



Local Self-Government Transparency Index 2023 (Local Transparency Index – LTI) Final Report

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Contents

- Executive Summary 3
- Methodology 6
- General observations 9
 - General evaluation of LSG transparency and perspectives for improvement 9
 - Selected systemic problems and observations 9
- Performance of LSGs in the specific areas of the research 12
 - Overview 12
- Fields of the research 15
 - Overview 15
 - Information Booklets 17
 - Budget 17
 - Public Procurements 18
 - Free Access to Information 18
 - Public Debates and Public Competitions 18
 - Public Enterprises and Public Institutions 19
 - Municipality and Citizens 19
 - Assembly and Council 19
 - Other Indicators 20
- Performance of in-city municipalities 21
 - Overview 21
 - Comparing Comparable Categories 22
 - Year by Year 24
- Selected individual examples 25
 - Budget 26
 - LSG and Citizens 27
 - Access to Information of Public importance and Information Booklet 28
 - Public Procurements 28
 - Public enterprises and Public Institutions 28
 - Public Debates and Public Competition 29
 - Other issues** 30
- Comparisons with previous LTI's 31
- Recommendations 33

Annexes	36
Annex 1. Average score per indicator	36
Annex 2. Final scores of municipalities compared to the LTI 2022.....	41
Municipalities that lost more than 10 points since 2022	45
Annex 3: Best performers in categories.....	46
Assembly and Council	46
Budget.....	46
Municipality and Citizens.....	47
Free Access to Information.....	47
Public enterprises and Public institutions	48
Public debates and public competitions.....	48
Annex no. 4. LTI indicators comparison 2023 vs.2022.....	49
Annex no. 5. The list of LTI 2015, 2017, 2019, 2020, 2021, 2022 & 2023 indicators.....	57
Annex no. 6. Performance of 25 LSGs previously supported by USAID Government Accountability Initiative (GAI)	67

Executive Summary

The Local Transparency Index (LTI) 2023 represents Transparency Serbia’s research¹, evaluation and ranking of 145 cities and municipalities and 25 in-city municipalities in Serbia. This is the seventh year (fifth 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 25 and 94 along with the Index.

The **average score** for 145 LSGs in the 2023 LTI is 52, three points above the LTI 2022 score.

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

Almost two thirds (65%) of all municipalities improved their scores². On the other hand, 30% registered a decrease compared to the previous year³. This is significant improvement from LTI 2022, when 49% (71 out of 145) raised their scores.

As for the categories, the increases were noted in the four areas, one of them surging significantly – “Information booklet” went from 41.7% (after falling from 51.9% in 2022) up to 73.3%. “Budget” went over 60% mark for the very first time, being 63.2% in 2023 (56.7% in 2022). “Public enterprises” continued ascend, from 29% in 2019, to 47.6% in 2022, and getting to 51.3 in LTI 2023. Five areas saw a decrease, but only one of them notably - “Public Procurements” from 72.6% to 62.2%. This is the continuation of the fall which begun in 2022 (from 95.5% in LTI 2021) after the new Law on Public Procurement came into force, not obliging the buyers to publish information on their website but merely on Public Procurement Portal.

“Assembly and Council” remains the least transparent category, although it also saw an increase – from 35.4% in 2022 to 39.5% in 2023.

On the individual LSGs’ level, 22 local governments registered an increase of 10 points or more in the past year. Thirty out of 145 municipalities have LTI greater than 60⁴, with eleven receiving scores above 70 and four above 80.

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

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

³ 44 out of 145.

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

This time, again, one municipality reached a score of 90+⁵ (Novi Pazar at 94). From the point of sustainable growth, it should be noted that 50 municipalities had a constant increase (or at least stagnation) of LTI in the last two research cycles (LTI 2023/2022 and LTI 2022/2021) and 25 municipalities maintained or increased their transparency over three research cycles (LTI 2023/2022, LTI 2022/2021 and LTI 2021/2020).

Results are encouraging. The “Budget” has been on the steady growth since the first LTI survey in 2015. There were several donor-supported programs, including dozens of municipalities, which contributed to this growth in the past several years. Introducing Portal for information booklets boosted improvement in this area. One of the areas regularly associated with corruption risks and high potential for misuse – public enterprises and public institutions also has positive trend regarding transparency. It is still rather low (just above 50%), but it is much better the 29% in 2019. Decline in transparency of the information about public procurements on LSG’s websites is the consequence of the new law, abolishing obligation to publish information on both Public Procurement Portal and LSG’s website and lack of will of most of the LGs to do more than envisaged by the law.

Some municipalities maintain the high level of LTI. Some of them are noted to do it periodically, in the process of verification, some of them have well organized mechanisms, running all around the year. There are also more than few municipalities on a stable growing course for the past three or four years, some of them slowly reaching marks over 55 or 60, and this could be described as sustainable growth. However, sustainable transparency has not been reached nationwide. There are fluctuations - some good performers from previous LTI cycles neglected their websites or some good practices, some municipalities with increases in LTI 2022 had their scores decrease in LTI 2023.

In the absence of written procedures for maintaining transparency, some projects, bringing together CSO’s, donors and municipalities, might have influenced local authorities to pay more attention to LTI and engage beyond the mere legal obligation in order to raise transparency. Some of them doing so for citizens’ sake, some for political benefits of presenting themselves as open and transparent, especially in the period before the elections, and some for in order to compete with other rival and/or neighboring municipalities.

The main conclusion for the LTI 2023 is that transparency has increased, but it is necessary to continue working on the establishment of sustainable mechanisms, primarily by adopting written procedures. Namely, clear procedures for reaching and maintaining transparency must be adopted, prescribing precise responsibilities and accountability for implementation. TS made model act regulating presentation of the PEs and PIs on LSGs websites and model act regulating LSGs’ websites in general.

In the past several years, USAID supported some municipalities adopting acts prescribing those procedures. Novi Pazar, which holds on at the top of LTI tables for several years, adopted such acts. There was also support (trainings, models for acts) for LSGs from Standing Conference of Towns and Municipalities of Serbia which contributed to this. A further boost could be given by introducing legal obligations for local governments (regarding transparency) by the central government. As noted earlier, better results are expected when laws prescribe transparency. When obligations are abolished (as it was related to public procurements), not many municipalities will hold on to good practices.

Individually, there were few changes within the top 10 municipalities. Novi Pazar and Sombor remained at the top, with Veliko Gradište raising from 7th to 3rd position. Kanjiža and Sokobanja are

⁵ There was none in LTI 2022 and one in LTI 2021 – Bečej at 90, which plunged to 67 in 2022.

still in the top five. Bor saw solid increase – from 14th to 6th position. The most significant leap is made by Kladovo, coming to 14th from 113th position, and the score growing from 40 to 68.

Scores of the largest cities in Serbia are a cause for concern due to a large drop in transparency and poor ratings and rankings. Novi Sad fell from 14th to 46th place (LTI from 65 to 56), Niš from 18th to 43rd (LTI from 64 to 57), and Belgrade from 25th to 98th(LTI from 57 to 46).

LTI rank/score	LTI 2023	LTI 2022	LTI 2021	LTI 2020
Novi Pazar	1/94	1/87	4/78	2/82
Sombor	2/84	2/85	2/88	3/80
Veliko Gradište	3/82	7/76	9/71	59/47
Kanjiža	4/81	5/79	3/83	4/77
Sokobanja	5/79	3/84	5/75	8/68

The LTI 2023 results demonstrate the influence of introducing (Information booklets) and abolishing legal obligations (Public procurements), direct support to local municipalities on transparency, political and administrative will, and cooperation with CSOs. Mechanisms which guarantee that improvement does not depend on the political will or enthusiasm of individuals within the local administration should be adopted, implemented, and disseminated further, their implementation supported and monitored (not merely through LTI results). LTI itself, as a long-term tracking mechanism, proves, cycle after cycle, 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. Such influence is expected in upcoming years, since LTI is envisaged as a measurement tool for the progress in the area of transparency in draft National Anti-corruption Strategy, published in September 2023.

It is important to mention that **poor scores in total or 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.**

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 five in the row, supported by the USAID. It was applied again in 2020, 2021, 2022 and 2023.

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 proved to encourage competition among LSGs. Transparency Serbia was convinced, and it proved to be true, that sustainable funding for nationwide LTI in the 2019/2023 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 2023, same as in LTI 2019, LTI 2020, LTI 2021 and LTI 2022, 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 in 2014/2015, similar previous experiences of members of the Transparency International network were used, especially the Slovak branch, and the GONG organization from Croatia, whose methodology was used by TI BiH.

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 2023 results with [LTI 2015](#), [LTI 2019](#), [LTI 2020](#), [LTI 2021](#), and [LTI 2022](#), one should have in mind that Transparency Serbia, in the meantime, slightly 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 8¹⁰ LSGs or 5% (one city, four towns and three in-city municipalities), which is far better than 2022, when 24 LSGs or 16% (three cities, 18 towns and three in-city municipalities) did not respond. It is even better when compared to LTI 2021 (total of 46 LSGs or 27% - six cities, 27 towns and 13 in-city municipalities failed to respond).

Same as in previous research, we also sent to all municipalities one request for free access to information using the “mystery shopper” strategy. In this concept, instead of TS as the organization,

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 Five 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, 123 local self-governments responded to citizens' requests and provided requested information. It is fewer than in 2022 (125), 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 April and May 2023.

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 2023 61 LSGs (out of 170, 36%, compared to 51 LSGs in 2022, 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** - between April and September 2023. 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 2023 is that **transparency has increased**, but it is **necessary to continue working on the establishment of sustainable mechanisms**, primarily by adopting written procedures. Namely, clear procedures for reaching and maintaining transparency must be adopted, prescribing precise responsibilities and accountability for implementation. Proof for this is Novi Pazar, which holds on at the top of LTI tables for several years, and which adopted such acts.

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.

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 in the past two years (from 95.5% in 2021 to 72.6% in 2022 and to 62.2% in 2023), proves this observation.

Introducing new, better, rules and obligations can propel raise of transparency. Thus, “Information booklet” category surged from 41.7% (after falling from 51.9% in 2022) up to 73.3%.

“Budget” went over 60% mark for the very first time, being 63.2% in 2023 (56.7% in 2022). Supporting LSGs in several projects, in particular those supported by USAID and SDC, probably affected growth in this category, in the range from publishing other budget documents, apart from the budget, to reports on public debates on budget proposals.

“Public enterprises” continued ascend, from 29% in 2019, to 47.6% in 2022, and getting to 51.3 in LTI 2023. However, **there are still public enterprises without websites**, more than 10 years after publishing information on their websites became obligatory (16% of the observed PEs), and there are PEs with websites without any relevant documents, envisaged by the Law on PE, published on them.

“Assembly and Council” remained the least transparent category, although it also saw an increase – from 35.4% to 39.5%. From the research and from LSGs’ responses on verification letters, it is notable that there are more municipalities with e-assemblies year after year. Some of those, however, share no data at all with public, but are merely used for internal purposes.

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, some bad practices also persist.

Selected systemic problems and observations

Making decisions, adopted by local authorities, available to citizens is the basic precondition for holding local government accountable. Therefore, the lack of transparency in the area “Assembly and Council” directly affects the possibility for citizens to recognize what effect those decisions will have on their life. According to LTI findings (and responses in the verification process), instead of the decisions, easily accessible on the website right after the session of the local assembly or council, citizens are often given interpretation (in the form of the explanation made by decision-makers, or news written by website editor) or it is considered that publishing decisions in the official gazette (often not searchable even when it can be found at the LSG’s website) is transparent enough. Some LSGs opt to publish just some documents, without clear criteria why some are published and others are not. The average score in the area “Assembly and Council” has been around 35% in the past three years. In LTI 2023 it came close to 40% for the first time (39.5%). The good news is that indicator that measures whether decisions made at the sessions of local assemblies can be found also raised from 35.2% in LTI 2022 to 46.2%¹² this year. However, this is still low, especially regarding the fact that still 17% 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 monitoring of city/municipal regulation significantly harder. The agenda of the next assembly’s session is posted at 53.1% (46.9% in LTI 2022) of the LSGs websites, and the proposed documents for the next session at 29.7% (24% in LTI 2021). Those positive trends should be welcomed, but the growth in this area has been extremely slow in the past period. The tempo of the growth regarding municipal council is more promising, but it is still very low – it raised from 14.5% in 2022 to 26.9% in 2023.

The current budget was not published at all on the websites of 2.1% of local self-government units (three out of 145). However, many budgets (20%) 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 previous research cycles it was noted as “encouraging” that the “citizens’ budget” was published by more LSGs each year. It declined in 2022, and the growth is still very slow - in LTI 2021 there was an increase from 55.1 to 57.9%), then it fell to 56.6 in LTI 2022, and now it is at 58.6% of the LSGs websites.

After the plunge caused by pandemic measures, there has been steady improvement in organizing public debates on budget issues (citizen surveys or consultation). It raised back to 55.2% in 2022 (from 39.3% in 2021), and this year it came to 73.1%, which is close to 77% in 2020 research. More LSGs published reports on budget public debates (raised from 33.8 to 46.2%) but there is a huge area for further improvement regarding this indicator.

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 earlier, there has been a steady progress visible in the area of Public Enterprises and Public Institutions since LTI 2019. However, the average score is still far below the desirable level (51.3% in LTI 2023) and some of the most important indicators are even decreasing. Therefore, this area remains one of the most problematic. The practice of appointing managers affiliated to political parties is a notorious fact and not a secret. In some cases, political 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. Comprehensive information about directors’ selection procedures can be found on websites of 5.5% of LSGs, decrease from 7.6% in 2022. (8 LSGs, compared to 11 in LTI

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

2022 and 6 in LTI 2021). Situation is a bit better, but far from good, when it comes to basic information about these procedures – they are published on 16.6% LSG’s website (down from 17.7 in LTI 2022 and 20.8% in LTI 2021).

Despite the legal obligations, 16% of the observed PEs do not have their own websites. This is the case with 24% of the observed Pls. In 21% 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.

The situation with publishing work plans and reports on the work still proves how neglected this area is – we found respectively 50% and 44% (small increase from LTI 2022) of these documents for the observed PEs, although this is a legal obligation.

There is a stagnation regarding the number of LSGs which have sections on their websites dedicated to PEs (89.0% compared to 89.7%) and Pls (88.3% compared to 89.7%). As noticed in previous reports, this is the first step towards the page with comprehensive information and documents, which TS has been proposing in all previous research conclusions.

More LSGs have adopted and published new development strategies. This indicator has risen from 34% in 2021 (huge decrease from 2020 after old strategies, valid until 2020) to 73% in LTI 2023.

There is a stagnation in the area of free access to information as a whole. However, within the category, there are some significant variations. Decrease in the number of municipalities which ignored requests continued – from 40% in 2021, to 23% in LTI 2022 and to 6% in 2023. This might be caused by better responsiveness by LSGs, caused by introduction of more efficient sanctions for not responding, or by decrease in the overall number of appeals submitted to the Commissioner against LSGs and local public enterprises.

There was no notable change in the number of LSGs which ignored the request sent by TS’ “mystery shopper” – 47¹³ in LTI 2023, compared to 45 (out of 170) LSGs in LTI 2022. One of them (Subotica) has a four-year continuity in not replying or non-submission of information to TS’ “mystery shopper”.

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**, Svrljig, 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

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.

Clear procedures for reaching and maintaining transparency must be adopted, prescribing precise responsibilities and accountability, but even more – these procedures must be implemented. Adopting and implementing such mechanisms guarantee that improvement will not depend on the political will or enthusiasm of individuals within the local administration.

Sanctions for violations of the rules and mechanisms should be not merely prescribed, but also regularly implemented. Abolishing obligations will regularly result in abolishing good practices envisaged by those obligations. This was the case with public procurements, when changes in the legislation abolished the obligation to publish information on the buyers' websites, which resulted in lower scores for many LSGs¹⁴.

However, the mere existence of the obligation and prescribed penalties 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 (51%), although steady improvement has been made since 2019 when the score was 29%. Score could have been higher if sanctions were used in the past in order to enforce implementation of the prescribed obligation. However, sanctions for breaking the law regarding the transparency (either at the local or national level) had never been implemented. Also, the bad examples had been given to local authorities all the time long by the Serbian government and its public enterprises which also kept ignoring its obligations.

The research again identified some examples of good practices (listed further down in this report), 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-related information (apart from budget itself). The justification/explanation of the budget is not available on the website of 54 (out of 170) LSGs. The 6-month and 9-month reports on budget execution are not available on the websites of 101 (out of 170) LSGs. Proper public debate on the budget has not been held in 52 LSGs (out of 170), and almost hundred cities and municipalities haven't published reports on the debate. On the other hand, it is encouraging that the "citizens' budget" is published on 99 (out of 170) observed websites.

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 (162 out of 170), but a number of LSGs which publish public calls and other documentation has dropped significantly (from 159 in 2021 to 95 in 2022 and to 63 in 2023).

Same as before (LTI 2022, 2021, 2020 and 2019), LSGs performed relatively well in the area of "free access to information" - they complied in 100% of cases with a duty to inform citizens on how to submit requests. However, this information is visible in printed form only in seven service centers or administration premises.

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

Transparency of local public enterprises and institutions remains weak, although there has been a slow but steady progress visible in this area of since LTI 2019. However, the average score is still far below the desirable level (51.3% in LTI 2023) and some of the most important indicators are even decreasing.

Comprehensive information about directors' selection procedures can be found on websites of 5.5% of LSGs, and basic information about these procedures are published on 16.6% LSG's website.

Out of 145 observed, 23 PEs and 35 PIs do not have their websites. In 21% 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.

Publishing work plans and reports on the work is legal obligations, yet we found respectively 50% and 44% (small increase from LTI 2022) of these documents for the observed PEs.

There is a stagnation regarding the number of LSGs which have sections on their websites dedicated to PEs (89.0% compared to 89.7%) and PIs (88.3% compared to 89.7%). As noticed in previous reports, this is the first step towards the page with comprehensive information and documents, which TS has been proposing in all previous research conclusions.

It should be noted that number of LSGs' websites, on which we found data about the conducted public hearings/debates over the last 12 months, decreased from 104 to 96. On the other hand, both absolute and relative number of the reports on those debates, containing information on proposals made by citizens and the reasons for acceptance/refusal, increased (from 38 to 44, which is 36% to 45% of those which organized debates).

LSGs largely follow the legal requirement to publish inspection lists (95.9% of municipalities). Less than one-fourth of LSGs evaluated citizen satisfaction with services during the last four years or used such evaluation provided by others (NGOs, donors, etc.).

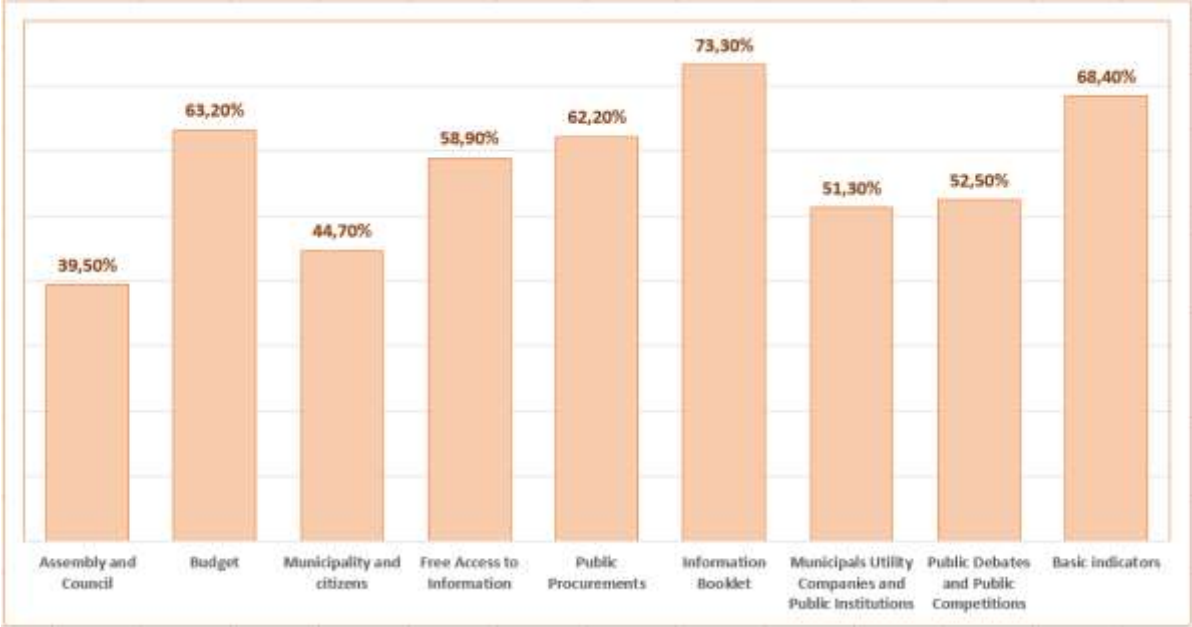
In the area of Assembly and Councils, the only indicator where LSGs performed well was publishing the list of assembly members (91%). However, contacts with assembly members (e-mail addresses, phone numbers, direct forms) are found on websites of merely 15.9% of LSGs. The agenda of the next Assembly's session is not visible in nearly half of LSGs, while voting results are available in 22% of cases. In addition, just the half of those publishing agendas also publish draft documents to be discussed at the session. There has been an increase of number of city/municipality council decisions and assembly decisions available on the websites – 35.2 to 46.2% and 14.5 to 26.9% respectively.

In other, non-categorized indicators, LSGs performed best in publishing spatial plans/urban plans (99.3%) and for the mayors submitting a declaration of assets to ACAS – 97.9% of them did it. The systematization act of municipal administration was available at 91% (much better than 64% in 2022). Code of Ethics for civil servants was available on the web in 58% of cases. According to data from the Agency for the prevention of corruption, local anti-corruption plans, although mandatory, are adopted by 113 out of 145 (they are mandatory only for cities and municipalities, not for in-city municipalities), which is six more than in 2022.

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

There are eight LTI categories or broad areas in which TS observes transparency of LSGs. They are specific (such as “Budget” or “Public procurements”), grouping between four and 18 indicators (and bearing between four and 18 points). 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 “Information booklets” (73.3% of maximum score, sharp rise from 41.7% in previous research). “Public procurements” have been on the steady decline since some legal obligation had been abolished in 2021, and now this group stands at 62.2%, below “Budget”, which increased to 63.2%.

High scores from previous evaluations for “Public procurements” category 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 those three areas, 145 LSGs obtained more than half of possible scores in the area “Free access to information” (58.9% - little lower than in LTI 2022 and LTI 2021), “Public debates and public competition” (52.5%) and, for the very first time, in the “Public enterprises and public institutions” (Municipals Utility Companies and Public Institutions) category (51.3%).

When it comes to the individual indicators, there were 15 out of 95, with more than 90% of municipalities having positive scores (there were 10 such indicators in 2022). There are, actually, two with 100% compliance (Information on the working hours of administration available on the website and Information on the submission of a request for free access to information available on the website). Remaining indicators over 90% include: publishing spatial/urban plans, publishing budget, mayors submitting declarations of assets, publishing information on the website (or in the Information booklet) about the services provided by the municipality, having section on the website dedicated to public procurements (even if only PP plans are published there), publishing inspections controlling lists, financial plans of indirect budget users been published, with visible structure of funds intended for individual users, publishing calls for leasing property in LSGs’ possession, not having unresolved decisions of the Commissioner, having adopted Integrity Plan, having information about salaries of officials in the Information Booklet, publishing list of assembly members on the website and publishing the rulebook on internal organization and systematization of administration.

At the bottom of the table, there are no indicators with a zero score. Last year’s bottom indicator publishing information on how individual members of the assembly voted at the assembly session has increased from just one LSGs having such information publicly available to six. A small but encouraging step, which is the result of the introduction of e-assemblies.

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

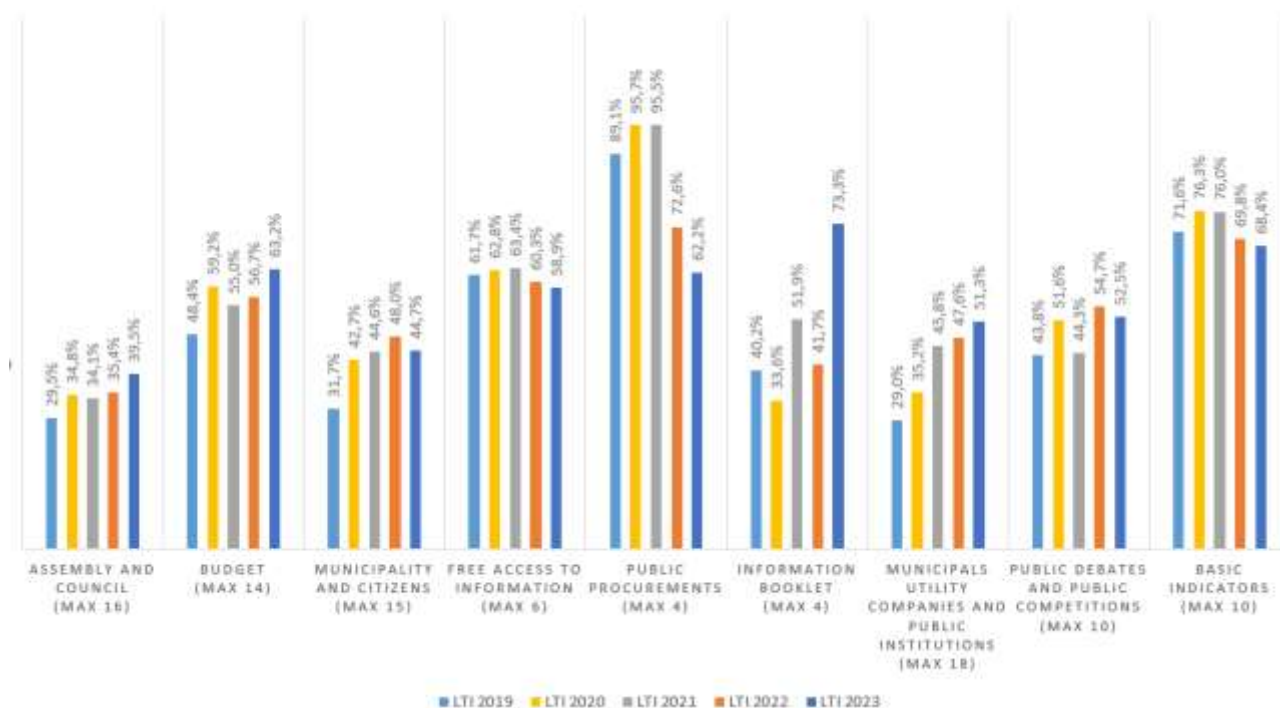
	Assembly and Council	Budget	Municipality and citizens	Free Access to Information	Public Procurements	Information Booklet	Municipals Utility Companies and Public Institutions	Public Debates and Public Competitions	Basic indicators
Average	6.3	8.8	6.7	3.5	2.5	2.9	9.2	5.2	6.8
% of max score	39.5%	63.2%	44.7%	58.9%	62.2%	73.3%	51.3%	52.5%	68.4%

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 three years, performance was worst in the category “Assembly and Council”. It is better than before in “Public enterprises and public institutions”, with constant growth over the past four years, but still at the rather low level (51.3%). Surge has been seen in the “Information booklet” category score.

Graph No 2. LSGs overall performance by categories in 2023 vs 2022 vs 2021 vs 2020 vs 2019



Legend: Comparison of LSGs overall performance in all fields, 2019 vs 2020 vs. 2021 vs. 2022 vs. 2023

Information Booklets

The average score in this area surged to 73.3% after dropping to 41.7% in 2022 from previous score of 51.9%. The main reason for this is new legal obligation – to publish electronic information booklets on the Commissioner’s portal, with link on the LSGs’ website, instead of publishing word or PDF versions only on LSGs websites. Most of LSGs, however, now have both versions, and TS researchers looked for information for LTI indicators on both sources. Besides that, now there are four entities within LSG which are obliged to produce information booklet – administration, assembly, counsel and mayor, while before legislative amendments it was allowed and common to have one Booklet for all these bodies.

There are four indicators in this category and each one had large increase in LTI 2023. Having published and regularly (at least three months) updated booklet surged from 41.4 to 73.8%. TS examined Administration’s booklet (or old “joint” municipal booklet on the LSG’s website) for this indicator, as it contains information that most citizens are interested for. Having current annual plan of public procurement or link to the plan in the (administration’s) booklet has grown from 36 to 68%, having information about officials’ salaries (examined mayor’s and assembly’s booklet) from 69 to 92% and indicator “Booklet contains 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” surged from 21 to 60%.

There are 58 LSGs with the maximum score of 4.

Budget

Performance in the “Budget” category continued steady growth and it reach its eight-year peak at 63.2% (in 2022 it improved from 55% to 56.7%). The current year budget document is almost all LSGs’ websites (97.9%), 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 44.8% (small increase compared to 39.3% in 2022) of LSGs published at least 6 and 9-months reports on budget execution. It is encouraging that number of LSGs publishing monthly reports on budget execution has been increasing in the past three years and it reached 15% in LTI 2023. Audit reports were discussed and published in 33% (24% in 2021) of instances. Number of LSGs organizing public debate on the budget (citizen surveys or consultation meetings) reached its pre-pandemics level with 73.1%. There has been a large increase in the number of municipalities publishing report on the public debate on the budget – from 33.8% to 46.2%. This can be partly attributed to support to municipalities through various donor backed project, with TS participating in some of those. TS also developed the tool for measuring citizens participation in the budgeting process – Local Index of Participation LIPA.

In the category of “**Budget**”, the best score had seven cities and municipalities (Užice, Bor, Ljubovija, Kanjiža, Pirot, Kikinda, Rekovac) and one in-city municipality (Surčin) – maximum of 14 points, followed by 11 LSGs having score 13.

Public Procurements

The category of “**Public procurements**” used to be the best one until 2021 when some legal obligation were abolished and many LSGs had stopped publishing public procurements on their websites. Despite this, almost all LSGs have a page on the website dedicated to public procurements 96.6%, compared to 99.3 in 2022), but only 40% of them still publish information about current procurements (compared to 62.8% in 2022 and 94.5% in 2021). A slight increase in number of LSGs publishing information about PPs completed in the past 12 months is caused by new rules about Information booklets, for this is the source of this information in most of the cases when positive mark is granted (72.4% in 2023, 65.6 in 2022 and 95.5 in 2021). 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. More information on this topic is provided in the Local Public Procurement Index (LPPI), developed by TS. There are 54 LSGs with maximum score - 4.

Free Access to Information

LSGs performed relatively well in this area. All of the (100%) comply with the duty to inform citizens on how to submit requests. However, only 4.1% (same as LTI 2022) provide the same information on their premises. Three-quarters of LSGs (almost the same as in LTI 2022 and 2021) provided requested information (in a timely manner) to TS’s “mystery shopper”. In this category, 12 LSGs had a very good score of 5 and none had maximum score of 6.

Public Debates and Public Competitions

Only 96 LSGs (66.2% compared to 71.7% in 2022), eight less than previous year, published information about some hearing/debate held during the previous 12 months (other than a consultation on a municipal budget). However, there has been a slight increase in number of those publishing reports on public debates, which contained information on proposals received from citizens and reasons for the acceptance/refusal of those proposals – 44 compared to 38 LGSs in 2022. (30.3 and 26.5% respectively). The disparity between the announced leasing of municipal property (94.5%) and published information about the outcome of those announcements (5.5%) is huge. For the third 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 82.1% and 86.9% of cases respectively and results in 75.2% and 74.5% (69.7% and 72.4% in 2022 and 53.8% and 44.1% in 2021) of cases. There is no progress, however when it comes to justifying to the public how this money was spent and what has been achieved – reports are published in 4.1% (six cases, compared to 11 in 2022 and eight in 2021) and 5.5% (eight cases, compared to 12 in 2022 and seven in 2021) respectively. Some municipalities pointed, in their verification responses, to report containing information about all distribution of the funds (public calls, participants etc.), but this is not what this indicator refers to – reports by those to which the money has been allocated and/or evaluation reports of the projects. In this category, Leskovac, Bojnik and Kanjiža scored nine out of 10, and Novi Pazar, Tutin, Sombor, Pirot and Sokobanja had eight points.

Public Enterprises and Public Institutions

This area has been on the path of slow but steady growth since 2019 and it reached 50% mark for the first time. The increase was noted with 11 out of 18 indicators. Amongst those seven which decreased, four had very small decline. The cause for the concern, however, is decrease of already small number of LSGs and/or, public enterprises and public institutions publishing information and documents from the director selecting procedures. Comprehensive documents on the competition process for electing PEs' directors can be found on a handful of LSGs' websites (5.5%, compared to 7.6% in 2022), and at least some documents can be found in 16.6% of cases (17.2% in 2022).

There are still nearly 90% of LSGs with a special section on their websites with information about PEs and PIs. On the other hand, there is still a large number of observed PEs without their own websites (15.9%), although there has been a legal obligation to post certain information and documents on their website for more than a decade. More than 20% 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. This is, however, better than 30% noted in LTI 2022.

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

Municipality and Citizens

In this category, the best rated indicator remain the one which is the easiest to fulfil – publishing information on working hours (100%). Another indicator with high average score (96%) is publishing inspection controlling lists on the website. Around half of LSGs provide the possibility on their websites for citizens to report irregularities or violations of laws, including corruption. Such a possibility exists in less than 30% of LSGs' service centers or other premises. Less than quarter of LSGs conducted research on satisfaction with their services during the last four years or used surveys provided by others (NGOs, donors).

Same as in LTI 2022, just one municipality (Novi Pazar) reached a maximum score (15) in this category, and Sombor followed it with 13 points.

Assembly and Council

In this, the worst ranked category, the only aspects of transparency where assemblies and councils performed well were publishing the list of their members (91%) and making the Official Gazette available on the website (83.4%). Even the next Assembly's session agenda was not visible in almost half of the LSGs. Furthermore, nearly half of those publishing agendas (53.1% in total) for municipal sessions also publish draft documents to be discussed at the session of the local parliament (total of 29.7%). Somewhat promising is the fact that Indicator that measures whether decisions made at the sessions of local assemblies can be found increased to 46.2% from 35.2% in LTI 2022. The growth of similar indicator related to municipal council is even more promising, but it is still very low – it jumped from 14.5% in 2022 to 26.9% in 2023. One more indicator should be noted - publishing information on

how individual members of the assembly voted at the assembly session has increased from just one LSGs having such information publicly available to six. This small but encouraging step is the result of the introduction of e-assemblies, and presenting data from e-assemblies in assemblies' session minutes.

There are some good examples in this field – Veliko Gradište had a maximum score of 16, and it is followed by Sombor, Kragujevac, and Novi Pazar with 15.

Other Indicators

In non-categorized indicators (other), LSGs performed best when it comes to publishing spatial/urban plans and having a latest declaration of assets submitted by the mayor to the Agency for Preventing Corruption. Number of LSGs publishing rulebook on internal organization and systematization of administration increased significantly, probably due to new rules regarding information booklets (from 64.1% to 91%). On the other hand, number of LSGs publishing the number of employees (in Information Booklet, in Budget or as separate information on the website), has dropped from 96.6% to 83.4%

Information on municipal property leased to other entities is published in only four cases, this result which annulled hopes from the previous cycles when there were 10 LSGs with such data and it seemed that there could be further slow, but steady, growth (from three in 2021 and one in 2020). Reports on contact with lobbyists (actually forms for contacts, without any recorded contacts) can be found in six instances, and a weekly or daily schedule of the mayor's activities is published on four LSGs' websites.

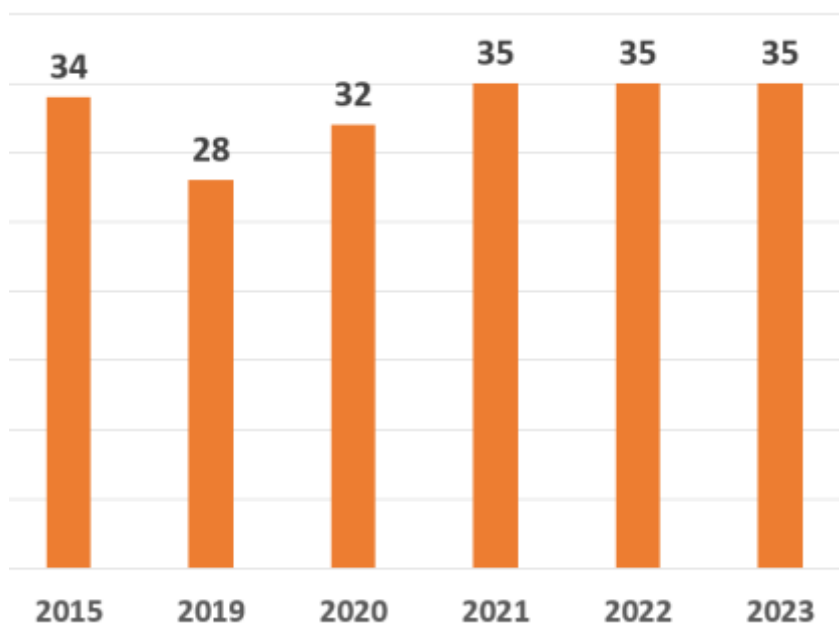
Performance of in-city municipalities

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 2023 with previous years (2022, 2021, 2020, 2019 and 2015), but did not rank them.

Overview

The most general observation is that the average performance of city municipalities has remained the same for the third consecutive year. It is important, however, to bear in mind that average LTI levels large surges and plunges by individual LSGs - 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. Namely, ten out of 25 LSGs increased LTI, one of them significantly (10 points), 11 decreased (two of them 10 points or more), and four remained at the same level of transparency.

Graph no. 4. City municipalities' average LTI index 2015 – 2023



City municipalities performed best in the area of “Information Booklet” (68%, up from 54% in 2022), followed by “Free access to information” (54.7%, minor increase compared to 2022).

On the other hand, performance is worst in the category “Assembly and Council”, where 25 city municipalities’ index is 3.4 out of a maximum of 18 points (21.3%). The low score in the field “Public Enterprises and Public Institutions” (27.8%) can be justified by the fact that not all of these in-city municipalities have public enterprises (or even public institutions) in their jurisdiction. Jurisdictions

could partly explain low average in the “Public debate and public competitions” category, but it doesn’t explain decrease from 28.4 in 2022 to 24.4 this year.

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, three city municipalities performed 50% or above - Sevojno, which had 15 out of 16. Surčin and Palilula Niš are other two with relatively high scores (9 and 8). Besides Palilula Niš and Sevojno, only Čukarica, 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 councilors on the websites (22 out of 25). Only nine of them (13 in 2022) 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 (41% compared to 39%). Surčin has the best score – maximum 14 out of 14, followed by Palilula Niš and Sevojno (11).

Current budget is on the webpage of 21 city municipalities (out of 25), in most instances (20 out of those 21), in machine-readable or searchable form. The situation is worse when it comes to the availability of data on budget spending – only four (seven in 2022) 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 low– there are three published. It is, however, improvement compared to none in 2022.

As for the “**Municipality and citizens**” category, the overall result is slightly lower than in the previous year (39.5% compared to 42%). The best performers are Surčin and Čukarica, with ten out of 15.

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, and nine of them have such mechanisms on their premises.

Table no. 5: LTI Score of city municipalities 2015-2023

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

“Free access to information” had minor increase after significant drop in 2022 (54.7 in 2023, 53.3% in 2022 and 66.7% in 2021). The duty to inform citizens on their websites on submitting a request for free access to information is fulfilled by all 25 city municipalities.

FOI request sent by TS’s “mystery shopper” was responded to by only 15 city municipalities. Only one of them (Zvezdara) have information on submitting a request for free access to the information visible in the service centers or administration premises.

Year by Year

Ten city municipalities increased LTI, 11 decreased, and four remained at the same level of transparency.

Among the improved ones, two of them have increased their overall score by ten points or more: Vračar from 22 to 33 and Palilula Niš from 33 to 43. Two LSGs had significant drop – Mladenovac from 45 to 34 and Novi Beograd from 29 to 19.

Comparing LTI indexes of city municipalities over the past six LTI cycles, 2015, 2019, 2020, 2021, 2022 and 2023, we see that few of them had steady growth (or small variations): Surcin (32–42–53–62–69–72), with LTI 2021, LTI 2022, and especially LTI 2023, score which is, even without certain competences, comparable with the best performers on the main table, Zvezdara (41-38-40-40-43-57) and Palilula Niš (32-31-28-33-33-43). Sevojno, after long period of growth and reaching high mark of 66, dropped to 60 this year.

On the other side, 11 city municipalities have not managed to improve or maintain the same performance as in 2022.

Selected individual examples

Good Practices:

- Kanjiža - Good example of publishing Assembly decisions http://www.kanjiza.rs/ujlap/site/index-sr.html?cat_id=47 Form for citizens applying for presence at the assembly's session: <http://www.kanjiza.rs/ujlap/site/documents/zahtev.pdf>
- 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
- 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://kragujevac.ls.gov.rs/tekst/3192/akti-gradskog-veca.php> and assembly decisions <https://www.kragujevac.rs/lokalna-samouprava/skupstina-grad/sednice-skupstine-grad>
- Leskovac – Good example of publishing Assembly decisions- <https://novi.gradleskovac.org/sednice-skupstine-grad> and Council decisions <https://novi.gradleskovac.org/sednice-gradskog-veca/>
- Mionica – Information about contact with assembly members - <https://www.mionica.rs/about-us/so/odbornici>
- 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/>
- 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>
- 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. There is information on individual members of the Assembly's votes.
- 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> Also – minutes from all previous Council sessions: <https://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/%d0%be%d0%bf%d1%88%d1%82%d0%b8%d0%bd%d1%81%d0%ba%d0%be-%d0%b2%d0%b5%d1%9b%d0%b5/%d0%b7%d0%b0%d0%bf%d0%b8%d1%81%d0%bd%d0%b8-%d1%86%d0%b8-%d1%81%d1%82%d0%b0%d1%80%d0%b8-%d1%81%d0%b0%d0%b7%d0%b8%d0%b2/>

- Zrenjanin - Good example of publishing Assembly decisions <http://www.zrenjanin.rs/sr-lat/skupstina-grada/prethodne-sednice-skupstine-grada>
- 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>
- Smederevska Palanka – Good example of publishing Assembly decisions - <https://www.smederevskapalanka.rs/%d0%be%d0%b4%d0%bb%d1%83%d0%ba%d0%b5-%d0%b8-%d0%b4%d1%80%d1%83%d0%b3%d0%b0-%d0%b0%d0%ba%d1%82%d0%b0/>
- Despotovac – Minutes from the Assembly sessions and information on individual members of the Assembly votes <https://www.despotovac.rs/images/stories/Izvod%20iz%20zapisnika%2019.%20SO%20Despotovac.pdf>
- Kraljevo - There is a special Assembly web page - <https://skupstina.kraljevo.rs/>
- Kladovo – Fine Assembly’s presentation: <https://kladovo.org.rs/lokalna-samouprava/skupstina-opstine/>
- Sokobanja – Contacts of the Assembly members - <https://sokobanja.ls.gov.rs/odbornici> and separate page for documents and adopted decisions: <https://sokobanja.ls.gov.rs/materijal-za-sednice>, <https://sokobanja.ls.gov.rs/usvojene-odluke-2> Explanation for citizens how to apply for presence at the session: <https://sokobanja.ls.gov.rs/prisustvo-gradjana> Council - decisions and sessions: <https://sokobanja.ls.gov.rs/pozivi-2>, <https://sokobanja.ls.gov.rs/usvojene-odluke>
- Užice – Assembly’s page with documents: <https://uzice.rs/27-sednica-skupstine-grada-uzica-2/>
- Tutin – Contact with Assembly members - <http://www.tutin.rs/lokalna-samouprava/odbornici-skupstine-opstine-tutin/>
- Medveđa - Assembly sessions audio live broadcast/recordings <https://www.medvedja.ls.gov.rs/%D0%BB%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/%D1%81%D0%BA%D1%83%D0%BF%D1%88%D1%82%D0%B8%D0%BD%D0%B0-%D0%BE%D0%BF%D1%88%D1%82%D0%B8%D0%BD%D0%B5/%D0%B0%D1%83%D0%B4%D0%B8%D0%BE-%D0%BF%D1%80%D0%B5%D0%BD%D0%BE%D1%81-%D0%BF%D1%83%D1%82%D0%B5%D0%BC-%D0%B8%D0%BD%D1%82%D0%B5%D1%80%D0%BD%D0%B5%D1%82%D0%B0/>
- Kruševac - Contact with Assembly members - <https://krusevac.ls.gov.rs/skupstina-grada/> and and information on individual members of the Assembly votes <https://krusevac.ls.gov.rs/sednice-skupstine/>

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/>
- Sokobanja – daily reports on execution: <https://sokobanja.ls.gov.rs/archives/category/realizacija-budzeta>
- Paraćin – Good example <https://www.paracin.rs/index.php/budzet-opstine-paracin>.
- Surčin – monthly reports https://surcin.rs/?page_id=28394&d=LzlwMjM%3D&m1dll_index_get=0
- Kanjiža – monthly reports - <http://www.kanjiza.rs/ujlap/site/index-sr.html?mnu=4&art=4-3-5-sr.html>
- Kula – monthly reports - <https://kula.rs/budzet-opstine-kula/izvršenja-budzeta/>

- 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>
- Užice – Budget portal with monthly execution reports <http://195.178.50.217/client/documents/17>.
- Titel – Budget page with monthly execution reports <https://www.opstinatitel.rs/budzet-opstine/>
- Veliko Gradište - Budget portal with monthly execution reports - <http://109.92.20.178/client/dashboard>
- Vranje - Monthly budget implementation reports in the form of a citizen report are found on the page <https://www.vranje.org.rs/uploads/files/2227-2038-maj-2023.pdf>
- Kladovo – Public debate on the budget, monthly execution reports <https://kladovo.org.rs/lokalna-samouprava/opstinska-uprava/odeljenje-za-budzet-i-finansije/odsek-za-budzet-i-racunovodstvo/>
- Zrenjanin - <https://www.zrenjanin.rs/sr/gradska-vlast/budzet-grada-zrenjanina>
- Kikinda - Citizens report on budget execution - <http://www.kikinda.org.rs/index.php?language=lat&page=informacije&option=budzet&level=zavrsniracun>
- Ljubovija – Budget portal <http://109.92.31.60/bportal/client/documents/13> and report on public debate <https://www.ljubovija.rs/javneRasprBudz.php>

LSG and Citizens

Good Practices:

- 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/>
- 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 Kneževac - Contact information of local community councilors on the municipal website - <https://www.noviknezevac.rs/samouprava/mesne-zajednice/>
- Požarevac – Mechanism for reporting corruption - <https://pozarevac.rs/prijava-korupcije/>
- Petrovac na Mlavi – Mechanism for reporting corruption - <https://www.petrovacnamlavi.rs/prijavi-korupciju/>
- Kragujevac – Mechanism for reporting irregularities and problems - <https://kragujevac.ls.gov.rs/tekst/264/prijava-problema-upita-i-predloga.php>
- Kladovo - Contact information of local community councilors on the municipal website <https://kladovo.org.rs/mesne-zajednice-u-opstini-kladovo/>

Access to Information of Public importance and Information Booklet

Good Practices:

- Novi Bečej – Information Booklet a bit bulky but a lot information presented user friendly (services – usluge, for instance)

https://www.novibecej.rs/dokumenta/informator_o_radu/informator_o_radu_09.03.2023.pdf

Topola – Fine Information booklet, with deadlines for procedures (usluge) presented -

<https://topola.rs/wp-content/uploads/2023/05/%D0%98%D0%BD%D1%84%D0%BE%D1%80%D0%BC%D0%B0%D1%82%D0%BE%D1%80-%D0%BF%D0%B4%D1%84.pdf> and

<https://informator.poverenik.rs/informator?org=SZ7Wzo7W3R75Hqxoq&ch=BWvWL7BAzkWS9jdNk&code=>

<https://informator.poverenik.rs/informator?org=SZ7Wzo7W3R75Hqxoq&ch=BWvWL7BAzkWS9jdNk&code=>

- 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/>

<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/>

<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/>

<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:

- Valjevo - Good example of PP page: <https://www.valjevo.rs/javne-nabavke/>
- Veliko Gradište - Good example of PP page: <https://velikogradiste.rs/javne-nabavke-4/>
- Kladovo - Good example of PP page: <https://kladovo.org.rs/category/javne-nabavke/>
- Prokuplje – PPs for PEs and PIs: <https://prokuplje.org.rs/javne-nabavke-lokalnih-javnih-preduzeca-i-ustanova/jkp-hammeum/>

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>
- Apatin – Banner on home page – ask PEs' and PIs' directors <http://www.soapatin.org/pitajte-direktore>

- Bečej – PEs’ 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>
- Novi Pazar – Good examples – all documents on the webpage:
<https://www.novipazar.rs/lokalna-samouprava/javna-preduzeca#rukovodstvo-5> also page of the Commission: <http://www.eskupstina.novipazar.rs/sastav-skupstine/stalna-radna-tela#komisija-za-sprovodjenje-konkursa-za-imenovanje-direktora>
- Ljubovija - Names of the members of the Management and Supervisory Boards elected by the Municipal Assembly - <http://www.ljubovija.rs/lokalna/66>
- Zrenjanin – Everything except appointment of directors: <http://zrenjanin.rs/sr/e-uprava/javna-preduzeca/jkp-vodovod-i-kanalizacija> and <http://zrenjanin.rs/sr/e-uprava/ustanove/kulturni-centar>
- Bač – Interesting presentation of documents about PEs and PIs, including pricelist and appointment of the PE-s director:
http://www.bac.rs/sr/dokumenta?field_godina_dokumenta_value%5Bvalue%5D%5Byear%5D=&field_tip_dokumenta_tid=69&title= and
[http://www.bac.rs/dokumenta?field_godina_dokumenta_value\[value\]\[year\]=&field_organ_dokumenta_tid=All&field_tip_dokumenta_tid=10](http://www.bac.rs/dokumenta?field_godina_dokumenta_value[value][year]=&field_organ_dokumenta_tid=All&field_tip_dokumenta_tid=10)
- Sremska Mitrovica -Fine example of PEs’ presentation on LSG’s website:
http://www.sremskamitrovica.rs/kategorija.php?cat_id=180
- Bor – Number of employes in Pis and Pes and links:
<https://bor.rs/%d0%bf%d1%80%d0%b5%d0%b4%d1%83%d0%b7%d0%b5%d1%9b%d0%b0-%d0%b8-%d1%83%d1%81%d1%82%d0%b0%d0%bd%d0%be%d0%b2%d0%b5/>
- Užice - Fine example of PEs’ presentation on LSG’s website <https://uzice.rs/javne-sluzbe/jkp-vodovod/> and <https://uzice.rs/javne-sluzbe/gradski-kulturni-centar/>

Public Debates and Public Competition

Good Practices:

- Dimitrovgrad - Fine example of page about public debates
https://www.dimitrovgrad.rs/javne_rasprave/2022
- Kragujevac – Calls and decisions grouped <https://kragujevac.ls.gov.rs/tekst/2218/javni-konkursi-stipendije-pozivi.php>
- Bač - Calls and decisions grouped <https://www.bac.rs/sr/konkursi>
- Topola - Fine example of page about public debates: <https://topola.rs/5893-2/>
- Užice - Calls and decisions <https://uzice.rs/konkurs-za-za-sufinansiranje-projekata-proizvodnje-medijskih-sadrzaja-u-oblasti-javnog-informisanja-na-teritoriji-grad-a-uzica-za-2023-godinu/>
- Novi Pazar – Section about financing projects: <https://www.novipazar.rs/projektno-finansiranje>

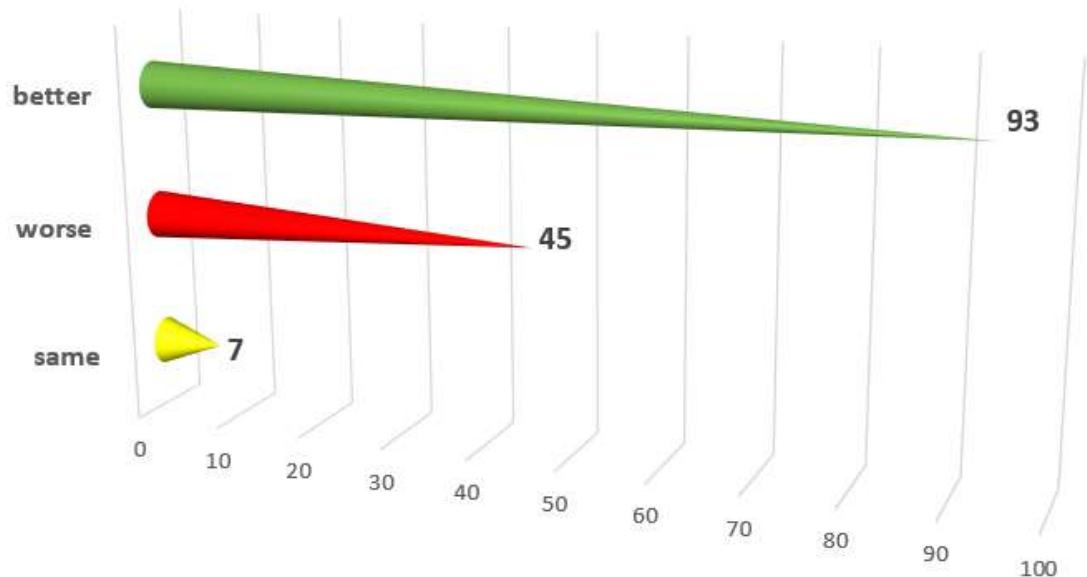
Other issues

Good Practices:

- Kanjiža – Comprehensive record of the property (real estate) owned by municipality which is leased: <http://www.kanjiza.rs/ujlap/site/index-sr.html?mnu=4&art=4-3-3-sr.html>
- Bor - the record of the property (real estate) owned by municipality which is leased (without information about price) <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>
- 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>
- Kanjiža – Number of employees and results <http://kanjiza.rs/ujlap/site/documents/4-4-1/izvestaj-22-sr.pdf>
- Kovin – Number of employees: <https://www.kovin.rs/registar-zaposlenih/>
- Srbobran - Number of employees <https://www.srbobran.rs/lokalna-samouprava/podaci-zaposleni>
- Čuprija – Fine presentation of number of employees: <https://cuprija.rs/sr/wp-content/uploads/2021/01/Podaci-o-broju-zaposlenih-i-radno-anga%C5%BEovanih-lica-12-01-2023.pdf>
- Kladovo – Page dedicated to lobbying with explanations (register is empty): <https://kladovo.org.rs/lokalni-antikorupcijski-forum/lobiranje-i-lobisti/>
- Novi Pazar – Page dedicated to lobbying (register is empty): <https://www.novipazar.rs/usluge/3645-registar-lobista?highlight=WyJpenZlXHUwMTYxdGFqIiwic3JlZHN0dmltYSIsImluZm9ybWlzYW5qYSIsInNyZWRzdHZpbWEgaW5mb3JtaXNhbmphllo=#registar-lobista-za-grad-novi-pazar>
- Kladovo - Number of employees, monthly: <https://kladovo.org.rs/document-tag/broj-zaposlenih-2023/>
- Sokobanja – Reports on the work of administration: https://sokobanja.ls.gov.rs/wp-content/uploads/2023/06/3_Izvestaj-OU.pdf
- Sokobanja – Mayors weekly activities reports: <https://sokobanja.ls.gov.rs/predsednik-opstine-skobanja>

Comparisons with previous LTI's

Graph No 5: Comparison 2023 vs.2022 - How many LSGs got better or worse, or performed equal



The overall average LTI score for 145 LSGs in 2023 is 52 and it is higher than LTI 2022 (49), LTI 2021 (48) and LTI 2020 (46). Seven cities and municipalities have the same score as last year. Less than third LSGs (45) worsened their score from last year (in the 2022 final report, 67 worsened compared to 2021).

Despite the fact that 93 LSGs improved, it should be noted that 52 out of 145 LSGs have not improved their score and this implicates that the space for improvements is still huge. Variations, ups and downs by some municipalities in the past few years, also indicate that achieving transparency's sustainability is one of the main challenges.

Look behind mere numbers and statistics, by TS research, tells that budget category in general is getting better from the point of transparency and citizen - friendly presentation. This also applies to quality of budget public debates and reports on public debates. There are more LSGs with budget portals, but some of them fail to publish all information, at least in timely manner, on those portals.

Public debates (apart from budget ones) and public competitions are still not organized in a way that would enable easy insight. Despite there are separate section named Debates or Competitions, some information can be only found on News sections. Search engines on many websites are not reliable.

There are many obsolete banners leading to old documents. On the other hand, some banners supposed to contain old documents from previous years (for instance "Budget 2018") lead to page where new documents can be found.

The best-ranked in LTI 2023 is Novi Pazar (94, had 87 in 2022 and 78 in 2021), followed by Sombor with a score 84 (85 in 2022 and 88 in 2021) and Veliko Gradište with 82 (76 in 2022 and 71 in 2021) Kanjiža is fourth (81, had 79 in 2022 and 83 in 2021), followed by Sokobanja with 79 (84 in 2022, 75 in

2021). Bor made leap to 6th place with 78 (62 in 2022 and 62 in 2021). Leskovac(77), Tutin (76) and Užice (75) joined by Pirot (72). Kladovo and Kosjerić should be mentioned for a notable leap up the scale – from 113nd to 19th, respectively. Petrovac, Zaječar, Kuršumlija, Rekovac and Bačka Palanka also made significant improvement.

Preševo remained at the bottom of the table, but this municipality managed to improve to 25 points from disappointing nine in 2022. There are no other LSGs with score under Koceljeva, Sečanj, Kovačica, Bujanovac and Knić are only municipalities with score under 30.

There are more LSGs which made more than 10 points increase in LTI 2022, but their final score still places them within the middle or lower part of the table. Proving that improvement is sustainable and keeping up the good work should result in excellent score and upper part of the table in LTI 2024. In total, **22 LSGs (10 in 2022, compared to 2021) improved their scores for 10 points or more in the last year:** Kladovo (28), Kosjerić (23), Temerin and Rekovac (19), Zaječar (18), Ada (17), Beočin and Preševo (16), Sečanj and Petrovac (15), Žitište and Bojnik (14), Bor and Merošina (13), Koceljeva and Knić (12), Bačka Palanka, Šabac and Kuršumlija (11), Stara Pazova, Lapovo and Priboj (10).

On the other hand, Žabalj lost 14 points, Beograd and Mladenovac 11 and Krupanja and Novi Beograd lost 10.

Sustaining good score, or improving it, in most cases remains the **matter of political prioritization or the individual effort of one or few civil servants**. On the other hand, **written procedures and independent monitoring could help maintain good results and, more than anything, support will and efforts of interested civil servants and decision-makers**.

Recommendations

After five consecutive cycles of evaluating and ranking, with many LSGs improving and average LTI growing, **sustainability of transparency remains one of the top issues**. Several municipalities proved, in the past few years, to have strong determination to raise and maintain LTI scores (and transparency). Many LSGs had ad-hoc leaps, followed either by stagnation or, even worse, large decline. There is also certain number of municipalities stagnating at the lower levels of the table. This implies that, in the absence of the rules, actual political (or administrative) leaders and their will, capacity, priorities or support from NGOs, donors, other projects influence final result and ranking of the LSGs.

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's major recommendation is unchanged from the previous cycle - more effort should be invested in maintaining the level of the raised transparency through developing procedures prescribed by local policies and procedures, defined by different internal 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 presents some new recommendations and restates the recommendations made in the previous research rounds:

- TS encourages LSGs to adopt an act that would clearly regulate scope of information that should be published on municipal website, deadlines for updating these information as well as duties and responsibilities within the administration, in order to improve transparency and ensure sustainable progress;
- While the draft National anti-corruption strategy and Action plan (till the end of 2024) envisage some, but limited scope of action (distribution of funds for CSO and media, e-consultations) when it comes to the local government transparency, we encourage introducing additional activities in the (National) Action plan for the period 2025-2027 and continuation of Local anti-corruption plans development;
- TS recommends the Government of Serbia to promote good practices identified on local level, both in design of nation-wide policies and in the work of national institutions, in particular when it comes to budget transparency and public procurements;
- The **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**. Separate "subsites" ("skupstina.municipality.ls.gov.rs" or "skupstina.municipality.rs" or "budzet.municipality.rs" or "urbanizam.municipality.rs") are citizens' friendly and they increases transparency;
- e-parliament with public access is an excellent way to raise transparency and to make available all the information, including how the individual members of the assembly voted, amendments etc. Even if there is no public access to the e-parliament for some technical reason, data from the e-parliament can be presented on separate page on the web site, or used in minutes. TS encourages LSGs to introduce e-parliament;

- TS recommends LSGs to make separate pages on the website dedicated to the activities of the assembly (as not merely presenting its jurisdiction and members), of the mayor and the council. These pages 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;
- LSGs should make budget portals as an excellent way to make information available to citizens and to increase transparency. Budget portals should be updated with documents and information regularly;
- Without budget portal, special "Budget" page on LSGs website, should have on it 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;
- TS recommends to LSGs to enhance transparency in public procurements: It is necessary to systematically publish data on public procurement on the internet presentations of local self-governments. Although there is currently only a legal obligation to publish the public procurement plan, it is desirable to publish data on public procurement procedures as well. This particularly applies to procurement procedures to which the law does not apply. The other solution could be a direct link from PP page on LSGs' website to each particular procurement on PP portal; TS also encourages LSGs to record data on contract execution for all types of public procurement procedures and to begin publishing data on contract execution;
- LSGs should group information on public calls and competitions 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. This implies to reports made by NGOs and media, not just the report with table containing information which projects were supported in the previous year;
- TS encourages LSGs to broadcasting assembly sessions on websites, Youtube channels or social networks pages and to make recording available to public. TS supports this rather than previous practice of paying to media to broadcast sessions. The latter mechanisms was occasionally used, as pointed in some researches, to circumvent money to certain media;
- LSGs should make “hybrid” public debates and/or meetings a regular practice. Those methods and channels (such as online platform debates and meetings) could and should be combined with physical meetings 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;

- TS reminds LSGs that contact information of assembly members and local councilors (officials at “mesne zajednice”) (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 assembly members and 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 (four organs – assembly, mayor, administration and council) should post and regularly update their Information Booklets on Portal, in full compliance with the mandatory Instruction (Rulebook) prescribed by the Commissioner for Information of Public Importance;
- 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
33. Is the information on the working hours of administration available on the website or telephone number through which it is possible to get this information?	100.0%
46. Are information on the submission of a request for free access to information on the site? **	100.0%
90. Are spatial plans / urban plans published on the site?	99.3%
15. Is the budget for the current year available on the website? **	97.9%
95. Has the mayor submitted a declaration of assets to ACAS?	97.9%
37. Is there information on the website about the services provided by the municipality?	96.6%
48. Is there a section on the website dedicated to public procurements?	96.6%
34. Are there inspections controlling lists on website?	95.9%
27. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users?	95.2%
75. Does the municipality regularly announce a call for leasing property in its possession?	94.5%
45. The municipality has no unresolved decisions of the Commissioner?	93.8%
93. Has the Integrity Plan been adopted and has the LSG report on its implementation?	93.8%
53. Does the Information Booklet contain information about salaries of officials and employees?	91.7%
11. Is the list of assembly members published on the website?	91.0%
86. Is the rulebook on internal organization and systematization of administration posted on the site?	91.0%
55. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?	89.0%

56. Is there a special segment on the municipal website dedicated to public institutions with PI data?	88.3%
79. Have the public calls for the allocation for NGOs been published on the website?	86.9%
28. Does the municipal administration have a service center through which it provides all the services?	85.5%
57. Does the observed PE have its own website?	84.1%
13. Is the local Official Gazette available on the site? **	83.4%
87. Is data about number of the employees in local administration published on the website?	83.4%
77. Have the public calls for media allocation in the last 12 months been published on the website?	82.1%
17. Is the budget published on the website in machine-readable or searchable form?	80.0%
59. Have public competitions for the selection of directors of public enterprises been conducted?	79.3%
72. Is the list with prices of services provided by observed PE and PI available on the website of the municipality or PI/PE website?	79.3%
94. Has the Local anti corruption plan been adopted?	77.9%
58. Does the observed PI have its own website	75.9%
78. Have the results of the competition for media allocation in the last 12 months been published on the website?	75.2%
43. Did the municipalities provide requested information (FOI request) in time? **	74.5%
80. Have the results of the competition for the allocation for NGOs been published on the website?	74.5%
51. Is the Information Booklet published on the site and updated in the last 3 months?	73.8%
22. Has a public debate on the budget been held - citizen surveys or consultation meetings?	73.1%
83. Has the municipality's development strategy been published on the website?	73.1%
16. Is the justification/explanation of the budget available on the website?	72.4%
23. Has a public call for public debate on the budget been published on the website?	72.4%
50. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?	72.4%

52. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?	67.6%
73. Is there data on the website about the conducted public hearings/debates in the last 12 months (except for the budget)?	66.2%
60. Have public competitions for the selection of directors of public institutions been conducted?	64.8%
70. Is the data on the number of employees in the observed public institutions posted on the municipal website?	63.4%
38. Are there contact information of local community councilors on the municipal website?	62.1%
25. Has the proposal for the final budget account been considered at the session and published (on the website) in the last 12?	61.4%
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?	60.0%
21. Is there a citizens' budget published and available on the website?	58.6%
88. Is there a code of ethics for employees and is it available on the site?	58.6%
9. Is the agenda of the next session of the assembly published on the website?	53.1%
71. Is the data on the number of employees in the observed PE published on the municipal site?	52.4%
66. Is the annual work plan of the observed PE published on the website of the PE or municipality website?	50.3%
31. Is there a possibility on the website for citizens to report irregularities or violation of laws. including corruption?	49.7%
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?	48.3%
3. Are the decisions adopted by the assembly in the past 24 months available on the website?	46.9%
1. Are the decisions adopted by the Assembly published and available on the website? **	46.2%
24. Has the report on the public debate on the budget been published on the website?	46.2%
18. Are 6-month and 9-month reports on budget execution available on the website?	44.8%
67. Is the report on the work of the observed PE published on the website of the PE or municipality website?	44.1%
40. Are there defined permanent terms for mayor (or deputy mayor) meeting with citizens?	40.0%

49. Is the data on the PP published on the website (competitions, documentation, changes, questions and answers ...)? **	40.0%
61. Is the systematization of observed PE published on the website of municipality or PE?	40.0%
19. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?	35.9%
26. Has the audit of the final budget account been considered at the session and published (on the website) in the last 12 months?	33.8%
62. Is the systematization of observed PI published on the website of municipality or PI?	33.1%
74. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?	30.3%
5. Have the proposed documents been published on the website before being considered at the session of the Assembly?	29.7%
2. Are the decisions adopted by the city council published and available on the website?	26.9%
4. Are the decisions adopted by the city council in the past 24 months available on the website?	26.9%
30. Is there a possibility for citizens to report irregularities in the work or violation of the law, including corruption, in the service center or in the premises of the administration?	26.2%
68. Is the annual work plan of the observed PI published on the website of the PI or municipality website?	26.2%
69. Is the report on the work of the observed PI published on the website of the PI or municipality website?	24.8%
10. Are there announcement of municipal/city council sessions on the website?	24.1%
42. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?	23.4%
6. Have the results of the voting at the last session of the assembly been published on the website?	22.8%
14. Are the Assembly sessions broadcasted live on the website or municipalities social network's page or Youtube channel (or is the integral recording available)?	22.8%
29. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration?	19.3%
85. Has a report on the work of the administration for the previous year been published?	17.2%
64. Are the documents from the selection procedure of the director of the observed PE published on the website of the PE or the municipality?	16.6%
12. Is there data for citizens' contact with assembly members published on the website?	15.9%

20. Are monthly reports (or cumulative monthly reports) on budget execution available on the website?	15.2%
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%
41. Are data on the contact of the mayor or deputy with the citizens visible on the premisses?	9.0%
36. Is there data on handling complaints, petitions and complaints available on the website?	6.2%
44. No complaints were filed against municipalities in the last year due to ignoring requests for information of public importance?	6.2%
35. Can a citizen monitor the status of his case on the website?	5.5%
63. Is there, on the municipality website, a page of the Commission for the Election of the Director of POEs with all the documents, including the minutes from the meetings?	5.5%
65. Are the documents from the selection procedure of the director of the observed PI published on the website of the PE or the municipality?	5.5%
76. Are the rental lease reports (commercial premises, agricultural land) published on the site?	5.5%
82. Have the reports on the realization of NGO projects financed by the municipality been published on the website?	5.5%
7. Has information been posted on individual members of the assembly votes on legislation debated?	4.1%
47. Is information on the submission of a request for free access to information visible in the service center or administration premises?	4.1%
81. Have the reports on the realization of media projects financed by the municipality been published on the website?	4.1%
91. Is there a report on contact with lobbyists published on the web site?	4.1%
32. Do (both/all) mechanisms for reporting allow anonymity?	3.4%
84. Is the annual plan of work of municipal administration published on the site?	3.4%
89. Has the record of the property (real estate) owned by municipality which is leased published on the website, with data on leases, price and duration of lease?	2.8%
92. Is there a daily or weekly schedule of the mayor's activities published on the website?	2.8%

Annex 2. Final scores of municipalities compared to the LTI 2022

			LTI	LTI	LTI	LTI	LTI		
	Municipality	position in LTI 2022	2019	2020	2021	2022	2023	Growth 2023/2022	Growth 2023/2022 (%)
1	Novi Pazar	1	66	82	78	87	94	7	8.0%
2	Sombor	2	52	80	88	85	84	-1	-1.2%
3	Veliko Gradište	7	64	47	71	76	82	6	7.9%
4	Kanjiža	5	47	77	83	79	81	2	2.5%
5	Sokobanja	3	46	68	75	84	79	-5	-6.0%
6	Bor	14	42	46	62	65	78	13	20.0%
7	Leskovac	8	60	75	75	74	77	3	4.1%
8	Tutin	4	36	45	42	81	76	-5	-6.2%
8	Užice	6	64	70	62	78	75	-3	-3.8%
10	Pirot	14	46	45	41	65	72	7	10.8%
10	Subotica	10	51	63	69	70	70	0	0.0%
12	Kruševac	12	52	47	47	69	69	0	0.0%
13	Vranje	8	60	73	75	74	69	-5	-6.8%
14	Kladovo	113	28	35	47	40	68	28	70.0%
14	Temerin	66	52	59	61	48	67	19	39.6%
14	Kragujevac	14	42	55	68	65	66	1	1.5%
14	Vrnjačka Banja	10	62	63	64	70	66	-4	-5.7%
18	Bečej	13	38	83	90	67	64	-3	-4.5%
19	Petrovac	66	51	59	61	48	63	15	31.3%
19	Kosjerić	113	30	43	52	40	63	23	57.5%
21	Zrenjanin	39	44	63	57	53	62	9	17.0%
22	Senta	25	51	58	54	57	62	5	8.8%
22	Požarevac	25	57	39	59	57	62	5	8.8%
22	Zaječar	93	43	42	33	44	62	18	40.9%
25	Trstenik	22	47	49	44	59	62	3	5.1%
25	Kuršumlija	50	45	44	56	51	62	11	21.6%
25	Plandište	31	67	63	55	56	61	5	8.9%
25	Srbobran	31	46	53	57	56	61	5	8.9%
25	Kraljevo	31	57	47	53	56	61	5	8.9%
25	Rekovac	108	39	37	41	41	60	19	46.3%
31	Raška	19	44	47	53	62	60	-2	-3.2%
31	Vladičin Han	21	43	60	65	61	60	-1	-1.6%
31	Bačka Palanka	66	37	37	39	48	59	11	22.9%
31	Ruma	22	49	56	59	59	59	0	0.0%
35	Ljubovija	50	45	52	55	51	59	8	15.7%
35	Boljevac	35	40	40	64	55	59	4	7.3%
35	Priboj	61	48	55	54	49	59	10	20.4%
38	Aleksinac	31	40	43	48	56	59	3	5.4%
39	Indija	25	52	55	58	57	58	1	1.8%

39	Mali Zvornik	46	36	52	61	52	58	6	11.5%
39	Čačak	56	54	58	54	50	58	8	16.0%
39	Bojnik	93	41	50	45	44	58	14	31.8%
39	Žitište	98	37	44	40	43	57	14	32.6%
39	S. Mitrovica	39	45	51	49	53	57	4	7.5%
39	Ljig	66	29	39	48	48	57	9	18.8%
46	Niš	18	34	46	40	64	57	-7	-10.9%
46	Kovin	46	40	41	39	52	56	4	7.7%
46	Novi Sad	14	43	56	73	65	56	-9	-13.8%
46	Šabac	86	41	57	50	45	56	11	24.4%
50	Topola	35	50	52	44	55	56	1	1.8%
50	Paraćin	76	66	50	48	47	56	9	19.1%
50	Knjaževac	56	54	54	55	50	56	6	12.0%
50	Novi Bečej	50	48	45	45	51	55	4	7.8%
50	Kikinda	66	49	47	50	48	55	7	14.6%
50	Odžaci	76	41	48	50	47	55	8	17.0%
56	Bač	66	49	49	54	48	55	7	14.6%
56	Negotin	46	45	48	51	52	55	3	5.8%
56	Ražanj	61	33	45	47	49	55	6	12.2%
56	Babušnica	50	47	48	49	51	55	4	7.8%
56	Vlasotince	56	35	42	52	50	55	5	10.0%
61	Beočin	123	35	42	49	38	54	16	42.1%
61	Kučevo	61	33	51	48	49	54	5	10.2%
61	Rača	76	34	49	40	47	53	6	12.8%
61	Dimitrovgrad	25	38	51	43	57	53	-4	-7.0%
61	Bački Petrovac	39	51	51	49	53	52	-1	-1.9%
66	Lapovo	103	39	37	39	42	52	10	23.8%
66	Ćuprija	86	29	29	40	45	52	7	15.6%
66	Nova Varoš	56	45	47	55	50	52	2	4.0%
66	Varvarin	46	51	49	56	52	52	0	0.0%
66	Vrbas	22	40	54	44	59	51	-8	-13.6%
66	Irig	93	48	48	44	44	51	7	15.9%
66	Valjevo	76	40	45	49	47	51	4	8.5%
66	Malo Crniće	66	38	28	45	48	51	3	6.3%
66	Despotovac	93	37	34	47	44	51	7	15.9%
66	Svrljig	39	43	37	41	53	51	-2	-3.8%
76	Prokuplje	103	37	38	36	42	51	9	21.4%
76	Bačka Topola	61	45	54	54	49	50	1	2.0%
76	Vršac	108	42	40	41	41	50	9	22.0%
76	Loznica	35	38	46	48	55	50	-5	-9.1%
76	Sjenica	50	34	39	39	51	50	-1	-2.0%
76	Ivanjica	50	46	55	53	51	50	-1	-2.0%
76	Novi Kneževac	39	39	50	51	53	49	-4	-7.5%
76	Stara Pazova	117	26	40	41	39	49	10	25.6%
84	Šid	113	30	32	38	40	49	9	22.5%
84	Osečina	113	33	53	52	40	49	9	22.5%
86	G. Milanovac	66	28	49	40	48	49	1	2.1%

86	Apatin	39	41	51	56	53	48	-5	-9.4%
86	Žabalj	19	36	55	60	62	48	-14	-22.6%
86	Vladimirci	76	36	38	43	47	48	1	2.1%
86	Požega	25	40	54	53	57	48	-9	-15.8%
86	Aleksandrovac	76	37	39	33	47	48	1	2.1%
86	Brus	86	35	41	38	45	48	3	6.7%
93	Bosilegrad	117	52	48	51	39	48	9	23.1%
93	Ada	139	26	37	34	30	47	17	56.7%
93	Žabari	84	37	40	45	46	47	1	2.2%
93	Prijepolje	93	37	42	43	44	47	3	6.8%
93	Merošina	137	26	24	29	34	47	13	38.2%
98	Medveđa	117	26	37	44	39	47	8	20.5%
98	Beograd	25	30	33	46	57	46	-11	-19.3%
98	Pančevo	66	45	49	48	48	46	-2	-4.2%
98	Sremski Karlovci	76	22	31	38	47	46	-1	-2.1%
98	Sm. Palanka	123	12	41	38	38	46	8	21.1%
103	Čajetina	39	43	57	55	53	46	-7	-13.2%
103	Crna Trava	103	41	41	43	42	46	4	9.5%
103	Ub	98	20	40	38	43	45	2	4.7%
103	Smederevo	127	39	51	53	37	45	8	21.6%
103	Jagodina	98	21	21	23	43	45	2	4.7%
108	Arilje	66	39	53	51	48	45	-3	-6.3%
108	Ćićevac	123	42	38	42	38	45	7	18.4%
108	Gadžin Han	127	46	56	43	37	45	8	21.6%
108	Blace	61	37	46	54	49	45	-4	-8.2%
108	Lebane	127	25	30	36	37	45	8	21.6%
113	Mali Idoš	103	36	39	37	42	44	2	4.8%
113	Kula	56	45	48	52	50	44	-6	-12.0%
113	Krupanj	38	48	58	55	54	44	-10	-18.5%
113	Lajkovac	76	35	41	46	47	44	-3	-6.4%
117	Mionica	86	37	47	52	45	44	-1	-2.2%
117	Bajina Bašta	108	34	46	45	41	43	2	4.9%
117	Žitorađa	103	30	38	39	42	43	1	2.4%
117	Čoka	84	39	45	49	46	42	-4	-8.7%
117	Velika Plana	86	36	45	44	45	42	-3	-6.7%
117	Doljevac	86	33	41	42	45	42	-3	-6.7%
123	Surdulica	117	42	40	42	39	42	3	7.7%
123	Nova Crnja	98	23	33	30	43	41	-2	-4.7%
123	Bela Palanka	127	39	46	38	37	41	4	10.8%
123	Sečanj	142	26	34	33	25	40	15	60.0%
127	Batočina	98	36	39	37	43	40	-3	-7.0%
127	Knić	140	26	34	38	28	40	12	42.9%
127	Trgovište	108	34	32	36	41	40	-1	-2.4%
127	Arandelovac	135	44	39	33	35	39	4	11.4%
127	Alibunar	108	31	36	37	41	38	-3	-7.3%
127	Majdanpek	127	32	39	36	37	38	1	2.7%
133	Opovo	86	33	42	46	45	37	-8	-17.8%

133	Žagubica	117	35	45	42	39	37	-2	-5.1%
135	Titel	117	29	40	35	39	36	-3	-7.7%
135	Lučani	133	33	32	37	36	36	0	0.0%
137	Pećinci	133	29	25	38	36	35	-1	-2.8%
138	Golubac	135	33	53	38	35	35	0	0.0%
139	Svilajnac	127	18	22	23	37	35	-2	-5.4%
140	Bela Crkva	123	21	18	33	38	34	-4	-10.5%
140	Koceljeva	144	23	22	35	22	34	12	54.5%
142	Bogatić	138	19	31	28	33	33	0	0.0%
142	Kovačica	142	28	36	38	25	32	7	28.0%
144	Bujanovac	140	32	34	21	28	32	4	14.3%
145	Preševo	145	13	23	21	9	25	16	177.8%
			LTI	LTI	LTI	LTI	LTI	Growth	Growth
	Municipality		2019	2020	2021	2022	2023	2023/2022	2023/2022
									(%)
1	Surčin *		42	53	62	69	72	3	4.3%
2	Sevojno *		37	42	52	66	60	-6	-9.1%
3	Zvezdara *		38	40	40	43	57	14	32.6%
4	Čukarica *		37	32	43	43	43	0	0.0%
5	Palilula Niš*		31	28	33	33	43	10	30.3%
6	Barajevo *		32	47	42	38	38	0	0.0%
7	Zemun *		26	38	29	39	35	-4	-10.3%
8	Lazarevac *		36	36	43	36	34	-2	-5.6%
9	Mladenovac *		25	33	41	45	34	-11	-24.4%
10	Obrenovac *		38	41	35	32	34	2	6.3%
11	Savski Venac *		38	36	39	34	34	0	0.0%
12	Kostolac *		23	30	24	36	34	-2	-5.6%
13	Voždovac *		24	22	35	27	33	6	22.2%
14	Vračar *		26	24	31	22	33	11	50.0%
15	Grocka *		31	28	37	33	33	0	0.0%
16	Crveni Krst *		20	28	37	35	33	-2	-5.7%
17	Rakovica *		21	31	37	36	29	-7	-19.4%
18	Stari Grad *		23	28	35	28	29	1	3.6%
19	Vranjska Banja *		10	25	27	26	29	3	11.5%
20	Pantelejš *		23	39	23	28	26	-2	-7.1%
21	Medijana *		25	24	21	25	26	1	4.0%
22	Niška Banja *		31	35	26	24	21	-3	-12.5%
23	Palilula *		29	24	31	23	20	-3	-13.0%
24	Sopot *		13	20	23	16	20	4	25.0%
25	Novi Beograd *		27	28	25	29	19	-10	-34.5%

Municipalities that lost more than 10 points since 2022

	LTI 2019	LTI 2020	LTI 2021	LTI 2022	LTI 2023	Growth 2023/2022	Growth 2023/2022 (%)
Žabalj	36	55	60	62	48	-14	-22.6%
Beograd	30	33	46	57	46	-11	-19.3%
Mladenovac *	25	33	41	45	34	-11	-24.4%
Krupanj	48	58	55	54	44	-10	-18.5%
Novi Beograd *	27	28	25	29	19	-10	-34.5%

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)
3	Veliko Gradište	16
2	Sombor	15
16	Kragujevac	15
1	Novi Pazar	15
12	Vranje	13
8	Tutin	13
39	Čačak	13
12	Kruševac	13
43	Žitište	13

Budget

Overall Rank	LSG	Budget (max 14)
9	Užice	14
6	Bor	14
33	Ljubovija	14
4	Kanjiža	14
10	Pirot	14
53	Kikinda	14
30	Rekovac	14
2	Sombor	13
5	Sokobanja	13
8	Tutin	13
53	Ražanj	13
105	Blace	13
1	Novi Pazar	13
65	Nova Varoš	13
19	Petrovac	13
15	Temerin	13
14	Kladovo	13
39	Bojnik	13

Municipality and Citizens

Overall Rank	LSG	Municipality and citizens (max 15)
1	Novi Pazar	15
2	Sombor	13
9	Užice	11
18	Bečej	11
46	Šabac	11
6	Bor	11
14	Kladovo	11
46	Novi Sad	10
22	Zaječar	10

Free Access to Information

Overall Rank	LSG	Free Access to Information (max 6)
2	Sombor	5
65	Lapovo	5
1	Novi Pazar	5
7	Leskovac	5
77	Sjenica	5
53	Ražanj	5
113	Kula	5
53	Bač	5
16	Kragujevac	5
65	Ćuprija	5
27	Plandište	5
16	Vrnjačka Banja	5

Public enterprises and Public institutions

Overall rank	LSG	Municipals Utility Companies and Public Institutions (max 18)
4	Kanjiža	18
3	Veliko Gradište	18
1	Novi Pazar	18
10	Pirot	17
5	Sokobanja	16
18	Bečej	15
9	Užice	15
11	Subotica	15
6	Bor	15
19	Petrovac	15
33	Aleksinac	14
105	Jagodina	14
16	Vrnjačka Banja	14
7	Leskovac	14
30	Raška	14
82	Osečina	14

Public debates and public competitions

Overall Rank	LSG	Public Debates and Public Competitions (max 10)
7	Leskovac	9
39	Bojnik	9
4	Kanjiža	9
1	Novi Pazar	8
8	Tutin	8
2	Sombor	8
10	Pirot	8
5	Sokobanja	8

Annex no. 4. LTI indicators comparison 2023 vs.2022

Indices	% of max score LTI 2020	% of max score LTI 2021	% of max score LTI 2022	% of max score LTI 2023	Increased %	% of improvement
46. Are information on the submission of a request for free access to information on the site? **	93.1%	95.9%	95.9%	100.0%	4.1%	4.3%
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%	100.0%	6.9%	7.4%
90. Are spatial plans / urban plans published on the site?	89.0%	97.9%	97.2%	99.3%	2.1%	2.1%
95. Has the mayor submitted a declaration of assets to ACAS?	94.5%	95.2%	99.3%	97.9%	-1.4%	-1.4%
15. Is the budget for the current year available on the website? **	93.8%	93.1%	93.1%	97.9%	4.8%	5.2%
48. Is there a section on the website dedicated to public procurements?	97.2%	96.6%	99.3%	96.6%	-2.8%	-2.8%
37. Is there information on the website about the services provided by the municipality?		60.7%	77.9%	96.6%	18.6%	23.9%
34. Are there inspections controlling lists on website?	86.9%	94.5%	94.5%	95.9%	1.4%	1.5%
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%	95.2%	5.5%	6.2%
75. Does the municipality regularly announce a call for leasing property in its possession?	91.0%	95.2%	97.9%	94.5%	-3.4%	-3.5%
45. The municipality has no unresolved decisions of the Commissioner?	84.1%	85.5%	85.5%	93.8%	8.3%	9.7%
93. Has the Integrity Plan been adopted and has the LSG report on its implementation?	53.8%	17.2%	17.2%	93.8%	76.6%	444.0%

53. Does the Information Booklet contain information about salaries of officials and employees?	46.2%	57.9%	69.0%	91.7%	22.8%	33.0%
11. Is the list of assembly members published on the website?	89.7%	88.3%	91.7%	91.0%	-0.7%	-0.8%
86. Is the rulebook on internal organization and systematization of administration posted on the site?	53.8%	77.9%	64.1%	91.0%	26.9%	41.9%
55. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?	77.9%	86.2%	89.7%	89.0%	-0.7%	-0.8%
56. Is there a special segment on the municipal website dedicated to public institutions with PI data?	69.0%	82.8%	89.7%	88.3%	-1.4%	-1.5%
79. Have the public calls for the allocation for NGOs been published on the website?	82.8%	76.6%	85.5%	86.9%	1.4%	1.6%
28. Does the municipal administration have a service center through which it provides all the services?	82.1%	83.4%	81.4%	85.5%	4.1%	5.1%
57. Does the observed PE have its own website?		77.9%	84.8%	84.1%	-0.7%	-0.8%
87. Is data about number of the employees in local administration published on the website?		97.9%	96.6%	83.4%	-13.1%	-13.6%
13. Is the local Official Gazette available on the site? **	78.6%	81.4%	81.4%	83.4%	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%	82.1%	0.7%	0.8%
17. Is the budget published on the website in machine-readable or searchable form?	83.4%	75.2%	79.3%	80.0%	0.7%	0.9%
72. Is the list with prices of services provided by observed PE and PI available on the website of the municipality or PI/PE website?	56.6%	65.5%	73.1%	79.3%	6.2%	8.5%
59. Have public competitions for the selection of directors of public enterprises been conducted?	74.5%	69.0%	71.0%	79.3%	8.3%	11.7%
94. Has the Local anti corruption plan been adopted?	70.3%	69.7%	73.8%	77.9%	4.1%	5.6%

58. Does the observed PI have its own website		69.0%	73.8%	75.9%	2.1%	2.8%
78. Have the results of the competition for media allocation in the last 12 months been published on the website?		53.8%	69.7%	75.2%	5.5%	7.9%
43. Did the municipalities provide requested information (FOI request) in time?***	84.1%	77.9%	76.6%	74.5%	-2.1%	-2.7%
80. Have the results of the competition for the allocation for NGOs been published on the website?		44.1%	72.4%	74.5%	2.1%	2.9%
51. Is the Information Booklet published on the site and updated in the last 3 months?	51.7%	45.5%	41.4%	73.8%	32.4%	78.3%
83. Has the municipality's development strategy been published on the website?	77.9%	34.5%	56.6%	73.1%	16.6%	29.3%
22. Has a public debate on the budget been held - citizen surveys or consultation meetings?	76.6%	39.3%	55.2%	73.1%	17.9%	32.5%
23. Has a public call for public debate on the budget been published on the website?	73.1%	71.0%	72.4%	72.4%	0.0%	0.0%
16. Is the justification/explanation of the budget available on the website?	66.2%	68.3%	68.3%	72.4%	4.1%	6.1%
50. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?	96.6%	96.6%	65.5%	72.4%	6.9%	10.5%
52. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?	15.9%	55.2%	35.9%	67.6%	31.7%	88.5%
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%	66.2%	-5.5%	-7.7%
60. Have public competitions for the selection of directors of public institutions been conducted?	70.3%	62.1%	60.0%	64.8%	4.8%	8.0%
70. Is the data on the number of employees in the observed public		91.0%	89.7%	63.4%	-26.2%	-29.2%

institutions posted on the municipal website?						
38. Are there contact information of local community councilors on the municipal website?	59.3%	55.9%	66.2%	62.1%	-4.1%	-6.3%
25. Has the proposal for the final budget account been considered at the session and published (on the website) in the last 12?	57.9%	54.5%	52.4%	61.4%	9.0%	17.1%
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%	49.0%	20.7%	60.0%	39.3%	190.0%
21. Is there a citizens' budget published and available on the website?	51.7%	57.9%	56.6%	58.6%	2.1%	3.7%
88. Is there a code of ethics for employees and is it available on the site?	42.8%	42.8%	49.0%	58.6%	9.7%	19.7%
9. Is the agenda of the next session of the assembly published on the website?	42.1%	49.0%	46.9%	53.1%	6.2%	13.2%
71. Is the data on the number of employees in the observed PE published on the municipal site?	32.4%	31.7%	21.4%	52.4%	31.0%	145.2%
66. Is the annual work plan of the observed PE published on the website of the PE or municipality website?		33.8%	46.2%	50.3%	4.1%	9.0%
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%	49.7%	-4.8%	-8.9%
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%	48.3%	6.2%	14.8%
3. Are the decisions adopted by the assembly in the past 24 months available on the website?	27.6%	24.8%	30.3%	46.9%	16.6%	54.5%

1. Are the decisions adopted by the Assembly published and available on the website? **	30.3%	33.1%	35.2%	46.2%	11.0%	31.4%
24. Has the report on the public debate on the budget been published on the website?	42.8%	35.9%	33.8%	46.2%	12.4%	36.7%
18. Are 6-month and 9-month reports on budget execution available on the website?	43.4%	39.3%	39.3%	44.8%	5.5%	14.0%
67. Is the report on the work of the observed PE published on the website of the PE or municipality website?		25.5%	42.1%	44.1%	2.1%	4.9%
49. Is the data on the PP published on the website (competitions, documentation, changes, questions and answers ...)? **	94.5%	94.5%	62.8%	40.0%	-22.8%	-36.3%
40. Are there defined permanent terms for mayor (or deputy mayor) meeting with citizens?	42.1%	37.2%	46.2%	40.0%	-6.2%	-13.4%
61. Is the systematization of observed PE published on the website of municipality or PE?	16.6%	19.3%	26.9%	40.0%	13.1%	48.7%
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%	35.9%	9.7%	36.8%
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%	33.8%	9.7%	40.0%
62. Is the systematization of observed PI published on the website of municipality or PI?	18.6%	17.2%	19.3%	33.1%	13.8%	71.4%
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%	30.3%	4.1%	15.8%
5. Have the proposed documents been published on the website before being considered at the session of the Assembly?	15.2%	20.0%	24.1%	29.7%	5.5%	22.9%
2. Are the decisions adopted by the city council published and available on the website?	11.0%	13.8%	14.5%	26.9%	12.4%	85.7%
4. Are the decisions adopted by the city council in the past 24 months available on the website?	11.0%	12.4%	12.4%	26.9%	14.5%	116.7%

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%	26.2%	-38.6%	-59.6%
68. Is the annual work plan of the observed PI published on the website of the PI or municipality website?	23.4%	26.2%	17.9%	26.2%	8.3%	46.2%
69. Is the report on the work of the observed PI published on the website of the PI or municipality website?	22.1%	24.1%	17.2%	24.8%	7.6%	44.0%
10. Are there announcement of municipal/city council sessions on the website?		18.6%	21.4%	24.1%	2.8%	12.9%
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%	23.4%	3.4%	17.2%
14. Are the Assembly sessions broadcasted live on the website or municipalities social network's page or Youtube channel (or is the integral recording available)?	55.2%	47.6%	49.7%	22.8%	-26.9%	-54.2%
6. Have the results of the voting at the last session of the assembly been published on the website?	17.9%	20.0%	17.9%	22.8%	4.8%	26.9%
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%	19.3%	-2.1%	-9.7%
85. Has a report on the work of the administration for the previous year been published?	14.5%	17.2%	17.2%	17.2%	0.0%	0.0%
64. Are the documents from the selection procedure of the director of the observed PE published on the website of the PE or the municipality?		20.7%	17.2%	16.6%	-0.7%	-4.0%
12. Is there data for citizens' contact with assembly members published on the website?	21.4%	15.9%	15.2%	15.9%	0.7%	4.5%
20. Are monthly reports (or cumulative monthly reports) on budget execution available on the website?	10.3%	8.3%	11.0%	15.2%	4.1%	37.5%
41. Are data on the contact of the mayor or deputy with the citizens visible on the premisses?	9.0%	6.2%	28.3%	9.0%	-19.3%	-68.3%

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?	3.4%	6.2%	9.0%	9.0%	0.0%	0.0%
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%	6.2%	-17.2%	-73.5%
36. Is there data on handling complaints, petitions and complaints available on the website?	9.7%	7.6%	6.9%	6.2%	-0.7%	-10.0%
76. Are the rental lease reports (commercial premises, agricultural land) published on the site?	0.0%	4.1%	26.2%	5.5%	-20.7%	-78.9%
35. Can a citizen monitor the status of his case on the website?	11.0%	10.3%	11.0%	5.5%	-5.5%	-50.0%
65. Are the documents from the selection procedure of the director of the observed PI published on the website of the PE or the municipality?		17.9%	9.7%	5.5%	-4.1%	-42.9%
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%	5.5%	-2.8%	-33.3%
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?		4.1%	7.6%	5.5%	-2.1%	-27.3%
81. Have the reports on the realization of media projects financed by the municipality been published on the website?		5.5%	7.6%	4.1%	-3.4%	-45.5%
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%	4.1%	0.0%	0.0%
91. Is there a report on contact with lobbyists published on the web site?	0.7%	2.8%	3.4%	4.1%	0.7%	20.0%
7. Has information been posted on individual members of the assembly votes on legislation debated?	0.0%	0.0%	0.7%	4.1%	3.4%	500.0%

32. Do (both/all) mechanisms for reporting allow anonymity?	37.2%	11.0%	12.4%	3.4%	-9.0%	-72.2%
84. Is the annual plan of work of municipal administration published on the site?	2.1%	2.8%	6.9%	3.4%	-3.4%	-50.0%
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%	2.8%	-4.1%	-60.0%
92. Is there a daily or weekly schedule of the mayor's activities published on the website?	0.7%	2.8%	4.1%	2.8%	-1.4%	-33.3%

Annex no. 5. The list of LTI 2015, 2017, 2019, 2020, 2021, 2022 & 2023 indicators

Indicators	2021, 2022 and 2023	20 20	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 on the website or municipalities social network's page or Youtube channel (or is the integral recording available)?					
15. Is the budget for the current year available on the website? **					
Is the budget published on 6 digits of the economic classification?	/	/	/	/	
16. Is the justification/explanation of the budget available on the website?					
17. Is the budget published on the website in machine-readable or searchable form?				/	/
18. Are 6-month and 9-month reports on budget execution available on the website?					/
19. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?					

Are the data on budget execution in the last three months available on the site?	/	/	/	/	
Are the data on budget execution updated in the last 30 days and available on the site?	/	/	/	/	
20. Are monthly reports (or cumulative monthly reports) on budget execution available on the site?					/
21. Is there a citizens' budget published and available on the site?					
22. Has a public debate on the budget been held - citizen surveys or consultation meetings?					
23. Has a public call for public debate on the budget been published on the website?					
24. Has the report on the public debate on the budget been published on the website?					
25. Has the proposal for the final budget account or the adopted budget account been considered at the session and published (on the website) in the last 12?		/	/	/	/
Has the proposal for the final budget account been published in the last 12 months or the adopted budget account?	/				
26. Has the audit of the final budget account been considered at the session and published (on the website) in the last 12 months?					
27. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users?					
28. Does the municipal administration have a service center through which it provides all the services?					
29. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration?					

Are there information about reporting of corruption visible in the service center or administration offices?	/				
30. Is there a possibility for citizens to report irregularities in the work or violation of the law, including corruption, in the service center or in the premises of the administration?					
Are there mechanisms for reporting corruption on the website?	/				
31. Is there a possibility on the website for citizens to report irregularities or violation of laws. including corruption?					
32. Do (both/all) mechanisms for reporting allow anonymity?				/	/
33. Is the information on the working hours of administration available on the website or telephone number through which it is possible to get this information?					
34. Are there inspections controlling lists on website?				/	/
35. Can a citizen monitor the status of his case on the website?					
36. Is there data on handling complaints, petitions and complaints available on the website?					
37. Is there information on the website about the services provided by the municipality?		/	/	/	/
38. Are there contact information of local community 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 published on the website (competitions, documentation, changes, questions and answers ...)? **					
50. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?					

51. Is Information Booklet published on the site and updated in the last 3 months?					
52. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?					
53. Does the Information Booklet contain information about salaries of officials and employees?					
Does the Information Booklet contain rulebook on salaries of officials?	/	/	/	/	
54. Does the Information Booklet contain information on the services provided by the municipality and deadlines for their provision or a link to the register or place on the website where this information can be found?					
55. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?					/
56. Is there a special segment on the municipal website dedicated to public institutions with PI data?					/
57. Does the observed PE have its own website?		/	/	/	/
58. Does the observed PI have its own website		/	/	/	/
59. Have public competitions for the selection of directors of public enterprises been conducted?					
60. Have public competitions for the selection of directors of public institutions been conducted?					
61. Is the systematization of observed PE published on the website of municipality or PE?					
62. Is the systematization of observed PI published on the website of municipality or PI?					

63. Is there, on the municipality website, a page of the Commission for the Election of the Director of POEs with all the documents, including the minutes from the meetings?		/	/	/	/
64. Are the documents from the selection procedure of the director of the observed PE published on the website of the PE or the municipality?					
65. Have the documents from the procedure for the election of the director of the observed PI been published on the website?					
66. Have the annual work plans of the observed PEs been published on the website of the PE or municipality website?		/	/	/	/
67. Have the reports on the work of the observed PE been published on the website of the PE or municipality website?		/	/	/	/
Have the annual work plans and reports on the work of the observed PE been published on the website of the PE (or municipality)?	/				
69. Have the work plans of the observed PI been published on the website of the PI or municipality website?					
69. Are there reports on the work of the observed PI published on the website of the municipality or PI?					/
Are reports on consideration of reports on the work of PE published on site?	/	/	/	/	
Are reports on consideration of reports on the work of PI published on site?	/	/	/	/	
70. Are the data on the number of employees in the public institutions posted on the municipal website?		/	/	/	/
Are the data on the number of employees in the municipality and the public institutions posted on the site?	/				/
71. Are the data on the number of employees in PEs published on the municipal site?					/

Are the data on the number of employees in municipality, PEs and PIs published on site?	/	/	/	/	
72. Is the list with prices of services provided by the observed PE and PI available on the website of the municipality or PI/PE website?					
Are there consultations with the citizens when determining the prices of the services of PIs and PEs, through consulting meetings, surveys or through an advisory body (Consumer Protection Act, Art. 83)?	/				
73. Are there data on the website about the conducted public 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?					

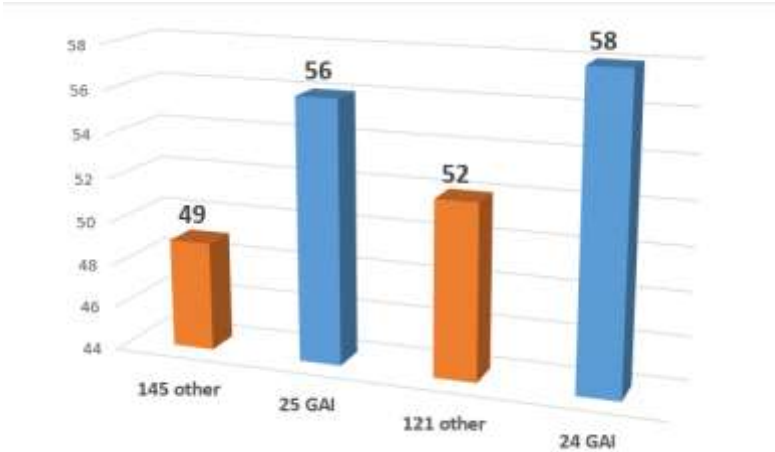
Annex no. 6. Performance of 25 LSGs previously supported by USAID Government Accountability Initiative (GAI)

TS assessed separately the performance of 25 cities, municipalities and in-city municipalities which were supported by the previous USAID GAI in order to present how sustainable some of the improvements (described in LTI 2022 report) were and to compare them with the rest of the LSGs. All 24 cities and municipalities from three groups, in three years when GAI supported LSGs are presented together – and one in-city municipality is presented separately.

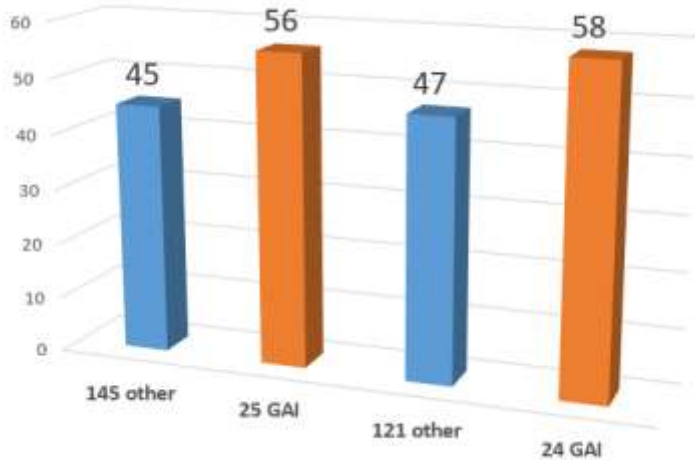
The average score of GAI LSGs is higher than the average score of other LSGs. However, this discrepancy is smaller than in 2022. Namely, average score of the GAI LSGs remained the same and the average score of other LSGs increased (same as did average score in total)

Graph no. 3:

A) Average score LTI 2023 – LSG’s included in USAID/GAI program and other LSGs. (24 refers to cities and municipalities, and 25 includes one in-city municipality)



B) Average score LTI 2022 – LSG’s included in USAID/GAI program and other LSG (24 refers to cities and municipalities, and 25 includes one in-city municipality)s



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	84		15	13	13	5	4	4	12	8	10
Žabalj	48		3	12	7	2	2	4	3	6	4
Sremski Karlovci	46		6	5	3	4	2	3	12	4	8
Sremska Mitrovica	57		3	11	8	4	4	3	12	5	8
Šid	49		8	6	6	2	2	3	10	5	6
Krupanj	44		3	10	6	4	0	2	12	0	4
Ljubovija	59		9	14	6	4	2	3	9	6	8
Šabac	56		3	10	11	2	2	4	8	7	4
Mionica	44		10	8	5	2	2	2	7	2	6
Veliko Gradište	82		16	11	9	4	4	4	18	7	10
Kragujevac	66		15	7	8	5	4	2	13	5	10
Požega	48		10	7	7	4	2	4	5	3	8
Priboj	59		10	7	9	4	2	4	10	6	8
Sjenica	50		5	9	7	5	4	4	6	3	8
Čajetina	46		6	8	6	4	1	2	8	5	6
Vrnjačka Banja	66		6	11	9	5	4	2	14	7	8
Novi Pazar	94		15	13	15	5	4	4	18	8	10
Raška	60		5	10	6	4	2	4	14	7	6
Varvarin	52		3	9	8	4	3	4	7	6	8
Niš	57		9	11	7	1	1	2	13	6	6
Bela Palanka	41		1	10	6	4	2	0	7	3	4
Dimitrovgrad	53		10	8	6	4	2	2	8	6	8
Vranje	69		13	10	8	2	4	4	13	7	8
AVERAGE	58	AVERAGE	7.9	9.5	7.6	3.7	2.5	3.1	10.4	5.1	7.3
All 145		AVERAGE	6.3	8.8	6.7	3.5	2.5	2.9	9.2	5.2	6.8
All 170		AVERAGE	5.9	8.4	6.6	3.5	2.4	2.9	8.6	4.8	6.4
Stari Grad *	29		3	5	5	4	1	1	3	4	4
All 25	56	AVERAGE	7.7	9.4	7.5	3.7	2.5	3.0	10.1	5.1	7.1

Table no. 3.: LTI 2023 – LSG’s included in USAID/GAI program and other – indices by categories, percentage

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)
24 GAI	49.5%	68.2%	50.8%	61.1%	63.5%	77.1%	57.9%	51.3%	72.5%
121 other	38.0%	63.4%	44.4%	59.5%	63.2%	74.0%	51.0%	53.2%	68.9%
25 GAI	48.3%	66.9%	50.1%	61.3%	62.0%	75.0%	56.2%	50.8%	71.2%
145 other	35.3%	59.8%	43.6%	58.6%	61.4%	73.3%	47.2%	48.3%	64.3%

They performed almost equally or better in all categories, with the most significant discrepancy in the area “Assembly and Council”. In LTI 2022 there was notable discrepancy in the “Public Procurement” category, but now it can be concluded that GAI LSGs also abandoned old (not obligatory any more) practice of publishing information about PPs on their websites.

One should have in mind that this is, however, an average score and that actually, there were excellent performances and some underachievers amongst those 25. It can be seen in the following table – 10 LSGs improved their score, and 14 have decreased it.

Table no. 4.: LTI 2023/ LTI 2022 comparison – LSG’s included in USAID/GAI program

LTI 2022 final rank	LTI 2022	LSG	LTI 2023 final rank	LTI 2023
1	87	Novi Pazar	1	94
2	85	Sombor	2	84
7	76	Veliko Gradište	3	82
8	74	Vranje	12	69
10	70	Vrnjačka Banja	16	66
14	65	Kragujevac	16	66
19	62	Raška	30	60
50	51	Ljubovija	33	59
61	49	Priboj	33	59
25	57	Indžija	39	58
18	64	Niš	43	57
39	53	Sremska Mitrovica	43	57
86	45	Šabac	46	56
25	57	Dimitrovgrad	63	53
46	52	Varvarin	65	52
50	51	Sjenica	77	50
113	40	Šid	82	49
19	62	Žabalj	87	48
25	57	Požega	87	48
39	53	Čajetina	99	46
76	47	Sremski Karlovci	99	46
38	54	Krupanj	113	44
86	45	Mionica	113	44
127	37	Bela Palanka	124	41
	31	Stari grad*		29

Comparing GAI LSGs performance in 2023 with LTI 2019 shows that almost all of them (24 out of 25) improved their transparency on the long run.

Table no. 5.: LTI 2023/ LTI 2019 comparison – LSG’s included in USAID/GAI program

LTI 2019 final rank	LTI 2019	LSG	LTI 2023 final rank	LTI 2023
3	66	Novi Pazar	1	94
13	52	Sombor	2	84
4	64	Veliko Gradište	3	82
8	60	Vranje	12	69
6	62	Vrnjačka Banja	16	66
56	42	Kragujevac	16	66
49	44	Raška	30	60
43	45	Ljubovija	33	59
30	48	Priboj	33	59
15	52	Indija	39	58
106	34	Niš	43	57
42	45	Sremska Mitrovica	43	57
62	41	Šabac	46	56
81	38	Dimitrovgrad	63	53
22	51	Varvarin	65	52
105	34	Sjenica	77	50
119	30	Šid	82	49
92	36	Žabalj	87	48
69	40	Požega	87	48
52	43	Čajetina	99	46
138	22	Sremski Karlovci	99	46
29	48	Krupanj	113	44
84	37	Mionica	113	44
77	39	Bela Palanka	124	41
	23	Stari grad*		29