



Local Self-Government Transparency Index 2022

(Local Transparency Index – LTI)

Final Report

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Table of Contents

Executive Summary	4
Methodology	7
General observations.....	10
General evaluation of LSG transparency and perspectives for improvement.....	10
Selected systemic problems and observations	10
Performance of LSGs in the specific areas of the research	13
Overview	13
Fields of the research.....	16
Overview	16
Public procurements	18
Free access to information	18
Budget.....	18
Public Debates and Public Competitions	18
LSGs and citizens	19
Public Enterprises and Public Institutions.....	19
Information Booklets.....	20
Assembly and Council.....	20
Other indicators	20
Performance of 25 LSGs supported by USAID GAI.....	21
Performance of in-city municipalities.....	25
Overview	25
Comparing comparable	26
Categories	26
Year by Year	28
Selected individual examples	29
Budget.....	30
LSG and Citizens	31
Access to Information of Public importance and Information Booklet.....	31
Public Procurements.....	32
Public enterprises and Public Institutions.....	32
Public Debates and Public Competition.....	33
Other issues	33
Comparisons with previous LTI's	35
Recommendations.....	36

Annexes.....	38
Annex 1. Average score per indicator.....	38
Annex 2. Final scores of municipalities compared to the LTI 2021	43
Municipalities that lost more than 10 points since 2021	47
Annex 3: Best performers in categories.....	48
Assembly and Council.....	48
Budget.....	48
Municipality and Citizens.....	49
Free Access to Information	49
Information Booklet	49
Public enterprises and Public institutions.....	50
Public debates and public competitions.....	50
Annex no. 4. LTI indicators comparison 2022 vs.2021	51
Annex no. 5. The list of LTI 2015, 2017, 2019, 2020, 2021 & 2022 indicators	59

Executive Summary

The Local Transparency Index (LTI) 2022 represents Transparency Serbia's research¹, evaluation and ranking of 145 cities and municipalities and 25 in-city municipalities in Serbia. This is the sixth year (fourth consecutive) that Transparency Serbia is conducting the LTI.

Municipalities and cities are ranked based on 95 different criteria that evaluate transparency. The Index scores range from 0 to 100, though in practice, municipalities and cities scored between 9 and 87 along with the Index.

The **average score** for 145 LSGs in the 2022 LTI is 49, one point above the LTI 2021 final score.

Score/Year	2015	2019	2020	2021	2022
Max	74	67	83	90	87
Average	40	40	46	48	49
Min	11	12	18	21	9

Almost half (49%) of all municipalities improved their scores². On the other hand, 46% registered a decrease compared to the previous year³.

As for the categories, the increases were noted in the five areas, only one of them being significant – “Public Debates and Public Competitions”, from 44.3% to 54.7%. Four areas saw a decrease, two of them plunged notably - “Information booklets” from 51.9% to 41.7% and “Public Procurements” from 95.5% to 72.6%. The latter was expected after the new Law on Public Procurement came into force. Namely, the buyers are not obliged anymore to publish information on their website but merely on Public Procurement Portal.

“Assembly and Council” remains the least transparent category. Nevertheless, 25 municipalities supported by the USAID GAI project in efforts to raise transparency marked higher scores in this category than the rest of the LSGs. The discrepancy is even bigger when 13 municipalities, which GAI supported for a more extended period, are compared to other cities and towns. These municipalities also have significantly higher average scores (62 if 13 municipalities from phases I and II are observed or 56 if all 25 are taken into account) than the rest of the LSGs (45). This proves that LTI research and regularly published rankings, in conjunction with the follow-up activities with local governments, is helping to build momentum to increase transparency.

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

² 71 out of 145 where in-city municipalities are excluded.

³ 67 out of 145.

On the individual LSGs' level, 21 local governments registered an increase of 10 points or more in the past year. Twenty one out of 145 municipalities have an LTI greater than 60⁴, with eleven receiving scores above 70 and four above 80.

This time, unlike LTI 2021, no one reached a score of 90⁵. From the point of sustainable growth, it should be noted that 38 municipalities had a constant increase (or at least stagnation) of LTI in the last three research cycles (LTI 2020, 2021 and 2022).

Considering that changes in public procurement legislation and pandemics influenced scores in some categories, results can be labelled encouraging or at least not disappointing. Some municipalities seem to be on a stable course for the past three or four years, and this could be, with a lot of caution, described as sustainable. However, it is still early to conclude that a sustainable level of transparency has been reached nationwide. There are still large fluctuations in both halves of the table. Namely, some good performers from previous LTI cycles were underachievers in this research; some municipalities with high increases in LTI 2021 had their scores decrease in LTI 2022.

On the other hand, some longtime underachievers increased their scores significantly. Elections held in 2020, personal changes which followed, combined with relying on "political will" in the absence of written procedures for maintaining transparency, might have resulted in both positive and negative changes in scores in some municipalities.

The main conclusion is unchanged from two previous research cycles since 2020 - **significant and continuous efforts are still needed to improve and maintain transparency even among the best performers**. Clear procedures for reaching and maintaining transparency must be adopted, prescribing precise responsibilities and accountability, but even more – these procedures must be implemented.

USAID supported some municipalities adopting acts prescribing those procedures. A further boost could be given by introducing legal obligations for local governments (regarding transparency) by the central government. **Better results are visible in the areas where laws prescribe transparency**. When obligations are abolished (as it was related to public procurements), not many municipalities will hold on to good practices. Also, pandemics were an excuse to abolish some practices, but there was no effort noted to design new online tools (or use existing tools) for communication of local administration with citizens and businesses.

Individually, there were few changes within the top 10 municipalities, with the most significant leap by Tutin, from position 93 to 4, and the score growing from 42 to almost double – 81.

Bečej fell down the ladder from 1st to 13th, Petrovac and Temerin from 17th to 66th.

On the other hand, Užice rose from 15th to 6th. Pirot, Raška and Kruševac should be mentioned for a notable leap up the scale – from 102nd to 14th, 41st to 19th and from 70th to 12th, respectively.

Novi Pazar scored highest, and Sombor kept its second position:

⁴ There were 20 in LTI 2021 final and 13 in LTI 2020 final ranking.

⁵ Last year's top ranked Bečej plunged from 90 to 67, which is the biggest decrease in LTI 2022 vs LTI 2021.

LTI range/score	LTI 2022	LTI 2021	LTI 2020
Novi Pazar	1/87	4/78	2/82
Sombor	2/85	2/88	3/80
Sokobanja	3/84	5/75	8/68
Tutin	4/81	93/42	78/45
Kanjiža	5/79	3/83	4/77

From both a positive and negative perspective, the LTI 2022 results demonstrate the influence of abolishing legal obligations, the pandemics (without introducing new practices for interaction), and direct support to local municipalities on transparency. After preparing mechanisms that should guarantee that improvement does not depend on the political will or enthusiasm of individuals within the local administration (as it was done with municipalities included in the GAI project), those mechanisms should be disseminated further, and LSGs should be supported (and monitored) to implement them. LTI itself, as a long-term tracking mechanism, proved once again as a guideline for local governments willing to increase the transparency of their work and for citizens to understand in which areas and how the performance of their municipalities may be improved.

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 Serbia⁶. TS applied this index for the first time in 2015, when 168 cities were evaluated. The survey was repeated on a small sample of 15 municipalities and cities two years later, in 2017. In 2019, TS applied nationwide research again, the first out of four in the row, envisaged to be supported by the USAID. It was applied again in 2020, 2021 and 2022.

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. It could also motivate changes in regulations and practice in problematic areas in the large number of units of the local self-governments. Besides that, continuous monitoring encourages competition among LSGs, as confirmed in the previous cycles. Transparency Serbia was convinced, and it proved to be true, that sustainable funding for nationwide LTI in the 2019/2022 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 in a range from 0 to 100. In 2022, same as in LTI 2019, LTI 2020 and LTI 2021, 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 90 others 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 centers 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 “city municipalities”. For the purposes of this report, both municipalities and city municipalities are collectively referred to as “units of local self-government” (LSG) - though this is not formally the case for city municipalities.

All one hundred and forty-five (145)⁷ 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 the municipalities, as their scope of duties depends solely on decisions of relevant city statutes. That 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

⁶ When designing the LTI, similar previous experiences of members of the Transparency International network were used, especially the Slovak branch, and the GONG organization from Croatia, whose methodology was used by TI BiH.

⁷ 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“).

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

When comparing LTI 2022 results with [LTI 2015](#), [LTI 2019](#), [LTI 2020](#) and [LTI 2021](#), one should have in mind that Transparency Serbia, in the meantime, adjusted indicator questions⁸. 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 individual 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)⁹.

In work on data collection, 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.

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 24¹⁰ LSGs or 16% (three cities, 18 towns and three in-city municipalities), which is far better than in 2021 (total of 46 LSGs or 27% - six cities, 27 towns and 13 in-city municipalities). This is same as the 2020 final response (24 LSGs 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,

⁸ 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.

⁹ 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

¹⁰ Four responded within the verification process.

the request was signed by an individual citizen who provided a private mail address for answers. Within this indicator, we did not want to measure transparency about any particular information but to establish if the units of the local self-government would respond equally to the requests of an ordinary citizen, as they do when receiving a request from a civil society watchdog organization. This year, 125 local self-governments responded to citizens' requests and provided requested information. It is fewer than in 2021 (130), 2020 (138) and 2019 (150), thus indicating the stable trend of lower compliance with the Law on Free Access to Information in general.

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 report¹¹. 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 kilometers in this research and visited all 170 local self-government units. We visited municipal administrations, more precisely, LSGs' service centers. In that way, we established the state on the spot for five indicators. These visits took place in November 2021.

Due to the pandemics, our researchers faced some restrictions, but not as many as in LTI 2021 cycles.

Same as each year, TS researchers were confronted with the suspicion of employees in service centers 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 remained unchanged. In 2022 51 LSGs (out of 170, exactly 30%, compared to 46 LSGs in 2021, 37 in 2020 and 74 in 2019) responded to the call for verification. Verification resulted in growth of average LTI score by two points, compared to preliminary calculation.

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**. 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.

¹¹ Due to huge number of appeals and low level of capacities, Commissioner's decisions on appeals are usually delayed for several months.

General observations

General evaluation of LSG transparency and perspectives for improvement

The main observation about LTI 2022 is that **sustainable transparency has not been reached** and, in most cases, **progress is made when LSGs are assisted** (supported by various programs, national or local NGOs) and/or when there is a **political will** to “cash in”, in a political sense, on transparency and anti-corruption. In some cases, **competition between LSGs** propelled success which, however, might be questionable from the sustainability point of view. Rules established at the national level could be helpful for this cause. Pandemics and measures aiming to prevent the spread of the virus are still influencing transparency in a negative sense. LSGs didn't develop new mechanisms to replace those abolished for health reasons. As for the rest, the observation from several previous research cycles still stands - **scores are higher, and the transparency is higher in those areas in which the law prescribes explicitly a duty to publish information and sanctions for their violation**. The case of the public procurements, where some legal obligations were abolished, and scores significantly dropped (from 95.5% to 72.6%), proves this observation. Some improvement was made in the field of “Public debates and public competitions”, but the average score (54.7% compared to 44.3%) is slightly above the level of LTI 2020. It is, however, higher than LTI2019 (43.8%), the year before the pandemics, which could be encouraging.

Steady growth is noticeable in the field of “Public enterprises and public institutions”, from 29% in LTI 2019 to 47.6% in LTI 2022. Law on Public Enterprises prescribes the obligation and penalties for unpublished data. However, besides legal obligations, the implementation of the prescribed mechanisms, including penalty mechanisms, is of enormous importance. There are no charges for braking obligations prescribed by the Law on Public Enterprises, and 15% of the observed PEs (from the sample) **don't have their own website**. On the other hand, this is an improvement in comparison with LTI 2021, when 22% of the observed PEs had not fulfilled this obligation prescribed back in 2012.

The **research again identified some examples of good practices, some of them maintained for several years and some good practices replicated. On the other hand, most of bad practices also persist.** These include insufficient budget information. The average score in this area raised from 55% to 56.7%, but it is still under LTI 2020 level (59.2%). There was no improvement over the past three years regarding the problem with unavailable or inaccessible information on the decisions of the local assemblies. After notable improvement regarding information booklets in LTI 2021 (33.6% to 51.9%), the decline was noted in LTI 2022 (to 41.7%).

Selected systemic problems and observations

As noted earlier, all LTI research cycles show how a lack of transparency decreases the possibility of holding local government accountable. For the past three years, the average score in the area “Assembly and Council” has been around 35%. At the same time, there was no significant change in the average score of the indicator that measures whether decisions made at the sessions of local assemblies can be found. It raised from 33.1% in LTI 2021 to 35.2%¹² this year. That is worrying regarding the fact that still almost 20% of local self-governments have no Official Gazette of the town, or a link to it, on their websites. In combination, the lack of transparency for these indicators makes

¹² All data related to 145 cities and municipalities, unless otherwise indicated.

monitoring of city/municipal regulation significantly harder. The agenda of the next assembly's session is posted at only 46.9% (49% in LTI 2021) of the LSGs websites, and the proposed documents for the next session at 24% (20% in LTI 2021). There is even less transparency about municipal council – decisions can be found on 14.5% of the LSGs websites.

The current budget was not published at all on the websites of 6.9% of local self-government units. Furthermore, many budgets (21%) are not published in a machine-readable or at least searchable format. That means that they are published in non-searchable form but as scanned images in PDF. In LTI 2021, it was noted as “encouraging” that the “citizens’ budget” was published by more LSGs than in LTI 2020 (an increase from 55.1 to 57.9%). In LTI 2022, it was found on 56.6% of the LSGs websites.

After the plunge caused by pandemic measures, there was some improvement in organizing public debates on budget issues (citizen surveys or consultation). It raised back to 55.2% from 39.3%, which is still far from 77% in 2020 research. It should be noted that not a single LSG organized an online debate in cases when physical budget debates were abolished “due to health measures”.

Improvement noted in the field of “Public Debates and Public Competitions” is caused mainly by the relaxation of some health measures during the 2021 and organizing public debates on issues other than budget. As for public competitions, more results for both media and NGOs allocations’ competitions have been published, and the discrepancy between the percentage of the LSGs with competitions published and the results published has narrowed.

As mentioned above, there is a slight improvement in the LTI 2022, but steady progress since LTI 2019 is visible in the area of Public Enterprises and Public Institutions. However, the average score is still far below the desirable level (47.6% in LTI 2022). This area remains one of the most problematic. The practice of appointing affiliated party managers of these entities is a notorious fact and not a secret. In some cases (as seen at the state level in the EPS manager affair) party affiliation completely prevails over expertise. Even if (or when) this is not the case, LSGs do not sufficiently address these concerns through increased transparency.

Despite the legal obligations, 15% of the observed PEs do not have their own websites. This is the case with 26% of the observed PIs. In 29% of LSGs, there was at least one case of the PE’s director holding a position after its acting director term ran out and public calls not being published or executed. Comprehensive information about directors’ selection procedures can be found on websites of 7.6% of LSGs (11 LSGs, compared to 6 in LTI 2021), with the situation being a bit better, but far from good, when it comes to basic information about these procedures – they are published on 17.2% LSG’s website (down from 20.8% in LTI 2021). Although improved from the previous research, the situation with publishing work plans and reports on the work still proves how neglected this area is – we found around 45% of these documents for the observed PEs, although this is a legal obligation.

The good news from LTI 2021 remains – more LSGs each year have sections on their websites dedicated to PEs (89.7% compared to 86%) and PIs (89.7% compared to 83%). As noticed last year, this is the first step towards the page with comprehensive information and documents, which TS has been proposing in all previous research conclusions.

Some improvement has been made regarding one of the most remarkable discrepancies noted in LTI 2021. Last year 95.2% of LSGs published public calls for leasing property in its possession, and only 4.1% (6 LSGs) published reports about these leases. This year, there were 97.9% LSGs that published calls and 26.2% published reports.

A lot of municipalities had their development strategy valid until 2020. Not adopting new strategies resulted in a considerable decrease for this indicator in LTI 2021 – from 77.9% to 34.5%. Now, this indicator has risen, but not to the previous level. In LTI 2022 it stands at 56.6%.

There is a stagnation in the area of free access to information as a whole. However, within the category, there are some significant variations. After the large decrease in the number of municipalities which ignored requests – from 23% of those with no complaints filed against them in LTI 2020 to 40% in 2021, the score is back to 23% in LTI 2022. This might prove the TS presumption from the previous cycle that improvement was actually a consequence of the decrease in the overall number of appeals submitted to the Commissioner against LSGs and local public enterprises decreased in 2020 compared to 2019.

There was no notable change in the number of LSGs which ignored the request sent by TS’ “mystery shopper” – 45¹³ in LTI 2022, compared to 40 (out of 170) LSGs in LTI 2021. Of these 45, 22 did not submit the requested information in 2021 either, seven of them have a three-year continuity in not replying or non-submission of information to TS’ “mystery shopper” (Subotica, Plandište, Bogatić, Loznica, Valjevo, Svilajnac, Kostolac), and two municipalities didn’t reply not even once since 2019: Svilajnac and Kostolac. For those eight non-reply persistent cities, municipalities and city municipalities, the data were crossed with two other indicators related to the procedure in the field of access to information of public importance - complaints due to ignoring other requests and having unexecuted decisions of the Commissioner. A serious problem with access to information seems to exist in Subotica, Bogatić, Loznica, Valjevo, Svilajnac and Kostolac.

After the brief improvement in LTI 2021 in the area of the Information Booklet (33.6% in previous to 51.9%) , the average score is down to 41.7%. It is propelled by the previously mentioned problem with the public procurement-related obligations (this indicator falling from 55.2% to 35.9%) and by less information about services provided to citizens, containing (for LTI standard obligatory) information about deadlines for municipal services. However, those four indicators in this section don’t give the complete picture of the situation regarding this instrument for proactive transparency. Notes taken by TS researchers indicate that these documents can still be significantly improved – they are often bulky, with unnecessary information (such as complete budgets from a few years ago), with a huge number of hard-to-read images (scanned documents) instead of text or tables, with data 5-6 years old. TS worked on the improvement of the Information Booklet with two LSGs supported by the USAID GAI project and produced a methodology for evaluating and improving Booklets.

The format and layout of published information remain an issue, even when data are generally transparent. Promoting good practices or good models for some sections (such as “Public Enterprises”, or “Public Procurements”, “Budget”) as a positive example nationwide or to municipalities included in certain projects would be helpful. Also, separate portals for public procurement, budget, urban planning can be a good practice example. E-registers of administrative procedures are useful not just for the sake of “user-friendliness” and search facility but also for providing a more significant amount of information.

¹³ **Subotica**, **Žitište**, Zrenjanin, **Nova Crnja**, **Sečanj**, Čoka, Vršac, Kovačica, **Plandište**, Apatin, Temerin, Indija, **Bogatić**, **Loznica**, Šabac, **Valjevo**, **Žagubica**, Topola, Paraćin, **Jagodina**, **Svilajnac**, Kosjerić, **Prijepolje**, Kraljevo, Tutin, Brus, Čičevac, **Merošina**, Svrlijig, Blace, **CrnaTrava**, **Bujanovac**, Vladičin Han, **Preševo**, Barajevo, Grocka, Novi Beograd, **Obrenovac**, **Rakovica**, Savski Venac, **Sopot**, Stari grad, **Čukarica**, **Medijana**, **Kostolac**. (Bolded - LSGs which haven’t replied to 2021 request, bolded and underlined – haven’t replied in 2021 and 2020)

Performance of LSGs in the specific areas of the research

Overview

The scores are higher, and the transparency is increased when laws explicitly prescribe a duty to publish information, when sanctions for their violations are also envisaged, and when those sanctions are regularly implemented. This was the case with public procurements, but changes in the legislation abolished the obligation to publish information on the buyers' websites, which resulted in lower scores for many LSGs¹⁴. The mere existence of the obligation and penalties for unpublished data doesn't automatically result in compliance with the law and higher obligation. The proof of this is public enterprise-related information. The average score for this area is still low (47.6%), although steady improvement has been made since 2019 when the score was 29%. Not only the sanctions for breaking the law regarding the transparency (either at the local or national level) had never been implemented, but the bad examples had been given all the time long by the Serbian government and the SOEs.

The research again identified some examples of good practices, some of them maintained for several years, some good practices replicated, but, on the other hand, most of the bad practices also persist. These include insufficient budget information. The pandemics can't be blamed again. The lack of effort to adapt some mechanisms to pandemics is visible from the responses of LSGs to indicator questionnaires sent by TS and from information collected from their websites. This is particularly applicable to the lack of online public debates when physical ones are abolished due to health safety reasons, organizing direct online contact with LSGs' officials (mayor, deputy etc.) or introducing mechanisms for monitoring the status of citizens' cases thorough the local administration.

The budget for 2022 is not published on the websites of 18 LSGs (out of 170, including city municipalities). The justification/explanation of the budget is not available on the website of another 59 LSGs. On the other hand, it is encouraging that the "citizens' budget" is published on 93 observed websites. This is almost equal as the 2021 result (94).

The number of LSGs which published the complete documentation from the election process of directors of public enterprises has doubled from 2021 (14 from 7), and 27 had published at least some documents which can provide a relatively high level of transparency (four less than in previous research). There has been an improvement in publishing information about property leases – 42 (compared to nine in 2021). On the other hand, it means that that information can't be found on 115 websites of LSGs because the public calls were found on the websites of as many as 157 municipalities, cities and city municipalities.

As mentioned, and explained before, there is a significant decline in the area of public procurement – almost all LSGs have a section on their websites dedicated to public procurements (166 out of 170), but a number of LSGs which publish public calls and other documentation has dropped significantly (from 159 to 95).

Same as before (LTI 2021, 2020 and 2019), LSGs performed relatively well in the area of "free access to information" - they complied in 96% of cases with a duty to inform citizens on how to submit

¹⁴ They are obliged to publish information on PP Portal only.

requests. However, this information is visible in printed form only in nine service centers or administration premises.

Local public enterprises and institutions remain problems for transparency. Out of 145 observed, 22 PEs and 38 PIs do not have their websites. In 29% of LSGs, there was at least one case of the PE's director holding a position after its acting director term ran out and a public call not being published or executed. The situation with publishing work plans and reports on the work, although being a legal obligation, proves how neglected this area is – we found around 45% of these documents for the observed PEs and merely 17% for the PIs at the websites of LSGs, PEs or PIs. The good news from this area is that more LSGs have sections on their websites dedicated to PEs and PIs (89.7%). This could serve to build pages with comprehensive information and documents and help improve transparency in this area on a large scale.

As mentioned, public debates were affected by the pandemics, but on a smaller scale than in previous research. We found data on the website of 104 LSGs about the conducted public hearings/debates over the last 12 months, compared with 79 in LTI 2021. However, that information was found on 120 websites in the research cycle before the pandemics (LTI 2020). Only 38 of those 104 published reports on public debates containing information on proposals made by citizens and the reasons for acceptance/refusal.

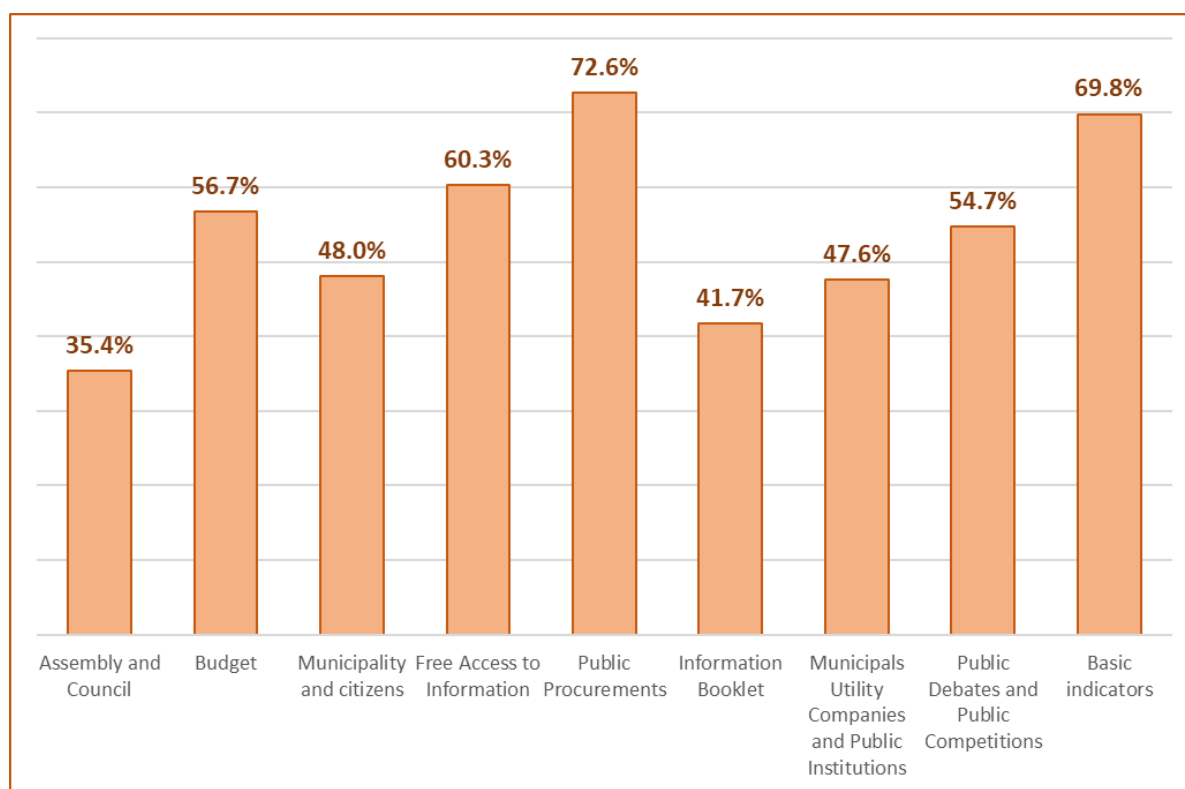
LSGs largely follow the legal requirement to publish inspection lists (94.5% of municipalities). One-fifth of LSGs evaluated citizen satisfaction with services during the last four years or used such evaluation provided by others (NGOs, donors, etc.).

In the area of Assembly and Councils, the only indicator where LSGs performed well was publishing the list of assembly members (91.7%). However, contacts with assembly members (e-mail addresses, phone numbers, direct forms) are found on websites of merely 15.2% of LSGs. The agenda of the next Assembly's session is not visible in over a half of LSGs, while voting results are available in 18% of cases. In addition, just the half of those publishing agendas also publish draft documents to be discussed at the session. City/municipality council decisions are available in 14.5% of LSGs only and those of assemblies in 35.2%.

In other, non-categorized indicators, LSGs performed best for the mayors submitting a declaration of assets to APC: 99.32% of them did it (all but one). The Systematization act of municipal administration was available at 64%, lower than in 2021 (78%) but still better than in 2020 (53%). Code of Ethics for civil servants was available on the web in 49% of cases. According to data from the Agency for the prevention of corruption, local anti-corruption plans, although mandatory, are adopted by 107 out of 145 (they are mandatory only for cities and municipalities, not for in-city municipalities), which is six more than in 2021.

It is important to mention that **poor scores in some categories do not necessarily mean that corruption is widespread in the related areas. Similarly, good scores by no means guarantee that the process is free from corruption.** Transparency is just a mechanism for easier detection or 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 having a higher LTI, and vice versa. The fact is that a low LTI should "wake up the public" and local administration and management, while high LTIs mean that corruptive behavior will be more difficult to conceal and easier to detect.

Graph no 1: Percentage of successful performance of 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.

Fields of the research

Overview

The LTI observes transparency within eight broad areas. Thirteen questions are not grouped within the broader categories, as they are focused on rather narrow areas, such as transparency of municipal administration work plans, codes of ethics, spatial plans etc. Within those eight categories, the best performance was identified in the area of public procurements (72.6% of maximum score). However, this is far below the score from previous years, when public procurements were regularly rated above 90%.

High scores from previous evaluations were a consequence of clear, comprehensible legal duties in that area: the fact that LSGs were required to publish information on the central government's Public Procurement Portal under penalty of sanctions for non-compliance and to publish that information on their own websites. The obligation to publish it on their websites was abolished in 2021. and it resulted in lower scores overall.

Aside from public procurements, 145 LSGs obtained more than half of possible scores in the area of free access to information (60.3% - little lower than in LTI 2021), budget (56.7%) and in the area of public debates and public competition (54.7%).

When it comes to the individual indicators, there were 10 out of 95, with more than 90% of municipalities having positive scores: existing section on the website dedicated to public procurements (even if only PP plans are published there), publishing working hours, publishing number of employees in local administration, publishing spatial/urban plans, publishing information how to submit a request for access to public information, mayors submitting declarations of assets, announcing calls for leasing public property, publishing budget, publishing inspections controlling lists, publishing list of assembly members.

At the bottom of the table, there are no indicators with a zero score. The lowest score (just one LSG) is for the indicator for publishing information on how individual members of the assembly voted at the assembly session.

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

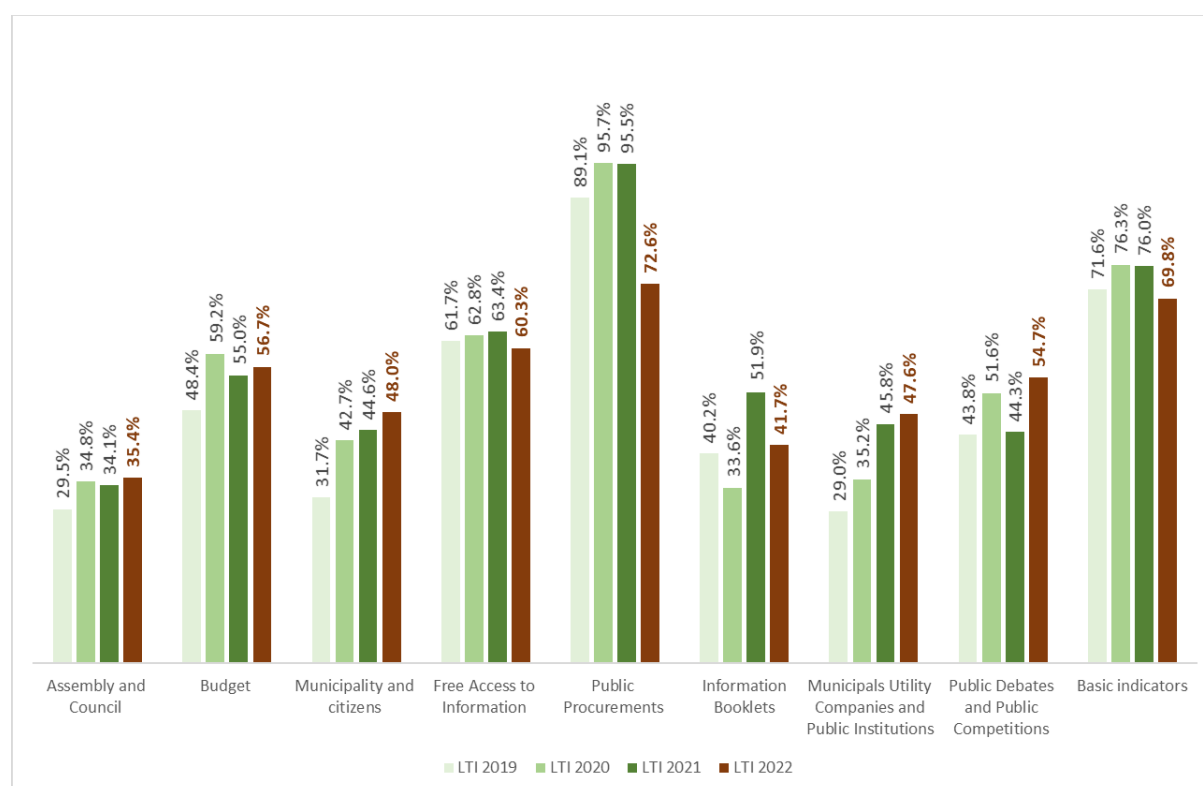
	Assembly and Council	Budget	Municipality and citizens	Free Access to Information	Public Procurements	Information Booklet	Municipals Utility Companies and Public Institutions	Public Debates and Public Competitions	Basic indicators
Average	5.7	7.9	7.2	3.6	2.9	1.7	8.6	5.5	7.0
% of max score	35.4%	56.7%	48.0%	60.3%	72.6%	41.7%	47.6%	54.7%	69.8%

Legend: Score range 0 to Max score for certain category

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

Same as in previous two years, performance was worst in the category “Assembly and Council”. It is slightly better than before in “Public enterprises and public institutions”, with constant growth over the past three years, but still at the rather low level (47.6%).

Graph No 2. LSGs overall performance by categories in 2022 vs 2021 vs 2020 vs 2019



Legend: Comparison of LSGs overall performance in all fields, 2019 vs 2020 vs. 2021 vs. 2022

Public procurements

The category of “**public procurements**” generally used to be the best one. Almost all LSGs have a page on the website dedicated to public procurements, but only half of them still publish information about current procurements and have information about procurements from the past 12 months. It should also be noted that this finding is limited only to the availability of select procurement-related documents as the scope of the analyses does not entail an assessment of the procurement processes themselves.

Free access to information

LSGs performed relatively well in this area. More than 95% of them comply with the duty to inform citizens on how to submit requests. However, only 4.1% provide the same information on their premises. Three-quarters of LSGs (76.6%) provided requested information (in a timely manner) to TS’s “mystery shopper”. There were no significant changes since LTI 2021.

In this category, one municipality had a maximum score of 6: Sokobanja, while 26 LSGs had a very good score of 5.

Budget

Performance in the “Budget” category slightly improved (from 55% to 56.7%). The current year budget document is available on most LSGs’ websites (93.1%), in four-fifths of cases, in machine-readable or at least searchable form. The situation is significantly worse regarding the availability of data on budget spending, where only 39.3% (same as in 2021 and less than 2020 - 43%) of LSGs published at least those reports. Audit reports were discussed and published in 24.1% (20% in 2021) of instances. The decrease in public debates area caused by pandemics in 2021, when it fell from 76.6% to 39.3%, has been reversed, but the score is far below the pre-pandemics period – 55.2%.

In the category of “**Budget**”, the best score had Sombor, Užice, Sokobanja and Tutin – maximum of 14 points, followed by 10 LSGs having score 13.

Public Debates and Public Competitions

Regarding public debates, 71.7% (54.5% in 2021) of LSGs published information about some hearing/debate held during the previous 12 months (other than a consultation on a municipal budget). This is at the level of the pre-pandemic result (72%). However, only 38 LSGs (26.5%) published reports on public debates, which contained information on proposals received from citizens and reasons for the acceptance/refusal of those proposals. The disparity between the announced leasing of municipal property (97.9%) and published information about the outcome of those announcements (26.2%) is

large, but it should be noted that it is significantly smaller than in 2021 (95.2 : 4.1) For the second consecutive year, the disparity is getting smaller when it comes to the publishing of information about the distribution of municipal funds for media and CSO projects, where we found announcements in 81.4% and 85.5% (79.3% and 76.6% in 2021) of cases respectively and results in 69.7% and 72.4% (53.8% and 44.1% in 2021) of cases. It is also getting better, but very slowly, when it comes to justifying to the public how this money was spent and what has been achieved – reports are published in 7.6% (11 cases, compared to eight in 2021) and 8.3% (12 cases, compared to seven in the previous year) respectively.

In this category, Novi Pazar, Blace, Kruševac and Tutin scored maximum 10 points, Užice Sombor and Vladimirovci had nine points.

LSGs and citizens

In this area, the most transparent aspects are information on working hours (not very demanding) and publishing inspection controlling lists on the website (legal obligation). More than 54% of LSGs provide the possibility on their websites for citizens to report irregularities or violations of laws, including corruption. Such a possibility exists in 65% of LSGs' service centers or other premises. One-fifth of LSGs conducted research on satisfaction with their services during the last four years or used surveys provided by others (NGOs, donors).

Just one municipality (Novi Pazar) reached a maximum score (15) in this category, and Sombor followed it with 14 points.

Public Enterprises and Public Institutions

There are more LSGs each year with a special section on their websites with information about PEs and PIs – 89.7% in LTI 2022, compared with 82% in 2021 and 70% in 2020. There is still a large number of observed PEs without their own websites (15%), although there has been a legal obligation to post certain information and documents on their website since 2012. Almost 30% of LSGs have at least one director not elected at the public competition or being an acting director after the maximum term prescribed by the law runs out.

Comprehensive documents on the competition process for electing directors can be found on a handful of LSGs' websites (7.6%, compared to 4.1% in 2021), and at least some documents can be found in 17% of cases.

In the category "Public enterprises and Public institutions," the best ranked are the municipalities of Tutin (maximum – 18 points), Kanjiža (17), Sokobanja (16), followed by Bečej, Pirot and Užice (15 out of 18).

Information Booklets

The average score in this area dropped to 41.7% after a huge increase in 2021 (51.9% from 33.6%). It should be taken into consideration that LTI focuses on a few issues regarding Booklets, and some of the information TS researchers are looking for does not need to be updated regularly. On the other hand, notes made by researchers indicate that Information Booklets are often bulky, with a lot of old redundant information. Thirteen LSGs had the maximum score of 4.

Assembly and Council

Same as before, the only aspects of transparency where assemblies and councils performed well were publishing the list of their members (91.7%) and making the Official Gazette available on the website (81.4%). Even the next Assembly's session agenda was not visible in more than half of the LSGs. Furthermore, nearly half of those publishing agendas (46.9% in total) for municipal sessions also publish draft documents to be discussed at the session of the local parliament. Municipality council decisions are available in 14.5% of LSGs only, and those of assemblies are available in 35.2%.

On the other hand, there are some good examples even in this field - Sombor had a score of 15 (ot of 16), followed by Kragujevac, Niš and Vranje with 14 and Vladičin Han, Sokobanja and Novi Pazar with 13 points.

Other indicators

In non-categorized indicators (other), LSGs performed best when it comes to publishing the number of employees (this information can be found in Information Booklet, in Budget or as separate information on the website), publishing spatial/urban plans and having a declaration of assets submitted to the Anti-corruption Agency (Agency for Preventing Corruption) by the mayor.

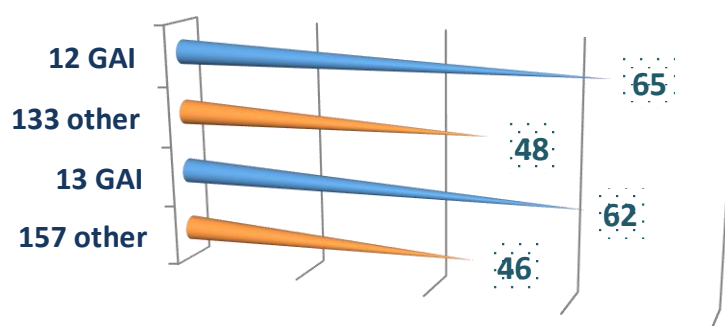
Information on municipal property leased to other entities is published in ten cases, which is encouraging compared to previous years' results (three in 2021 and one in 2020). Reports on contact with lobbyists (or at least forms for contacts) can be found in five instances, and a weekly schedule of the mayor's activities is published on six LSGs' websites.

Performance of 25 LSGs supported by USAID GAI

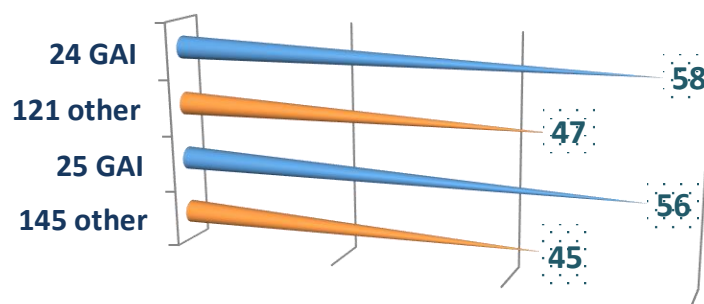
TS compared the performance of 25 cities, municipalities and in-city municipalities supported by the USAID GAI project with the rest of the LSGs. There are two separate comparisons – those 13 supported within the phase I and II, and 12 LSGs which were included in phase III (just one year). Within the first group, there is one in-city municipality. Therefore, comparisons are made between 12 “GAI cities and municipalities” and 132 other cities and municipalities, and between 13 included LSGs and all other LSGs (157 of them), as well as 24 “GAI cities and municipalities” and 121 other cities and municipalities, and between all 25 included LSGs and all other LSGs (145 of them). The average score of GAI LSGs is significantly higher than the average score of other LSGs:

Graph no. 3: Average score LTI 2022 – LSG’s included in USAID/GAI program and other LSGs

A)



B)



In the following two tables, it can be seen how “GAI LSGs” performed by categories, and how they stand in each category, compared with non-GAI LSGs:.

Table no. 2: LTI 2022 score – LSG's included in USAID/GAI program– indices by categories

	LTI		Indices by categories								
			Assembly and Council	Budget	Municipality and citizens	Free Access to Information	Public Procurements	Information Booklet	Municipals Utility Companies and	Public Debates and Public	Basic indicators
LSGs			max 16	max 14	max 15	max 6	max 4	max 4	max 18	max 10	max 10
Sombor	85		15	14	14	5	4	2	11	9	10
Žabalj	62		3	13	11	4	2	3	12	6	6
Sremski Karlovci	47		3	7	8	3	4	3	9	5	8
Irig	44		6	7	7	3	1	1	8	6	8
Sremska Mitrovica	53		3	13	7	4	4	3	11	5	8
Šid	40		3	5	6	4	4	1	6	5	8
Krupanj	54		7	9	9	5	4	3	8	3	8
Ljubovija	51		5	13	6	4	1	1	11	4	6
Šabac	45		4	6	10	2	4	3	6	6	6
Mionica	45		8	7	7	4	2	3	5	3	8
Veliko Gradište	76		12	13	10	5	4	4	14	7	10
Kragujevac	65		14	8	7	4	4	1	13	7	10
Požega	57		11	7	8	4	4	4	9	4	10
Priboj	49		10	8	7	4	1	0	8	5	8
Sjenica	51		10	6	7	5	4	4	4	4	10
Čajetina	53		8	9	9	3	4	2	9	3	8
Vrnjačka Banja	70		12	12	9	3	4	1	13	8	10
Novi Pazar	87		13	12	15	5	4	3	14	10	10
Raška	62		6	11	11	4	3	2	13	6	8
Varvarin	52		3	11	7	4	3	2	7	7	8
Niš	64		14	8	5	3	4	1	14	8	10
Bela Palanka	37		1	9	3	4	4	0	3	5	6
Dimitrovgrad	57		11	7	6	4	4	1	10	8	10
Vranje	74		14	13	11	3	4	1	11	8	10
AVERAGE	58	AVERAGE	8.2	9.5	8.3	3.9	3.4	2.0	9.5	5.9	8.5
All 145		AVERAGE	5.7	7.9	7.2	3.6	2.9	1.7	8.6	5.5	7.0
All 170		AVERAGE	5.3	7.6	7.1	3.6	2.7	1.7	8.0	5.1	6.5
Stari Grad *	28		6	5	6	2	1	1	3	0	4
All 25	56	AVERAGE	8.1	9.3	8.2	3.8	3.3	2.0	9.3	5.7	8.3

Table no. 3.: LTI 2022 – LSG’s included in USAID/GAI program and other – indices by categories, percentage

LTI 2022 12-133, 13-157, 24-121 and 25-145 comparison

LTI	Indices by 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
	(max 16)	(max 14)	(max 15)	(max 6)	(max 4)	(max 4)	(max 18)	(max 10)	(max 10)
12 GAI	62.0%	73.2%	62.8%	63.9%	93.8%	52.1%	61.1%	70.8%	90.0%
133 other	33.0%	55.3%	46.7%	60.0%	70.7%	40.8%	46.4%	53.2%	68.0%
13 GAI	60.1%	70.3%	61.0%	61.5%	88.5%	50.0%	57.7%	65.4%	86.2%
157 other	31.1%	52.8%	46.0%	59.1%	65.1%	43.0%	43.6%	49.6%	63.1%
24 GAI	51.0%	67.9%	55.6%	64.6%	84.4%	51.0%	53.0%	59.2%	85.0%
121 other	32.2%	54.4%	46.4%	59.6%	70.0%	39.5%	46.5%	53.7%	66.9%
25 GAI	50.5%	66.6%	54.9%	63.3%	82.0%	50.0%	51.6%	56.8%	83.2%
145 other	30.3%	51.8%	45.7%	58.7%	64.1%	42.1%	43.5%	49.7%	61.8%

They performed almost equally or better in all categories, with the most significant discrepancy in the area “Assembly and Council” and “Public Procurement”. Despite the difficulties mentioned above, 13 LSGs succeeded in keeping their average score over the 50% mark in all categories. Even when observed all GAI supported LSGs, including those which had support just for one year, average scores are far above the rest.

One should have in mind that this is, however, an average score and that actually, there were excellent performances and some underachievers amongst those 13 and 25. It can be seen in the following table – 11 LSGs improved their score, and 14 have decreased it.

Table no. 4.: LTI 2022/ LTI 2021 comparison – LSG's included in USAID/GAI program

LTI 2022 final rank	LTI 2022	LSG	LTI 2021 final rank	LTI 2021
1	87	Novi Pazar	4	78
2	85	Sombor	2	88
7	76	Veliko Gradište	9	71
8	74	Vranje	5	75
10	70	Vrnjačka Banja	13	75
14	65	Kragujevac	11	68
18	64	Niš	103	40
19	62	Raška	41	53
19	62	Žabalj	20	60
25	57	Indija	23	58
25	57	Požega	41	53
25	57	Dimitrovgrad	88	43
38	54	Krupanj	30	55
39	53	Sremska Mitrovica	58	49
39	53	Čajetina	29	55
46	52	Varvarin	26	56
50	51	Ljubovija	29	55
50	51	Sjenica	108	39
61	49	Priboj	35	54
76	47	Sremski Karlovci	113	38
86	45	Šabac	55	50
86	45	Mionica	46	52
113	40	Šid	113	38
127	37	Bela Palanka	113	38
	31	Stari grad*		35

Performance of in-city municipalities

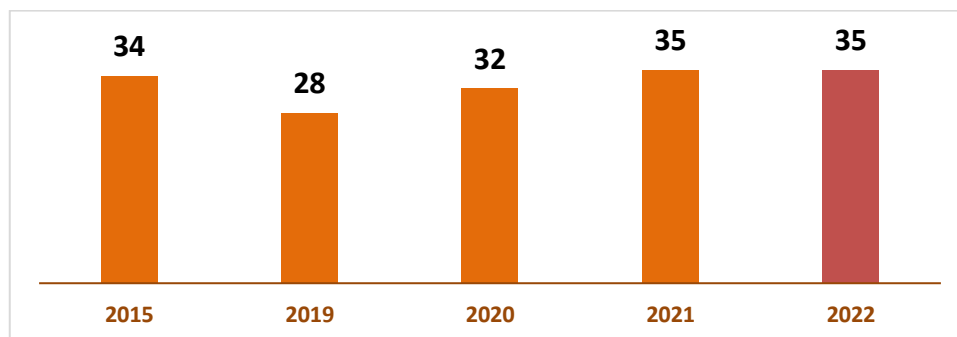
As already stated in the Methodology section, city municipalities do not have the same jurisdiction as other LSGs since their scope of duties depends solely on decisions of relevant city statutes, and that practice differs from city to city. Furthermore, some of the observed indicators are not applicable to the city municipalities. Thus, Transparency Serbia has evaluated 25 city municipalities, comparing their performances in 2022 with previous years (2021, 2020, 2019 and 2015), but did not rank them.

Overview

The most general observation is that the average performance of city municipalities has improved in comparison with the previous years: average LTI grew from 28 in 2019 to 32 in 2020, 35 in 2021 and it remained at this level in the 2022 evaluation.

It is important, however, to bear in mind that part of the growth in 2021 was attributed to the adjustment of several indicators. Also, the average LTI increase is not the result of the steady growth of all (or most) municipalities. Several had significant gains, but, on the other hand, several faced substantial declines in the index.

Graph no. 4. City municipalities' average LTI index 2015 – 2022



City municipalities performed best in the area of “Information Booklet”, followed by “Free access to information” (both slightly above 50%).

On the other hand, performance is worst in the category “Assembly and Council”, where 25 city municipalities’ index is 3 out of a maximum of 18 points. The low score in the field “Public Enterprises and Public Institutions” (26.7%) can be justified by the fact that not all of these in-city municipalities have public enterprises (or even public institutions) in their jurisdiction.

However, there has been a huge decline in the area “Public procurement”, due to above mentioned reason (relaxation of legal obligations) – from 92% do 34%.

Comparing comparable

Categories

There are four categories where the comparison among city municipalities is really possible: “Assembly and Council”, “Budget”, “Municipalities and citizens”, and “Free access to information”.

In the “**Assembly and Council**” category (maximum 16 points), with the worst average index among comparable fields, just one city municipality performed above 50%- Sevojno, which had 14 out of 16. Čukarica, Stari grad and Surčin are others with relatively high scores (7 and 6). Besides those four, only Rakovica, Savski Venac and Vranjska Banja have decisions adopted by their assemblies published and available on the websites.

City municipalities have been most devoted to publishing the list of councillors on the websites (23 out of 25). Thirteen of them are publishing the agenda of the next assembly session on the website.

Responses to all other indicator questions show that city municipalities have not taken their duties and the quest for transparency in the category “Assembly and Council” seriously.

Performance in the “**Budget**” category is a bit better than last year (39% compared to 35%). Surčin has the best score – 13 out of 14, followed by Palilula Niš and Sevojno (11).

Current budget documentation is on the webpage of 17 city municipalities (out of 25), in most instances, in machine-readable or searchable form. The situation is worse when it comes to the availability of data on budget spending – seven had six and 9-months reports published. It is not surprising that the level of compliance with the standard to publish and discuss the annual budget audit is also as low as possible – there is none published (in LTI 2021, there were two cases).

As for the “**Municipalities and citizens**” category, the overall result is similar as the previous year (42% compared to 40%). The best performers are Surčin and Sevojno, with ten out of 15. Savski Venac, which had 10 points, fell to six this year.

Almost all municipalities have information on the working hours of administration available on the website or telephone number through which it is possible to get this information. Twenty-two city municipal administrations have a functional service center that provides all the services. Also, 21 have information on the website about the services offered by the municipality. On the other hand, only five of them provide a possibility for citizens to report irregularities or violations of laws on their websites, but 14 of them have such mechanisms on their premises. Five municipalities (four more than in 2021) provide an opportunity for citizens to monitor the status of their cases on their websites.

Table no. 5: LTI Score of city municipalities 2015-2022

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

“Free access to information” dropped significantly – from 66.7%. to 53.3%. The duty to inform citizens on their websites on submitting a request for free access to information is fulfilled by 24 out of 25 city municipalities.

FOI request sent by TS’s “mystery shopper” was responded to by only 14 city municipalities. Only three of them (Zvezdara, Zemun and Sevojno) have information on submitting a request for free access to the information visible in the service centers or administration premises.

Year by Year

Nine city municipalities have improved from last year, two had LTI scores unchanged, and fourteen performed worse in the 2022 evaluation. Among the improved ones, three of them have increased their overall score by more than ten points: Sevojno, Kostolac and Zemun.

Comparing LTI indexes of city municipalities over the past five LTI cycles, 2015, 2019, 2020, 2021 and 2022, we see that several had steady growth or small variations: Surcin (32–42–53–62–69), with LTI 2021 and LTI 2022 score which is, even without certain competences, comparable with the best performers on the main table, Kostolac, Vranjska Banja and Sevojno, with the latter having a respectable LTI 2022 score of 66.

Zvezdara is stagnating with variations (41–38–40–40–43). Mladenovac, which had 50 points in 2015 and then fell to 25 in LTI 2019, keeps rising again (50–25–33–41–45).

On the other side, 14 city municipalities have not managed to improve or maintain the same performance as in 2021. On the other hand, the good news is that the largest drop was nine points (one LSG) and five additional LSGs had drops larger than five points.

Selected individual examples

Good Practices:

- Kanjiža - Good example of publishing Assembly decisions http://www.kanjiza.rs/uijlap/site/index-sr.html?cat_id=47
- Senta - Good example of publishing Assembly decisions http://www.zenta-senta.co.rs/cr/%D0%9B%D0%BE%D0%BA%D0%B0%D0%BB%D0%BD%D0%B0_%D1%81%D0%B0%D0%BC%D0%BE%D1%83%D0%BF%D1%80%D0%B0%D0%B2%D0%B0_2/p/20/10_01_2014_Ma%20terijal-za-sednicu-SO.html/4
- Plandište - Useful web pages on the Municipal Assembly and the Municipal Councils' work - <http://plandiste-opstina.rs/lokalna-vlast/skupstina-opstine/sednice-so>
- Bački Petrovac - Official gazette with content, list of published decisions <http://www.backipetrovac.rs/dokumenti/sluzbeni-list-opstine-backi-petrovac>
- Kragujevac - Good example of publishing Council decisions <https://www.kragujevac.rs/lokalna-samouprava/gradsko-vece/odluke-gradskog-veca> and assembly decisions <https://www.kragujevac.rs/lokalna-samouprava/skupstina-grad/sednice-skupstine-grad>
- Leskovac – Good example of publishing Assembly decisions- <https://www.gradleskovac.org/index.php/lokalna-samouprava/skupstina-grad/sednice-skupstine/> <https://www.gradleskovac.org/index.php/lokalna-samouprava/gradsko-vece/sednice-gv>
- Gadžin Han - All the sessions of the Municipal Assembly (and the minutes)- <http://gadzinhan.rs/lokalna-samouprava/skupstina/akti-so/> and all decisions from municipal council meetings - <http://gadzinhan.rs/lokalna-samouprava/opstina/akti-veca>
- Sombor – Good example of citizen attendance at the Assembly sessions - <https://www.sombor.rs/lokalna-samouprava/skupstina-grad/prisustvo-gradjana-sednicama-skupstine-grad/> and the list of councilors is downloadable in a Word document with a table that includes e-mail addresses- <https://www.sombor.rs/lokalna-samouprava/skupstina-grad/odbornici-skupstine-grad-sombora/>
- Krupanj - Information on all members of parliamentary working bodies found - <http://www.krupanj.org.rs/index.php?id=65>
- Novi Sad - There is an android application for reviewing Assembly materials (not available on the site, however) - <https://play.google.com/store/apps/details?id=vpetrovic.skupstinans>
- Vrnjačka Banja - There are announcements of sessions of the Municipal Assembly - agenda and complete materials, which includes an excerpt from the minutes from the previous session <http://vrnjackabanja.gov.rs/aktuelnosti/skupstina-opstine>
- Novi Pazar – There is e-Assembly - <http://www.eskupstina.novipazar.rs> All documents discussed at the meetings, including the minutes, are posted; Councilors presented in detail, with information on membership in the working bodies. There is a contact form where one can choose which councilor to ask the question.
- Bečej – There is a special Assembly web page - <http://www.skupstina.becej.rs/sr/> and there is a working mechanism for asking councilors questions, who answer via e-mail; questions and answers are visible. <http://www.skupstina.becej.rs/%D0%BF%D0%B8%D1%82%D0%B0%D1%98%D1%82%D0%B5-%D0%BE%D0%B4%D0%B1%D0%BE%D1%80%D0%BD%D0%B8%D0%BA%D0%B0/>
- Zrenjanin - Good example of publishing Assembly decisions <http://www.zrenjanin.rs/sr-lat/skupstina-grad/prethodne-sednice-skupstine-grad>

- Crna Trava – Good example of publishing Assembly decisions - <http://www.opstinacrnatrava.org.rs/%d0%be%d0%b4%d0%bb%d1%83%d0%ba%d0%b5-%d1%81%d0%ba%d1%83%d0%bf%d1%88%d1%82%d0%b8%d0%bd%d0%b5.html>
- Žabari – Information about contacts with assembly members in the Information Booklet https://zabari.org.rs/dokumenti/wp-content/uploads/sites/2/2021/08/2021-INFORMATOR_cir.pdf

Budget

Good Practices:

- Sombor - Good example - report from public debate, budget documents by year and monthly reports: <https://www.sombor.rs/dokumenti-organa-grada/budzet-grada-sombora/2021-godina>
- Ljubovija - Budget portal, with documents sorted by year. Publishing monthly reports on execution. http://109.92.31.60/bportal/client/performances/IZVESTAJ_8
- Veliko Gradište – Public debate: <http://109.92.20.178/client/documents/13>
- Sokobanja – daily reports on execution: <https://sokobanja.ls.gov.rs/archives/category/realizacija-budzeta>
- Tutin – monthly reports on execution: <http://www.tutin.rs/dokumenta/mesecni-izvestaji-o-izvršenju-budzeta/>
- Žabari – Call for public debate with documents: <https://zabari.org.rs/dokumenti/budzet/poziv-za-javnu-raspravu-3>
- Kovin – Good example of report from public debate: <https://www.kovin.rs/javne-rasprave>
<https://www.kovin.rs/wp-content/uploads/Izvestaj-o-procesu-konsultacija-sa-gradjanima.pdf>
- Apatin - Perfectly structured and transparent by year; all documents are categorized; the rationale is part of the budget - <http://www.soapatin.org/budzet>
- Vrnjačka Banja - Good example of a budget page: everything is on it, including a call for public budget debates and reports from the discussion <http://vrnjackabanja.gov.rs/dokumenta/budzet>
- Vranje - Monthly budget implementation reports in the form of a citizen report are found on the page (until November 2021): <http://www.vranje.org.rs/dokumenta.php?id=11354>.
- Paraćin – Good example <https://www.paracin.rs/index.php/budzet-opstine-paracin>.
- Sremska Mitrovica Monthly income and expenditures in the form of visual presentation: http://www.sremskamitrovica.rs/kategorija.php?cat_id=166
- Surčin – monthly reports http://surcin.rs/?page_id=28394&d=LzlwMjE%3D&m1dll_index_get=0
- Ljubovija – Budget portal with all information <http://109.92.31.60/bportal/client/documents/13>. Monthly execution report: http://109.92.31.60/bportal/client/performances/IZVESTAJ_8.
- Bor – Budget portal with monthly execution reports <http://77.46.142.54/client/dashboard>

LSG and Citizens

Good Practices:

- Rakovica – Citizens' friendly page: <https://rakovica.rs/servis-gradjana/gradjanska-stanja>
- Bač - Administrative procedures with description and given deadlines http://www.bac.rs/administrativni_postupci
- Niš - Electronic Regulatory Register - <http://www.eservis.ni.rs/propisi/> and Electronic Register of administrative procedures <http://regap.ni.rs/>
- Vranje - Electronic Register of administrative procedures - <https://regap.vranje.org.rs/>
- Šabac – Allows citizens to monitor the status of their cases (administrative procedure)- <http://213.240.36.188/pls/apex/f?p=520:1:0:>
- Bor . Citizens can monitor the status of their cases http://77.46.142.54:8888/web_portal_bor/default.cfm
- Boljevac- citizens can monitor the status of their cases <http://www.boljevac.org.rs/status-vaseg-predmeta>
- Novi Pazar– Status of the case <http://91.150.87.126/PublicWebUIsp>
- Kanjiža - <http://www.kanjiza.rs/ujlap/site/index-sr.html?id=1861>

Access to Information of Public importance and Information Booklet

Good Practices :

- Bor – Excellent Information Booklet <https://bor.rs/wp-content/uploads/2021/11/Informator-GU-10.11.2021..pdf>
- Požarevac– Well-structured Information Booklet <https://pozarevac.rs/dokumentacija/>
- Varvarin - Good examples of presentign deadlines, services in the Information Booklet <http://varvarin.org.rs/wp-content/uploads/2020/12/Informator-o-radu-30.11.2020..pdf>
- Bečej - Very detailed instruction on access to information of public importance, including all authorities in the municipality from which information may be sought (including local communities, public administration and public enterprises) - <http://www.becej.rs/%d1%81%d0%b5%d1%80%d0%b2%d0%b8%d1%81-%d0%b3%d1%80%d0%b0%d1%92%d0%b0%d0%bd%d0%b0/%d0%b8%d0%bd%d1%84%d0%be%d1%80%d0%bc%d0%b0%d1%86%d0%b8%d1%98%d0%b5-%d0%be%d0%b4-%d1%98%d0%b0%d0%b2%d0%bd%d0%be%d0%b3-%d0%b7%d0%b0%d0%bd%d0%b0%d1%87%d0%b0%d1%98%d0%b0/>
- Vrnjačka Banja - Comprehensive webpage dedicated to applying for access to information of public importance - <http://vrnjackabanja.gov.rs/dokumenta/zahtev-za-informacije-od-javnog-znacaja>

Public Procurements

Good Practice:

- Subotica - Well structured PP page. but without data for 2021 and 2022:
<http://www.subotica.rs/index/page/lg/sr/id/4093>
- Čoka – Good example of PP page but without data for 2021 and 2022:
http://www.coka.rs/sr/doc/javna_nabavka/#PJN
- Sremska Mitrovica Good example of PP page but without data for 2021 and 2022:
http://www.sremskamitrovica.rs/kategorija.php?cat_id=65
- Valjevo - Good example of PP page: <https://www.valjevo.rs/javne-nabavke/>
- Medijana – Interesting page dedicated to public procurements (spreadsheet of documents) but without data for 2022- <http://medijana.rs/javne/2021>
- Beograd - There is a special city portal about public procurements - <https://nabavke.beograd.gov.rs/Pretraga.aspx?tab=1>

Public enterprises and Public Institutions

Good Practices:

- Kanjiža – Records on directors' election: <http://www.kanjiza.rs/ujlap/site/index-sr.html?mnu=2&art=3-5-3-dokumenti-sr.html>
- Tutin – PE's data and documents on LSG's website: <http://www.tutin.rs/dokumenta/ustanove-i-preduzeca/>
- Apatin – Banner on home page – ask PE's directors <http://www.soapatin.org/pitajte-direktore>
- Bečej – PE's documents presented on LSG's website.
<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>
- Paraćin - PE's documents presented on LSG's website.
<https://www.paracin.rs/index.php/ustanove-jp/javna-preduzeca/javno-preduzece-vodovod>
- Čačak - PE's documents presented on LSG's website. Also, documents about directors' appointments: https://www.cacak.org.rs/lzvestaj_o_radu-280-1
- Novi Pazar – Good examples – all documents on the webpage:
<https://www.novipazar.rs/lokalna-samouprava/javna-preduzeca#rukovodstvo-5>
- Ljubovija - Names of the members of the Management and Supervisory Boards elected by the Municipal Assembly - <http://www.ljubovija.rs/lokalna/66>
- Plandište – Good page on PEs and PIs - <http://plandiste-opstina.rs/lokalna-vlast/javna-preduzeca-ustanove/>
- Novi Sad – There is information about directors and members of boards of directors and supervisory boards of PEs, Public communal enterprises, public administration and school boards - <http://www.novisad.rs/articles/45>

- Niš – There is PE page with consolidated service pricing and business reports, and financial statements - <http://www.gu.ni.rs/institucije/javna-preduzeca/>
- Aleksinac – Number of employees in PEs and Pls
http://www.aleksinac.org/pdf/BROJ_ZAPOSLENIH.pdf
- Leskovac – PEs' working plans and reports on LSG's website: -
<https://www.gradleskovac.org/index.php/vazna-dokumenta/izvestaji-o-rad-u-i-planovi>
- Bečej – Documents and information about PEs and Pls on LSG's website:
<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/>

Public Debates and Public Competition

Good Practices:

- Kruševac – annual plan of public competitions - https://krusevac.ls.gov.rs/wp-content/uploads/2022/01/Godisnji_plan_nabavki.pdf
- Vladičin Han – public debates:
<http://www.vladicinhan.org.rs/Opstine3/Cir/Siteview.asp?ID=6021>
- Kragujevac – Calls and decisions grouped - <https://www.kragujevac.rs/e-usluge/konkursi-stipendije-pozivi/>
- Bač - Calls and decisions grouped <https://www.bac.rs/sr/konkursi>
- Sombor – Reports on realized media projects:
<https://www.sombor.rs/aktuelnosti/konkursi/odluke-po-konkursu/>

Other issues

Good Practices:

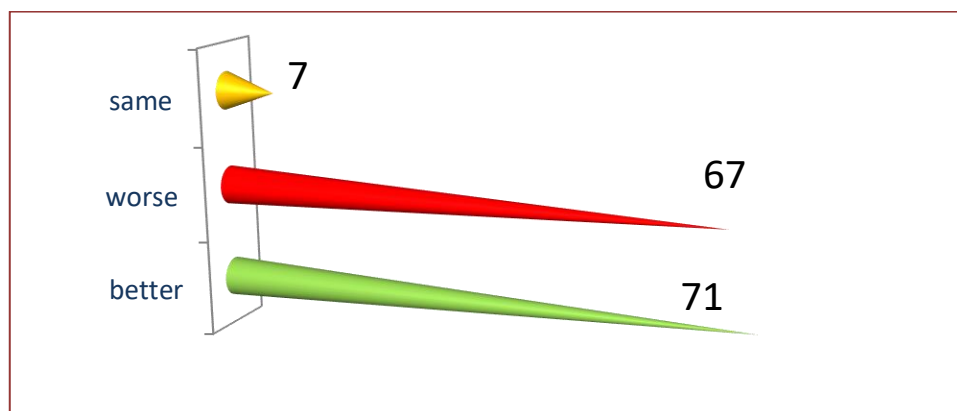
- Boljevac - the record of the property (real estate) owned by municipality which is leased
<http://bor.rs/komunalni-poslovi/>
- Petrovac – Banner for reporting corruption on the home page:
<https://www.petrovacnamlavi.rs/prijavi-korupciju/>
- Zaječar- Reporting corruption: <http://www.zajecar.info/kontakt>
- Novi Pazar - Register of lobbyists - <https://www.novipazar.rs/usluge/3645-registar-lobista>
- Sombor - Very detailed information about the local community: <https://www.sombor.rs/lokalna-samouprava/mesne-zajednice/>
- Žabari – Comprehensive page of spatial plans and plans of general and detailed regulation -
<https://zabari.org.rs/dokumenti/category/planska-dokumenta/>
- Bač - Excellent search for documents by category and year - <https://www.bac.rs/sr/dokumenta>
- Sombor - There is a table with a list of all appointed and employed persons in the city government -<https://www.sombor.rs/dokumenti-organa-grada/imenovana-postavljena-i-zaposlena-lica/> and a list of staff members of the City, in budget inspection service and member

of attorney general office who receive reimbursement of travel expenses. This is a great example: although it is not among the indicators, it is a good measure to prevent abuse.

- Vrbas - Special site of the Department of Urbanism - <https://urbanizam.vrbas.net/> and one of the Inspection Services - <https://inspekcije.vrbas.net/>
- Pirot – number of employees in the city administration, by months: <https://www.pirot.rs/index.php/dokumenta/broj-zaposlenih-2021-cir>

Comparisons with previous LTI's

Graph No 5: Comparison 2022 vs.2021 - How many LSGs got better or worse, or performed equal



The overall average LTI score for 145 LSGs in 2022 (49) is slightly higher than LTI 2021 (47.8) and the final score in the LTI 2020 (45.9). Seven cities and municipalities have the same score as last year. Less than half LSGs (67) worsened their score from last year (in the 2021 final report, 55 worsened compared to 2020).

The fact that 74 out of 145 LSGs have not improved their score indicates that the space for improvements is still very huge and that achieving transparency's sustainability is one of the main challenges.

The best-ranked is Novi Pazar (87, had 78 in 2021), followed by Sombor with a score 85 (88 in 2021). Sokobanja with 84 (75 in 2021). Tutin made one of the highest improvements since LTI has been established – from 42 to 81, which was enough for fourth place this year. Kanjiža is fifth (79, had 83 in 2021), followed by Užice with 78 (62 in 2021) and Veliko Gradište (76, had 71 in LTI 2021). Vranje and Leskovac are constant in the top ten, sharing position eight this year with 74 points each. Pirot, Raška and Kruševac should be mentioned for a notable leap up the scale – from 102nd to 14th, 41st to 19th and from 70th to 12th, respectively.

At the bottom of the table is Preševo, which managed to perform even worse, having only nine points (21 in LTI 2021). Koceljeva, Sečanj, Kovačica, Bujanovac and Knić are only municipalities with score under 30.

Ten LSGs improved their scores for 10 points or more in the last year: Tutin (39), Niš and Pirot (24), Kruševac (22), Jagodina (20), Užice (16), Vrbas and Trstenik (15), Svilajnac, Aleksandrovac and Dimitrovgrad (14), Nova Crnja, Kovin (13), Sjenica and Svrlijig (12), Topola, Zaječar and Beograd (11).

On the other hand, the best performer from 2021 lost the most points: Bečej lost 23. Smederevo lost 16, and four LSGs lost 13 points (Petrovac, Koceljeva, Temerin and Kovačica). Bečej fell down the ladder from 1st to 13th, Petrovac and Temerin from 17th to 66th.

That is another proof that a **transparency level that has been once achieved is by no means a guarantee of sustainable good practice.** It may be a matter of political prioritization or the individual effort of one civil servant. On the contrary, **written procedures and independent monitoring could help to maintain good results and, more than anything, individual efforts or interested civil servants and decision-makers.**

Recommendations

After four consecutive cycles of evaluating and ranking, **sustainability of transparency has emerged as one of the top issues**. Apart from several municipalities with strong determination to raise and maintain LTI scores (and transparency) and a certain number of those stagnating at the lower levels of the table, most of the other LSGs had their ups and downs, depending on actual political (or administrative) leaders, capacity, priorities or support from NGOs, donors, other projects. Even in those LSGs, persisting at the top, it is questionable if scores would be kept in case of personal changes at several posts in administration or at the political decision-making level. Therefore, **TS recommends that more effort is invested in maintaining the level of the raised transparency through developing procedures prescribed by acts**. Those acts should, by all means, include responsibility and accountability for fulfilling the prescribed tasks.

Without a universal model for LSG's website, not merely the frame, as prescribed by IT office's Instruction, but the recommended content, TS recommends LSGs to replicate or further develop good practices. Some of the good practices are presented in this report.

Transparency Serbia again reminds us of the recommendations made in the previous research rounds - **most important information on the website (about the budget, decisions of municipality assembly, council, information about public enterprises, public competitions, public procurement etc.) should be systematized**.

This particularly relates to:

- page on the website dedicated to the activities of the assembly (as not merely presenting its jurisdiction and members), of the mayor and the council. This page should contain all relevant documents and information, such as announcements for the next session with the agenda and materials (including the minutes from previous sessions), reports from the sessions with adopted decisions or exact links to the Official Gazette issue in which the decisions are published;
- special "Budget" page, with not merely adopted budget, but all information and documents related to the budget (even if duplicated from the page with news or public calls) - periodical reports on execution (including monthly reports), final accounts (annual report), rebalances, citizens' budgets, calls for public budget discussions and reports from public debates; These documents could or should be sorted by the year.
- Publishing information about public procurement on LSGs' websites. This is not obligatory anymore, but TS recommends publishing systemized information the way it was done before changes of the law (which was prescribed as an obligation only to publish it on PP Portal). The other solution could be a direct link from PP page on LSGs' website to each particular procurement on PP portal.
- Information on public calls and competitions should be grouped with results or decisions related to those calls (as was the case on most occasions with public procurements – grouping everything about one PP procedure). Transparency Serbia also strongly recommends publishing reports (and/or evaluations of projects) on the implementation of NGOs and media projects;

Pandemics period, when some activities, especially those with physical meetings, were abolished, should have resulted in new channels for public debates, meetings of the LSGs' officials with the citizens, and the introduction of new channels for citizens to track their cases. This hasn't been done so far, and TS urges LSGs to do it even though some believe that pandemics are approaching their end. Those methods and channels (such as online platform debates and meetings) could and should be combined with physical meetings even after the pandemics to reach the wider public.

LSGs should use all available channels (social media, classic media, direct contact) to reach citizens in order to increase their participation in debates on budget and other acts or in projects and competitions run by LSGs.

Electronic registers of administrative procedures are helpful, and they should be introduced in all cities and municipalities. Even in the digital age, LSGs should have in mind that some citizens, users of their services, do not use the internet. Therefore, most important information on procedures and deadlines for municipal administrations should be published in service centers, or citizens should be given an opportunity to access the information (with possible assistance) at the register of administrative procedures on the computer in the LSG premises;

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

LSGs, having technical and financial capacities, should establish mechanisms to enable citizens to track their administrative cases and receive data on the handling of appeals, complaints and grievances. If there are no such capacities, TS recommends publishing phone numbers of civil servants that would provide this information in visible places. LSGs could address donors for financing this mechanism or offer citizens to decide, in the early budget debate, if such cost (as well as building a database of administrative procedures) should be included in the budget;

LSGs should clearly notify citizens of their **mechanisms for reporting wrongdoings**, including mechanisms for reporting the suspicion of corruption. They should post such information on websites and in premises of administration;

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

LSGs should edit their pages dedicated to public enterprises, public utility companies and other public institutions. Transparency Serbia recommends LSGs use these pages to create a comprehensive segment with all information and the documents. Part of this page should be devoted to the work of the Commission for the Election of the Directors of Public Enterprises and Public Utilities Companies with all the documents regarding the work of the Commission. This especially applies to the sessions' minutes. The purpose would be to see how candidates are scored and the rank list created.

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

Annexes

Annex 1. Average score per indicator

Indicator	Percentage of the maximum value
48. Is there a section on the website dedicated to public procurements?	99.3%
95. Has the mayor submitted a declaration of assets to ACAS?	99.3%
75. Does the municipality regularly announce a call for leasing property in its possession?	97.9%
90. Are spatial plans / urban plans published on the site?	97.2%
87. Is data about number of the employees in local administration published on the website?	96.6%
46. Are information on the submission of a request for free access to information on the site? **	95.9%
34. Are there inspections controlling lists on website?	94.5%
15. Is the budget for the current year available on the website? **	93.1%
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?	93.1%
11. Is the list of assembly members published on the website?	91.7%
27. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users?	89.7%
55. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?	89.7%
56. Is there a special segment on the municipal website dedicated to public institutions with PI data?	89.7%
70. Are the data on the number of employees in the public institutions posted on the municipal website?	89.7%
45. The municipality has no unresolved decisions of the Commissioner?	85.5%
79. Have the public calls for the allocation for NGOs been published on the website?	85.5%

57. Does the observed PE have its own website?	84.8%
13. Is the local Official Gazette available on the site? **	81.4%
28. Does the municipal administration have a service center through which it provides all the services?	81.4%
77. Have the public calls for media allocation in the last 12 months been published on the website?	81.4%
17. Is the budget published on the website in machine-readable or searchable form?	79.3%
37. Is there information on the website about the services provided by the municipality?	77.9%
43. Did the municipalities provide requested information (FOI request) in time? **	76.6%
58. Does the observed PI have its own website	73.8%
94. Has the Local anti corruption plan been adopted?	73.8%
72. Is the list with prices of services provided by PEs and PIs available on the website of the municipality or PI/PE website?	73.1%
23. Has a public call for public debate on the budget been published on the website?	72.4%
80. Have the results of the competition for the allocation for NGOs been published on the website?	72.4%
73. Is there data on the website about the conducted public hearings/debates in the last 12 months (except for the budget)?	71.7%
59. Have public competitions for the selection of directors of public enterprises been conducted?	71.0%
78. Have the results of the competition for media allocation in the last 12 months been published on the website?	69.7%
53. Does the Information Booklet contain information about salaries of officials and employees?	69.0%
16. Is the justification/explanation of the budget available on the website?	68.3%
38. Are there contact information of local community councilors on the municipal website?	66.2%
50. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?	65.5%
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?	64.8%
86. Is the rulebook on internal organization and systematization of administration posted on the site?	64.1%

49. Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers ...)? **	62.8%
60. Have public competitions for the selection of directors of public institutions been conducted?	60.0%
21. Is there a citizens' budget published and available on the website?	56.6%
83. Has the municipality's development strategy been published on the website?	56.6%
22. Has a public debate on the budget been held - citizen surveys or consultation meetings?	55.2%
31. Is there a possibility on the website for citizens to report irregularities or violation of laws. including corruption?	54.5%
25. Has the proposal for the final budget account months or the adopted budget account been considered at the session and published (on the website) in the last 12?	52.4%
14. Are the Assembly sessions broadcasted live or are there transcripts published, or footage from the sessions broadcasted, or recordings of the whole session available on the website?	49.7%
88. Is there a code of ethics for employees and is it available on the site?	49.0%
9. Is the agenda of the next session of the assembly published on the website?	46.9%
40. Are there defined permanent terms for mayor (or deputy mayor) meeting with citizens?	46.2%
66. Have the annual work plans of PEs been published on the website of the PE or municipality website?	46.2%
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?	42.1%
67. Have the reports on the work of PEs been published on the website of the PE or municipality website?	42.1%
51. Is the Information Booklet published on the site and updated in the last 3 months?	41.4%
18. Are 6-month and 9-month reports on budget execution available on the website?	39.3%
52. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?	35.9%
1. Are the decisions adopted by the Assembly published and available on the website? **	35.2%
24. Has the report on the public debate on the budget been published on the website?	33.8%
3. Are the decisions adopted by the assembly in the past 24 months available on the website?	30.3%

41. Are data on the contact of the mayor or deputy with the citizens visible on the premisses?	28.3%
61. Is the systematization of PE published on the website of municipality or PE?	26.9%
19. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?	26.2%
74. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?	26.2%
76. Are the rental lease reports (commercial premises, agricultural land) published on the site?	26.2%
5. Have the proposed documents been published on the website before being considered at the session of the Assembly?	24.1%
26. Has the audit of the final budget account been considered at the session and published (on the website) in the last 12 months?	24.1%
44. No complaints were filed against municipalities in the last year due to ignoring requests for information of public importance?	23.4%
10. Are there announcement of municipal/city council sessions on the website?	21.4%
29. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration?	21.4%
71. Are the data on the number of employees in PEs published on the municipal site?	21.4%
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 these information can be found?	20.7%
42. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?	20.0%
62. Is the systematization of PI published on the website of municipality or PI?	19.3%
6. Have the results of the voting at the last session of the assembly been published on the website?	17.9%
68. Have the annual work plans of PIs been published on the website of the PI or municipality website?	17.9%
64. Have the documents from the selection procedure of the director of PE been published on the website?	17.2%
69. Have the reports on the work of PIs been published on the website of the PI or municipality website?	17.2%
85. Has a report on the work of the administration for the previous year been published?	17.2%
93. Has the Integrity Plan been adopted and has the LSG report on its implementation?	17.2%

12. Is there data for citizens' contact with assembly members published on the website?	15.2%
2. Are the decisions adopted by the city council published and available on the website?	14.5%
4. Are the decisions adopted by the city council in the past 24 months available on the website?	12.4%
32. Do (both/all) mechanisms for reporting allow anonymity?	12.4%
20. Are monthly reports (or cumulative monthly reports) on budget execution available on the website?	11.0%
35. Can a citizen monitor the status of his case on the website?	11.0%
65. Have the documents from the procedure for the election of the director of the PI been published on the website?	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%
82. Have the reports on the realization of NGO projects financed by the municipality been published on the website?	8.3%
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?	7.6%
81. Have the reports on the realization of media projects financed by the municipality been published on the website?	7.6%
36. Is there data on handling complaints, petitions and complaints available on the website?	6.9%
84. Is the annual plan of work of municipal administration published on the site?	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%
47. Is information on the submission of a request for free access to information visible in the service center or administration premises?	4.1%
92. Is there a daily or weekly schedule of the mayor's activities published on the website?	4.1%
91. Is there a report on contact with lobbyists published on the web site?	3.4%
7. Has information been posted on individual members of the assembly votes on legislation debated?	0.7%

Annex 2. Final scores of municipalities compared to the LTI 2021

			LTI	LTI	LTI	LTI		
	Municipality	<i>position in LTI 2021</i>	2019	2020	2021	2022	Growth 2022/2021	Growth 2022/2021 (%)
1	Novi Pazar	4	66	82	78	87	9	11.5%
2	Sombor	2	52	80	88	85	-3	-3.4%
3	Sokobanja	5	46	68	75	84	9	12.0%
4	Tutin	93	36	45	42	81	39	92.9%
5	Kanjiža	3	47	77	83	79	-4	-4.8%
6	Užice	15	64	70	62	78	16	25.8%
7	Veliko Gradište	9	64	61	71	76	5	7.0%
8	Vranje	5	60	73	75	74	-1	-1.3%
8	Leskovac	5	60	75	75	74	-1	-1.3%
10	Vrnjačka Banja	13	62	63	64	70	6	9.4%
10	Subotica	10	51	63	69	70	1	1.4%
12	Kruševac	70	52	47	47	69	22	46.8%
13	Bečej	1	38	83	90	67	-23	-25.6%
14	Kragujevac	11	42	55	68	65	-3	-4.4%
14	Bor	15	42	46	62	65	3	4.8%
14	Pirot	98	46	45	41	65	24	58.5%
14	Novi Sad	8	43	56	73	65	-8	-11.0%
18	Niš	103	34	46	40	64	24	60.0%
19	Raška	41	44	47	53	62	9	17.0%
19	Žabalj	20	36	55	60	62	2	3.3%
21	Vladičin Han	12	43	60	65	61	-4	-6.2%
22	Trstenik	82	47	49	44	59	15	34.1%
22	Ruma	21	49	56	59	59	0	0.0%
22	Vrbas	82	40	54	44	59	15	34.1%
25	Dimitrovgrad	88	38	51	43	57	14	32.6%
25	Indija	23	52	55	58	57	-1	-1.7%
25	Požega	41	40	54	53	57	4	7.5%
25	Senta	35	51	58	54	57	3	5.6%
25	Beograd	74	30	33	46	57	11	23.9%
25	Požarevac	21	57	39	59	57	-2	-3.4%
31	Aleksinac	64	40	43	48	56	8	16.7%
31	Kraljevo	41	57	47	53	56	3	5.7%
31	Srbobran	24	46	53	57	56	-1	-1.8%
31	Plandište	29	67	63	55	56	1	1.8%

35	Loznica	64	38	46	48	55	7	14.6%
35	Topola	82	50	52	44	55	11	25.0%
35	Boljevac	13	40	40	64	55	-9	-14.1%
38	Krupanj	29	48	58	55	54	-1	-1.8%
39	Bački Petrovac	58	51	51	49	53	4	8.2%
39	Čajetina	29	43	57	55	53	-2	-3.6%
39	Sremska Mitrovica	58	45	51	49	53	4	8.2%
39	Zrenjanin	24	44	63	57	53	-4	-7.0%
39	Apatin	26	41	51	56	53	-3	-5.4%
39	Svrljig	98	43	37	41	53	12	29.3%
39	Novi Kneževac	51	39	50	51	53	2	3.9%
46	Kovin	108	40	41	39	52	13	33.3%
46	Mali Zvornik	17	36	52	61	52	-9	-14.8%
46	Negotin	51	45	48	51	52	1	2.0%
46	Varvarin	26	51	49	56	52	-4	-7.1%
50	Ivanjica	41	46	55	53	51	-2	-3.8%
50	Kuršumlija	26	45	44	56	51	-5	-8.9%
50	Ljubovija	29	45	52	55	51	-4	-7.3%
50	Novi Bečej	77	48	45	45	51	6	13.3%
50	Sjenica	108	34	39	39	51	12	30.8%
50	Babušnica	58	47	48	49	51	2	4.1%
56	Knjaževac	29	54	54	55	50	-5	-9.1%
56	Kula	46	45	48	52	50	-2	-3.8%
56	Vlasotince	46	35	42	52	50	-2	-3.8%
56	Nova Varoš	29	45	47	55	50	-5	-9.1%
56	Čačak	35	54	58	54	50	-4	-7.4%
61	Kučevo	64	33	51	48	49	1	2.1%
61	Ražanj	70	33	45	47	49	2	4.3%
61	Bačka Topola	35	45	54	54	49	-5	-9.3%
61	Priboj	35	48	55	54	49	-5	-9.3%
61	Blace	35	37	46	54	49	-5	-9.3%
66	Kikinda	55	49	47	50	48	-2	-4.0%
66	Ljig	64	29	39	48	48	0	0.0%
66	Pančevo	64	45	49	48	48	0	0.0%
66	Petrovac	17	51	59	61	48	-13	-21.3%
66	Temerin	17	52	59	61	48	-13	-21.3%
66	Arilje	51	39	53	51	48	-3	-5.9%
66	Bač	35	49	49	54	48	-6	-11.1%
66	Gornji Milanovac	103	28	49	40	48	8	20.0%
66	Bačka Palanka	108	37	37	39	48	9	23.1%
66	Malo Crniće	77	38	28	45	48	3	6.7%
76	Odžaci	55	41	48	50	47	-3	-6.0%
76	Paraćin	64	66	50	48	47	-1	-2.1%
76	Sremski Karlovci	113	22	31	38	47	9	23.7%

76	Aleksandrovac	134	37	39	33	47	14	42.4%
76	Valjevo	58	40	45	49	47	-2	-4.1%
76	Rača	103	34	49	40	47	7	17.5%
76	Lajkovac	74	35	41	46	47	1	2.2%
76	Vladimirci	88	36	38	43	47	4	9.3%
84	Čoka	48	39	45	49	46	-3	-6.1%
84	Žabari	77	37	40	45	46	1	2.2%
86	Ćuprija	103	29	29	40	45	5	12.5%
86	Doljevac	93	33	41	42	45	3	7.1%
86	Mionica	46	37	47	52	45	-7	-13.5%
86	Opovo	74	33	42	46	45	-1	-2.2%
86	Šabac	55	41	57	50	45	-5	-10.0%
86	Velika Plana	82	36	45	44	45	1	2.3%
86	Brus	113	35	41	38	45	7	18.4%
93	Irig	82	48	48	44	44	0	0.0%
93	Prijepolje	88	37	42	43	44	1	2.3%
93	Zaječar	134	43	42	33	44	11	33.3%
93	Bojnik	77	41	50	45	44	-1	-2.2%
93	Despotovac	70	37	34	47	44	-3	-6.4%
98	Batočina	123	36	39	37	43	6	16.2%
98	Jagodina	142	21	21	23	43	20	87.0%
98	Nova Crnja	139	23	33	30	43	13	43.3%
98	Ub	113	20	40	38	43	5	13.2%
98	Žitište	103	37	44	40	43	3	7.5%
103	Crna Trava	88	41	41	43	42	-1	-2.3%
103	Mali Idoš	123	36	39	37	42	5	13.5%
103	Prokuplje	127	37	38	36	42	6	16.7%
103	Žitorađa	108	30	38	39	42	3	7.7%
103	Lapovo	108	39	37	39	42	3	7.7%
108	Bajina Bašta	77	34	46	45	41	-4	-8.9%
108	Rekovac	98	39	37	41	41	0	0.0%
108	Trgovište	127	34	32	36	41	5	13.9%
108	Vršac	98	42	40	41	41	0	0.0%
108	Alibunar	123	31	36	37	41	4	10.8%
113	Kladovo	70	28	35	47	40	-7	-14.9%
113	Kosjerić	46	30	43	52	40	-12	-23.1%
113	Osečina	46	33	53	52	40	-12	-23.1%
113	Šid	113	30	32	38	40	2	5.3%
117	Stara Pazova	98	26	40	41	39	-2	-4.9%
117	Surdulica	93	42	40	42	39	-3	-7.1%
117	Titel	131	29	40	35	39	4	11.4%
117	Žagubica	93	35	45	42	39	-3	-7.1%
117	Bosilegrad	51	52	48	51	39	-12	-23.5%
117	Medveđa	82	26	37	44	39	-5	-11.4%
123	Bela Crkva	134	21	18	33	38	5	15.2%
123	Beočin	58	35	42	49	38	-11	-22.4%

123	Čićevac	93	42	38	42	38	-4	-9.5%
123	Smederevska Palanka	113	12	41	38	38	0	0.0%
127	Bela Palanka	113	39	46	38	37	-1	-2.6%
127	Lebane	127	25	30	36	37	1	2.8%
127	Majdanpek	127	32	39	36	37	1	2.8%
127	Smederevo	41	39	51	53	37	-16	-30.2%
127	Svilajnac	142	18	22	23	37	14	60.9%
127	Gadžin Han	88	46	56	43	37	-6	-14.0%
133	Lučani	123	33	32	37	36	-1	-2.7%
133	Pećinci	113	29	25	38	36	-2	-5.3%
135	Golubac	113	33	53	38	35	-3	-7.9%
135	Arandjelovac	134	44	39	33	35	2	6.1%
137	Merošina	140	26	24	29	34	5	17.2%
138	Bogatić	141	19	31	28	33	5	17.9%
139	Ada	133	26	37	34	30	-4	-11.8%
140	Bujanovac	144	32	34	21	28	7	33.3%
140	Knić	113	26	34	38	28	-10	-26.3%
142	Kovačica	113	28	36	38	25	-13	-34.2%
142	Sečanj	134	26	34	33	25	-8	-24.2%
144	Koceljeva	131	23	22	35	22	-13	-37.1%
145	Preševo	144	13	23	21	9	-12	-57.1%
	Municipality		LTI 2019	LTI 2020	LTI 2021	LTI 2022	Growth 2022/2021	Growth 2022/2021 (%)
1	Barajevo *		32	47	42	38	-4	-9.5%
2	Voždovac *		24	22	35	27	-8	-22.9%
3	Vračar *		26	24	31	22	-9	-29.0%
4	Grocka *		31	28	37	33	-4	-10.8%
5	Zvezdara *		38	40	40	43	3	7.5%
6	Zemun *		26	38	29	39	10	34.5%
7	Lazarevac *		36	36	43	36	-7	-16.3%
8	Mladenovac *		25	33	41	45	4	9.8%
9	Novi Beograd *		27	28	25	29	4	16.0%
10	Obrenovac *		38	41	35	32	-3	-8.6%
11	Palilula *		29	24	31	23	-8	-25.8%
12	Rakovica *		21	31	37	36	-1	-2.7%
13	Savski Venac *		38	36	39	34	-5	-12.8%
14	Sopot *		13	20	23	16	-7	-30.4%
15	Stari Grad *		23	28	35	28	-7	-20.0%
16	Čukarica *		37	32	43	43	0	0.0%
17	Surčin *		42	53	62	69	7	11.3%
18	Medijana *		25	24	21	25	4	19.0%
19	Niška Banja *		31	35	26	24	-2	-7.7%
20	Palilula Niš*		31	28	33	33	0	0.0%
21	Pantelejev *		23	39	23	28	5	21.7%

22	Crveni Krst *		20	28	37	35	-2	-5.4%
23	Vranjska Banja *		10	25	27	26	-1	-3.7%
24	Kostolac *		23	30	24	36	12	50.0%
25	Sevojno *		37	42	52	66	14	26.9%

Municipalities that lost more than 10 points since 2021

	LTI 2019	LTI 2020	LTI 2021	LTI 2022	Growth 2022/2021	Growth 2022/2021 (%)
Bečej	38	83	90	67	-23	-25.6%
Smederevo	39	51	53	37	-16	-30.2%
Koceljeva	23	22	35	22	-13	-37.1%
Kovačica	28	36	38	25	-13	-34.2%
Petrovac	51	59	61	48	-13	-21.3%
Temerin	52	59	61	48	-13	-21.3%
Preševo	13	23	21	9	-12	-57.1%
Bosilegrad	52	48	51	39	-12	-23.5%
Kosjerić	30	43	52	40	-12	-23.1%
Osečina	33	53	52	40	-12	-23.1%
Beočin	35	42	49	38	-11	-22.4%
Knić	26	34	38	28	-10	-26.3%

Annex 3: Best performers in categories

(City municipalities do not have the same competencies as cities and towns and their indices cannot be compared with other indices)

Assembly and Council

Overall Rank	LSG	Assembly and Council (max 16)
2	Sombor	15
14	Kragujevac	14
8	Vranje	14
18	Niš	14
21	Vladičin Han	13
3	Sokobanja	13
1	Novi Pazar	13
39	Zrenjanin	12
5	Kanjiža	12
31	Kraljevo	12
7	Veliko Gradište	12
4	Tutin	12
10	Vrnjačka Banja	12

Budget

Overall Rank	LSG	Budget (max 14)
2	Sombor	14
6	Užice	14
3	Sokobanja	14
4	Tutin	14
7	Veliko Gradište	13
14	Bor	13
50	Ljubovija	13
39	Sremska Mitrovica	13
61	Ražanj	13
19	Žabalj	13
8	Vranje	13
61	Blace	13
12	Kruševac	13
5	Kanjiža	13

Municipality and Citizens

Overall Rank	LSG	Municipality and citizens (max 15)
1	Novi Pazar	15
2	Sombor	14
6	Užice	13
13	Bečej	12
14	Novi Sad	12
10	Subotica	11
5	Kanjiža	11
19	Žabalj	11
19	Raška	11
3	Sokobanja	11
8	Vranje	11

Free Access to Information

Overall Rank	LSG	Free Access to Information (max 6)
3	Sokobanja	6

Information Booklet

Overall Rank	LSG	Information Booklet (max 4)
22	Ruma	4
25	Požarevac	4
7	Veliko Gradište	4
39	Zrenjanin	4
13	Bečej	4
5	Kanjiža	4
10	Subotica	4
76	Lajkovac	4
14	Bor	4
25	Požega	4
39	Bački Petrovac	4
50	Sjenica	4
98	Ub	4

Public enterprises and Public institutions

Overall rank	LSG	Municipals Utility Companies and Public Institutions (max 18)
4	Tutin	18
5	Kanjiža	17
3	Sokobanja	16
13	Bečej	15
14	Pirot	15
6	Užice	15
7	Veliko Gradište	14
30	Aleksinac	14
98	Jagodina	14
18	Niš	14
25	Beograd	14
1	Novi Pazar	14

Public debates and public competitions

Overall Rank	LSG	Public Debates and Public Competitions (max 10)
1	Novi Pazar	10
61	Blace	10
12	Kruševac	10
4	Tutin	10
5	Užice	9
2	Sombor	9
76	Vladimirci	9
14	Bor	8
10	Vrnjačka Banja	8
25	Dimitrovgrad	8
50	Kuršumlija	8
31	Aleksinac	8
21	Vladičin Han	8
14	Pirot	8
8	Leskovac	8
8	Vranje	8
3	Sokobanja	8
18	Niš	8

Annex no. 4. LTI indicators comparison 2022 vs.2021

Indices	% of max score LTI 2020	% of max score LTI 2021	% of max score LTI 2022	Increased %	% of improvement
48. Is there a section on the website dedicated to public procurements?	97.2%	96.6%	99.3%	2.8%	2.9%
95. Has the mayor submitted a declaration of assets to ACAS?	94.5%	95.2%	99.3%	4.1%	4.3%
75. Does the municipality regularly announce a call for leasing property in its possession?	91.0%	95.2%	97.9%	2.8%	2.9%
90. Are spatial plans / urban plans published on the site?	89.0%	97.9%	97.2%	-0.7%	-0.7%
87. Is data about number of the employees in local administration published on the website?		97.9%	96.6%	-1.4%	-1.4%
46. Are information on the submission of a request for free access to information on the site? **	93.1%	95.9%	95.9%	0.0%	0.0%
34. Are there inspections controlling lists on website?	86.9%	94.5%	94.5%	0.0%	0.0%
15. Is the budget for the current year available on the website? **	93.8%	93.1%	93.1%	0.0%	0.0%
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%	97.2%	93.1%	-4.1%	-4.3%
11. Is the list of assembly members published on the website?	89.7%	88.3%	91.7%	3.4%	3.9%
27. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users?	85.5%	92.4%	89.7%	-2.8%	-3.0%
55. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?	77.9%	86.2%	89.7%	3.4%	4.0%

56. Is there a special segment on the municipal website dedicated to public institutions with PI data?	69.0%	82.8%	89.7%	6.9%	8.3%
70. Are the data on the number of employees in the public institutions posted on the municipal website?		91.0%	89.7%	-1.4%	-1.5%
45. The municipality has no unresolved decisions of the Commissioner?	84.1%	85.5%	85.5%	0.0%	0.0%
79. Have the public calls for the allocation for NGOs been published on the website?	82.8%	76.6%	85.5%	9.0%	11.7%
57. Does the observed PE have its own website?		77.9%	84.8%	6.9%	8.8%
13. Is the local Official Gazette available on the site? **	78.6%	81.4%	81.4%	0.0%	0.0%
28. Does the municipal administration have a service center through which it provides all the services?	82.1%	83.4%	81.4%	-2.1%	-2.5%
77. Have the public calls for media allocation in the last 12 months been published on the website?	80.0%	79.3%	81.4%	2.1%	2.6%
17. Is the budget published on the website in machine-readable or searchable form?	83.4%	75.2%	79.3%	4.1%	5.5%
37. Is there information on the website about the services provided by the municipality?		60.7%	77.9%	17.2%	28.4%
43. Did the municipalities provide requested information (FOI request) in time? **	84.1%	77.9%	76.6%	-1.4%	-1.8%
58. Does the observed PI have its own website		69.0%	73.8%	4.8%	7.0%
94. Has the Local anti corruption plan been adopted?	70.3%	69.7%	73.8%	4.1%	5.9%
72. Is the list with prices of services provided by PEs and PIs available on the website of the municipality or PI/PE website?	56.6%	65.5%	73.1%	7.6%	11.6%
23. Has a public call for public debate on the budget been published on the website?	73.1%	71.0%	72.4%	1.4%	1.9%

80. Have the results of the competition for the allocation for NGOs been published on the website?		44.1%	72.4%	28.3%	64.1%
73. Is there data on the website about the conducted public hearings/debates in the last 12 months (except for the budget)?	72.4%	54.5%	71.7%	17.2%	31.6%
59. Have public competitions for the selection of directors of public enterprises been conducted?	74.5%	69.0%	71.0%	2.1%	3.0%
78. Have the results of the competition for media allocation in the last 12 months been published on the website?		53.8%	69.7%	15.9%	29.5%
53. Does the Information Booklet contain information about salaries of officials and employees?	46.2%	57.9%	69.0%	11.0%	19.0%
16. Is the justification/explanation of the budget available on the website?	66.2%	68.3%	68.3%	0.0%	0.0%
38. Are there contact information of local community councilors on the municipal website?	59.3%	55.9%	66.2%	10.3%	18.5%
50. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?	96.6%	96.6%	65.5%	-31.0%	-32.1%
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?	78.6%	62.1%	64.8%	2.8%	4.4%
86. Is the rulebook on internal organization and systematization of administration posted on the site?	53.8%	77.9%	64.1%	-13.8%	-17.7%
49. Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers ...)? **	94.5%	94.5%	62.8%	-31.7%	-33.6%
60. Have public competitions for the selection of directors of public institutions been conducted?	70.3%	62.1%	60.0%	-2.1%	-3.3%
21. Is there a citizens' budget published and available on the website?	51.7%	57.9%	56.6%	-1.4%	-2.4%

83. Has the municipality's development strategy been published on the website?	77.9%	34.5%	56.6%	22.1%	64.0%
22. Has a public debate on the budget been held - citizen surveys or consultation meetings?	76.6%	39.3%	55.2%	15.9%	40.4%
31. Is there a possibility on the website for citizens to report irregularities or violation of laws. including corruption?	50.3%	71.0%	54.5%	-16.6%	-23.3%
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?	57.9%	54.5%	52.4%	-2.1%	-3.8%
14. Are the Assembly sessions broadcasted live or are there transcripts published, or footage from the sessions broadcasted, or recordings of the whole session available on the website?	55.2%	47.6%	49.7%	2.1%	4.3%
88. Is there a code of ethics for employees and is it available on the site?	42.8%	42.8%	49.0%	6.2%	14.5%
09. Is the agenda of the next session of the assembly published on the website?	42.1%	49.0%	46.9%	-2.1%	-4.2%
40. Are there defined permanent terms for mayor (or deputy mayor) meeting with citizens?	42.1%	37.2%	46.2%	9.0%	24.1%
66. Have the annual work plans of PEs been published on the website of the PE or municipality website?		33.8%	46.2%	12.4%	36.7%
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?	78.6%	36.6%	42.1%	5.5%	15.1%
67. Have the reports on the work of PEs been published on the website of the PE or municipality website?		25.5%	42.1%	16.6%	64.9%
51. Is the Information Booklet published on the site and updated in the last 3 months?	51.7%	45.5%	41.4%	-4.1%	-9.1%

18. Are 6-month and 9-month reports on budget execution available on the website?	43.4%	39.3%	39.3%	0.0%	0.0%
52. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?	15.9%	55.2%	35.9%	-19.3%	-35.0%
01. Are the decisions adopted by the Assembly published and available on the website? **	30.3%	33.1%	35.2%	2.1%	6.3%
24. Has the report on the public debate on the budget been published on the website?	42.8%	35.9%	33.8%	-2.1%	-5.8%
03. Are the decisions adopted by the assembly in the past 24 months available on the website?	27.6%	24.8%	30.3%	5.5%	22.2%
41. Are data on the contact of the mayor or deputy with the citizens visible on the premises?	9.0%	6.2%	28.3%	22.1%	355.6%
61. Is the systematization of PE published on the website of municipality or PE?	16.6%	19.3%	26.9%	7.6%	39.3%
19. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?	26.2%	21.4%	26.2%	4.8%	22.6%
74. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?	24.8%	24.8%	26.2%	1.4%	5.6%
76. Are the rental lease reports (commercial premises, agricultural land) published on the site?	0.0%	4.1%	26.2%	22.1%	533.3%
05. Have the proposed documents been published on the website before being considered at the session of the Assembly?	15.2%	20.0%	24.1%	4.1%	20.7%
26. Has the audit of the final budget account been considered at the session and published (on the website) in the last 12 months?	22.1%	20.0%	24.1%	4.1%	20.7%
44. No complaints were filed against municipalities in the last year due to ignoring requests for information of public importance?	23.4%	40.0%	23.4%	-16.6%	-41.4%
10. Are there announcement of municipal/city council sessions on the website?		18.6%	21.4%	2.8%	14.8%

29. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration?	20.7%	16.6%	21.4%	4.8%	29.2%
71. Are the data on the number of employees in PEs published on the municipal site?	32.4%	31.7%	21.4%	-10.3%	-32.6%
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?	20.7%	49.0%	20.7%	-28.3%	-57.7%
42. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?	18.6%	18.6%	20.0%	1.4%	7.4%
62. Is the systematization of PI published on the website of municipality or PI?	18.6%	17.2%	19.3%	2.1%	12.0%
06. Have the results of the voting at the last session of the assembly been published on the website?	17.9%	20.0%	17.9%	-2.1%	-10.3%
68. Have the annual work plans of PIs been published on the website of the PI or municipality website?	23.4%	26.2%	17.9%	-8.3%	-31.6%
64. Have the documents from the selection procedure of the director of PE been published on the website?		20.7%	17.2%	-3.4%	-16.7%
69. Have the reports on the work of PIs been published on the website of the PI or municipality website?	22.1%	24.1%	17.2%	-6.9%	-28.6%
85. Has a report on the work of the administration for the previous year been published?	14.5%	17.2%	17.2%	0.0%	0.0%
93. Has the Integrity Plan been adopted and has the LSG report on its implementation?	53.8%	17.2%	17.2%	0.0%	0.0%
12. Is there data for citizens' contact with assembly members published on the website?	21.4%	15.9%	15.2%	-0.7%	-4.3%
02. Are the decisions adopted by the city council published and available on the website?	11.0%	13.8%	14.5%	0.7%	5.0%
04. Are the decisions adopted by the city council in the past 24 months available on the website?	11.0%	12.4%	12.4%	0.0%	0.0%

32. Do (both/all) mechanisms for reporting allow anonymity?	37.2%	11.0%	12.4%	1.4%	12.5%
20. Are monthly reports (or cumulative monthly reports) on budget execution available on the website?	10.3%	8.3%	11.0%	2.8%	33.3%
35. Can a citizen monitor the status of his case on the website?	11.0%	10.3%	11.0%	0.7%	6.7%
65. Have the documents from the procedure for the election of the director of the PI been published on the website?		17.9%	9.7%	-8.3%	-46.2%
08. Are the amendments submitted on the draft acts that were considered at the last session (and the amendments' justifications/explanations) published on the website?	3.4%	6.2%	9.0%	2.8%	44.4%
82. Have the reports on the realization of NGO projects financed by the municipality been published on the website?	10.3%	4.8%	8.3%	3.4%	71.4%
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?		4.1%	7.6%	3.4%	83.3%
81. Have the reports on the realization of media projects financed by the municipality been published on the website?		5.5%	7.6%	2.1%	37.5%
36. Is there data on handling complaints, petitions and complaints available on the website?	9.7%	7.6%	6.9%	-0.7%	-9.1%
84. Is the annual plan of work of municipal administration published on the site?	2.1%	2.8%	6.9%	4.1%	150.0%
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?	0.7%	2.1%	6.9%	4.8%	233.3%
47. Is information on the submission of a request for free access to information visible in the service center or administration premises?	7.6%	3.4%	4.1%	0.7%	20.0%

92. Is there a daily or weekly schedule of the mayor's activities published on the website?	0.7%	2.8%	4.1%	1.4%	50.0%
91. Is there a report on contact with lobbyists published on the web site?	0.7%	2.8%	3.4%	0.7%	25.0%
07. Has information been posted on individual members of the assembly votes on legislation debated?	0.0%	0.0%	0.7%	0.7%	NA

Annex no. 5. The list of LTI 2015, 2017, 2019, 2020, 2021 & 2022 indicators

Indicators	2021 and 2022	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 councilors to the mayor and/or the city council?	/				
14. Are the Assembly sessions broadcasted live or are there transcripts published, or footage from the sessions broadcasted, or recordings of the whole session available on the website?					
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 councilors 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 center or administration premises?					
48. Is there a section on the website dedicated to public procurements?					
49. Is the data on the PP in accordance with the PP Law 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 these 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 PE published on the website of municipality or PE?					
62. Is the systematization of 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. Have the documents from the selection procedure of the director of PE been published on the website?					
65. Have the documents from the procedure for the election of the director of the PI been published on the website?					
66. Have the annual work plans of PEs been published on the website of the PE or municipality website?		/	/	/	/
67. Have the reports on the work of PEs been published on the website of the PE or municipality website?		/	/	/	/
Have the annual work plans and reports on the work of PEs been published on the website of the PE (or municipality)?	/				
69. Have the work plans of PIs been published on the website of the PI or municipality website?					
69. Are there reports on the work of public institutions on the website of the municipality or PI?					/
Are reports on consideration of reports on the work of PE published on site?	/	/	/	/	
Are reports on consideration of reports on the work of PI published on site?	/	/	/	/	
70. Are 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 PEs and PIs 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 hearings/debates in the last 12 months (except for the budget)?					
Is the public debate about the increase in the rate and the amount of public revenues conducted?	/	/	/	/	
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?					