

SPECIAL ADVISORS TO MINISTERS

Regulations and situation in the context of the GRECO
recommendation from the 5th round of evaluation

Transparency Serbia, December 2025

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About the analysis

This analysis was done within the project "*Supporting civil society monitoring of the implementation of fifth round GRECO recommendations, carrying out anti-corruption assessment of laws and monitoring civil service in connection with corruption prevention*". It represents the second insight into the current state of affairs. The first insight, that is, the first analysis, was published in April 2024. That analysis contained data on advisers hired since October 26, 2022, when the Government of Serbia was elected, as well as on those who were appointed before that date and continued to perform their duties.

This analysis deals with the advisors hired after the election of the Government on April 17, 2025 and those who were appointed before that date and are still hired.

Special advisors are the subject of an analysis created within the project dedicated to GRECO's recommendations from the 5th round of evaluation because among them there is also one that refers to the Government advisors and special advisors to ministers. Namely, GRECO recommended to ensure the transparency of information about who are the advisors of public officials and what is the legal basis of their engagement. Transparency Serbia therefore analysed the situation in this area - how it is regulated, who are the advisors, on what basis were they hired and what is the situation with the transparency of that data.

GRECO recommendations

In the evaluation report adopted by GRECO at the plenary session 21.-25. March 2022, (Fifth round of evaluation Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies), among the 24 recommendations are the following:

ii. that (i) chiefs of cabinet and advisers (including of the President) undergo integrity checks as part of their recruitment in order to avoid and manage conflicts of interests; (ii) **the names and area of competence of all advisers in Government and in the President's cabinet be made public and easily accessible;**

iv. that (i) **the remit of the Law on Prevention of Corruption be expanded to cover all persons with top executive functions (PTEFs), including the Prime Minister's and Deputy Prime Ministers' chiefs of cabinet as well as special and government advisers;** (ii) a code of conduct applicable to PTEFs be adopted, covering integrity matters (e.g. conflicts of interest, contacts with lobbyists and third parties, postemployment restrictions, etc.), accompanied by sanctions for violations and appropriate practical guidance; and (iii) an appropriate document on conduct be developed for the President;

Legal framework

The legal framework was not changed after the publication of the first analysis, in April 2024.

This means that the status of special advisors is still legally regulated by the Law on the Government ("Official Gazette of the RS", no. 55/2005, 71/2005 - corrected, 101/2007, 65/2008, 16/2011, 68/2012 - decision of Const. Court, 72/2012, 7/2014 - decision of Const. Court, 44/2014 and 30/2018 - other law), the Law on State Administration ("Official Gazette of RS", no. 79/2005, 101/2007, 95/2014, 47/2018 and 30/2018 - other law), the Law on the President of the Republic ("Official Gazette of RS", no. 111/2007) and by the Decision of the Government on the number of special advisors and the criteria for their compensation work (number 121-955/2021).

Law on Government

Cabinet of the Prime Minister and Cabinet of the Deputy Prime Minister

Article 27

The Prime Minister and the Deputy Prime Ministers have cabinets, which at their behest perform professional and other tasks for their needs. The Prime Minister and the Deputy Prime Minister can appoint advisors within the cabinet.

The employment in the cabinet is regulated for a certain period of time, while mandate of the Prime Minister or Deputy Prime Minister last. The rights and obligations of advisors who do not establish an employment relationship are regulated by a contract, according to the general rules of civil law, and the remuneration for work according to the standards determined by the Government.

Cabinets are led by heads of cabinets, who are appointed and dismissed by the Prime Minister or Deputy Prime Minister.

The mandate of the head of the cabinet ends with the termination of the mandate of the Prime Minister or Deputy Prime Minister, resignation or dismissal.

Law on State Administration

Special Advisers of the Minister

Article 27

A Minister may appoint at the maximum three special advisors.

A Special Advisor of the Minister upon proposal of the Minister shall prepare proposals, make opinions and perform other work for the Minister.

Rights and obligations of a special adviser shall be regulated by a contract, according to the general rules of the civil law and the remuneration for work shall be regulated according to the standards determined by the Government.

A number of special advisors of the Minister shall be determined by the act of the Government for each ministry

Law on the President of the Republic

Publication of legal acts of the President of the Republic

Article 25

Decrees are published in the "Official Gazette of the Republic of Serbia", with the exception of decrees appointing, promoting and dismissing officers of the Serbian Army.

*The "Official Gazette of the Republic of Serbia" publishes decisions by which the President of the Republic announces parliamentary elections, proposes to the National Assembly candidates for Prime Minister, **appoints** the General Secretary of the President of the Republic, the Chief of Cabinet of the President of the Republic, **advisors to the President of the Republic** and other officials in the General Secretariat of the President of the Republic, as well as other legal acts that the President of the Republic decides to publish.*

The publication of legal acts of the President of the Republic in the "Official Military Gazette" is governed by a special regulation.

Head of the Cabinet of the President of the Republic and advisors to the President of the Republic

Article 28

*In addition to the Secretary General and the Deputy Secretary General, the duties directly related to the function and powers of the President of the Republic are performed by the Head of the Cabinet of the President of the Republic **and the advisors of the President of the Republic**.*

The head of the Cabinet of the President of the Republic and advisers to the President of the Republic are officials appointed and dismissed by the President of the Republic.

Functions of the head of the Cabinet of the President of the Republic and the advisors of the President of the Republic cease if they resign, if they are dismissed or when the new President of the Republic takes the oath.

Act of the government

Although the Law on State Administration stipulates that the minister can appoint a maximum of three special advisers, the Decision on the number of special advisers and the criteria for remuneration for their work stipulates, however, that all ministers can appoint a maximum of three advisers, and the Minister of Education and the Minister of Science and Technological Development - four special advisers. It is also stipulated that ministers without a portfolio can appoint one special adviser. The act also prescribed that special advisers are not employed in the ministry, but their rights and obligations are governed by a contract, according to the general rules of civil law.

The act of the Government narrowly defines the salary, i.e. remuneration for advisers: The remuneration for the work of special advisers depends on the complexity, importance and scope of their work and on the importance of the area for which they are in charge.

The compensation for the work of special advisers cannot be higher than the amount obtained by multiplying the net base and the coefficient for calculating the salary of the adviser to the Deputy Prime Minister who is employed by the Government.

Strategic anti-corruption acts

Strategy and the first Action Plan

On July 25, 2024, the Government of Serbia adopted the National Strategy for the Fight against Corruption for the period 2024-2028. ("Official Gazette of RS", No. 63/2024). The introductory part of the Strategy states that one of the expected effects is that its implementation contributes to the fulfilment of 14 transitional criteria for Chapter 23: Judiciary and fundamental rights, which refer to the Subchapter: Fight against corruption, and **especially transitional criteria related to the harmonization of the normative framework in accordance with the GRECO (Council of Europe Group of States against Corruption) recommendations.**

The recommendations whose fulfilment is observed in this analysis are intended to be fulfilled through the measures and activities prescribed by the Action Plan for the period 2024-2025.

In the chapter "Overview and analysis of the current situation", the Strategy states the findings and recommendations from the evaluation report of GRECO: "In the Fifth Round of Evaluation, the Report contains 24 recommendations aimed at preventing corruption and strengthening the integrity of central authorities (highest executive functions) and law enforcement bodies. When it comes to the recommendations of GRECO from the Fifth Round of Evaluation, the Republic of Serbia should take measures to prevent corruption in relation to persons in the highest positions in the executive power, including the prime minister, ministers, state secretaries, assistant ministers, heads of the cabinet of the prime minister and deputy prime ministers of the government, and special advisers to the ministers and advisers to the prime minister and deputy prime ministers of the government, as well as to increase awareness of training in the field of whistle-blower protection. The link between individual recommendations and the Strategy for the fight against corruption is stated in the sections dealing with special goals and measures."

In the aforementioned chapter, "Special objectives and measures", within the framework of special objective 1 (Improvement of the normative framework for more effective prevention and suppression of corruption) there is the measure **"Improvement of the normative framework in order to eliminate the risk of corruption in selection/appointment and employment and promotion procedures in the public sector, including local self-government"**.

It states that the integrity check recommended in the GRECO report (recommendation II) for ministers should also be passed by their chiefs of staff and advisors. At this point, however, it is not mentioned that GRECO's recommendation also includes the advisors of the President of the Republic. The second part of this recommendation is not mentioned either - that "the names and areas of competence of all advisors in the Government and in the President's office should be publicly and easily available".

Within the same special objective, the measure **"Improving the normative framework to reduce the possibility of corrupt behaviour in the public sector and in the relationship between the public and private sectors"** refers to recommendation IV of the GRECO report: "The Act on Prevention of Corruption does not prescribe the obligation to publish data on the application of the corruption risk assessment mechanism in the regulations, i.e. the obligation to publish the opinions of the Agency for the Prevention of Corruption and data on the actions of state administration bodies according to the opinions of the Agency. The elimination of these shortcomings is in accordance with recommendation III from the Fifth Evaluation Round of GRECO, recommendation IV from GRECO's Fifth Evaluation

Round, recommendation XI of the Fifth Evaluation Round, as well as recommendation XII of the Fifth Evaluation Round, which include the adoption of a strategic document **for the prevention of corruption among persons in the highest executive positions, the adoption of the Code of Conduct that applies to persons with the highest executive positions, the introduction of the obligation to report conflicts of interest by persons in the highest executive positions, as well as prescribing rules on the termination of employment for persons in the highest executive positions**. In this regard, through the Action Plan for period 2026-2028, it is necessary to foresee activities that include an analysis of the needs and possibilities for the possible adoption of a strategic document for the prevention of corruption among the **highest holders of executive power**, which would define a clear goal in the prevention of political corruption; adoption of the Code of Conduct for the highest representatives of the executive power; analysis of needs and options for possible changes to the normative framework that regulates the obligation to report conflicts of interest, as well as the rules on the prohibition or restriction of employment of the highest representatives of the executive power after the termination of office".

The strategy here retains the wording "highest representatives of the executive power", which could refer to a narrower circle than what is stated in the recommendation itself. Also, the strategy does not deal with the part of the recommendation that relates to the developing a document on conduct for the president. Namely, the recommendation reads: "that (i) the remit of the Law on Prevention of Corruption be expanded to cover all persons with top executive functions (PTEFs), **including the Prime Minister's and Deputy Prime Ministers' chiefs of cabinet as well as special and government advisers**; (ii) a code of conduct applicable to PTEFs be adopted, covering integrity matters (e.g. conflicts of interest, contacts with lobbyists and third parties, postemployment restrictions, etc.), accompanied by sanctions for violations and appropriate practical guidance; and (iii) an **appropriate document on conduct be developed for the President**".

Special objective 4 (Strengthening of integrity in the public sector and authorities responsible for combating corruption) contains the measure **"Improving anti-corruption mechanisms in the work of the public sector"**. It is stated that the illegal accumulation of public functions, incompatibility with another public function, activity or duty, conflict of interest when entering a public office, performing other work without the consent of the Agency, i.e. activities when entering a public office which are observed as potential risks of corruption. The aforementioned risk is a **consequence of the lack of prior verification of the integrity of candidates who are to enter public office** by the authorities responsible for their appointment. The regulations do not prescribe a mandatory preliminary check of the integrity of candidates who are to enter public office, which would be carried out by the authorities responsible for the appointment at the local level. **The mentioned risk was identified by recommendations I and II from the Fifth Evaluation Round of GRECO**, so the activities planned for the elimination of this risk will also contribute to the fulfilment of the recommendations.

The action plan for the period 2024-2025 envisages (Measure 4.4. Improvement of anti-corruption mechanisms in the work of the public sector) that by the end of the 4th quarter of 2025, rules will be adopted for checking the integrity of heads of cabinet and advisers before their appointment (activity 4.4.5). This activity, according to the Action Plan, is carried out by the General Secretariat of the Government.

Activity 4.4.6 implies the publication of the names and competences of cabinet chiefs and advisers on the official websites of the Government bodies", which is also the responsibility of the General Secretariat of the Government, with the same deadline - the 4th quarter of 2025.

Proposal for a new Action Plan

Some of the activities related to recommendations II and IV from the 5th round of the GRECO evaluation are provided for in the Proposal of the Action Plan for the period 2026-2028, which was up for public debate until mid-October 2025 and whose adoption is yet to come at the time of this analysis.

The measure mentioned in the Strategy, Improvement of anti-corruption mechanisms in the work of the public sector, in the AP for 2026-2028 is within the special objective Strengthening integrity in the public sector and authorities responsible for combating corruption

This AP foresees the formation of a Government Working Body in order to implement the GRECO recommendations, already in the first quarter of 2026. The General Secretariat of the Government will be in charge of this.

Part of the operationalization of the implementation of the first part of recommendation IV (that the scope of the Law on the Prevention of Corruption be expanded to include all persons in the highest executive positions, including the heads of the Cabinet of the Prime Minister and the Deputy Prime Ministers of the Government, as well as special and government advisers) should be implemented in the 1st quarter of 2026 through the updating of the Guide for Officials (activity 4.4.3), which will be the responsibility of the Agency for the Prevention of Corruption.

Although the Action Plan for the period 2024-2025 stipulated that by the end of the 4th quarter of 2025, the rules for checking the integrity of cabinet chiefs and advisers before their appointment were to be adopted, the same activity, with the same obligee (General Secretariat of the Government), is also foreseen in the Action Plan for 2026-2028 for the 1st quarter of 2026. In this way, three months before the deadline, the AP confirmed that this undemanding activity (in the first place, the activity does not require a complex and long adoption procedure) will not be carried out in accordance with the plan.

The situation is the same with activity 4.4.6. from AP 2024-2025 - "publication of the names and competences of cabinet heads and advisers on the official websites of government bodies", which was also the responsibility of the General Secretariat of the Government, with a deadline of the 4th quarter of 2025. This activity also appears in the AP proposal for 2026-2028, with a deadline of the first quarter of 2026.

Finally, the AP Proposal for 2026-2028 does not contain the activities mentioned in the strategy, in relation to the second and third part of the IV recommendation ((ii) a code of conduct applicable to PTEFs be adopted, covering integrity matters (e.g. conflicts of interest, contacts with lobbyists and third parties, postemployment restrictions, etc.), accompanied by sanctions for violations and appropriate practical guidance; and (iii) an appropriate document on conduct be developed for the President), where it was explicitly stipulated that the action plan for the period 2026-2028 should "provide activities that include an analysis of the needs and possibilities for the possible adoption of a strategic document for the prevention of corruption **among the highest holders of the executive power**, which would define a clear goal in preventing political corruption; the adoption of the Code of Conduct for the highest representatives of the executive power; an analysis of the needs and options for the possible change of the normative framework that regulates the obligation to report conflicts of interest as well as the rules on the prohibition or restriction of the employment of the highest representatives of the executive power after the termination of office".

Current status

The fulfilment of the GRECO recommendation (to ensure transparency of information about who all the advisors of public officials are and what is the legal basis for their engagement) is possible even without the engagement of a single obligee, with a prescribed deadline, but it can be done by the bodies themselves in which the advisors are engaged (ministries, cabinets, secretariats). Considering this, TS requested information about advisors from the Government of Serbia¹, the President of Serbia and 30 ministries, i.e. 25 ministries and five cabinets of ministers without portfolios. From the Government of Serbia, i.e. its General Secretariat, TS requested information on the advisors of the Prime Minister and the Deputy Prime Ministers².

What was requested

The following data were requested from **the ministries and the General Secretariat of the Government**:

- 1. Information on the number of persons who are currently engaged as special advisors to the ministers. (that is, as advisors to the Prime Minister and Deputy Prime Ministers)*
- 2. Copies of decisions on the appointment of special advisors (that is, advisors to the Prime Minister and Deputy Prime Ministers) that were adopted in the period from April 17, 2025 to the date of processing the request.*
- 3. Copies of decisions on the appointment of special advisors (that is, advisors to the Prime Minister and Deputy Prime Ministers) that were adopted in the period from January 1, 2024 to April 17, 2025, in the event that the appointed persons continued to work as special advisors after April 17, 2025.*
- 4. Explanations of the decision from points 2 and 3 of this request or another document from which the qualifications of the appointed special advisors can be seen (that is, advisors to the advisors to the Prime Minister and Deputy Prime Ministers).*
- 5. Information on whether the ministry (i.e. the Government) has published on its website who are the persons appointed as special advisors (i.e. advisors to advisors to the Prime Minister and Deputy Prime Ministers) and the address of the page where this information can be found.*

The following information was requested from the **President of the Republic**:

- 1. Information on whether some persons are currently **engaged in advisory work** with the President of the Republic of Serbia, i.e. in the General Secretariat of the President of the Republic, in addition to the persons appointed as advisors, i.e. whether they were engaged in the period from 1.1.2022. year.*
- 2. Copies of decisions or contracts on hiring persons from item 1 of this request.*
- 3. Explanations of the decisions from item 2 of this request or another document from which the qualifications of the appointed advisors can be seen, as well as the area for which they are hired.*

¹ <https://transparentnost.org.rs/en/projects/288-unapredjenje-pracenja-implementacije-preporuka-petog-kruga-greco-preporuka-od-strane-civilnog-drustva>

² https://transparentnost.org.rs/images/Zahtev_Vlada_-_savetnici.pdf

4. *Information on whether the General Secretariat of the President of the Republic of Serbia has published on its website who are the persons appointed as advisors and the address of the page where this information can be found.*

Who responded to the request

Responses were sent by 25 out of 32 authorities - the General Secretariat of the Government, the President of the Republic and 23 ministries (21 ministries and 2 cabinets of ministers without portfolios). **Substantive responses** (more or less substantive) **were sent by the President of the Republic and 22 ministries.**

No response came from four ministries (Ministry of Agriculture, Ministry of Justice, Ministry of Health and Ministry of Public Investments) and three cabinets of ministers without portfolios (Cabinet of the Minister for Coordination of Activities and Measures in the Field of Diaspora Relations, Cabinet of the Minister for International Economic Cooperation and Social Position of the Church in the Country and Abroad and Cabinet of the Minister for Gender Equality, Prevention of Violence against Women and Economic and Political Empowerment of Women).

The president's advisors

In the response of the **General Secretariat of the President of the Republic**, it is stated that, in addition to the persons appointed as advisors, there are no other persons engaged for advisory work. The names of the persons appointed as advisors are published on the official website of the President.

On the website³ (General Secretariat/Advisors menu) there is a list of advisors, along with an introductory text that states that "Advisors to the President of the Republic perform the most complex analytical, advisory and other related duties necessary to the President which pertain to the system of government, developing and functioning of the political system and initiatives for passing new laws as well as implementation of existing ones, economic trends and development of the economic system, defence and security, work of the National Assembly of the Republic of Serbia and the Government of the Republic of Serbia and other governmental bodies, relations between the Republic of Serbia and other countries and international organizations, briefings, cooperation with research and other institutions, enjoyment of civil and human rights and those of national minorities as well as other professional services".

On the website, there are no appointment documents, explanations, or other documents from which it would be possible to see for which area the advisors were hired and what qualifications they have for performing those jobs.

The area of engagement is stated, however, in the appointment decisions found in the official gazettes: Tatjana Jović is advisor for foreign policy, Milorad Veljović for security, Suzana Vasiljević for cooperation with the media, Verica Lazić for social and health issues, Nenad Mihailović for political issues and relations with persons with disabilities, Dejan Savić for culture, Branka Đukić for public policies and Miloš Vučević for regional affairs.

³ <https://www.predsednik.rs/en/general-secretariat/advisors>

The General Secretariat considers the data confidential

The Government Secretariat refused to provide the data. In their response⁴ rejecting the request for access to information of public importance, it is stated that the **advisors** of the Cabinet of the President and the Vice President of the Government "**do not meet the requirements prescribed by law to be information of public importance**, and the provision of personal data and the basis and method of engagement of any person who is not obliged to publicly disclose personal data in terms of regulations on the prevention of corruption would represent a violation of the right to privacy and a violation of the right to protect the personal data".

The Secretariat concluded that the advisors, in addition to not being officials, cannot influence the work of public authorities, that they are employed in the cabinet with rights and obligations regulated for permanent employment or engagement contract, but that the jobs they perform do not represent the performance of a public function nor can they be interpreted as jobs related to the work of public authorities. This is because, as the Secretariat states, the Prime Minister is not a public authority, and the employees in the cabinet "are not in any way connected with the work of the Government" (which is public authority).

This position of the Secretariat is contrary to recommendation II from the fifth evaluation of GRECO and inconsistent with the Anti-Corruption Strategy and Action Plan, according to which the very same General Secretariat of the Government is obliged to ensure "the publication of the names and competences of cabinet heads and advisors on the official websites of the Government bodies" by the end of 2025. The same activity has now been postponed by the AP draft for 2026-2028 to the first quarter of 2026, but it is not clear what changes in regulations would precede it in order to remove the obstacles pointed out by the General Secretariat in the response to TS, i.e. in the explanation for the rejection of the request.

Transparency Serbia sent a new request⁵ to the Government of Serbia, this time asking **only for the number of advisors**, but that request was **also rejected** with almost the same explanation⁶.

Ministerial advisors

General statistics

Out of 30 ministries (including five cabinets of ministers without portfolios), **23 (21 ministries and 2 cabinets of ministers without portfolios)** sent answers. These are worse data regarding compliance with the obligations from the Law on Free Access to Information of Public Importance than in the previous cycle, when two ministries did not respond to the requests, i.e. one Ministry (agriculture, forestry and water management) and one cabinet of the minister without portfolio (responsible for diaspora). **Those two authorities did not respond this time either, as well as ministries of justice, health, public investment and the cabinet of the minister for international economic cooperation and the social position of the church in the country and abroad and the cabinet of the minister for**

⁴ https://transparentnost.org.rs/images/Odgovor_Vlada_Srbije_-_savetnici_-_odbijen_zahtev.pdf

⁵ https://transparentnost.org.rs/images/Zahtev_Vladi_Srbije_-_broj_savetnika.pdf

⁶ https://transparentnost.org.rs/images/vlada_savetnici.pdf

gender equality, prevention of violence against women and economic and political empowerment of women.

One of the 23 answers was formal - it was stated that all the requested information can be found in the Ministry of Defence information booklet. However, not only that links to the allegedly published data were not provided (which would be a legal obligation if this was the case), but we could not find them even by detailed search of the information booklet⁷.

Out of the 22 authorities who actually sent answers, 14 of them answered all the questions, more or less substantively. "More or less" means that in some answers the titles published in the appointment decisions (lawyer... or economist...) were cited as qualifications for performing the duties of advisors. Those, however, do not provide insight into the experience and expertise in the field for which the advisor is hired.

Number of advisors

Of those 22, 14 of them have engaged the maximum allowed number of advisors: three each for the ministers of the interior, economy, environmental protection, public administration, for human and minority rights, for European integration, for work and employment, for family care, sports, culture, rural welfare, tourism and youth, information and telecommunications, and one minister without portfolio in charge of reconciliation and regional cooperation.

The Minister of Education, who is entitled to four, hired three, and the Minister of Science, who is also entitled to four advisors, has hired two. The same number has Minister of Domestic and Foreign Trade.

The ministers of construction, transport and infrastructure, mining and energy, and foreign affairs have one advisor each. The minister without portfolio responsible for the development of underdeveloped municipalities and the minister of finance do not have advisors. For the latter, however, as well as for the ministers of internal affairs and economy, it should be taken into account that in addition to being able to hire special advisors in the capacity of ministers, they can also have advisors as deputy prime ministers, and we did not manage to get answers as to whether they have them.

In total, for all the ministers for whom answers were submitted - out of the maximum 64 advisors allowed, 50 were hired.

Basic information about advisors

At least basic information about advisors (names) is **published on the websites of six out of a total of 30** ministries (more precisely, 25 ministries and five cabinets of ministers without portfolios). The advisors' **biographies** are available **on the websites of three ministries** - all three advisors in one case, two out of three in two cases.

On the website of the **Ministry for Human and Minority Rights and Social Dialogue**, names and biographies can be found in the "Minister's Cabinet" section.

Ministry of Education - on the website (About the Ministry) there are biographies of two of the three advisors.

⁷ <https://informator.poverenik.rs/informator?org=GKh7haahm4T6Zmb7v>

The **Ministry of Rural Welfare** has published names on the "Contact" page, as well as the **cabinet of the Minister for Reconciliation and Regional Cooperation** on the contact page.

The Ministry of Labour, Employment, Veterans and Social Affairs - published the names in the information booklet - in the chapter "Heads of public authorities".

The Ministry of Health, which did not respond to the request, published the names of three advisors and the biographies of two (Ministry/Organization/Advisors). It is not clear, however, whether these are appointments from before the election of the new government (April 16, 2025), in which the Minister of Health remained unchanged.

On the website of the Cabinet of the Minister for Gender Equality, a "Special Advisor" page was found, but there is no information on it.

This is worse than in the previous cycle, when data on special advisors could be found on the websites or in the information booklets of seven ministries. In five cases, the data was on the websites (education, culture, science, human and minority rights, and rural welfare), and in two cases, in the information booklet (Ministry of Labour and Ministry of Family Care).

This means that the situation remained unchanged (positive) in four ministries - for human and minority rights, the Ministry of Education, the Ministry of Rural Welfare and the Ministry of Labour and Employment.

The Ministry of Health, which had no published names, now has them, but this time it did not respond to the request, so it is not clear whether it is about the appointments after the election of the government, on April 16, 2025, or in the previous mandate, from June 2024.

There has also been a visible deterioration: **three ministries that had published data in the previous cycle, now do not (culture, family care and science, with the latter previously also having published biographies of advisors).**

Change of minister - change of practice

Regarding the change in practice (for the better or for the worse), it is interesting to see a few more **individual examples** that indicate that there **are no rules in the ministries, or even an established practice**, but that the decision on **what will be published or submitted in response** to a FOI request depends on the person who decides on it. And who, it turned out, is not the person in charge of handling requests for free access to information of public importance.

Thus, in the previous cycle, the Ministry of Environmental Protection stated in its response that they only had three advisors, and that they did not publish information about them, referring to Article 14 of the Law on Information of Public Importance (privacy and other personal rights) as the reason that they could not provide the other requested data, including the names of the advisors.

This time, in the response **signed by the same person authorized to act on requests for free access**, decisions on appointment and CVs were also submitted.

As in the Ministry of Environmental Protection, the minister was changed in the Ministry of the Interior (the previous cycle did not cover the period of Prime Minister Miloš Vučević, the requests were for the beginning of 2024), so the answer is different. In the last cycle, the names of the engaged advisors

were blacked out in the submitted decisions on appointment, while this time the decisions were submitted with some personal data blacked out, but the names are visible.

In the previous cycle, a specific answer came from the Ministry of Labour, Employment, Veterans and Social Affairs, which did not provide data on qualifications. It stated that the appointment of a special advisor to the minister is not a procedure in the field of labour law, but the legal basis for their engagement is contained in the Law on State Administration, and their rights and obligations are regulated by the contract. Therefore, it is stated in the answer, no special conditions or competences are prescribed that they must meet, but the minister has the discretionary right to assess which person can contribute the most to his work.

This time they answered again that there are no prescribed qualifications for the appointment, it is a discretionary decision of the minister, so the information about the qualifications cannot be seen in the decision, or the explanation of the decision, but they submitted the advisors' CVs from which the qualifications can be seen.

The practice, bad however, is unchanged in the Ministry of Defence. In the previous cycle, this ministry requested an extension of the deadline up to 40 days, and after 36 days they sent a response in which they cited several articles of the Law on State Administration that regulate the area of engagement of advisors and the government's Decision on the number of special advisors and the criteria for compensation for their work. It was mentioned that those acts stipulate that the Minister of Defence can appoint three special advisors, and finally noted that so many were hired. Nothing more about them, no names, nothing about expertise, criteria and benchmarks, compensation and whether the data is publicly available.

This time too, the articles of the Law on Ministries in connection with the appointment of special advisors and the Law on Free Access to Information of Public Importance in connection with the creation and publication of work informants were cited and at the end it was stated: "According to what has been said above, with full respect and understanding, we suggest that you follow the changes to the information booklet of the Ministry of Defence, which contains accurate and complete information about the authority and which is updated in a timely manner by introducing appropriate changes."

That information about the authority in the booklet, however, **does not include anything related to special advisors**. This is still insufficient to conclude that the Minister of Defence did not hire any special advisors.

In the previous cycle, the Ministry of State Administration and Local Self-Government submitted decisions on the appointment of advisors and the contracts concluded with them, claiming that their qualifications were also seen from those documents, which was not true. This time, the Ministry took a few steps back, and in its response only stated that three advisors had been hired, **but did not give their names or any other details**.

The answer states that "due to the nature of the engagement of special advisors to the minister, i.e. the fact that they are not employed in the ministry, but their rights and obligations are determined by contract... and that... no specific conditions are prescribed regarding their work experience, professional qualifications and other conditions, the Ministry is not obliged to have information related to their qualifications when engaging special advisors". There was no mention of the obligation to know their names and to present that information to the public.

Qualifications

Related to qualifications of advisors, as already mentioned, three ministries have published biographies on their websites. Seven ministries submitted resumes in response to the request, while two even submitted diplomas of special advisors. In two cases, the appointment decisions (supplied upon request) show profession (lawyer, economist, etc.), while six ministries submitted decisions that only include the names of advisors, but not even the titles.

This time, although that document was not requested, four ministries submitted **contracts** on hiring advisors (seven in the previous cycle). **Amounts paid to advisors** are visible in two contracts (this information was visible in four cases in the last survey). All advisors in the Ministry of Sports have the same fees as before - 147,338 dinars per month, which is more than advisors in the Ministry of Information and Telecommunications who receive 130,000 dinars per month.

In the previous cycle, advisors in the Ministry of Human and Minority Rights were paid 136,000, and 120,000 in the Ministry of Culture, but this time those two bodies did not submit contracts.

Regarding the advisors themselves, **their qualifications, experience and other engagements**, several **interesting or specific data** were noted from the submitted documents, or were found in the media.

From the Ministry of Internal Affairs, decisions on appointment were submitted, from which only the names are visible - **Slavica Đukić Dejanović, Saša Radulović and Milomir Premović**. The honorary president of the SPS and the former minister of education stated for the media that, as an advisor, she was in charge of the psychological and health status of members of the MUP, while Premović was mentioned as an advisor for relations with China. On the other hand, it is not possible to determine who Saša Radulović is.

The Ministry of Environmental Protection has three advisors - one is a graduate ecologist, the other graduated from the Faculty of Law in Vienna, while the third is Aleksa Tojčić, who was also a special advisor for former minister Irena Vujović. He is a lawyer and member of the **Centre for Social Stability**⁸, an organization that declares itself as the organizer of rallies against blockades and produces videos directed against student protests and the opposition.

The Minister for Human and Minority Rights and Social Dialogue also has an advisor who, as stated in the biography on the website⁹, is active in the **Centre for Social Stability**. This is the historian Dušan Mišković, born in 1994, who worked in the private sector in the field of employment agencies from 2022 to 2025. Since 2023, he has been engaged as an expert associate in the Fund for Refugees and Displaced Persons and for cooperation with Serbs in the region. From 2014 to 2024, he was active in the Student Union.

And while professional cooperation in the Fund for Refugees and Displaced Persons could be interpreted as experience in the field of human and minority rights, it is difficult to find a similar reference for second advisor – Dragan Delibašić. In the biography on the website, it is stated that Delibašić received his university education in Zagreb and that he completed specialist studies in Belgrade. In the work biography submitted to TS, it can be seen that he actually graduated from the Military Technical Academy of the Yugoslav People's Army (graduated in traffic engineering), and then

⁸ https://transparentnost.org.rs/images/Ministarstvo_z%C5%A1tite_%C5%BEivotne_sredine_-_savetnici.pdf
page 11-12

⁹ <https://minijmpdd.gov.rs/ministarstvo/kabinet-ministra/>

specialized studies at the Military Technical Academy of Army of Yugoslavia and that he was a professional military from 1989 to 2022. From 2023 to 2024, he was an internal control officer at JP Pošta Srbije - worked on prevention and detection of corruption, and from November 2024 at the Ministry of Domestic and Foreign Trade, he worked on creating analyses of various forms of illegal trade.

The biography on the website is more succinct, so it only says that he worked in the Ministry of Defence, JP "Post of Serbia" and the Ministry of Domestic and Foreign Trade and that during his working life he was engaged in risk analysis and management within various operational frameworks in the provision of notifications and analytical reports.

The third advisor dealt with issues of terrorism and human rights, primarily women's and children's rights.

Among the three advisors to the Minister for European Integration is another activist from the **Centre for Social Stability**. Lawyer Marko Miskeljic is often seen in the pro-government media as an analyst who deals with blockades and "blockaders", the hypocrisy of the opposition, Kosovo, Oil industry of Serbia.

Advisor Srđan Barac, a lawyer, is also an analyst present in the media, where he condemns students, blockades, and talks about Kosovo. Barac was an advisor to Nemanja Starović, the current Minister for European Integration, when he was the Minister for Labour and Employment. Based on that, it could be concluded that it is a matter of a person trusted by the minister, rather than an advisor who is an expert in the field of work of the ministries, or that he is a person whose expertise goes beyond the boundaries of individual departments or portfolios.

Organizational sciences engineer David Ivanović, who is an advisor to the Minister of Education, has **extensive experience in the field of advising**. Namely, **advising**, in addition to his "first professional steps in the private sector", as stated in his biography, is **the only thing he has been doing since he graduated in 2022**. After the "first steps", it is stated, he was "engaged" in the Cabinet of the Prime Minister as an advisor for youth and education. "Working engagement" continues in the Cabinet of the President of the Serbian Parliament as an advisor for education and youth policies, with a focus on the development and monitoring of public policies in education, preparation of thematic analyses and reports, organization of cross-sectoral meetings and working groups and coordination with competent ministries and relevant parliamentary committees, the most important of which are the Committee on Children's Rights and the Committee on Education. Since April 2025, he has been a special advisor to the Minister of Education.

Although he has no work experience in the field for which he was hired (according to the appointment decision) - the field of pupil and student's standard, he has it as a pupil and student. His biography states that he graduated from primary and secondary school with a Vuk diploma, "and was also the recipient of numerous decorations". "During his undergraduate studies, as a member of numerous student organizations and secretary of the Student Parliament, he gained knowledge and competence in the field of student education, development and organization of academic and extracurricular programs." Therefore, as stated in the biography, "on the basis of these competencies, he continued his professional career in the institutions of the Government of the Republic of Serbia."

In the **Ministry of Labour, Employment, Veterans and Social Affairs**, can also be found a special advisor to the minister with experience in the non-governmental sector. This time it is not the Centre for Social Stability, but the **Centre for Anthropological Studies**, one of the founders of which is lawyer Miroslav Vasić, the current advisor to the minister. According to his biography, Vasić practiced criminal,

international criminal, labour, civil and commercial law since 1985, and he was a member of the Election commission for three mandates (on the proposal of the Serbian party Zavetnici). The Centre for Anthropological Studies is an organization that deals with cults and sects, and is known for the public appearances of one of its founders - Miroljub Petrović.

Another advisor to Milica Đurđević Stamenkovski, Minister of Labour, is **former professional football player** Srđan Stanić, who graduated in **sports management** at BK University, and was the member of the municipal council in Vrbas, in charge of sports and youth.

The Minister for Family Care, Jelena Žarić Kovačević, who was the Minister for Public Administration and Local Self-Government in the previous government, **brought all three special advisors with her to the new position**, which is another indicator that the selection of advisors depends less on specific expertise and more on ministerial trust.

Lawyer Vladan Antić, born in 1978, since graduating in 2008, worked as a lawyer, councillor in the Crveni Krst municipality, president of the Municipal Election Commission in that Niš municipality, and then as an advisor to the minister, who is also from Niš.

Judging by his biography, Milenko Krajcar, **before becoming an advisor, did not have any experience with state administration, local self-government and family care** (at least not professional experience). He graduated from hotel management, then graduated from Megatrend with a degree in economics and a master's degree in economic sciences. He has been working at SOE Srbijagas since 2013 as a commercial associate for capacity sales, and before that he was involved in marketing, sales and was an assistant to the main manager of the service network of the Pirot company "Tigar trgovina".

The third special advisor, Studenka Stojanović, born in 1982, graduated management in 2012 at the Technical Faculty in Bor. The first job listed in her CV was director of Bor tourism centre in 2014 (two years after graduation), then she was a member of parliament for four years (2016-2020), and since 2021 she is a "leading associate" at SOE Pošta.

The Ministry of Culture has only sent appointment decisions, which do not even include professions of advisors, and there are no biographies on the website, so it is difficult to identify them more precisely.

TS found that a person with the same name as a special advisor (Slavica Marković) is the head of the cabinet of Minister Nikola Selaković, and a person with the same name was in the Ministry of Justice, where Selaković was previously a minister.

The identity of Nermina Ahmetović can be confirmed, as it can also be confirmed that the positions of special advisors are distributed in inter-party coalition agreements, in a similar way as the positions of directors of public companies. Namely, on the website of the Party of Justice and Reconciliation there is information¹⁰ about her appointment as a special advisor and information that she graduated in English from the University of Pristina, and that in her new position she is in charge of the culture of national minorities. The website states that "with her appointment, the position usurped by the dissidents that **belonged to the party** (Party of Justice and Reconciliation, ed.) **in the coalition agreements** was freed." After the appointment, Ahmetović thanked the president of the party for becoming a special advisor to the Minister of Culture¹¹: "I am asking the Lord Almighty to make it easier

¹⁰ <https://spp.rs/nermina-ahmetovic-nova-specijalna-savjetnica-ministra-kulture>

¹¹ <https://sandzacke.rs/featured/nermina-ahmetovic-imenovana-specijalnom-savjetnicom-za-kulturu-nacionalnih-manjina/>

for us and keep us on the path of truth and justice. **I thank the president and the leadership of the party for their trust.** Only together can we create a better future for everyone!".

The **second advisor to the Minister of Culture** is Miroslav Knežević, former **State Secretary for Tourism** in the Ministry of Trade, Tourism and Telecommunications, **associate professor at the Faculty of Tourism and Hotel Management** of Singidunum University. Knežević worked for five years in a tourist agency in Zlatibor, and since 2011 he has been employed at Singidunum University (teaching assistant, docent, involved in the courses Economics of Tourism, Quality Management in the Hotel Industry, Hotel Business, Management in the Hotel Industry and Dean of the Faculty of Tourism and Hotel Management).

The Minister of Science, Technological Development and Innovation has an advisor in charge of coordination between the Ministry and the Fund for Science and for **scientific activity in the sphere of security and defence**. Advisor Sava Stambolić graduated from the Faculty of Law in Novi Sad, deals with rhetoric, public speaking, he is active in Svetosavska omladine, in the Cultural Centre Novi Sad in 2012-2013 as an assistant director, he worked on the introduction of the Cyrillic alphabet into the visual identity of the institution, engaged in programs focused on identity topics. He then worked for four years (2015-2019) in the notary's office, and from 2019 in the city administration of Subotica, he was the head of the mayor's cabinet. At the Serbian embassy in Moscow, he worked with the Serbian community in Russia, he was engaged with organising supplementary school of the Serbian language. From June 2024 to May 2025 he was an advisor to the Prime Minister Miloš Vučević, "dealing with a wide range of issues, from international relations, to **fostering relations of the Prime Minister's Office with local self-governments and national minorities**, to youth policy, as a member of the Government Council for Youth". While dealing with national minorities, Stambolić did not neglect the national majority either, so in the Subotica association "Arsenije Čarnojević" he deals with "the affirmation of Serbian native history through the organization of ceremonies, lectures, and literary evenings."

An enviable biography, although it is not clear from it whether there are points of contact with the department of science, technological development and innovation. When it comes to the specific area of consulting (scientific activity in the sphere of security and defence), it is stated that Stambolić "during 2025" attended Studies of Security and Defence, within the School of National Defence "Vojvoda Radomir Putnik". He "successfully completed" these studies in July 2025, **a month after he became an advisor for scientific activity in the sphere of security and defence**. His final work is entitled "The importance of insignia for army morale and military ethos in the concept of total defence".

The **Minister of Information and Telecommunications** has a special advisor whose duties, according to the contract, are specified, which is not the case in most contracts – it is usually only stated that advisors "formulate opinions and perform advisory work for the minister". Among other things, he should provide "support to public authorities for public calls in the field of public information" and to "create the specification of Phase 2 of the platform for the establishment of a Public Information System for the implementation and monitoring of co-financing of projects in the field of public information". This advisor, Miloš Garić, was the editor-in-chief of the Kosovo online portal, and was previously the state secretary in the same ministry.

Doctor of philosophy Aleksandar Lukić is a special advisor dealing with coordination and organization, while special advisor Uroš Švaković deals with matters in the field of international cooperation and European integration and the implementation of EU directives into national legislation.

Suggestions and possible solutions

TS suggestions reloaded

The proposals and possible solutions are, for the most part, identical to those that TS gave in the previous cycle of research on the fulfilment of GRECO recommendations, in April 2024. We are dealing with the problem and solutions that go much further into the past, far before the first analysis was made, and even before they were formulated as concrete recommendations in 2022, within the report on the fifth round of the GRECO evaluation. Transparency Serbia, namely, for almost two decades, has been pointing to the need to legally regulate possible conflicts of interest among advisors to holders of the highest public positions due to the possibility that they can actually influence the making of important decisions.

At the same time, care must be taken not to jeopardize the ability to engage in this way, as advisors, professionals who have their regular jobs and responsibilities, and who are not ready to sacrifice them in order to devote themselves fully to providing support to public officials. Such persons cannot be subject to the same prohibitions and restrictions as for officials, but it is necessary to introduce rules on the basis of which they would be obliged to disclose whether they have any private interest in the matter on which they provide advice and to ensure compliance with those obligations. On the other hand, if advisory positions are treated as a reward for persons who are politically or personally close to officials, or as an opportunity for de facto employment in the state administration of persons who would not meet the requirements for appointment to high positions in the hierarchy, then it would be justified to treat them like any other politically appointed official. It is a concept that was also presented in the last published draft amendment to the Law on Prevention of Corruption.

In its 2022 report, GRECO indicated that the scope of the Law on the Prevention of Corruption needs to be expanded to include all persons in the highest executive positions, including special advisors and government advisors. Based on the recommendations of GRECO, the Agency for the Prevention of Corruption should regularly control the reports on the assets and income of the officials of the executive power (among which will be included their advisors and heads of cabinet).

TS believes that GRECO has well noticed that it is necessary to ensure the transparency of information about who are the advisors of public officials. In the previous analysis, TS recalled the almost comical case of the Prime Minister's "fake advisor"¹² from October 2016 as a good illustration of what is possible when such data are not easily available. The scope of the GRECO recommendations is limited, however, because the recommendations refer only to advisors whose status is clearly defined in the system of executive power (so-called special advisors). However, situations where advisors are hired according to an unknown legal procedure, with an unknown status, for an unknown amount and for an unknown client are not covered¹³.

In order to fulfil the second part of the second recommendation, in connection with the publication ("to be publicly and easily accessible") of the names and areas of competence of all advisors in the

¹² <https://www.transparentnost.org.rs/en/ts-and-media/press-issues/8731-regulating-the-status-of-government-advisors-and-publishing-of-information-related-to-them>

¹³ <https://www.transparentnost.org.rs/index.php/sr/aktivnosti-2/pod-lupom/10312-pitajte-blerov-institut-ko-ga-placa-da-savetuje-vladu-srbije> (in Serbian)

Government and in the president's cabinet, the Government of Serbia, in its anti-corruption strategy and action plans for its implementation (at the time of this analysis, in October 2025, the AP for 2026-2028 is still in the form of a proposal), has foreseen that it should be fulfilled by "publishing the names and competences of the heads of the cabinet and advisors on the official websites of the Government's bodies". According to the first plan, it was supposed to be completed in the last quarter of 2025, but this not overly demanding activity, the fulfilment of which does not require a significant time commitment of much larger human capacities or financial resources, was also included in the proposal of the plan for 2026-2028, i.e. it was postponed to the first quarter of 2026. In the meantime, the Government of Serbia refuses to provide information on the advisors of the Prime Minister and Vice President, and even their number.

Essentially, the planned activity from the Action Plan follows the proposal of TS from the analysis published in 2024 (to be fulfilled through the introduction of the obligation and practice of publication on the websites of the Government, ministries and the President), while it is noticeable that the plan does not mention the President of the Republic. The answer to the question of why this is so could be found in the fact that the Government cannot oblige the President to fulfil the recommendations. During the drafting of the Strategy and the AP, TS pointed out that precisely because of this, these documents (or at least the Strategy) would have to be adopted by the parliament, but there was simply no will for that in the working group, that is, in the Ministry of Justice.

TS indicated in last year's analysis that this GRECO recommendation could be partly fulfilled by the Agency for the Prevention of Corruption (when and if the advisors receive the status of public official), by making it possible to find information on all persons performing a certain public function in its registers of public officials. Even now this kind of search is possible, but not completely reliable (similar functions entered in a different way).

Last year's TS recommendation for a step on the normative plan that would ensure, or at least create the preconditions, for this information to be published, still stands. One of the ways for this would be to specify the act adopted by the Commissioner for Information of Public Importance and Protection of Personal Data. The current Instructions for The Creation and Publication of Information Booklet On the Work of Public Authority Bodies ("Official Gazette of the RS", No. 10/2022) could be specified in this sense, so that the obligation to publish information on public office holders and advisors to public office holders is expressly prescribed.

The analysis of the practice of the ministries shows that the names of the engaged advisors are not published as a rule or that it is not done in a systematic way, which would guarantee up-to-datedness. At the same time, while regulating the obligation to publish becomes part of the official policy of the Government of Serbia, the number of ministries whose names have already been published is decreasing, and the Government itself refuses to provide them upon a request for free access to information of public importance. On the other hand, the names of the advisors of the President of the Republic are published¹⁴, but without additional information about their responsibilities and without biographies.

¹⁴ <https://www.predsednik.rs/en/general-secretariat/advisors>

Draft amendment to the Law "on ice"

Nothing has changed in relation to the Draft Amendments to the Law on the Prevention of Corruption, which was set for public hearing in the period from August 3 to 22, 2022. This text has still not been transformed into a proposal, and the report from the public hearing, which had to be published in early September 2022, is still not available. The reasons for this are unknown.

Although this draft was mainly prepared to respond to some of GRECO's recommendations, it was not done satisfactorily.

The main change in the draft amendments to the law refers to the definition of the term "public official". The adoption of this change would be very important because in this way the unfounded and harmful authentic interpretation of this law, which was adopted by the Assembly in February 2021, will be practically put out of force. As a result of this interpretation several thousand officials lost that status (e.g. school principals). In the new definition, it is expressly stated that cabinet chiefs and advisors will be officials, but only those who perform these tasks within the Government of Serbia and ministries.

These changes are carried out due to the recommendations of GRECO. It is true that GRECO recommended that the term "official" should include heads of cabinet in the Government, as well as advisors to the President of the Republic and in the Government (ministries). However, the sole reason for limiting those recommendations to these cabinet chiefs and advisors was the circumstance that the GRECO evaluation team had a narrowly defined task - to examine the regulations and practices concerning the highest parts of the executive power in the Republic of Serbia. Therefore, there is no reason to limit legislative intervention exclusively to these cabinet chiefs and advisors.

On the contrary, the term "official" should similarly include persons who perform similar tasks in other government bodies (for example, in the National Assembly, in cities, in public enterprises and other state-owned enterprises and the like). Similarly, if the deputy director of the Agency for the Prevention of Corruption is explicitly mentioned, it should be seen if there are any other deputy directors and other officials, who for some reason are not covered by the current legal norms.

In addition to the above, when comparing the proposed legal solution with GRECO's recommendations, it is striking that the proposed definition does not mention the chief of staff and advisors to the President of the Republic (but only those who perform these functions and tasks under the Prime Minister and Deputy Prime Ministers of the Government or individual ministers), so this omission should either be corrected (if this is the case), or in the explanation it should be pointed out that the chief of staff of the President of the Republic and his advisors are already included on another basis.

In order to reflect on the effects of this norm, it should be considered and explained what status the heads of the cabinet and advisors will have as public officials. Namely, the Law foresees a different system of prohibitions, restrictions and obligations for public officials, depending on whether it is considered to be a function that requires employment, that is, permanent work or not. In this sense, it is necessary to present to the public, and above all to future taxpayers, what their obligations would be and to fully consider the justification of such a solution.

Finally, in addition to advisory positions that are formalized and recognized as such in the legal system of the Republic of Serbia, there are numerous situations when it was claimed or speculated that individuals (e.g. former officials of other countries) worked as advisors in the Government of Serbia.

The legal nature of these engagements was not clarified, and it can be assumed that they were in fact consulting contracts, which were not even concluded by the Government of the Republic of Serbia, but by other entities that paid the consultants. Such situations represent an additional danger to the public interest, because the advisor engaged in this way is not responsible for his work to the authority / public official, but may represent the hidden interests of the person who hired him and who finances his work.

Regulating these issues goes beyond the current scope of the Law on Prevention of Corruption (in the sense of including such persons with the term public official), but it certainly deserves to be regulated. The right place for that could still be the Law on Prevention of Corruption, because there is no other regulation that would regulate the work of advisors to all public officials. All the reasons stemming from the need to regulate the conflict of interest in the advisors of individual executive officials who are appointed to those positions, which GRECO pointed out, also exist when it comes to advisors who provide services under a contract (e.g. to disclose whether they have any conflict of interest in connection with the advice they provide). We believe that GRECO would also have recommended the regulation of these issues if it had been aware of the existence of this practice in Serbia.

The norm could read like this:

3) "public official" is:

(1) any person who was elected, appointed or nominated to a public authority, with the exception of persons who are representatives of private capital in managing bodies of companies that are public authorities;

(2) civil servant in position, deputy director of the Agency for the Prevention of Corruption,

(3) head of the cabinet and advisor of the elected, appointed or nominated person (alternative: appointed by the elected, appointed or nominated person)".

Alternatively, in the event that, during the consideration of this proposal and the public discussion, the conclusion is reached that it would be too much of an intervention to include all heads of the cabinet and advisors under the term "officials", then it should be listed who will be covered by the norm, but in such a way that the list is, in any case, wider than the one that represents the minimum for fulfilling the GRECO recommendations. At the very least, it should include cabinet chiefs and advisors at republican and provincial authorities, as well as at the level of the City of Belgrade and other cities.

When it comes to other persons who actually perform consultancy work and do not fall into any of the mentioned categories, a special norm should be prescribed in this law:

"Conflict of interest among persons who provide advice to public officials."

Article ...

The prevention, reporting and method of resolving conflicts of interest of persons who are not public officials within the meaning of this law, and who perform consulting work for public officials on a contractual basis with a public authority, are governed by the provisions of that contract, in accordance with the principles of this law.

Counselling of public officials may not be performed by a natural or legal person who is not engaged by the public authority."

The draft law does not regulate the legal relations arising from the factual termination of validity of the authentic interpretation of the definition of public official, as well as the fact that after the adoption

of the amendments, certain persons would become public officials for the first time based on the amendments to the law (actual advisors, cabinet chiefs, etc.). They must be left with the right to choose - whether they want to continue doing those jobs under different circumstances. Our proposal is to regulate it this way:

"The person referred to in Article ... shall, within 15 days from the date of application of this law, inform the authority responsible for his election, nomination or appointment in writing whether they wish to continue to perform advisory duties, i.e. duty of the head of the cabinet, as a public function."

A person from paragraph 1 of this article who declares positively is considered a public official from the day of the positive declaration. A person from paragraph 1 of this article who declares negative is not considered a public official, provided that they are relieved of their duties, that is, that they terminate the employment contract within six months from the date of application of this law.

In the event that the person referred to in paragraph 3 of this article is not dismissed, that is, if they do not terminate the employment contract within the period referred to in paragraph 3 of this article, they shall be considered a public official starting from the date of expiry of the period referred to in paragraph 3 of this article.

The authority informs the Agency about its actions and the actions of the persons referred to in this article within 15 days from the occurrence changes."

Attachment: Links to responses to requests (in Serbian):

[Government \(General Secretariat\) – request denied](#)

[Government \(General Secretariat\) – second request denied](#)

[President](#)

[Ministry of finance](#)

[Ministry of Interior](#)

[Ministry of Economy](#)

[Ministry of Environmental Protection](#)

[Ministry of Construction, Transport and Infrastructure](#)

[Ministry of Mining and Energy](#)

[Ministry of Domestic and Foreign Trade](#)

[Ministry of Public Administration and Local Self-Government](#)

[Ministry for Human and Minority Rights and Social Dialogue](#)

[Ministry of European Integration](#) [Attachment](#)

[Ministry of Defence](#)

[Ministry of Foreign Affairs](#)

[Ministry of Education](#)

[Ministry of Labour, Employment, Veteran and Social Affairs](#)

[Ministry for Family Care and Demography](#)

[Ministry of Sport – 1st response](#) [Ministry of Sport – 2nd response](#) [Att 1](#) [Att2](#) [Att3](#) [Att 4](#)

[Ministry of Culture](#)

[Ministry for Rural Welfare](#) [Att1](#) [Att2](#) [Att3](#)

[Ministry of Science, Technological Development and Innovation](#)

Ministry of Tourism and Youth

Ministry of Information and Telecommunications

Cabinet of Minister without portfolio in charge of improving the development of underdeveloped municipalities

Cabinet of Minister without portfolio in charge of reconciliation, regional cooperation and social stability