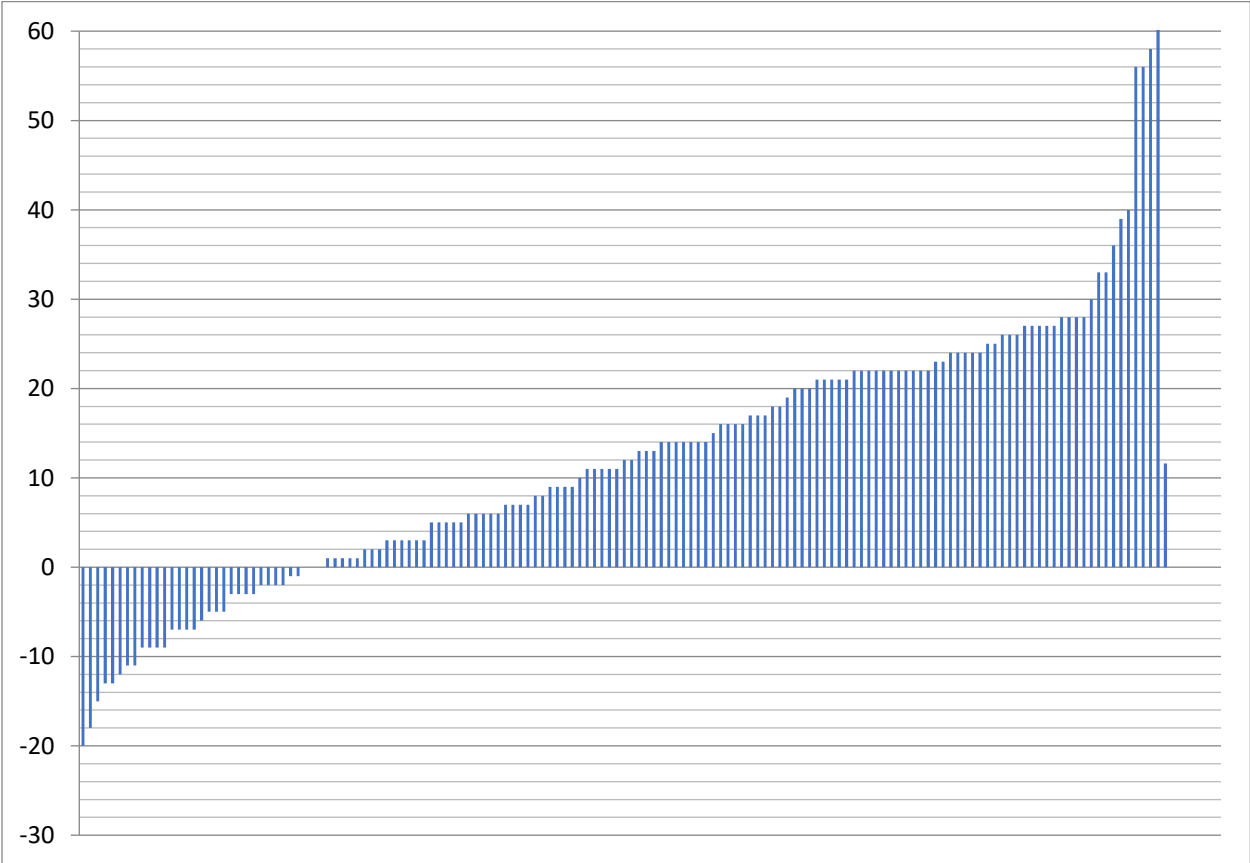
Several districts follow with scores between 45 and 48, and at the bottom there is Pčinjski, with an average score of 42.5. One out of seven LSGs from this region recorded an excellent result, another a good result, the remaining five are below average, some of which are at the very bottom of the table.

General trends 2015 / 2024

Although slow, the progress of municipalities and cities in terms of transparency is evident over a long period of time. When the findings of LTI 2024 are compared with those from the first survey, conducted in 2015, the conclusion is that thirty LSGs have decreased their level of transparency during the previous decade, that in three cases the result was identical, and that the vast majority (112 LSGs, i.e. 77%) progressed. On average, the score is now better by 11.6 points.

That progress, however, was by no means uniform. It is the highest in this year's first-placed Novi Pazar (as many as 58 points), and only slightly lower (56) in Bor and Veliki Gradište. On the other hand, the decline was greatest in Paraćin (20 points), which was rated as the most transparent in the first survey from 2015, followed by Bujanovac (18 points).

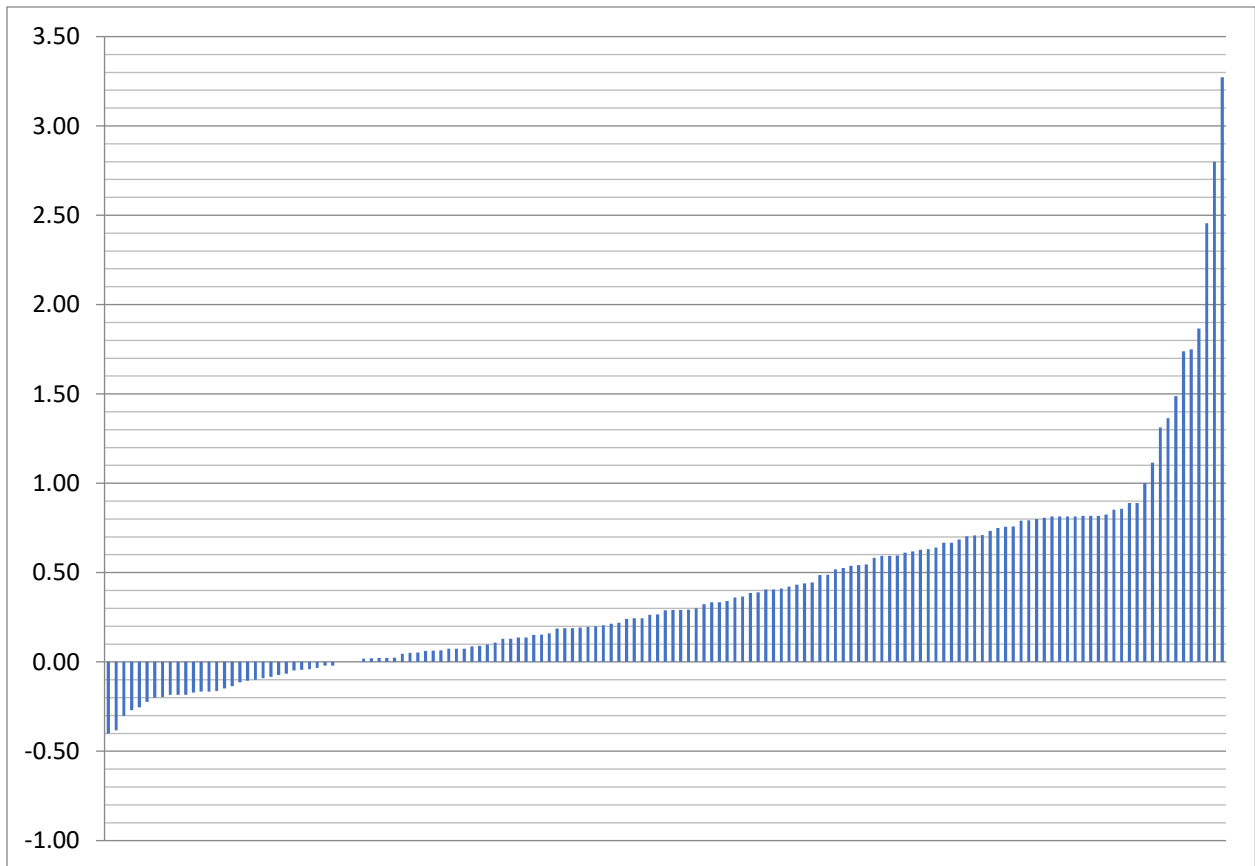
Graph No 9 : Increase or decrease of LSGs' LTI scores 2015 / 2024 (absolute)



While in some cities and municipalities, work on improving transparency was started nine years ago from solid foundations, in others the situation recorded in the first survey was significantly worse, so the room for improvement was greater. That is why it is interesting to look at the results through another type of comparison - the degree of relative progress, or in rarer cases, regression, in each municipality. On average, over nine years, LSGs have improved their initial results by as much as 40%.

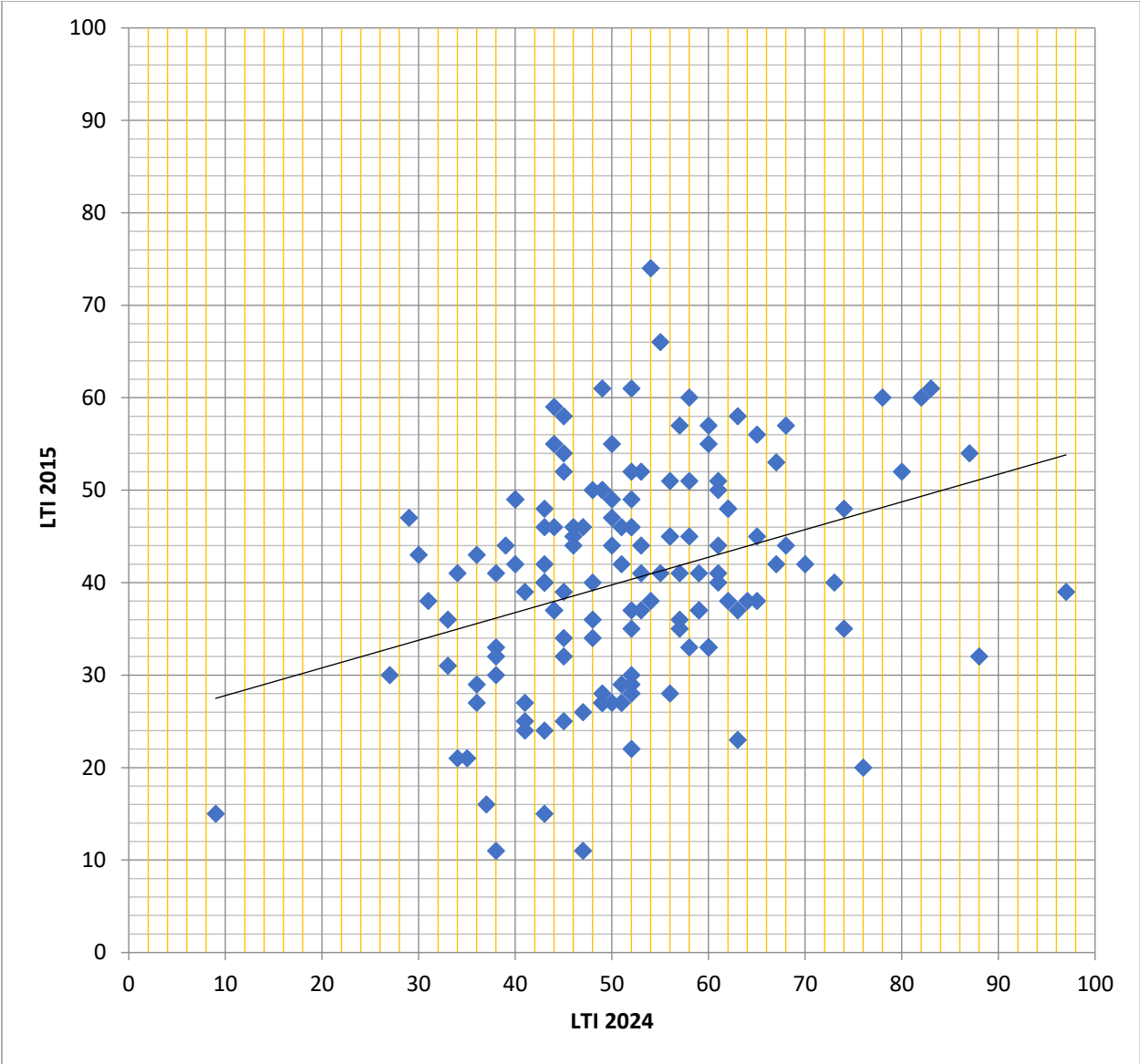
Among them are ten LSGs that more than doubled their initial score, and the record holder is Smederevska Palanka, where the current score is more than three times better than the one from 2015, thanks to an extremely low starting position (only 11). In a relative sense, the municipality of Preševo regressed the most, losing 40% of points from the initial survey.

Graph No 10 : Increase or decrease of LSGs' LTI scores 2015 / 2024 (relative)



When looking at the "coordinate system" of the results according to the initial and latest LTI survey, it can be seen that the municipalities are most often grouped around a score close to 50 in the current survey, while their starting position was below 30 points, or close to a score of 60. with a starting position that was close to 40 points, as well as in the zone of those who now, as well as almost a decade ago, had around 50 points.

Graph No 11 LSGs' scores 2015 and 2024



Gender Representation in Top Positions

Data on gender representation in management positions in local self-governments are not directly related to transparency, nor are they part of the evaluation and ranking within the LTI survey. However, during this research TS dealt with the list of managers in the local self-government units (sending letters, determining whether property declarations were submitted, etc.), and used this opportunity to examine this category as well – the number of men and women in the positions of presidents of the municipalities or mayors and in the positions of heads of the city or municipal administrations (in local self-government units in which there is a single administration).

The analysis also presents a comparison with the results from the period of data collection for LTI 2023 (this analysis has not been published at the time), which is relevant because in the meantime, elections have been held in almost all LSGs and new mayors have been elected.

Out of 170 cities, municipalities and in-city municipalities, 32 mayors are female, while 132 are men.

The imbalance was even higher in 2023, when only 23 women held the highest position in local self-government units.

Of the 32 women in top positions, four are mayors of cities of Užice, Smederevo, Jagodina and Vršac), 24 of municipalities, and four of in-city municipalities.

Mayors		
170 JLS	m	f
2024	138	32
2023	147	23
32 woman mayors:		
Cities: 4		
Municipalities: 24		
In-city municipalities: 4		

The balance exists in a position that is supposed to be professional, for which a public competition is announced, although in practice it is often

Heads of administration			
	m	f	No head appointed
2024	75	86	6
2023	77	84	9

already known in advance who will be named and with which party they are associated. This refers to the heads of administration. Out of 170 local self-government units, six of them do not have a single administration, in three there are currently no heads (two female deputies and one male deputy), while of the remaining 161 - 86 are female (53.5%) and 75 male (46.5%).

These numbers correspond to the period from a year ago, when the ratio was 84:77, but it does not mean that the managers of the local administration were not replaced after the elections. Namely, during the process of updating the data for sending letters to local self-government units, TS determined that a large number of local self-government units has new heads of administrations.

In following 15 municipalities and cities women occupy both managerial positions - mayor or president of the city/municipality and head of administration: Apatin, Alibunar, Babušnica, Bajina Bašta, Čičevac, Čuprija, Kovin, New Belgrade, Opovo, Senta, Sevojno, Surdulica, Topola, Vršac and Varvarin.

Selected individual examples

Assembly and Council

Good practices:

- Novi Pazar – There is an e-Assembly - <http://www.eskupstina.novipazar.rs> All documents discussed at the sessions, including minutes, have been published; The information on deputies is presented in detail, including information on the membership in the working bodies. There is a contact form through which a question can be posed to a selected deputy.
- Novi Bečej – a good example of publishing the convocation and decisions of the assembly in one place <https://www.novibecej.rs/index.php/o-nama/skupstina-opstine/sednice-so-nb>
- Veliko Gradište – Contact with deputies <https://velikogradiste.rs/skupstina-opstina/>
- Loznica – documents on the website of the Assembly <https://loznica.rs/sednice-skupstine-grad-loznice/> all decisions and on the „Documents“ page - <https://loznica.rs/dokumenti/odluke-skupstine-grad-loznice/>
- Kanjiža - A good example of publishing the decisions of the Assembly - http://www.kanjiza.rs/ujlap/site/index-sr.html?cat_id=47 Form for citizens to register for attendance at the session of the Assembly: <http://www.kanjiza.rs/ujlap/site/documents/zahtev.pdf>
- Bački Petrovac - Official Gazette with contents, list of published decisions <http://www.backipetrovac.rs/dokumenti/sluzbeni-list-opstine-backi-petrovac>
- Kragujevac - A good example of publishing the decisions of the Council <https://kragujevac.ls.gov.rs/tekst/3192/akti-gradskog-veca.php>, and the decisions of the Assembly <https://www.kragujevac.rs/lokalna-samouprava/skupstina-grad/sednice-skupstine-grad>
- Leskovac – A good example of publishing the decisions of the Assembly - <https://novi.gradleskovac.org/sednice-skupstine-grad> and the decisions of the Council - <https://novi.gradleskovac.org/sednice-gradskog-veca/>
- Mionica – Information on contact with members of the Assembly - <https://www.mionica.rs/about-us/so/odbornici>
- Gadžin Han - all assembly sessions (with minutes) <http://gadzinhan.rs/lokalna-samouprava/skupstina/akti-so/> and all decisions of the Council <http://gadzinhan.rs/lokalna-samouprava/opstina/akti-veca>
- Sombor – A good example of information about the presence of citizens at the sessions of the Assembly - <https://www.sombor.rs/lokalna-samouprava/skupstina-grad/prisustvo-gradjana-sednicama-skupstine-grad/>
- Zrenjanin - A good example of the publishing the decisions of the Assembly - <http://www.zrenjanin.rs/sr-lat/skupstina-grad/prethodne-sednice-skupstine-grad>

- Smederevo Palanka – A good example of publishing the decisions of the Assembly - <https://www.smederevskapalanka.rs/%d0%be%d0%b4%d0%bb%d1%83%d0%ba%d0%b5-%d0%b8-%d0%b4%d1%80%d1%83%d0%b3%d0%b0-%d0%b0%d0%ba%d1%82%d0%b0/>
- Despotovac – Minutes from the sessions of the Assembly and information on how individual deputies voted - <https://despotovac.ls.gov.rs/sednice-skupstine>
- Kraljevo - There is a separate assembly website - <https://skupstina.kraljevo.rs/>
- Kladovo – A well-presented Assembly - <https://kladovo.org.rs/lokalna-samouprava/skupstina-opstine/>
- Sokobanja –separate page for documents and adopted decisions - <https://sokobanja.ls.gov.rs/materijal-za-sednice>, <https://sokobanja.ls.gov.rs/usvojene-odluke-2>
Explanation to citizens on how to apply for attendance at the session - <https://sokobanja.ls.gov.rs/prisustvo-gradjana>
- Užice – Assembly page with documents - <https://uzice.rs/clanci/sednice-skupstine/>
- Tutin – Contact with deputies - <http://www.tutin.rs/lokalna-samouprava/odbornici-skupstine-opstine-tutin/>
- Kruševac – Contact with deputies - <https://krusevac.ls.gov.rs/skupstina-grada/> and information on their voting <https://krusevac.ls.gov.rs/sednice-skupstine/>

Budget

Good practices:

- Sokobanja – daily reports on execution- <https://sokobanja.ls.gov.rs/archives/category/realizacija-budzeta>
- Sombor – A good example – report from the public hearing, budget documentation per year and monthly reports - <https://www.sombor.rs/dokumenti-organa-grada/budzet-grada-sombora/>
- Bačka Topola - A good example of publishing the Citizen's Guide for the Budget Draft - <https://www.btopola.org.rs/sites/default/files/dokumenti/budzet/2023/%D0%93%D1%80%D0%B0%D1%92%D0%B0%D0%BD%D1%81%D0%BA%D0%B8%20%D0%B2%D0%BE%D0%B4%D0%B8%D1%87%20%D0%BA%D1%80%D0%BE%D0%B7%20%D0%9D%D0%B0%D1%86%D1%80%D1%82%20%D0%9E%D0%B4%D0%BB%D1%83%D0%BA%D0%B5%20%D0%BE%20%D0%B1%D1%83%D1%9F%D0%B5%D1%82%D1%83%20%D0%B7%D0%B0%202024.%20%D0%B3%D0%BE%D0%B4%D0%B8%D0%BD%D1%83.pdf>
- Odžaci – A good example of publishing a public hearing report on the Budget page <https://www.odzaci.rs/documents/1705059417-izvestaj-jr.pdf>
- Titel – a good example of publishing monthly reports on the execution of the Budget https://www.opstinatitel.rs/wp-content/uploads/2024/03/plan_i_izvršenje_rashoda_-_za_januar_2024.pdf

- Veliko Gradište – a good example of a budget portal <http://bportal.velikogradiste.rs/client/documents/13>
- Paraćin – a good example - <https://www.paracin.rs/index.php/budzet-opstine-paracin>.
- Surčin – monthly reports (until December 2023) https://surcin.rs/?page_id=28394&d=LzlwMjM%3D&m1dll_index_get=0
- Kula – monthly reports (until October 2023) - <https://kula.rs/budzet-opstine-kula/izvršenja-budzeta/>
- Ljubovija – Budget portal with all necessary documents <http://109.92.31.60/bportal/client/documents/13>. Monthly performance reports - http://109.92.31.60/bportal/client/performances/IZVESTAJ_8. and public hearing reports <https://www.ljubovija.rs/javneRasprBudz.php>
- Bor – Budget portal with monthly execution reports - <http://77.46.142.54/client/dashboard>
- Užice – Budget portal with monthly execution reports - http://195.178.50.217/client/performances/IZVESTAJ_8.
- Titel – Budget portal with monthly execution reports <https://www.opstinatitel.rs/budzet-opstine/>
- Vranje - Monthly reports on budget execution in the form of reports for citizens - <https://www.vranje.org.rs/fascikla/budzet/izvestavanje-gradjana-o-ostvarivanju-budzeta-2024>
- Kladovo – Public debate on the budget, monthly reports on execution <https://kladovo.org.rs/lokalna-samouprava/opstinska-uprava/odeljenje-za-budzet-i-finansije/odsek-za-budzet-i-racunovodstvo/>
- Kikinda - Reports on budget execution - <http://www.kikinda.org.rs/index.php?language=lat&page=informacije&option=budzet&level=zavrsniracun>

LSGs and citizens

Good practices:

- Bač - • Administrative procedures with description and deadlines http://www.bac.rs/administrativni_postupci
- Niš - Electronic Register of Regulations - <http://www.eservis.ni.rs/propisi/> and Electronic Register of Administrative Procedures <http://regap.ni.rs/>
- Boljevac - Citizens can track the status of their cases <http://www.boljevac.org.rs/status-vaseg-predmeta>
- Novi Kneževac - Contact details of members of the local community administration on the website of the municipality - <https://www.noviknezevac.rs/samouprava/mesne-zajednice/>
- Požarevac – Corruption Reporting Mechanism - <https://pozarevac.rs/prijava-korupcije/>

- Petrovac na Mlavi – Corruption Reporting Mechanism - <https://www.petrovacnamlavi.rs/prijavi-korupciju/>
- Kragujevac – Mechanism for reporting irregularities and problems - <https://kragujevac.ls.gov.rs/tekst/264/prijava-problema-upita-i-predloga.php>
- Kladovo - Contact details of members of the local community administration on the website of the municipality <https://kladovo.org.rs/mesne-zajednice-u-opstini-kladovo/>
- Petrovac – Corruption Reporting Mechanism <https://www.petrovacnamlavi.rs/prijavi-korupciju/>
- Zaječar- Corruption Reporting Mechanism <http://www.zajecar.info/kontakt>
- Sombor – Very detailed information about local communities - <https://www.sombor.rs/lokalna-samouprava/mesne-zajednice/>

Access to information of public importance and Information Booklets

Good practices:

- Topola – A good Information Booklet, with deadlines for procedures (services) - <https://informator.poverenik.rs/informator?org=SZ7Wzo7W3R75Hqxoq&ch=BWvWL7BAzkWS9jdNk&code=>
- Vrnjačka Banja - A comprehensive website dedicated to submitting requests for access to information of public importance - <http://vrnjackabanja.gov.rs/dokumenta/zahtev-za-informacije-od-javnog-znacaja>

Public Procurements

Good practices:

- Odžaci – A good example of a webpage on public procurements <https://www.odzaci.rs/javne-nabavke/2024>
- Sombor – A good example of a webpage on public procurements <https://www.sombor.rs/gradska-uprava/javne-nabavke-2/javne-nabavke-2024-godina/>
- Veliko Gradište - A good example of a webpage on public procurements <https://velikogradiste.rs/javne-nabavke-4/>
- Kladovo - A good example of a webpage on public procurements <https://kladovo.org.rs/category/javne-nabavke/>

Public Enterprises and Public Institutions

Good practices:

- Kanjiža – Records on the election of directors: <http://www.kanjiza.rs/ujlap/site/index-sr.html?mnu=2&art=3-5-3-dokumenti-sr.html>
- Apatin – Banner on the homepage – ask the directors of public enterprises and institutions <http://www.soapatin.org/pitajte-direktore>
- Bečej – Documents of public enterprises presented on the website of the municipality (the documents show a good pattern, but specific examples are from 2018) <http://www.becej.rs/%d0%be%d0%bf%d1%88%d1%82%d0%b8%d0%bd%d0%b0-%d0%b1%d0%b5%d1%87%d0%b5%d1%98/%d1%98%d0%b0%d0%b2%d0%bd%d0%b0-%d0%bf%d1%80%d0%b5%d0%b4%d1%83%d0%b7%d0%b5%d1%9b%d0%b0>
- Novi Pazar – Good examples – all documents on the website <https://www.novipazar.rs/lokalna-samouprava/javna-preduzeca#rukovodstvo-5> also a page dedicated to the Commission <http://www.eskupstina.novipazar.rs/sastav-skupstine/stalna-radna-tela#komisija-za-sprovedjenje-konkursa-za-imenovanje-direktora>
- Ljubovija - Names of members of the management and supervisory boards named by the Municipal Assembly - <http://www.ljubovija.rs/lokalna/66>
- Zrenjanin – Everything except the appointment of the director <http://zrenjanin.rs/sr/e-uprava/javna-preduzeca/jkp-vodovod-i-kanalizacija> i <http://zrenjanin.rs/sr/e-uprava/ustanove/kulturni-centar>
- Bač – Interesting presentation of documents on PE and PI, including price list and appointment of the director of PE http://www.bac.rs/sr/dokumenta?field_godina_dokumenta_value%5Bvalue%5D%5Byear%5D=&field_tip_dokumenta_tid=69&title= and
[http://www.bac.rs/dokumenta?field_godina_dokumenta_value\[value\]\[year\]=&field_organ_dokumenta_tid=All&field_tip_dokumenta_tid=10](http://www.bac.rs/dokumenta?field_godina_dokumenta_value[value][year]=&field_organ_dokumenta_tid=All&field_tip_dokumenta_tid=10)
- Bor – Number of employees in PE and PI and links <https://bor.rs/%d0%bf%d1%80%d0%b5%d0%b4%d1%83%d0%b7%d0%b5%d1%9b%d0%b0-%d0%b8-%d1%83%d1%81%d1%82%d0%b0%d0%bd%d0%be%d0%b2%d0%b5/>
- Užice - A good example of the presentation of PE on the website of the LSG <https://uzice.rs/javne-sluzbe/jkp-vodovod/> i <https://uzice.rs/javne-sluzbe/gradski-kulturni-centar/>

Public Debates and Public Competitions

Good practices:

- Novi Pazar – Project financing section <https://www.novipazar.rs/projektno-finansiranje>
- Dimitrovgrad - A good example of a page about public debates - https://www.dimitrovgrad.rs/javne_rasprave/2024
- Kragujevac – Public calls and decisions are grouped - <https://kragujevac.ls.gov.rs/tekst/2218/javni-konkursi-stipendije-pozivi.php>
- Topola - A good example of a page about public debates <https://topola.rs/5893-2/>

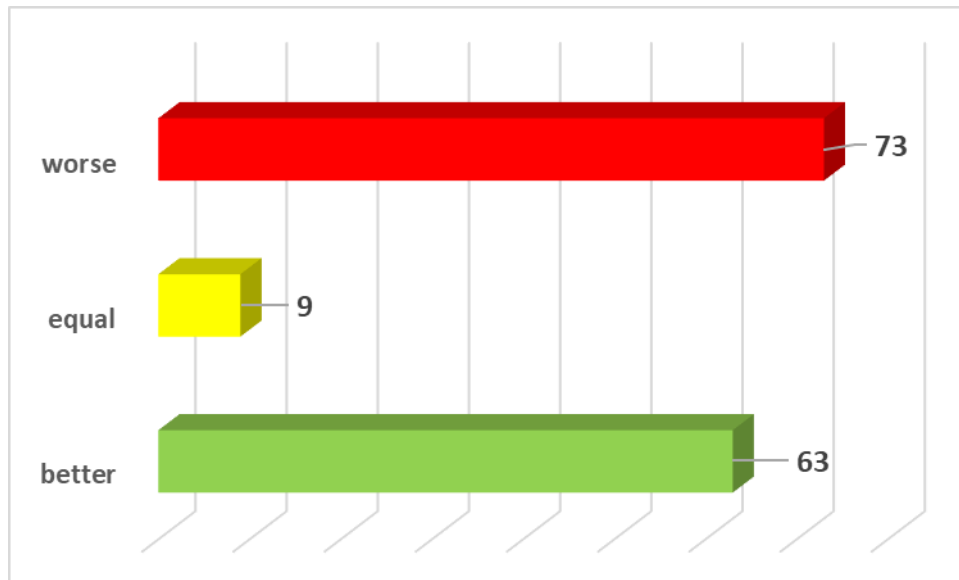
Other indicators

Good practices:

- Pirot – Number of employees in the administration, per month <https://www.pirot.rs/index.php/dokumenta/broj-zaposlenih-2021-cir>
- Kanjiža – Comprehensive data on municipal property leased <http://www.kanjiza.rs/ujlap/site/index-sr.html?mnu=4&art=4-3-3-sr.html>
- Plandište – good example of LSG property records, although information on tenants is missing <https://plandiste-opstina.rs/dokumenti/>
- Bor - Data on municipal property (real estate) leased (without price information) <http://bor.rs/komunalni-poslovi/>
- Sombor – Very detailed information about local community administrations - <https://www.sombor.rs/dokumenti-organa-grada/imenovana-postavljena-i-zaposlena-lica/>
- Vrbas – a special website about urbanism - <https://urbanizam.vrbas.net/> and inspection services - <https://inspekcije.vrbas.net/>
- Kovin – Number of employees (as of May 2023) <https://www.kovin.rs/registar-zaposlenih/>
- Srbobran - Number of employees <https://www.srbobran.rs/lokalna-samouprava/podaci-zaposleni>
- Novi Pazar – Page dedicated to lobbying (register is empty) <https://www.novipazar.rs/usluge/3645-registar-lobista>
- Kladovo - Number of employees <https://kladovo.org.rs/lokalna-samouprava/opstinska-uprava/odeljenje-za-upravne-i-zajednicke-poslove/>
- Sokobanja – Weekly reports on the activities of the mayor (until May 2024, only certain activities) <https://sokobanja.ls.gov.rs/predsednik-opstine-skokobanja>

Comparisons with previous LTI's

Graph No 12: Comparison 2024 vs.2023 - How many LSGs got better or worse, or performed equal



The total average LTI score for 145 LSGs in 2024 is 52, the same as in LTI 2023, and higher than LTI 2022 (49), LTI 2021 (47.8) and LTI 2020 (46). This is the first stagnation of the score since the first cycle of LTI research. The same score as last year has nine (out of 145) cities and municipalities. A little more than half of LSGs (73) degraded their result compared to last year (in LTI 2023 there were 45 of them, and in LTI 2022 the score was degraded by 67), while only 63 out of 145 LSGs improved their score.

There will be a lot of room for improvement in the coming year. This year's stagnation, and especially the deterioration of ratings in the in-city municipalities, can be explained by the elections – temporary financing (a large drop in the "Budget" segment) and the engagement of the administration in relation to the elections, which is why some other activities have been neglected. However, there are variations, ups and downs in areas that cannot be explained by these reasons alone, and it is certain that achieving the sustainability of transparency is one of the main challenges.

The notes of the TS team, taken during the research, also point to the picture behind the numbers, percentages, statistics. The reports from public debates, when published, are getting better. There are more than few local self-government units with budget portals, some of them are comprehensive and of high quality. On the other hand, some of them (yet) do not provide all the information, at least not in a timely manner.

Some information is hard to find. There is no consistency in the publication of invitations to public debates and reports from them, public competitions and decisions related to competitions. Some local self-government units have web-pages dedicated only to this area, some are scattered in segments such as "Documents", and some have to be searched for among news and current affairs. On the other hand, the web-sites are in general getting better.

There are still a lot of banners that lead to old documents, in the menus there are items that lead to individual documents, and not to sections (for example, "Budget 2022" as an item in the menu).

The best ranked in LTI 2024 is Novi Pazar with 97 (94 in LTI 2023, 87 in 2022 and 78 in 2021). The second is Veliko Gradište with 88 (82 in LTI 2023, 76 in 2022 and 71 in 2021), and the third is Kanjiža with 87 (81 in LTI 2023, 79 in 2022 and 83 in 2021). They are followed by Leskovac with 83, Sombor with 82, Sokobanja with 80, Vranje with 78, Bor with 76 and Tutin and Zaječar with 74. Only two cities are new in the top 10 – Vranje has now reached 7th place (from 12th last year), and Zaječar improved position from 22nd to 9th.

Amongst those which have made great progress, we should mention Čačak (from 39th to 12th) and Negotin (from 52nd to 17th). Čajetina went from 98th place to 40th position in the LTI ranking.

Preševo remained at the bottom of the table, returning to the previously recorded minimum score of 9 points. Gadžin Han (27 and a huge drop from 45 in LTI 2023), Bujanovac (29) and Kovačica (30) have a score of 30 or less.

Only five local self-government units improved their score by 10 or more points – Opovo (by 14, to 51), Čajetina, Čačak and Zaječar (by 12) and Negotin (by 10).

On the other hand, the biggest declines were recorded in Žitište (13), Beočin (11), Crna Trava, Bosilegrad, Jagodina (10 each) and the already mentioned Gadžin Han (18) and Presevo (16).

Beočin and Žitište, which had an increase in the index of 16 and 14 points respectively in the LTI 2023, are a confirmation of the problems with the sustainability of the results and the necessity of establishing permanent and stable procedures if there is a desire to permanently increase transparency.

Namely, maintaining a good score, or improving it, is most often is the result of the existence **of political priorities or individual efforts of one or more civil servants. Regulatory procedures and independent external monitoring could help to sustain good results and support the will and efforts of stakeholders and committed officials and decision-makers.**

Recommendations

Although the stagnation of LTI in this year's report, after six consecutive years of growth, can be explained by elections and accompanying circumstances (temporary financing, engagement of the administration), this is a significant indicator of the lack of mechanisms which would guarantee the sustainability of transparency. Elections are a regular activity, not an extraordinary and unpredictable disaster. On the other hand, a number of LSGs (although there are less than 50% of them this year) recorded an increase in LTI, or at least maintained the score at a similar level. At the very top, there are those which have been successfully maintaining, and even improving, the high results for several research cycles. Therefore, the elections can be interpreted as an excuse rather than a real reason for the decline in the rating in a larger number of local governments. Also, in some LSGs, it has been recorded in the past that they had ad hoc jumps, followed by either stagnation or decline and vice versa. Finally, there are about 20 municipalities that have stagnated in the lower part of the table for years. All this means that, in the absence of rules, the current top political (or administrative) local office holders and their will, as well as capacity, priorities or support of NGOs, donors and other projects have a decisive influence on the final result and ranking of LSGs.

Experience shows that some of the LSGs that were at the top failed to maintain their position. This is not only about local self-government units that had one-off rises, followed by inexplicable falls, but also about those that kept high scores for a long time, but significantly regressed, after personnel changes in the administration or at the level where political decisions are made.

Therefore, the main recommendation of the TS remained **unchanged compared to several previous cycles – to enable the maintenance of the achieved level of transparency, i.e. its growth, through stipulation of procedures with internal acts. It would also be of great help to prescribe certain obligations and/or procedures through acts at the national level.** These acts should contain responsibilities for the fulfilment of prescribed tasks.

Regarding the presentation and content of local self-government websites, TS recommends that local self-government units should take over or further develop examples of good practice when creating new web presentations, while respecting certain obligatory norms. Some of such best practices are listed in this report.

In LTI 2024, Transparency Serbia presents some new recommendations while it also repeats the recommendations from previous research cycles:

- Budget portals significantly contribute to transparency, but in certain LSGs they are neglected - they are not functional or lack data. TS calls on local self-government units to establish as many budget portals as possible, and to regularly maintain them and publish all relevant documents;
- If there is no budget portal, a separate web-page "Budget", on the LSGs website, should contain not only the adopted budget, but also all information and documents related to the budget (even if duplicated from the news page or public calls page) - periodic reports on execution (including monthly reports), final accounts (annual report), rebalances, citizens' budget, calls for public debates on the budget and reports from public debates; These documents could be or should be sorted by year;

- The TS encourages local self-governments to adopt an act that would clearly regulate the scope of information to be published on the municipal websites, the deadlines for updating this information, as well as the responsibilities within the administration, in order to improve transparency and ensure sustainable progress;
- The National Anti-Corruption Strategy, adopted in July 2024, recognizes the problem of insufficient transparency of the work of local self-government units, but the activities have yet to be specified. The TS calls on the Ministry of Justice and the Government to incorporate the key recommendations from this report into the Action Plan for the first year of implementation of the Strategy;
- The TS recommends to the Government of Serbia and responsible ministries to promote good practices identified at the local level, both in the preparation of state policies and in the work of national institutions, especially when it comes to budget transparency and public procurements;
- The most important information on the website (on the budget, decisions of the municipal assembly, council, on public enterprises, public competitions, public procurements, etc.) needs to be systematized. Specific "sub-sites" ("skupstina.opština.ls.gov.rs" or "skupstina.opština.rs" or "budžet.opština.rs" or "urbanizam.opština.rs") are citizen-friendly and increase transparency;
- An e-assembly with public access is a great way to increase transparency and make available all information, including how individual deputies voted, amendments, etc. Even if there is no public access to the e-assembly from some technical reason, data from the e-assembly can be presented on a separate page on the website, or within the minutes. TS encourages local self-governments to introduce e-assembly;
- TS recommends that local self-government units should create special pages on their websites dedicated to the activities of the Assembly (not only to represent its competencies and deputies), presidents/mayors and councils. These pages should contain all relevant documents and information, such as announcements of the next sitting with the agenda and materials (including minutes from previous sessions), reports from the sittings with the adopted decisions or exact links to the numbers of the Official Gazette in which the decisions were published;
- TS recommends local self-government units to improve the transparency of public procurements: it is necessary to systematically publish data on public procurements on the websites of local self-governments. Although there is currently only a legal obligation to publish the public procurement plan, it is desirable to publish data on public procurement procedures as well. This especially refers to procurement procedures to which the law does not apply. Another solution can be a direct link from the public procurement web-page on the LSGs website to each individual procurement on the public procurement portal (such examples are presented in the paragraph "Selected individual examples of good practice"); TS also encourages local self-government units to record data on contract performance for all types of public procurement procedures and to start publishing data on contract execution;
- LSGs should group information on public calls and competitions with the results or decisions related to these calls. Transparency Serbia also strongly recommends the publication of reports (and/or evaluations) on the implementation of the NGOs projects and media projects. This applies to reports from NGOs and the media, and not just to a report with a table containing data on which projects were supported in the previous year;
- TS encourages local governments to broadcast/live stream the sittings of the Assembly on their websites, YouTube channels or social media pages and to make the recordings available to the public. TS supports this solution rather than the practice of paying the television media to broadcast sittings.

The latter mechanisms have occasionally been used, as pointed out in some researches, in order for local self-government units to finance certain media in a roundabout way;

- Although the centralized and unified publication of Information Booklets on the Commissioner's Portal is useful, such technical solution is not adequate for displaying the budget and public procurements. The TS recommends to the Commissioner to modify these mechanisms, and the local self-government units to present links to these documents and information on their websites, or to the Open Data Portal in the Information Booklets on the Commissioner's Portal;
- Local self-government bodies (assembly, president/mayor, administration and council) should update their information on the work on the Portal, fully respecting the instructions prescribed by the Commissioner for Information of Public Importance;
- Local self-government units should remove non-up-to-date Information Booklets from their websites or indicate that these are old versions, and certainly place links and notices so that up-to-date information booklets can be found on the Commissioner's Portal;
- Local self-government units should indicate in the Information Booklets of assemblies, in the chapter "Transparency of work," a contact person for enabling the presence of citizens' at assembly sittings, and not only for the media, i.e. to indicate that the existing information also applies to citizens;
- Local self-government units should separate public debates and other forms of consultations with citizens (invitations, materials, reports) on a separate web-page, and make that page as visible as possible (special menu item, banner on the front page, etc.). This does not exclude the publication of these information in other parts of the website (news, etc.);
- LSGs should introduce "hybrid" public debates and/or meetings as a regular practice. These methods and channels (such as debates and meetings on an online platform) can and should be combined with physical meetings with the goal to accomplish better inclusion of the public.
- LSGs should use all available channels (social networks, traditional media, direct contacts) to reach citizens, in order to increase their participation in discussions on the budget and other acts or in projects and competitions announced by LSGs;
- Electronic registers of administrative procedures should be introduced in all cities and municipalities, because they are helpful. Even in the digital age, local governments should bear in mind that some citizens, users of their services, do not use the Internet, and therefore the most important information on the procedures and deadlines of municipal administrations should be visible in service centres or citizens should be enabled (with the possible help of employees) to access the register of administrative procedures on a computer in the premises of local self-government units;
- Local self-government units that have technical and financial capabilities should establish mechanisms through which citizens could track the progress of their case and obtain data on processing of complaints, petitions and objections. If such possibilities do not exist, the TS recommends that the e-mail addresses or telephone numbers of civil servants from whom this information can be obtained should be prominently published. LSGs could turn to donors for help in financing this mechanism, or offer citizens to decide at an early stage of the budget debate whether such costs (as well as the construction of a database of administrative procedures) should be included in the budget;

- LSGs should enable citizens to report irregularities through the website, but also directly in the premises of LSGs (service centres of the administration premises), as well as to enable this to be done anonymously. LSGs should regulate the procedures for dealing with these reports;
- TS calls on the Ministry of Public Administration and Local Self-Government to prepare amendments to the Law on Public Administration in order to regulate the transparency of work in a uniform way, as well as certain elements of the election of management bodies (directors, Managing Board, Supervisory Board) of public institutions founded by local self-government units;
- LSGs should organize their web-pages dedicated to public enterprises, public utility companies and public institutions. It is recommended by TS that these pages should be used to form a section where all information and documents will be available. A part of this web-page should be dedicated to the activities of the Commission for the Election of the Director of the Public Utility Company and that all documents created in the work of the Commission should be published on it, with the emphasis on the minutes from the meetings. The goal of such transparency would be to see how the candidates were scored and the rankings established.
- Local self-government units should publish the data on the real estates in their ownership (business premises, apartments and other facilities, construction land, agricultural land), with data on the users and the amounts of rent paid by the users. They can do this by creating their own database or using the data prepared for the Property Directorate of the RS.
- All LSGs should enable functional and reliable search of websites by keywords;
- All LSGs should create a web-page on their websites dedicated to lobbying, presenting basic information about lobbying and a register, even if no cases of lobbying have yet been recorded;
- TS recommends to local self-government units to publish agendas (daily or weekly) of the mayor. This refers to publishing specific and detailed information on activities, other than promotional, and not only general information, such as "day for the reception of citizens", "current obligations", etc.;
- TS reminds local self-government units that contact information of deputies and members of local community councils (e-mail addresses, telephones, time and place for regular meetings with citizens, if defined) should be published on websites;

Annexes

Annex 1. Average score per indicator

Indicator	% of the maximum value
33. 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?	100.0%
46. Are information on the submission of a request for free access to information on the site? **	100.0%
90. Are spatial plans / urban plans published on the site?	98.6%
34. Are there inspections controlling lists on website?	97.2%
37. Is there information on the website about the services provided by the municipality?	96.6%
48. Is there a section on the website dedicated to public procurements?	96.6%
75. Does the municipality regularly announce a call for leasing property in its possession?	95.2%
15. Is the budget for the current year available on the website? **	94.5%
45. The municipality has no unresolved decisions of the Commissioner?	93.8%
93. Has the Integrity Plan been adopted and has the LSG report on its implementation?	93.8%
53. Does the Information Booklet contain information about salaries of officials and employees?	93.1%
11. Is the list of assembly members published on the website?	92.4%
51. Is the Information Booklet published on the site and updated in the last 3 months?	90.3%
86. Is the rulebook on internal organization and systematization of administration posted on the site?	90.3%
27. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users?	89.7%
56. Is there a special segment on the municipal website dedicated to public institutions with PI data?	89.0%
55. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?	87.6%

79. Have the public calls for the allocation for NGOs been published on the website?	86.9%
43. Did the municipalities provide requested information (FOI request) in time? **	86.2%
57. Does the observed PE have its own website?	85.5%
77. Have the public calls for media allocation in the last 12 months been published on the website?	85.5%
28. Does the municipal administration have a service center through which it provides all the services?	84.8%
95. Has the mayor submitted a declaration of assets to ACAS?	84.8%
13. Is the local Official Gazette available on the site? **	83.4%
70. Is the data on the number of employees in the observed public institutions posted on the municipal website?	82.1%
72. Is the list with prices of services provided by observed PE and PI available on the website of the municipality or PI/PE website?	81.4%
94. Has the Local anti corruption plan been adopted?	80.0%
17. Is the budget published on the website in machine-readable or searchable form?	77.2%
58. Does the observed PI have its own website	77.2%
80. Have the results of the competition for the allocation for NGOs been published on the website?	76.6%
83. Has the municipality's development strategy been published on the website?	76.6%
16. Is the justification/explanation of the budget available on the website?	73.8%
59. Have public competitions for the selection of directors of public enterprises been conducted?	73.8%
87. Is data about number of the employees in local administration published on the website?	72.4%
73. Is there data on the website about the conducted public debates/debates in the last 12 months (except for the budget)?	71.0%
60. Have public competitions for the selection of directors of public institutions been conducted?	69.0%
78. Have the results of the competition for media allocation in the last 12 months been published on the website?	68.3%
25. Has the proposal for the final budget account been considered at the session and published (on the website) in the last 12?	67.6%

50. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?	64.8%
22. Has a public debate on the budget been held - citizen surveys or consultation meetings?	60.0%
23. Has a public call for public debate on the budget been published on the website?	59.3%
88. Is there a code of ethics for employees and is it available on the site?	59.3%
38. Are there contact information of local community deputies on the municipal website?	57.9%
9. Is the agenda of the next session of the assembly published on the website?	56.6%
52. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?	55.9%
31. Is there a possibility on the website for citizens to report irregularities or violation of laws. including corruption?	55.2%
54. Does the Information Booklet contain information on the services provided by the municipality and deadlines for their provision or a link to the register or place on the website where this information can be found?	55.2%
39. Is there information on the website or in the Information Booklet that citizens can attend the assembly sessions and instructions on how to apply?	49.7%
66. Is the annual work plan of the observed PE published on the website of the PE or municipality website?	49.0%
18. Are 6-month and 9-month reports on budget execution available on the website?	47.6%
21. Is there a citizens' budget published and available on the website?	47.6%
67. Is the report on the work of the observed PE published on the website of the PE or municipality website?	44.8%
1. Are the decisions adopted by the Assembly published and available on the website? **	44.1%
61. Is the systematization of observed PE published on the website of municipality or PE?	44.1%
71. Is the data on the number of employees in the observed PE published on the municipal site?	42.8%
3. Are the decisions adopted by the assembly in the past 24 months available on the website?	41.4%
19. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?	41.4%
40. Are there defined permanent terms for mayor (or deputy mayor) meeting with citizens?	40.7%

62. Is the systematization of observed PI published on the website of municipality or PI?	40.7%
24. Has the report on the public debate on the budget been published on the website?	40.0%
49. Is the data on the PP published on the website (competitions, documentation, changes, questions and answers ...)? **	37.2%
74. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?	34.5%
26. Has the audit of the final budget account been considered at the session and published (on the website) in the last 12 months?	31.0%
68. Is the annual work plan of the observed PI published on the website of the PI or municipality website?	29.0%
10. Are there announcement of municipal/city council sessions on the website?	27.6%
69. Is the report on the work of the observed PI published on the website of the PI or municipality website?	26.9%
5. Have the proposed documents been published on the website before being considered at the session of the Assembly?	23.4%
30. Is there a possibility for citizens to report irregularities in the work or violation of the law, including corruption, in the service center or in the premises of the administration?	22.8%
2. Are the decisions adopted by the city council published and available on the website?	21.4%
4. Are the decisions adopted by the city council in the past 24 months available on the website?	20.7%
6. Have the results of the voting at the last session of the assembly been published on the website?	20.0%
14. Are the Assembly sessions broadcasted live on the website or municipalities social network's page or YouTube channel (or is the integral recording available)?	19.3%
29. Are the deadlines for issuing documents and instructions visible in the service centre or at the premises of the administration?	19.3%
64. Are the documents from the selection procedure of the director of the observed PE published on the website of the PE or the municipality?	17.2%
32. Do (both/all) mechanisms for reporting allow anonymity?	15.2%
20. Are monthly reports (or cumulative monthly reports) on budget execution available on the website?	13.8%
42. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?	13.8%
12. Is there data for citizens' contact with assembly members published on the website?	13.1%

85. Has a report on the work of the administration for the previous year been published?	9.7%
8. Are the amendments submitted on the draft acts that were considered at the last session (and the amendments' justifications/explanations) published on the website?	9.0%
35. Can a citizen monitor the status of his case on the website?	8.3%
81. Have the reports on the realization of media projects financed by the municipality been published on the website?	8.3%
65. Are the documents from the selection procedure of the director of the observed PI published on the website of the PE or the municipality?	7.6%
82. Have the reports on the realization of NGO projects financed by the municipality been published on the website?	7.6%
41. Are data on the contact of the mayor or deputy with the citizens visible on the premises?	6.9%
89. 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?	6.9%
44. No complaints were filed against municipalities in the last year due to ignoring requests for information of public importance?	6.2%
76. Are the rental lease reports (commercial premises, agricultural land) published on the site?	6.2%
7. Has information been posted on individual members of the assembly votes on legislation debated?	5.5%
63. Is there, on the municipality website, a page of the Commission for the Election of the Director of POEs with all the documents, including the minutes from the meetings?	5.5%
47. Is information on the submission of a request for free access to information visible in the service centre or administration premises?	4.1%
36. Is there data on handling complaints, petitions and complaints available on the website?	3.4%
91. Is there a report on contact with lobbyists published on the web site?	3.4%
92. Is there a daily or weekly schedule of the mayor's activities published on the website?	3.4%
84. Is the annual plan of work of municipal administration published on the site?	1.4%

Annex 2. Final scores of municipalities compared to the LTI 2023

			LTI	LTI	LTI	LTI	LTI		
	Municipalities	<i>position in LTI 2023</i>	2020	2021	2022	2023	2024	Growth 2024/2023	Growth 2024/2023 (%)
1	Novi Pazar	1	82	78	87	94	97	3	3.2%
2	Veliko Gradište	3	47	71	76	82	88	6	7.3%
3	Kanjiža	4	77	83	79	81	87	6	7.4%
4	Leskovac	7	75	75	74	77	83	6	7.8%
5	Sombor	2	80	88	85	84	82	-2	-2.4%
6	Sokobanja	5	68	75	84	79	80	1	1.3%
7	Vranje	12	73	75	74	69	78	9	13.0%
8	Bor	6	46	62	65	78	76	-2	-2.6%
8	Tutin	8	45	42	81	76	74	-2	-2.6%
10	Zaječar	22	42	33	44	62	74	12	19.4%
10	Kruševac	12	47	47	69	69	73	4	5.8%
12	Čačak	39	58	54	50	58	70	12	20.7%
12	Užice	9	70	62	78	75	68	-7	-9.3%
14	Bečej	18	83	90	67	64	68	4	6.3%
15	Vrnjačka Banja	16	63	64	70	66	67	1	1.5%
16	Pirot	10	45	41	65	72	67	-5	-6.9%
16	Vladičin Han	30	60	65	61	60	65	5	8.3%
18	Negotin	52	48	51	52	55	65	10	18.2%
19	Subotica	11	63	69	70	70	65	-5	-7.1%
19	Srbobran	27	53	57	56	61	64	3	4.9%
21	Kladovo	14	35	47	40	68	63	-5	-7.4%
21	Petrovac	19	59	61	48	63	63	0	0.0%
21	Kraljevo	27	47	53	56	61	63	2	3.3%
21	Kragujevac	16	55	68	65	66	62	-4	-6.1%
21	Požarevac	22	39	59	57	62	62	0	0.0%
21	Novi Sad	46	56	73	65	56	62	6	10.7%
27	Aleksinac	33	43	48	56	59	61	2	3.4%
27	Temerin	15	59	61	48	67	61	-6	-9.0%
27	Zrenjanin	21	63	57	53	62	61	-1	-1.6%
30	Boljevac	33	40	64	55	59	61	2	3.4%
30	Topola	46	52	44	55	56	61	5	8.9%
30	Trstenik	22	49	44	59	62	60	-2	-3.2%
33	Senta	22	58	54	57	62	60	-2	-3.2%
33	Bačka Palanka	33	37	39	48	59	60	1	1.7%
33	Nova Varoš	64	47	55	50	52	60	8	15.4%
33	Knjaževac	52	54	55	50	56	60	4	7.1%
33	Kosjerić	19	43	52	40	63	59	-4	-6.3%
33	Kovin	46	41	39	52	56	59	3	5.4%
39	Babušnica	52	48	49	51	55	59	4	7.3%
39	Rekovac	30	37	41	41	60	58	-2	-3.3%

39	Šabac	46	57	50	45	56	58	2	3.6%
39	Novi Bečej	52	45	45	51	55	58	3	5.5%
43	Čajetina	98	57	55	53	46	58	12	26.1%
43	Ljubovija	33	52	55	51	59	57	-2	-3.4%
43	Raška	30	47	53	62	60	57	-3	-5.0%
43	S. Mitrovica	43	51	49	53	57	57	0	0.0%
47	Kučevo	62	51	48	49	54	57	3	5.6%
47	Niš	43	46	40	64	57	56	-1	-1.8%
47	Bač	52	49	54	48	55	56	1	1.8%
47	Valjevo	69	45	49	47	51	56	5	9.8%
47	Vrbas	69	54	44	59	51	56	5	9.8%
47	Indija	39	55	58	57	58	55	-3	-5.2%
53	Kuršumlja	22	44	56	51	62	55	-7	-11.3%
53	Paraćin	46	50	48	47	56	54	-2	-3.6%
53	Rača	62	49	40	47	53	54	1	1.9%
53	Ruma	33	56	59	59	59	53	-6	-10.2%
53	Lapovo	64	37	39	42	52	53	1	1.9%
53	Prokuplje	75	38	36	42	51	53	2	3.9%
53	Loznica	75	46	48	55	50	53	3	6.0%
53	Bačka Topola	75	54	54	49	50	52	2	4.0%
61	Šid	80	32	38	40	49	52	3	6.1%
61	Plandište	27	63	55	56	61	52	-9	-14.8%
63	Priboj	33	55	54	49	59	52	-7	-11.9%
63	Mali Zvornik	39	52	61	52	58	52	-6	-10.3%
65	Ražanj	52	45	47	49	55	52	-3	-5.5%
65	Dimitrovgrad	64	51	43	57	53	52	-1	-1.9%
65	Despotovac	69	34	47	44	51	52	1	2.0%
65	Žabari	93	40	45	46	47	52	5	10.6%
65	Blace	104	46	54	49	45	52	7	15.6%
70	Arilje	104	53	51	48	45	52	7	15.6%
70	Ljig	43	39	48	48	57	51	-6	-10.5%
70	Vlasotince	60	42	52	50	55	51	-4	-7.3%
70	Ćuprija	64	29	40	45	52	51	-1	-1.9%
70	Brus	85	41	38	45	48	51	3	6.3%
70	Opovo	113	42	46	45	37	51	14	37.8%
70	Ivanjica	80	55	53	51	50	50	0	0.0%
77	Kikinda	52	47	50	48	55	50	-5	-9.1%
77	Apatin	85	51	56	53	48	50	2	4.2%
77	Medveđa	98	37	44	39	47	50	3	6.4%
77	Lajkovac	113	41	46	47	44	50	6	13.6%
77	Irig	69	48	44	44	51	49	-2	-3.9%
82	Bojnik	39	50	45	44	58	49	-9	-15.5%
82	Odžaci	52	48	50	47	55	49	-6	-10.9%
82	Malo Crniće	69	28	45	48	51	49	-2	-3.9%
82	Pančevo	98	49	48	48	46	49	3	6.5%
82	Krupanj	113	58	55	54	44	49	5	11.4%
87	Velika Plana	120	45	44	45	42	49	7	16.7%

87	Žitorada	118	38	39	42	43	49	6	14.0%
87	G. Milanovac	85	49	40	48	49	48	-1	-2.0%
87	Osečina	85	53	52	40	49	48	-1	-2.0%
87	Žabalj	85	55	60	62	48	48	0	0.0%
87	Beograd	98	33	46	57	46	48	2	4.3%
87	Varvarin	69	49	56	52	52	47	-5	-9.6%
94	Sjenica	80	39	39	51	50	47	-3	-6.0%
94	Bajina Bašta	118	46	45	41	43	47	4	9.3%
94	Vršac	75	40	41	41	50	46	-4	-8.0%
94	Ada	93	37	34	30	47	46	-1	-2.1%
94	Doljevac	120	41	42	45	42	46	4	9.5%
99	Svrljig	75	37	41	53	51	45	-6	-11.8%
99	Novi Kneževac	80	50	51	53	49	45	-4	-8.2%
99	Žagubica	133	45	42	39	37	45	8	21.6%
99	Bački Petrovac	64	51	49	53	52	45	-7	-13.5%
99	Požega	85	54	53	57	48	45	-3	-6.3%
99	Smederevo	104	51	53	37	45	45	0	0.0%
105	Surdulica	120	40	42	39	42	45	3	7.1%
105	Čoka	120	45	49	46	42	44	2	4.8%
105	Titel	135	40	35	39	36	44	8	22.2%
105	Žitište	43	44	40	43	57	44	-13	-22.8%
105	Aleksandrovac	85	39	33	47	48	44	-4	-8.3%
105	Golubac	137	53	38	35	35	44	9	25.7%
105	Kula	113	48	52	50	44	43	-1	-2.3%
105	Nova Crnja	124	33	30	43	41	43	2	4.9%
113	Beočin	60	42	49	38	54	43	-11	-20.4%
113	Ćićevac	104	38	42	38	45	43	-2	-4.4%
113	Mionica	113	47	52	45	44	43	-1	-2.3%
113	Arandjelovac	130	39	33	35	39	43	4	10.3%
113	Majdanpek	131	39	36	37	38	43	5	13.2%
118	S. Palanka	98	41	38	38	46	43	-3	-6.5%
118	Stara Pazova	80	40	41	39	49	41	-8	-16.3%
120	Merošina	93	24	29	34	47	41	-6	-12.8%
120	Sremski Karlovci	98	31	38	47	46	41	-5	-10.9%
120	Lebane	104	30	36	37	45	41	-4	-8.9%
120	Vladimirci	85	38	43	47	48	40	-8	-16.7%
124	Ub	104	40	38	43	45	40	-5	-11.1%
124	Knić	126	34	38	28	40	40	0	0.0%
126	Prijepolje	93	42	43	44	47	39	-8	-17.0%
126	Alibunar	131	36	37	41	38	38	0	0.0%
126	Bosilegrad	93	48	51	39	48	38	-10	-20.8%
126	Mali Idoš	113	39	37	42	44	38	-6	-13.6%
130	Sečanj	126	34	33	25	40	38	-2	-5.0%
131	Bela Crkva	140	18	33	38	34	38	4	11.8%
131	Koceljeva	140	22	35	22	34	37	3	8.8%
133	Crna Trava	104	41	43	42	46	36	-10	-21.7%
133	Bela Palanka	124	46	38	37	41	36	-5	-12.2%

135	Batočina	126	39	37	43	40	36	-4	-10.0%
135	Jagodina	104	21	23	43	45	35	-10	-22.2%
137	Pećinci	137	25	38	36	35	34	-1	-2.9%
137	Trgovište	126	32	36	41	40	34	-6	-15.0%
137	Lučani	135	32	37	36	36	33	-3	-8.3%
140	Bogatić	142	31	28	33	33	33	0	0.0%
140	Svilajnac	137	22	23	37	35	31	-4	-11.4%
142	Kovačica	143	36	38	25	32	30	-2	-6.3%
143	Bujanovac	144	34	21	28	32	29	-3	-9.4%
143	Gadžin Han	104	56	43	37	45	27	-18	-40.0%
145	Preševo	145	23	21	9	25	9	-16	-64.0%
	In-city municipality		LTI 2020	LTI 2021	LTI 2022	LTI 2023	LTI 2024	Growth 2024/2023	Growth 2024/2023 (%)
1	Barajevo		47	42	38	38	37	-1	-2.6%
2	Voždovac		22	35	27	33	25	-8	-24.2%
3	Vračar		24	31	22	33	34	1	3.0%
4	Grocka		28	37	33	33	30	-3	-9.1%
5	Zvezdara		40	40	43	57	56	-1	-1.8%
6	Zemun		38	29	39	35	37	2	5.7%
7	Lazarevac		36	43	36	34	32	-2	-5.9%
8	Mladenovac		33	41	45	34	31	-3	-8.8%
9	Novi Beograd		28	25	29	19	19	0	0.0%
10	Obrenovac		41	35	32	34	31	-3	-8.8%
11	Palilula		24	31	23	20	17	-3	-15.0%
12	Rakovica		31	37	36	29	20	-9	-31.0%
13	Savski Venac		36	39	34	34	29	-5	-14.7%
14	Sopot		20	23	16	20	24	4	20.0%
15	Stari Grad		28	35	28	29	30	1	3.4%
16	Čukarica		32	43	43	43	46	3	7.0%
17	Surčin		53	62	69	72	67	-5	-6.9%
18	Medijana		24	21	25	26	22	-4	-15.4%
19	Niška Banja		35	26	24	21	18	-3	-14.3%
20	Palilula Niš		28	33	33	43	39	-4	-9.3%
21	Pantelej		39	23	28	26	25	-1	-3.8%
22	Crveni Krst		28	37	35	33	24	-9	-27.3%
23	Vranjska Banja		25	27	26	29	23	-6	-20.7%
24	Kostolac		30	24	36	34	31	-3	-8.8%
25	Sevojno		42	52	66	60	61	1	1.7%

Municipalities that lost more than 10 points since 2023

	LTI 2020	LTI 2021	LTI 2022	LTI 2023	LTI 2024	Growth 2024/2023	Growth 2024/2023 (%)
Gadžin Han	56	43	37	45	27	-18	-40.0%
Preševo	23	21	9	25	9	-16	-64.0%
Žitište	44	40	43	57	44	-13	-22.8%
Beočin	42	49	38	54	43	-11	-20.4%
Jagodina	21	23	43	45	35	-10	-22.2%
Crna Trava	41	43	42	46	36	-10	-21.7%
Bosilegrad	48	51	39	48	38	-10	-20.8%

Municipalities that gained more than 10 points since 2023

	LTI 2020	LTI 2021	LTI 2022	LTI 2023	LTI 2024	Growth 2024/2023	Growth 2024/2023 (%)
Opovo	42	46	45	37	51	14	37.8%
Zaječar	42	33	44	62	74	12	19.4%
Čajetina	57	55	53	46	58	12	26.1%
Čačak	58	54	50	58	70	12	20.7%
Negotin	48	51	52	55	65	10	18.2%

Annex 3: Best performers in categories

Assembly and Council

Overall Rank	LSG	Assembly and Council (max 16)
1	Novi Pazar	16
5	Sombor	15
3	Kanjiža	15
2	Veliko Gradište	14
9	Tutin	14
17	Subotica	14
24	Kragujevac	13
4	Leskovac	13
9	Zaječar	13
12	Čačak	13
11	Kruševac	12
27	Zrenjanin	12
27	Topola	12

Budget

Overall Rank	LSG	Budget(max 14)
3	Kanjiža	14
40	Rekovac	14
6	Sokobanja	14
60	Blace	14
9	Zaječar	14
15	Vrnjačka Banja	14
13	Užice	13
8	Bor	13
43	Ljubovija	13
9	Tutin	13
60	Ražanj	13
1	Novi Pazar	13
21	Petrovac	13
89	Žabalj	13
11	Kruševac	13
4	Leskovac	13
2	Veliko Gradište	13
7	Vranje	13

Municipality and Citizens

Overall Rank	LSG	Municipality and citizens (max 15)
1	Novi Pazar	15
2	Veliko Gradište	13
4	Leskovac	13
5	Sombor	12
21	Kladovo	12
8	Bor	11
12	Čačak	11
40	Šabac	10
9	Zaječar	10
15	Vrnjačka Banja	10
27	Boljevac	10
17	Negotin	10
15	Pirot	10

Free Access to Information

Overall Rank	LSG	Free Access to Information (max 6)
5	Sombor	5
56	Lapovo	5
1	Novi Pazar	5
4	Leskovac	5
93	Sjenica	5
60	Ražanj	5
111	Kula	5
47	Bač	5
60	Plandište	5
32	Trstenik	5
13	Bečej	5
127	Sečanj	5
119	Merošina	5

Public enterprises and Public institutions

Overall rank	LSG	Municipals Utility Companies and Public Institutions (max 18)
3	Kanjiža	18
2	Veliko Gradište	18
1	Novi Pazar	18
6	Sokobanja	17
17	Subotica	17
13	Bečej	16
7	Vranje	16
5	Sombor	16
13	Užice	15
24	Novi Sad	15
12	Čačak	15
27	Boljevac	14
40	Novi Bečej	14

Public debates and public competitions

Overall Rank	LSG	Public Debates and Public Competitions (max 10)
4	Leskovac	10
6	Sokobanja	10
1	Novi Pazar	9
11	Kruševac	9
7	Vranje	9
27	Aleksinac	9
3	Kanjiža	8
15	Pirot	8
8	Bor	8
20	Srbobran	8
17	Negotin	8

Annex no. 4. LTI indicators comparison 2024 vs 2023

Indices	% of max score LTI 2021	% of max score LTI 2022	% of max score LTI 2023	% of max score LTI 2024	Increased %	% of improvement
33. 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?	97.2%	93.1%	100.0%	100.0%	0.0%	0.0%
46. Are information on the submission of a request for free access to information on the site? **	95.9%	95.9%	100.0%	100.0%	0.0%	0.0%
90. Are spatial plans / urban plans published on the site?	97.9%	97.2%	99.3%	98.6%	-0.7%	-0.7%
34. Are there inspections controlling lists on website?	94.5%	94.5%	95.9%	97.2%	1.4%	1.4%
37. Is there information on the website about the services provided by the municipality?	60.7%	77.9%	96.6%	96.6%	0.0%	0.0%
48. Is there a section on the website dedicated to public procurements?	96.6%	99.3%	96.6%	96.6%	0.0%	0.0%
75. Does the municipality regularly announce a call for leasing property in its possession?	95.2%	97.9%	94.5%	95.2%	0.7%	0.7%
15. Is the budget for the current year available on the website? **	93.1%	93.1%	97.9%	94.5%	-3.4%	-3.5%
45. The municipality has no unresolved decisions of the Commissioner?	85.5%	85.5%	93.8%	93.8%	0.0%	0.0%
93. Has the Integrity Plan been adopted and has the LSG report on its implementation?	17.2%	17.2%	93.8%	93.8%	0.0%	0.0%
53. Does the Information Booklet contain information about salaries of officials and employees?	57.9%	69.0%	91.7%	93.1%	1.4%	1.5%
11. Is the list of assembly members published on the website?	88.3%	91.7%	91.0%	92.4%	1.4%	1.5%
51. Is the Information Booklet published on the site and updated in the last 3 months?	45.5%	41.4%	73.8%	90.3%	16.6%	22.4%
86. Is the rulebook on internal organization and systematization of administration posted on the site?	77.9%	64.1%	91.0%	90.3%	-0.7%	-0.8%
27. Have the financial plans of indirect budget users been published, with	92.4%	89.7%	95.2%	89.7%	-5.5%	-5.8%

visible structure of funds intended for individual users?						
56. Is there a special segment on the municipal website dedicated to public institutions with PI data?	82.8%	89.7%	88.3%	89.0%	0.7%	0.8%
55. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?	86.2%	89.7%	89.0%	87.6%	-1.4%	-1.6%
79. Have the public calls for the allocation for NGOs been published on the website?	76.6%	85.5%	86.9%	86.9%	0.0%	0.0%
43. Did the municipalities provide requested information (FOI request) in time? **	77.9%	76.6%	74.5%	86.2%	11.7%	15.7%
57. Does the observed PE have its own website?	77.9%	84.8%	84.1%	85.5%	1.4%	1.6%
77. Have the public calls for media allocation in the last 12 months been published on the website?	79.3%	81.4%	82.1%	85.5%	3.4%	4.2%
28. Does the municipal administration have a service center through which it provides all the services?	83.4%	81.4%	85.5%	84.8%	-0.7%	-0.8%
95. Has the mayor submitted a declaration of assets to ACAS?	95.2%	99.3%	97.9%	84.8%	-13.1%	-13.4%
13. Is the local Official Gazette available on the site? **	81.4%	81.4%	83.4%	83.4%	0.0%	0.0%
70. Is the data on the number of employees in the observed public institutions posted on the municipal website?	91.0%	89.7%	63.4%	82.1%	18.6%	29.3%
72. Is the list with prices of services provided by observed PE and PI available on the website of the municipality or PI/PE website?	65.5%	73.1%	79.3%	81.4%	2.1%	2.6%
94. Has the Local anti corruption plan been adopted?	69.7%	73.8%	77.9%	80.0%	2.1%	2.7%
17. Is the budget published on the website in machine-readable or searchable form?	75.2%	79.3%	80.0%	77.2%	-2.8%	-3.4%
58. Does the observed PI have its own website	69.0%	73.8%	75.9%	77.2%	1.4%	1.8%
80. Have the results of the competition for the allocation for NGOs been published on the website?	44.1%	72.4%	74.5%	76.6%	2.1%	2.8%
83. Has the municipality's development strategy been published on the website?	34.5%	56.6%	73.1%	76.6%	3.4%	4.7%
16. Is the justification/explanation of the budget available on the website?	68.3%	68.3%	72.4%	73.8%	1.4%	1.9%

59. Have public competitions for the selection of directors of public enterprises been conducted?	69.0%	71.0%	79.3%	73.8%	-5.5%	-7.0%
87. Is data about number of the employees in local administration published on the website?	97.9%	96.6%	83.4%	72.4%	-11.0%	-13.2%
73. Is there data on the website about the conducted public debates/debates in the last 12 months (except for the budget)?	54.5%	71.7%	66.2%	71.0%	4.8%	7.3%
60. Have public competitions for the selection of directors of public institutions been conducted?	62.1%	60.0%	64.8%	69.0%	4.1%	6.4%
78. Have the results of the competition for media allocation in the last 12 months been published on the website?	53.8%	69.7%	75.2%	68.3%	-6.9%	-9.2%
25. Has the proposal for the final budget account been considered at the session and published (on the website) in the last 12?	54.5%	52.4%	61.4%	67.6%	6.2%	10.1%
50. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?	96.6%	65.5%	72.4%	64.8%	-7.6%	-10.5%
22. Has a public debate on the budget been held - citizen surveys or consultation meetings?	39.3%	55.2%	73.1%	60.0%	-13.1%	-17.9%
23. Has a public call for public debate on the budget been published on the website?	71.0%	72.4%	72.4%	59.3%	-13.1%	-18.1%
88. Is there a code of ethics for employees and is it available on the site?	42.8%	49.0%	58.6%	59.3%	0.7%	1.2%
38. Are there contact information of local community deputies on the municipal website?	55.9%	66.2%	62.1%	57.9%	-4.1%	-6.7%
9. Is the agenda of the next session of the assembly published on the website?	49.0%	46.9%	53.1%	56.6%	3.4%	6.5%
52. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?	55.2%	35.9%	67.6%	55.9%	-11.7%	-17.3%
31. Is there a possibility on the website for citizens to report irregularities or violation of laws. including corruption?	71.0%	54.5%	49.7%	55.2%	5.5%	11.1%
54. Does the Information Booklet contain information on the services provided by the municipality and	49.0%	20.7%	60.0%	55.2%	-4.8%	-8.0%

deadlines for their provision or a link to the register or place on the website where this information can be found?						
39. Is there information on the website or in the Information Booklet that citizens can attend the assembly sessions and instructions on how to apply?	36.6%	42.1%	48.3%	49.7%	1.4%	2.9%
66. Is the annual work plan of the observed PE published on the website of the PE or municipality website?	33.8%	46.2%	50.3%	49.0%	-1.4%	-2.7%
18. Are 6-month and 9-month reports on budget execution available on the website?	39.3%	39.3%	44.8%	47.6%	2.8%	6.2%
21. Is there a citizens' budget published and available on the website?	57.9%	56.6%	58.6%	47.6%	-11.0%	-18.8%
67. Is the report on the work of the observed PE published on the website of the PE or municipality website?	25.5%	42.1%	44.1%	44.8%	0.7%	1.6%
1. Are the decisions adopted by the Assembly published and available on the website? **	33.1%	35.2%	46.2%	44.1%	-2.1%	-4.5%
61. Is the systematization of observed PE published on the website of municipality or PE?	19.3%	26.9%	40.0%	44.1%	4.1%	10.3%
71. Is the data on the number of employees in the observed PE published on the municipal site?	31.7%	21.4%	52.4%	42.8%	-9.7%	-18.4%
3. Are the decisions adopted by the assembly in the past 24 months available on the website?	24.8%	30.3%	46.9%	41.4%	-5.5%	-11.8%
19. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?	21.4%	26.2%	35.9%	41.4%	5.5%	15.4%
40. Are there defined permanent terms for mayor (or deputy mayor) meeting with citizens?	37.2%	46.2%	40.0%	40.7%	0.7%	1.7%
62. Is the systematization of observed PI published on the website of municipality or PI?	17.2%	19.3%	33.1%	40.7%	7.6%	22.9%
24. Has the report on the public debate on the budget been published on the website?	35.9%	33.8%	46.2%	40.0%	-6.2%	-13.4%
49. Is the data on the PP published on the website (competitions, documentation, changes, questions and answers ...)? **	94.5%	62.8%	40.0%	37.2%	-2.8%	-6.9%
74. Does the report on public debates contain information on proposals	24.8%	26.2%	30.3%	34.5%	4.1%	13.6%

made by citizens and the reasons for acceptance / refusal?						
26. Has the audit of the final budget account been considered at the session and published (on the website) in the last 12 months?	20.0%	24.1%	33.8%	31.0%	-2.8%	-8.2%
68. Is the annual work plan of the observed PI published on the website of the PI or municipality website?	26.2%	17.9%	26.2%	29.0%	2.8%	10.5%
10. Are there announcement of municipal/city council sessions on the website?	18.6%	21.4%	24.1%	27.6%	3.4%	14.3%
69. Is the report on the work of the observed PI published on the website of the PI or municipality website?	24.1%	17.2%	24.8%	26.9%	2.1%	8.3%
5. Have the proposed documents been published on the website before being considered at the session of the Assembly?	20.0%	24.1%	29.7%	23.4%	-6.2%	-20.9%
30. Is there a possibility for citizens to report irregularities in the work or violation of the law, including corruption, in the service center or in the premises of the administration?	62.1%	64.8%	26.2%	22.8%	-3.4%	-13.2%
2. Are the decisions adopted by the city council published and available on the website?	13.8%	14.5%	26.9%	21.4%	-5.5%	-20.5%
4. Are the decisions adopted by the city council in the past 24 months available on the website?	12.4%	12.4%	26.9%	20.7%	-6.2%	-23.1%
6. Have the results of the voting at the last session of the assembly been published on the website?	20.0%	17.9%	22.8%	20.0%	-2.8%	-12.1%
14. Are the Assembly sessions broadcasted live on the website or municipalities social network's page or Youtube channel (or is the integral recording available)?	47.6%	49.7%	22.8%	19.3%	-3.4%	-15.2%
29. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration?	16.6%	21.4%	19.3%	19.3%	0.0%	0.0%
64. Are the documents from the selection procedure of the director of the observed PE published on the website of the PE or the municipality?	20.7%	17.2%	16.6%	17.2%	0.7%	4.2%
32. Do (both/all) mechanisms for reporting allow anonymity?	11.0%	12.4%	3.4%	15.2%	11.7%	340.0%
20. Are monthly reports (or cumulative monthly reports) on	8.3%	11.0%	15.2%	13.8%	-1.4%	-9.1%

budget execution available on the website?						
42. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?	18.6%	20.0%	23.4%	13.8%	-9.7%	-41.2%
12. Is there data for citizens' contact with assembly members published on the website?	15.9%	15.2%	15.9%	13.1%	-2.8%	-17.4%
85. Has a report on the work of the administration for the previous year been published?	17.2%	17.2%	17.2%	9.7%	-7.6%	-44.0%
8. Are the amendments submitted on the draft acts that were considered at the last session (and the amendments' justifications/explanations) published on the website?	6.2%	9.0%	9.0%	9.0%	0.0%	0.0%
35. Can a citizen monitor the status of his case on the website?	10.3%	11.0%	5.5%	8.3%	2.8%	50.0%
81. Have the reports on the realization of media projects financed by the municipality been published on the website?	5.5%	7.6%	4.1%	8.3%	4.1%	100.0%
65. Are the documents from the selection procedure of the director of the observed PI published on the website of the PE or the municipality?	17.9%	9.7%	5.5%	7.6%	2.1%	37.5%
82. Have the reports on the realization of NGO projects financed by the municipality been published on the website?	4.8%	8.3%	5.5%	7.6%	2.1%	37.5%
41. Are data on the contact of the mayor or deputy with the citizens visible on the premises?	6.2%	28.3%	9.0%	6.9%	-2.1%	-23.1%
89. 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?	2.1%	6.9%	2.8%	6.9%	4.1%	150.0%
44. No complaints were filed against municipalities in the last year due to ignoring requests for information of public importance?	40.0%	23.4%	6.2%	6.2%	0.0%	0.0%
76. Are the rental lease reports (commercial premises, agricultural land) published on the site?	4.1%	26.2%	5.5%	6.2%	0.7%	12.5%
7. Has information been posted on individual members of the assembly votes on legislation debated?	0.0%	0.7%	4.1%	5.5%	1.4%	33.3%
63. Is there, on the municipality website, a page of the Commission for	4.1%	7.6%	5.5%	5.5%	0.0%	0.0%

the Election of the Director of POEs with all the documents, including the minutes from the meetings?						
47. Is information on the submission of a request for free access to information visible in the service center or administration premises?	3.4%	4.1%	4.1%	4.1%	0.0%	0.0%
36. Is there data on handling complaints, petitions and complaints available on the website?	7.6%	6.9%	6.2%	3.4%	-2.8%	-44.4%
91. Is there a report on contact with lobbyists published on the web site?	2.8%	3.4%	4.1%	3.4%	-0.7%	-16.7%
92. Is there a daily or weekly schedule of the mayor's activities published on the website?	2.8%	4.1%	2.8%	3.4%	0.7%	25.0%
84. Is the annual plan of work of municipal administration published on the site?	2.8%	6.9%	3.4%	1.4%	-2.1%	-60.0%

Annex no. 5. The list of LTI 2015, 2017, 2019, 2020 & 2021-2024 indicators

Indicators	2021, 2022, 2023, 2024	2020	2019	2017	2015
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?				/	/
Have the results of the voting of the Assembly in the past 24 months been published on the website?	/				
8. Are the amendments submitted on the draft acts that were considered at the last session (and the amendments' justifications/explanations) published on the website?					
Are justifications/explanations regarding the amendments published?	/			/	/
9. Is the agenda of the next session of the Assembly published on the website?					
10. Are there announcement of municipal/city council sessions on the website?		/	/	/	/
11. Is the list of assembly members published on the website?					
12. Is there data for citizens' contact with assembly members published on the website?					
13. Is the local Official Gazette available on the site? **					
Do rules of procedure envisage public questions of the deputies to the mayor and/or the city council?	/				
14. Are the Assembly sessions broadcasted live on the website or municipalities social network's page or Youtube channel (or is the integral recording available)?					

15. Is the budget for the current year available on the website? **					
Is the budget published on 6 digits of the economic classification?	/	/	/	/	
16. Is the justification/explanation of the budget available on the website?					
17. Is the budget published on the website in machine-readable or searchable form?				/	/
18. Are 6-month and 9-month reports on budget execution available on the website?					/
19. 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?	/	/	/	/	
20. Are monthly reports (or cumulative monthly reports) on budget execution available on the site?					/
21. Is there a citizens' budget published and available on the site?					
22. Has a public debate on the budget been held - citizen surveys or consultation meetings?					
23. Has a public call for public debate on the budget been published on the website?					
24. Has the report on the public debate on the budget been published on the website?					
25. Has the proposal for the final budget account or the adopted budget account been considered at the session and published (on the website) in the last 12?		/	/	/	/
Has the proposal for the final budget account been published in the last 12 months or the adopted budget account?	/				
26. Has the audit of the final budget account been considered at the session and published (on the website) in the last 12 months?					
27. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users?					
28. Does the municipal administration have a service center through which it provides all the services?					
29. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration?					
Are there information about reporting of corruption visible in the service center or administration offices?	/				

30. Is there a possibility for citizens to report irregularities in the work or violation of the law, including corruption, in the service center or in the premises of the administration?					
Are there mechanisms for reporting corruption on the website?	/				
31. Is there a possibility on the website for citizens to report irregularities or violation of laws. including corruption?					
32. Do (both/all) mechanisms for reporting allow anonymity?				/	/
33. 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?					
34. Are there inspections controlling lists on website?				/	/
35. Can a citizen monitor the status of his case on the website?					
36. Is there data on handling complaints, petitions and complaints available on the website?					
37. Is there information on the website about the services provided by the municipality?		/	/	/	/
38. Are there contact information of local community deputies on the municipal website?					
39. 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?	/	/	/	/	
40. Are there defined permanent terms for mayor (or deputy mayor) meeting with citizens?					
41. Are data on the contact of the mayor or deputy with the citizens visible on the premises?					
Are regular press conferences held (at least once a month) by the mayor?	/				
42. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?					
43. Did the municipalities provide requested information (FOI request) in time? **				/	/
44. No complaints were filed against municipalities in the last year due to ignoring requests for information of public importance?					
45. The municipality has no unresolved decisions of the Commissioner?					
46. Are information on the submission of a request for free access to information on the site?					

47. Is information on the submission of a request for free access to information visible in the service centre or administration premises?					
48. Is there a section on the website dedicated to public procurements?					
49. Is the data on the PP published on the website (competitions, documentation, changes, questions and answers ...)? **					
50. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?					
51. Is Information Booklet published on the site and updated in the last 3 months?					
52. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?					
53. Does the Information Booklet contain information about salaries of officials and employees?					
Does the Information Booklet contain rulebook on salaries of officials?	/	/	/	/	
54. Does the Information Booklet contain information on the services provided by the municipality and deadlines for their provision or a link to the register or place on the website where this information can be found?					
55. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?					/
56. Is there a special segment on the municipal website dedicated to public institutions with PI data?					/
57. Does the observed PE have its own website?		/	/	/	/
58. Does the observed PI have its own website?		/	/	/	/
59. Have public competitions for the selection of directors of public enterprises been conducted?					
60. Have public competitions for the selection of directors of public institutions been conducted?					
61. Is the systematization of observed PE published on the website of municipality or PE?					
62. Is the systematization of observed PI published on the website of municipality or PI?					
63. Is there, on the municipality website, a page of the Commission for the Election of the Director of POEs with all the documents, including the minutes from the meetings?		/	/	/	/
64. Are the documents from the selection procedure of the director of the observed PE published on the website of the PE or the municipality?					

65. Have the documents from the procedure for the election of the director of the observed PI been published on the website?					
66. Have the annual work plans of the observed PEs been published on the website of the PE or municipality website?		/	/	/	/
67. Have the reports on the work of the observed PE been published on the website of the PE or municipality website?		/	/	/	/
Have the annual work plans and reports on the work of the observed PE been published on the website of the PE (or municipality)?	/				
69. Have the work plans of the observed PI been published on the website of the PI or municipality website?					
69. Are there reports on the work of the observed PI published 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 the data on the number of employees in the public institutions posted on the municipal website?		/	/	/	/
Are the data on the number of employees in the municipality and the public institutions posted on the site?	/				/
71. 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?	/	/	/	/	
72. Is the list with prices of services provided by the observed PE and PI available on the website of the municipality or PI/PE website?					
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)?	/				
73. Are there data on the website about the conducted public debates/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?	/	/	/	/	
74. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?					
75. Does the municipality regularly announce a call for leasing property in its possession?					
76. Are the rental lease reports (commercial premises, agricultural land) published on the site?					

Have the public calls/ results of the competition for media allocation in the last 12 months been published on the website?	/				
77. Have the public calls for media allocation in the last 12 months been published on the website?		/	/	/	/
78. Have the results of the competition for media allocation in the last 12 months been published on the website?		/	/	/	/
Have the public calls/ results of the competition for the allocation for NGOs been published on the website?	/				
79. Have the public calls for the allocation for NGOs been published on the website?		/	/	/	/
80. Have the results of the competition for the allocation for NGOs been published on the website?		/	/	/	/
81. Have the reports on the realization of media projects financed by the municipality been published on the website?		/	/	/	/
82. 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?	/	/	/	/	
83. Has the municipality's development strategy been published on the website?					
84. 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?	/	/	/	/	
85. Has a report on the work of the administration for the previous year been published?					
86. Is the rulebook on internal organization and systematization of administration posted on the site?					
87. Is data about number of the employees in local administration published on the website?					
Are there information on the activities of the Council for the implementation of Ethical codes and its contacts with citizens on the website?	/				
88. Is there a code of ethics for employees and is it available on the site?					
89. 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?	/	/	/	/	

90. Are spatial (or urban) plans published on the site?					
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?				/	/
Has the Integrity Plan been adopted?	/				
93. Has the Integrity Plan been adopted (and has the LSG report on its implementation)?		/	/	/	/
94. Has the Local anticorruption plan been adopted?				/	/
95. Has the mayor submitted a declaration of assets to ACAS?					

Note: Indicators used in the last cycle are marked with ordinal numbers