



Transparentnost Srbija  
Transparency Serbia

# LOCAL SELF-GOVERNMENT TRANSPARENCY INDEX 2021 (Local Transparency Index – LTI) Final Report

Transparency Serbia

Belgrade, May 2020



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## Executive Summary

The Local Transparency Index (LTI) 2021 represents Transparency Serbia's research<sup>1</sup>, evaluation and ranking of 145 cities and municipalities and 25 in-city municipalities in Serbia. This is the fifth year (third 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 21 and 90 along the Index.

**The average score for 145 LSGs in the 2021 LTI is 48**, which is still low, but two points better than LTI 2020 score (46), and quite better than LTI 2019 average score of 40. Even more important is the fact that almost two thirds (59%) of all municipalities improved their scores<sup>2</sup>. On the other hand, 37% registered a decrease in comparison to the previous year<sup>3</sup>.

The largest increases were noted in the areas of "Information booklets" and "Municipal Utility Companies and Public Institutions". Decrease in certain categories (public debates, budget), on the other hand, could be attributed to pandemics that caused the absence of some mechanisms of public participation.

**"Assembly and Council" remains the least transparent category** but it is worth noticing that 13 municipalities, supported by USAID GAI project in efforts to raise transparency, had much higher scores in this category than the rest of LSGs. These 13 municipalities also have significantly higher average scores (57) than the rest of LSGs (45). Thus, LTI research and regularly published rankings, accompanied with the follow-up work with local governments to implement reforms is helping to build momentum to increase transparency.

On the individual LSGs' level 19 local governments registered an increase of 10 points or more in the past year. Twenty out of 145 municipalities have an LTI greater than 60<sup>4</sup>, with nine receiving scores above 70, three above 80 and, for the first time, one municipality reaching a score of 90. From the point of sustainable growth, it is also worth noticing that 54 municipalities had constant increase of LTI in the last three research cycles (LTI 2019, 2020 and 2021).

These are the encouraging results, but it is still early to conclude that sustainable level of transparency has been reached. Namely, some good performers from previous LTI cycles were underachievers in this research, while some municipalities which had high increases in LTI 2020, had their scores decreased in LTI 2021. Elections and personal changes which followed, combined with relying on "political will", in the absence of written procedures for maintaining transparency, might have resulted in negative changes of scores in some municipalities.

The main conclusion is unchanged from 2020 - **significant and continuous efforts are still needed to improve and maintain transparency even among best performers**. Pandemics can be an excuse up to

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<sup>1</sup>Project "Local Self-Government Transparency Index" TS conducted thanks to the support of the USAID.

<sup>2</sup> 101 out of 170, or 85 out of 145 where in-city municipalities are excluded.

<sup>3</sup> 63 out of 170 or 55 out of 145.

<sup>4</sup> There were 13 in LTI 2020

some level, but clear procedures for reaching and maintaining transparency must be adopted, prescribing precise responsibilities and accountability.

This could be done by acts adopted at the local level, or by legal obligations, prescribed by the central government. Namely, same as before - **better results were seen in the areas where transparency is prescribed by laws**. Furthermore, challenges of pandemics should be used as an incentive to design new on-line tools for communication of local administration with citizens and businesses.

Individually, the same municipalities remain at the top, slightly shuffling the order:

1. Bečej scored highest (90 in LTI 2021, 83 in 2020), staying at the very top,
2. Sombor (88 in 2021, 80 in 2020) raising from third to second,
3. Kanjiža (83 in 2021, 77 in 2020) rising from position four to three,
4. Novi Pazar (78 in LTI 2021, 82 in LTI 2020) falling two steps down, and
5. Leskovac, Vranje and Sokobanja tied at position five with score 75.

The best illustration of the improved level of transparency is the fact that by far the best score in LTI 2015 (74) would be sufficient only for eight positions on the list in LTI 2021.

Last years' lowest ranking municipality Bela Crkva made one of the biggest steps up. Though it improved its score by 15 points and 83%, the final result of 33 points is still not a score to be proud of. Bujanovac and Preševo (21 each) are at the bottom in this ranking, with Svilajnac and Jagodina<sup>5</sup> (23 points each) remaining amongst the least transparent LSGs for a third consecutive year.

Overall, LTI 2021 results demonstrate the influence of the pandemics on transparency. On the other hand, examples of good practices and commitment of some municipalities show that improvement can be made regardless of challenges. The next step should be adopting mechanisms which would guarantee that improvement does not depend on political will or enthusiasm of individuals within the local administration. LTI itself, as a long-term tracking mechanism, proved once again as a guideline for local governments willing to increase transparency of their work and for citizens to understand in which areas and how the performance of their municipalities may be improved.

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<sup>5</sup> They replied to the verification letter that the new site, currently under construction, will contain most of the documents, in accordance with the Decree on detailed conditions for creating and maintaining a web presentation of the institutions.

## Methodology

The transparency index of the local self-government (LTI) is a tool for measuring and evaluating transparency levels and ranking municipalities and cities which was designed by Transparency Serbia.<sup>6</sup> 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 again nation-wide research, first out of four in the row envisaged to be supported by the USAID. It was applied again in 2020 and 2021.

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 areas that are problematic in the large number of units of the local self-governments. Besides that, continuous monitoring encourages competition among LSGs, as confirmed in the previous cycles. Transparency Serbia was convinced and it proved to be true, that sustainable funding for nation-wide LTI in the 2019/2022 period helped not just to measure the transparency level of Serbian cities and municipalities, but actually to improve it.

According to the Transparency Serbia methodology, the index of transparency is calculated as the sum of the points calculated on the basis of the responses to the indicator questionnaire and in a range from 0 to 100. In 2021, same as in LTI 2019 and LTI 2020, there were 95 indicators (indicator questions). The negative answer yields 0 points, and the positive 1 or 2. Specifically, questions regarding the five most important indicators of transparency (the “basic indicators”) yield 2 points for a positive answer and 0 for a negative answer, while 90 others bring 1 or 0.

Answers to the indicator questionnaire are collected by reviewing the official website presentations of the cities, municipalities and city municipalities. Another method is a direct insight, realized by visiting all service centers and premises of the local administrations. The third source is 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)<sup>7</sup> 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 depend solely on decisions of relevant city statutes, and that practice differs from city to city. Furthermore, some of the indicators are not applicable to the in-city

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

<sup>7</sup>As prescribed by Law on Territorial Organization of the Republic of Serbia (Official Gazette of the Republic of Serbia, no. 129/2007, 18/2016 and 47/2018), except those from Kosovo („the territory of autonomous province Kosovo and Metohija”).

municipalities. For example, some of the in-city municipalities do not have “local communities”, public utility companies or public institutions under their control, and do not lease property. Possible calculation of the relative index (according to real competences and activities) of city municipalities would significantly complicate development of the LTI and could never be fully 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 in some instances such municipalities did not have the duty/ability to produce the information. It would be therefore incorrect to compare their ranks and indexes with the indexes of the other LSGs. To a greater extent, comparisons are possible among municipalities within the same city. However, caution 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 trend of transparency for these municipalities can be observed best through several cycles of evaluation.

When comparing LTI 2021 results with [LTI 2015](#) or [LTI 2019](#) and [LTI 2020](#), one should have in mind that Transparency Serbia in the meantime adjusted indicator questions<sup>8</sup>. Indicators in LTI 2020 were the same as in LTI 2019. However, some indicators were modified between 2020 and 2021 researches. TS did this in order 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). At the same time changes included erasing indicators that were an obstacle in practice (the assessment often depended on the unverifiable response of local governments, there were “halfway” situations in which it was difficult to decide whether the current situation was 0 or 1, and there were few indicators not extremely important for transparency or prevention of corruption). These changes affected directly or indirectly 23 indicators. Some of them were merged - two into one, so in order to get a positive grade, it is necessary to meet at least one of the previously separated criteria, some were deleted (for the previously mentioned reasons), and some separated into two indicators. Several completely new indicators were introduced.

TS performed testing with these changes. A total of six LSGs were assessed according to the old methodology, and then according to the new methodology. Results that were obtained indicated that the average score would be increased by 3.8 (range 2 to 5). This is the expected impact of the new methodology on the growth of the average LTI (with a deviation of +/- 2)<sup>9</sup>.

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<sup>8</sup> 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.

<sup>9</sup> More detailed explanation of this change in the annex “Explanation and justification for changes of indicators/questions”.



In the work on data collection, researchers of Transparency Serbia thoroughly reviewed websites of all 170 LSGs. After that, the research coordinator reviewed 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 46 LSGs or 27% (six cities, 27 towns and 13 in-city municipalities). This is much worse than in 2020, when 24 LSGs (14%) failed to respond. This can be attributed to pandemics, because requests were sent in December 2020, when second wave was at its peak, and many LSGs faced problems, either with employees on the sick leave or working from home and unable to gather all the data needed for complex requests such as this, inquiring about documents and information from several different administration sectors.

Same as in previous researches, we also sent to all municipalities one request for free access to information using the “mystery shopper” strategy. In this concept, instead of TS as the organization, the request was signed by an individual citizen who provided a private mail address for answers. Within this indicator we did not want to measure transparency about any particular information, but to establish if the units of the local self-government would respond equally to the requests of an ordinary citizen, as they do when receiving a request from a civil society watchdog organization. This year, 130 local self-governments responded to the citizen’s request and provided requested information, fewer than in LTI 2020 (138) and in LTI 2019 (150), thus indicating trend of lower compliance with the Law on Free Access to Information in general and to certain degree above-mentioned problems with pandemic-affected transparency.

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 report<sup>10</sup>. 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 practice used in all previous research cycles.

Associates of the Transparency Serbia have crossed over 10.000 kilometers in this research, and visited all 170 units of local self-government. We visited municipal administrations, more precisely, LSGs’ service centers. In that way, we established the state on-the-spot for five indicators. These visits took place in November 2020 at the beginning of the pandemic second wave climbing to the peak. TS rushed to finish this part of the research as early as possible fearing that service centers might close and local administrations switch to online functioning as it happened in Spring 2020. Our researchers did, however, face a lot of restriction even in this phase, and this influenced results.

Same as each year, on a few occasions, TS researchers were confronted with the suspicion of employees in service centers or security workers. 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.

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<sup>10</sup> Due to huge number of appeals and low level of capacities, Commissioner’s decisions on appeals are usually delayed for several months.

The last step was the verification of the results. In order to overcome possible omissions and to prevent some LSGs from being downgraded without justification, our researchers sent the list of missing information to all LSGs, so they can 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 to inform us where it can be found. TS verified all the responses and calculated the final scores. Regarding responses, some municipalities claimed that certain (missing) information or documents can be found on their websites without providing exact location. TS double checked. When no new information and documents were found the score remained unchanged. This year 46 LSGs (out of 170) responded<sup>11</sup> to the call for the verification (compared to 37 in 2020 and 74 in 2019). Although pandemics might be a possible cause of lesser response rate of LSGs, a more probable reason is their awareness that the transparency level assessed by TS researchers was fully accurate and that LSG have no additional information published on their web-sites. Some responses resulted in substantial improvement of the score, and some simply confirmed findings of the TS researchers<sup>12</sup>.

One should always bear in mind that results present **the status of transparency as assessed at the moment when research was done or when the verification is finalized**. The actual transparency of LSGs, i.e., on their web-sites and in their premises may therefore differ from the status at the moment of this report's submission and publication.

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<sup>11</sup> Apart from Jagodina, Bačka Palanka, Blace and Aleksinac also responded they are working on the new websites.

<sup>12</sup> Some municipalities claimed that certain (missing) information or documents can be found on their websites without providing exact location. TS double checked, in some instances new information and documents were found, but in some cases - not.

## General observations

### General evaluation of LSG transparency and perspectives for improvement

The specific observation about LTI 2021 is that pandemics and measures aiming to prevent spread of virus influenced transparency in a negative sense. Some public debate mechanisms were abolished, contact between administration and citizens restricted, local authorities faced problems with capacity due to sick leaves or work from home (with lower efficiency). As for the rest, the most general observation of the researchers remains the same – **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, such as public procurements.** Some improvement was made in the field of public enterprises and public institutions, but it is still small improvement, considering that average score in this area is 45.8%, whilst Law on Public Enterprises prescribes the obligation and penalties for unpublished data. This proves that even when obligations are prescribed by the law, they will not necessarily be met if sanction mechanisms do not function. Namely, other TS researches show that there were no charges raised ever for unpublished data about PEs, and therefore there are still 22% PEs (from the sample) **without even their own website.**

The research again identified some examples of good practices, some of them maintained for several years and some good practices replicated. On the other hand, most bad practices also persist. These include insufficient budget information, which was in this research probably additionally affected by the slow functioning of the local administration due to pandemics measures. The average score in this area decreased from 59.2 to 55%. There was no improvement regarding the problem with unavailable or inaccessible information on the decisions of the local assemblies, that was noticed last year. Some improvement was noted regarding information booklets.

### Selected systemic problems and observations

Even better than LTI 2020, the LTI 2021 shows how **the lack of transparency decreases possibilities to hold local government accountable.** The decisions made at the sessions of local assemblies can be found only at 33.1%<sup>13</sup> of LSGs websites. That is worrying regarding the fact that still 20% of local self-governments have no Official Gazette of the town on their websites or even a link to it. 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 only 49% of the LSGs websites, and the proposed documents for the next session at 20%. There is even less transparency about municipal council – decisions can be found on 13.8% of the LSGs websites.

The current budget was not published at all in the websites of 7% units of the local self-government (same as LTI 2020). Furthermore, many budgets (25%) 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. It is encouraging, on the other hand, that the "citizens' budget" is published by more LSGs than in LTI 2020 (increase from 55.1 to 57.9%). As mentioned above, in the context of the pandemics, fulfilling the requirement to organize public debates on certain budget issues was most

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<sup>13</sup> All data related to 145 cities and municipalities, unless otherwise indicated.

severely hampered by the anti-virus measures: public debate on the budget - citizen surveys or consultation – were organized by merely 39.3% of LSGs, compared to almost 77% in 2020 research.

**One of the greatest fields for improvement is, again, in the area of Public Enterprises and Public Institutions.** As noted in LTI 2020, the practice of appointing managers of these entities is frequently criticized as being motivated by party affiliation instead of professionalism. Similarly, party-based and excessive employment in the public sector is frequently suspected. However, LSGs do not sufficiently address these concerns through increased transparency. In spite of the legal obligations, almost quarter of the observed PEs do not have their own websites. This is the case with 31% of the observed PIs. In 31% of LSGs there was at least one case of the PE's director holding position after its acting director term ran out, and public calls not being published or executed. Comprehensive information about directors' selection procedures can be found on websites of only 4% of LSGs, with the situation being a bit better, but far from good, when it comes to basic information about these procedures – they are published on every fifth LSG's website. Situation with publishing work plans and reports on the work, although being a legal obligation, proves how neglected this area is – we found around 30% of these documents for the observed PEs and PI's at the websites of LSGs, PEs or PIs. The good news from this area is that more LSGs have sections on their websites dedicated to PEs (86%) and PIs (83%). This is a first step towards the page with comprehensive information and documents, which is something TS has been proposing in all previous researches' conclusions. In 2021. USAID GAI project supports four LSGs to develop such a page, which might be an embryo for replicating good practice in the future.

Some related indicators disclose the absence of a systemic approach in ensuring transparency: 95.2% of LSGs publish public calls for leasing property in its possession, and only 4.1% (6 LSGs) published reports about these leases. This is, however, an improvement, compared to LTI 2020, when not a single report was found. Surprisingly, reports were found on websites of small municipalities, some of them having low total scores, and not necessarily on the websites of those at the tops of the ranking.

One slightly modified indicator disclosed that adopting documents or procedures which are supposed to serve for anti-corruption or pro-transparency purposes is not enough if those documents and procedures are not implemented, or at least further monitored. In LTI 2020 and LTI 2019 TS scored adoption of Integrity Plans. Since new integrity plans are due in 2021, to avoid copying the same scores, TS made additional conditions for positive mark – adoption of Integrity plan, and reporting (to the Agency for Prevention of Corruption) on its implementation. Average score for this indicator plummeted from 54% to 17%.

A lot of municipalities had their development strategy valid until 2020. Not adopting new strategies resulted in a huge decrease for this indicator – from 77.9% to 34.5%.

Publishing reports on the realization of NGO projects and media projects financed by the municipality is still at the very low level (5.5% for media and 4.8% for NGOs). Decisions for distributing money on these calls often are followed by controversies and suspicions that funds are given to media or NGOs connected with local politicians or those inclining towards the local authorities or ruling parties. Further reason for concern is that many LSGs which published calls for media allocation didn't publish the decision (79.3/53.8%). This result is even worse with NGO allocations (76.6/44.1%).

Some improvement can be noted in the area of free access to information. According to data received from the Commissioner, there is a significant decrease in the number of municipalities which ignored

requests – in 2020 there were 23% of LSGs with no complaints filed against them in the previous year due to ignoring requests for information of public importance, and now there are 40%. However, one should not jump to the conclusion that this is an indicator of improvement in this field, as it is equally possible that citizens were more reluctant to file complaints to the Commissioner. Namely, according to the Commissioners' database of appeals<sup>14</sup>, the overall number of appeals submitted to the Commissioner against LSGs and local public enterprises decreased from 1378 in 2019 to 891 in 2020, and number of appeals because of ignoring the requests decreased from 864 to 538<sup>15</sup>.

However, there is the other face of the coin. The request sent by TS' "mystery shopper" was ignored by 40<sup>16</sup> (out of 170) LSGs.

Of these 40, 13 did not submit the requested information in 2020 either, and eight local self-governments have a three-year continuity in not replying or non-submission of information to TS' "mystery shopper": Belgrade, Bela Crkva, Svilajinac, Požega, Niš, Zemun, Pantelej, Kostolac.

For these eight cities, municipalities and city municipalities, the data were crossed with two other indicators related to the procedure in the field of access to information of public importance.

In 2019, 2020 and 2021, Belgrade and Bela Crkva ignored the requests of the "LTI citizen", but they also had complaints due to ignoring other requests, and in all three years they also had unexecuted decisions of the Commissioner.

Zemun is also "competing" with them, as it had eight zeros out of these nine possible ones - they only have a positive score in 2019 because no complaints were filed against them for ignoring the request.

Although we noticed improvement with the Information Booklet area, those few indicators don't give the complete picture of the situation regarding this instrument for proactive transparency. Notes taken by TS researchers indicate that these documents can be significantly improved – they are often bulky, with unnecessary information (such as complete budgets from a few years ago), with a huge number of hard-to-read images (scanned documents) instead of text or tables, with data 5-6 years old. TS worked on the improvement of the Information Booklet with two LSGs supported by the USAID GAI project and produced methodology for evaluating and improving Booklets. This effort may be helpful for improvements in this area. Amendments to the Law on free access to information of public importance, expected for 2021, would also bring changes in drafting of Booklets that may be helpful to achieve greater compliance.

One other remark from LTI 2020 remains valid - we identified a large number of LSGs' websites that have a formal framework for raising transparency to a higher level (appropriate sections) on their

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<sup>14</sup> <https://data.poverenik.rs/dataset/zalbe>

<sup>15</sup> Comprehensive information on number of submitted requests for information is not available, since only 38% of LSGs submitted their annual report to the Commissioner, <https://www.poverenik.rs/images/stories/dokumentacija-nova/izvestajiPoverenika/2020/CIRIzvestaj2020.docx>, page 83.

<sup>16</sup> Beograd, Subotica, Žitište, Nova Crnja, Sečanj, Bela Crkva, Plandište, Titel, Bogatić, Loznica, Valjevo, Ljig, Velika Plana, Žagubica, Jagodina, Svilajinac, Majdanpek, Arilje, Požega, Prijepolje, Užice, Vrnjačka Banja, Aleksandrovac, Niš, Aleksinac, Gadžin Han, Merošina, Dimitrovgrad, Lebane, Crna Trava, Bujanovac, Preševo, Zemun, Obrenovac, Rakovica, Sopot, Čukarica, Medijana, Pantelej, Kostolac

websites, but do not publish or update the content of relevant sections. Similarly, banners from the front pages frequently directed users towards information that is several years old or obsolete.

Also, the format and layout of published information remains 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 or web-pages for public procurement, budget, urban planning and administrative services can serve as 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 greater amount of information.

## Performance of LSGs in the specific areas of the research

### Overview

**The 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, such as public procurements.** However, this is not always the case - the Law on Public Enterprises prescribes the obligation and penalties for unpublished data but the average score for this area is still low (45.8%), although some improvement was made compared to LTI 2020. This proves that even when obligations are prescribed by the law, they will not necessarily be met if sanction mechanisms do not function.

The research again identified some examples of good practices, some of them maintained for several years, some good practices replicated, but, on the other hand, most of the bad practices also persist. These include insufficient budget information which was, in this research, probably affected by the slow functioning of the local administration due to pandemic measures.

The budget for 2021 is not published on websites of only 17 LSGs (out of 170, including city municipalities). However, the justification/explanation of the budget is not available on the website of another 59 LSGs. It is encouraging, on the other hand, that the “citizens’ budget” is published on 94 observed websites. This number has been growing constantly since LTI 2015.

Only seven (out of 170) LSGs published the complete documentation from the election process of directors of public enterprises and 31 had published at least some documents which can provide a relatively high level of transparency. Only nine local self-governments published the reports about property leases, even though the public calls were found on the websites of as many as 154 municipalities, cities and city municipalities.

As in all previous research, the best scores municipalities, cities and city municipalities have in the field of public procurements. Between 159 and 164 of them have positive scores on the three indicators in this segment.

Same as before (LTI 2020 and LTI 2019), LSGs performed relatively well in the area of “free access to information” - they complied in 95% of cases with 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.

Local public enterprises and institutions remain problems for transparency. Almost quarter of the observed PEs (out of 145) and 31% of PIs do not have their own websites. In 31% of LSGs there was at least one case of the PE’s director holding position after its acting director term ran out, and public call not being published or executed. Situation with publishing work plans and reports on the work, although being a legal obligation, proves how neglected this area is – we found around 25% of these documents for the observed PEs and PIs at the websites of LSGs, PEs or PIs. The good news from this area is that more LSGs have sections on their websites dedicated to PEs (86%) and PIs (83%). This could serve to build pages with comprehensive information and documents, and to help improve transparency in this area on a large scale.



As mentioned, public debates were affected by the pandemics. We found data on the website of 79 LSGs about the conducted public hearings/debates in the previous 12 months, compared to more than 120 in LTI 2020. Only 36 of those 79 published reports on public debates, containing information on proposals made by citizens and the reasons for acceptance / refusal.

LSGs largely follow the legal requirement to publish inspection lists (94% of municipalities). Less than one fifth of LSGs evaluated citizen satisfaction with services during the last four years.

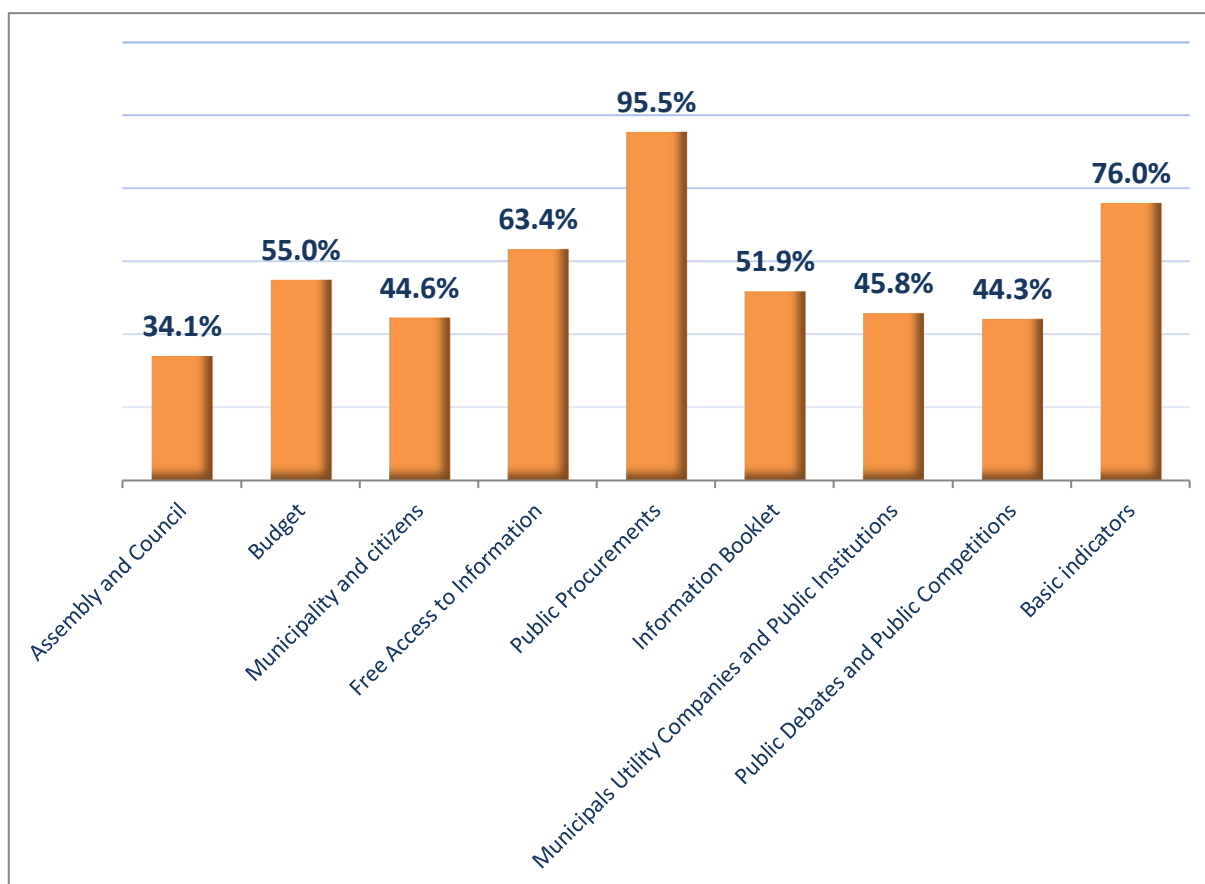
In the area Assembly and Councils, the only indicators where LSGs performed well was the publishing of the list of assembly members (88.3%). However, contacts with assembly members (e-mail addresses, phone numbers, direct forms) are found on websites of merely 15.9% of LSGs. The agenda of the next Assembly's session is not visible in over a half of LSGs, while voting results are available in 20% of cases. In addition, less than half of those publishing agendas also publish draft documents to be discussed at the session. City/municipality council decisions are available in 14% of LSGs only, and those of assemblies in 33%.

In other, non-categorized indicators, LSGs performed best when it comes to the mayors submitting a declaration of assets to APC: 95.2% of them did it. Systematization act of municipal administration was available at 78%, which is significantly better than in 2020 (53%). Code of Ethics for civil servants was available on the web in 43% of cases. According to data from the Anti-corruption agency (i.e. the Agency for prevention of corruption since September 1<sup>st</sup> 2020), local anti-corruption plans, although mandatory, are adopted by 101 out of 145 (they are mandatory only for cities and municipalities, not for in-city municipalities), which is 23 more than in 2020.

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



**Graph no 1: Percentage of successful performance of 145 LSGs per fields**



**Legend:**

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

*“Successful performance” refers to the percentage of maximum possible points that LSGs could have earned for indicators within a certain category.*

## Fields of the research

### Overview

The LTI observes transparency within eight broad areas. Thirteen questions are not grouped within the broader categories, as they are focused on rather narrow areas, such as transparency of municipal service local plans, codes of ethics, special plans etc. Within those eight categories, by far the best performance was identified in the area of public procurements (95.5% of maximum score).

As noted in the report, this result is a consequence of clearer comprehensible legal duties in that area: the fact that LSGs are required to publish similar information on the central government's Public Procurement Portal under penalty of sanctions for non-compliance. However, in all such instances where indicators relate to items that are required to be made available (by law), even when average scores are high, it also means that those municipalities and cities that do not comply with these requirements are in violation of the law. Namely, it would be normal that legal obligations are met, that scores in those areas are 100% and that additional high-level transparency standards are what best LSGs are aiming at.

Aside from public procurements, 145 LSGs obtained more than half of possible scores in the area of free access to information (62.9% - almost identical as in 2020), budget (55%) and slightly above half in the area of Information booklet. As mentioned above, due to pandemics, Public debates which were above 50% are now near the bottom of the scale, with average score of 44.3%, surpassing only Assembly and Council (34.1%).

When it comes to the individual indicators, there were 13 out of 95, with more than 90% of municipalities having positive score: publishing number of employees in local administration, publishing working hours, all indicators related to public procurements, publishing spatial/urban plans, publishing information how to submit request for access to public information, mayors submitting declarations of assets, announcing calls for leasing public property, publishing budget, etc.

At the bottom of the table, there is one indicator all LSGs in Serbia earned a score of zero: how individual members of the assembly voted at the assembly session.

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

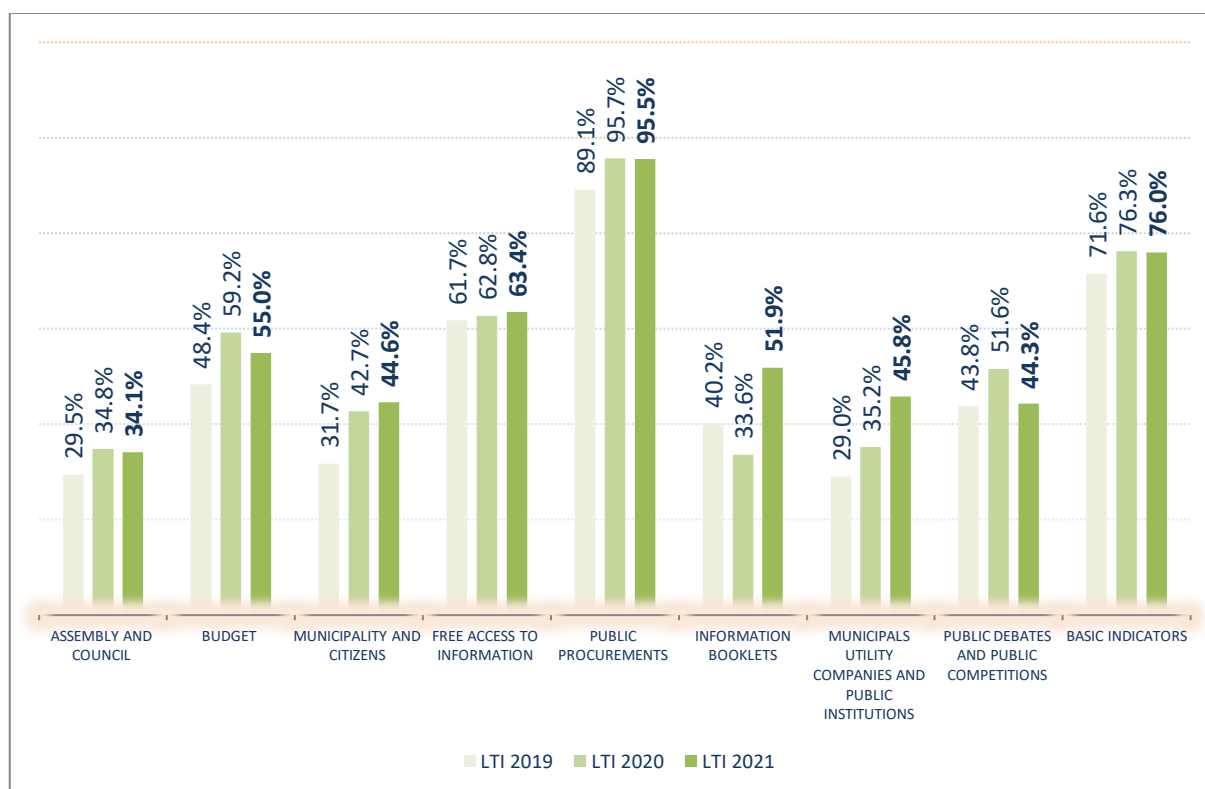
	Assembly and Council	Budget	Municipality and citizens	Free Access to Information	Public Procurements	Information Booklet	Municipals Utility Companies and Public Institutions	Public Debates and Public Competitions	Basic indicators
<b>Average</b>	<b>5</b>	<b>8</b>	<b>7</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>8</b>	<b>4</b>	<b>8</b>
<b>% of max score</b>	<b>34.1%</b>	<b>55.0%</b>	<b>44.6%</b>	<b>63.4%</b>	<b>95.5%</b>	<b>51.9%</b>	<b>45.8%</b>	<b>44.3%</b>	<b>76.0%</b>

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 LTI 2020, performance was worst in the category "Assembly and Council". It is slightly better than before in "Public enterprises and public institutions", with constant growth over the past three years, but still at the rather low level (45.8%).

Graph No 2. LSGs overall performance by eight indicators in 2021 vs 2020 vs 2019



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

## Public procurements

The category of “**public procurements**” was generally the best one, where as many as 135 (out of 145) scored a maximum of 4 points. However, this finding is limited only to availability of select procurement related documents as the scope of the analyses does not entail assessment of the procurement processes themselves.

## Free access to information

LSGs performed relatively well in this area. More than 95% of them comply with the duty to inform citizens on how to submit requests. However, only 3.4% provide the same information in their premises. Three quarters of LSGs (76.5%) provided requested information (in a timely manner) to TS’s “mystery shopper”.

In this category two municipalities had a maximum score of 6: Sombor and Bečej, while 46 LSGs had a very good score of 5.

## Budget

As mentioned before, performance in the “Budget” category decreased due to pandemics. Current year budget document is available on the most LSGs’ websites (93.1%), in three quarters of cases in machine-readable or at least searchable form, the situation is significantly worse when it comes to the availability of data on budget spending, where only 39.3% (43% in 2020) of LSGs published at least those reports. Audit reports were discussed and published in 20% of instances. The largest decrease was in the area of public debates – from 76.6% in 2020 to 39.3 in 2021.

In the category of “**Budget**”, the best score had Veliko Gradište and Sokobanja (maximum - 14), and Petrovac, Bor, Žabalj and Vranje having score 13.

## Information Booklets

Average score in this area surprisingly increased in spite of pandemics and possible problems for gathering information for updating Booklets in cases when administration employees worked from home. It should be taken in consideration, however, that LTI focuses on a few issues regarding Booklets, and some of the information TS researchers are looking for do not need to be updated regularly. On the other hand, notes made by researchers indicate that Information Booklets are often bulky, with a lot of old redundant information. Twenty five LSGs had the maximum score of 4.

## Public Enterprises and Public Institutions

More than 82% of LSGs (70% in 2020) have a special section of their websites with information about PEs and PIs. The cause for worry is the fact that nearly 25% of observed PE's don't have their own websites, although there has been a legal obligation to post certain information and documents on their website since 2012. More than 30% of LSGs have at least one director not elected at the public competition or being acting director after the maximum term prescribed by the law ran out,

Comprehensive documents on the competition process for electing directors are almost non-existent on LSG web pages (only 4.1%), and some documents can be found in 20% of cases.

In the category "Public enterprises and Public institutions" the best ranked are the municipalities of Kanjiža and Bečej (maximum 18), followed by Novi Pazar (16), and Mali Zvornik, Sokobanja and Šabac with 15 points.

## LSGs and citizens

In this area, the most transparent aspects are information on working hours (not very demanding) and publishing inspections controlling lists on the website (legal obligation). More than 70% of LSGs provide the possibility on their websites for citizens to report irregularities or violation of laws, including corruption. Such a possibility exists in 60% of LSGs' service centers or other premises. Less than one fifth of LSGs conducted research on satisfaction with their services during the last four years.

Just one municipality (Bečej) reached a maximum score (15) in this category, and it is followed by Novi Pazar (14) and Sombor with 13 points.

## Public Debates and Public Competitions

When it comes to public debates, 54.5% (72% in 2020) of LSGs published information of some hearing/debate held during the previous 12 months (other than consultation on municipal budget). Only 36 LSGs (24.8%) published reports on public debates which contained information on proposals received from citizens and reasons for the acceptance/refusal of those proposals. Disparity between the announced leasing of municipal property (95.2%) and published information about the outcome of those announcements (4.1%) remains huge. Disparity is smaller (but this doesn't mean that situation is better) when it comes to the publishing of information about the distribution of municipal funds for media and CSO projects, where we found announcements in 79.3% and 76.6% of cases respectively and results in 53.8% and 44.1% of cases. However, it is even worse with justifying to the public how this money was spent and what has been achieved – reports are published in 5.5% (eight cases) and 4.8 (seven cases) respectively.

In this category, Bor scored maximum 10 points, Sombor, Kanjiža and Leskovac had nine, followed by Knjaževac, Vranje and Veliko Gradište with eight points.

## Assembly and Council

Same as before, only aspects of transparency where assemblies and councils performed well was publishing of the list of their members (88.3%) and making official gazette available on the website (81.4%). Even the agenda of the next Assembly's session was not visible in more than a half of LSGs. Furthermore, nearly one third of those publishing agendas (20% in total) for municipal sessions also publish draft documents to be discussed at the session of the local parliament. Municipality council decisions are available in 13.8% of LSGs only, and those of assemblies are available in 33.1%.

In this category, Sombor had the maximum score of 15, Zrenjanin, Kragujevac, Vranje and Novi Sad had 14.

## Other indicators

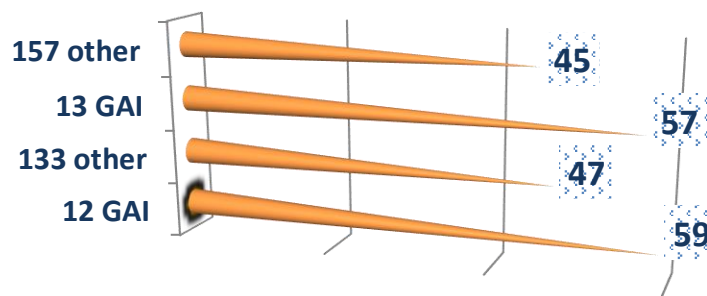
In non-categorized indicators (other), LSGs performed best when it comes to publishing number of employees (this information can be found in Information Booklet, in Budget or as a separate information at the website), publishing spatial/urban plans and having a declaration of assets submitted to the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

Information of municipal property leased to other entities is published in three cases, which is encouraging, compared to previous year's result (only one). Reports (merely empty forms at the moment) on contact with lobbyists can be found in four instances, and a weekly schedule of the mayor's activities is published at four LSGs' websites.

## Performance of 13 LSGs supported by USAID GAI

TS compared the performance of 13 cities and municipalities supported by the USAID GAI project with the rest of LSGs. Since one of the included LSG is in-city municipality, the comparison is made between 12 “GAI cities and municipalities” and 132 other cities and municipalities, and between 13 included LSGs and all other LSGs (157 of them). Average score of GAI LSGs is significantly higher than the average score of other LSGs:

**Graph no. 3.: Average score LTI 2021 – LSG’s included in USAID/GAI program and other LSGs**



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 2021 score – LSG’s included in USAID/GAI program– indices by categories, score**

	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 Competitions	Basic indicators
		(max 16)	(max 14)	(max 15)	(max 6)	(max 4)	(max 4)	(max 18)	(max 10)	(max 10)
Sombor	88	15	12	14	6	4	4	13	9	10
Žabalj	60	3	13	7	5	4	3	12	5	8
Sremska Mitrovica	49	4	11	7	4	4	4	8	2	8
Šabac	50	6	6	9	3	4	0	15	3	8
Kragujevac	68	14	11	8	4	4	0	13	6	10
Sjenica	39	4	5	7	3	4	2	6	2	8
Vrnjačka Banja	64	12	11	8	2	4	0	12	7	8
Novi Pazar	78	11	10	13	5	4	4	16	5	10
Raška	53	6	9	7	5	4	3	8	5	8
Niš	40	3	6	4	1	4	1	12	6	4
Dimitrovgrad	43	10	3	5	2	4	0	7	7	8
Vranje	75	14	13	12	4	4	3	8	8	10
<b>AVERAGE</b>	<b>59</b>	<b>9</b>	<b>9</b>	<b>8</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>11</b>	<b>5</b>	<b>8</b>
		53.1%	65.5%	56.1%	61.1 %	100.0 %	50.0 %	60.2%	54.2%	83.3 %
Stari Grad *	35	7	4	3	5	4	4	4	0	8
<b>AVERAGE All 13</b>	<b>57</b>	<b>8</b>	<b>9</b>	<b>8</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>10</b>	<b>5</b>	<b>8</b>
		52.4%	54.8%	50.0%	62.8 %	100.0 %	53.8 %	57.3%	50.0%	83.1 %

**Table no. 3.: LTI 2021 – LSG's included in USAID/GAI program and other – indices by categories, percentage**

	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 Competitions	Basic indicators
	(max 16)	(max 14)	(max 15)	(max 6)	(max 4)	(max 4)	(max 18)	(max 10)	(max 10)
<b>12 GAI</b>	53.1%	65.5%	56.1%	61.1%	100.0 %	50.0%	60.2%	54.2%	83.3%
<b>133 other</b>	32.4%	54.0%	43.6%	63.7%	95.1%	52.1%	44.5%	43.4%	75.3%
<b>13 GAI</b>	52.4%	54.8%	50.0%	62.8%	100.0 %	53.8%	57.3%	50.0%	83.1%
<b>157 other</b>	30.6%	51.8%	42.7%	63.3%	94.6%	53.0%	40.9%	40.6%	72.1%

They performed almost equally or better in all categories, with the biggest discrepancy in the area "Assembly and Council". In spite of difficulties mentioned above, 13 LSGs succeeded in keeping their average score over the 50% mark in all categories.

One should have in mind that this is, however, average score, and that actually there were excellent performances, but also some underachievers amongst those 13. It can be seen at the following table – seven LSGs improved their score, one had the same (rather low) score, and five have decreased it.

**Table no. 4.: LTI 2021/ LTI 2020 comparison – LSG's included in USAID/GAI program**

LTI 2021 final rank	LTI 2020 final rank	Municipality	LTI 2021 final	LTI 2020 final
2	3	Sombor	88	80
4	2	Novi Pazar	78	82
5	6	Vranje	75	73
11	25	Kragujevac	68	55
13	9	Vrnjačka Banja	64	63
20	27	Žabalj	60	55
41	64	Raška	53	47
55	20	Šabac	50	57
58	44	Sremska Mitrovica	49	51
88	43	Dimitrovgrad	43	51
103	69	Niš	40	46
108	107	Sjenica	39	39
		Stari Grad *	35	28



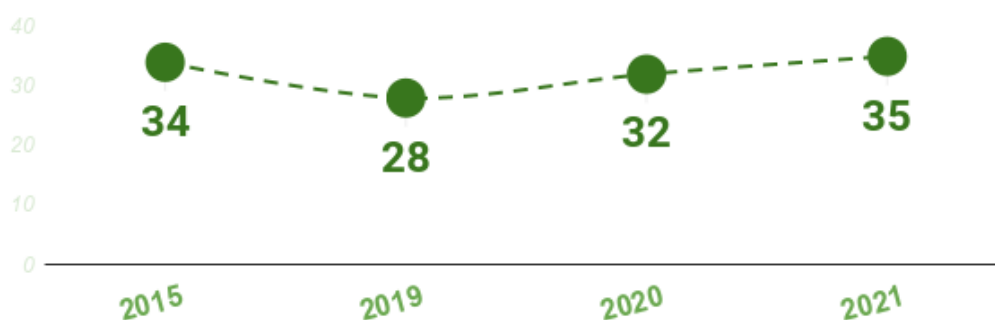
## Performance of in-city municipalities

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

### Overview

The most general observation is that the average performance of city municipalities has improved in comparison with the previous year: average LTI grew from 28 in 2019 to 32 in 2020 and 35 in 2021. It is important, however, to bear in mind that we adjusted indicator questions in the meantime, and that testing done on the sample of cities and municipalities indicated that change of methodology could result in the growth of average LTI up to 4 points. City municipalities were not tested, but some growth should be caused by this adjustment. Also, the average LTI increase is not the result of the steady growth of all (or most) municipalities. Several had large increases, but, on the other hand, several faced significant declines in the index.

**Graph no. 4. City municipalities average LTI index**



Same as before, city municipalities performed best in the area “Public procurement” (100%), followed by “Free access to information” (above 60%) and “Information Booklet” (50%).

On the other hand, performance is worst in the category “Public enterprises and public institutions”, where 25 city municipalities’ index is 4 out of maximum 18 points. However, not all of these city municipalities have public enterprises on their territories. They all do have assemblies, but the average score in this area is almost the same as in the “PEs and PIs” area – merely 20%.

## Comparing comparable

### Categories

In addition to “Public procurement”, there are only four more categories where the comparison among city municipalities is really possible: “Assembly and Council”, “Budget”, “Municipalities and citizens”, and “Free access to information”.

In the **“Assembly and Council”** category (maximum 16 points), with the worst average index among comparable fields, just one city municipality performed above 50%- Sevojno which had 15 out of 18 in LTI 2020, now stands at 14 out of 16. Both Stari Grad and Čukarica improved from two points to seven. Apart from those three, Vranjska Banja, Surčin, Palilula (Beograd), Savski Venac and Rakovica 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) Eleven of them are publishing agenda of the next assembly's session on the website.

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

Performance in the **“Budget”** category is worse than last year (average dropping from 38% to 35%). Surčin has the best score – 14 (maximum score), followed by Crveni Krst, Rakovica, Palilula Niš, Zvezdara and Lazarevac with nine out of maximum 14.

Current budget documentation is on the webpage of 18 city municipalities, (out of 25), in most instances in machine-readable or searchable form. Situation is significantly worse when it comes to the availability of data on budget spending (less than one-third). It is not surprising anymore that the level of compliance with the standard to publish and discuss the annual budget audit is at the very low level – there were none in LTI 2020, and now there are only two cases.

As for the **“Municipalities and citizens”** category the overall result is slightly better than previous year (increase from 34% to 40%) Barajevo which was the best performer last year with 10 points now has only five, and the best performer is Savski Venac, with 10 points, the only one with two-digit result.

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-one city municipal administrations have a functional service center through which it provides all the services. Only seven of them provide on their websites a possibility for citizens to report irregularities or violation of laws, but 13 of them have such mechanisms in their premises. One of them (Lazarevac) provides an opportunity for citizens to monitor the status of their cases on the website.

**Table no. 5: LTI Score of city municipalities 2015-2021**

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

**“Free access to information”** improved – from 56.7% to 66.7%. Duty to inform citizens on their websites on the submission of a request for free access to information is fulfilled by 23 out of 25 city municipalities.

FOI request sent by TS’s “mystery shopper” was responded to by 17 city municipalities. Only two of them (Zvezdara and Obrenovac, same as in LTI 2020) have information on the submission of a request for free access to information visible in the service centers or administration premises.

## Year by Year

Fifteen city municipalities have improved from last year, one had an LTI score unchanged, and nine performed worse. Among the improved ones, two of them have increased their overall score by more than ten points: Čukarica and Voždovac. Both, however, had a decrease in LTI 2020 compared to 2019.

Comparing LTI indexes of city municipalities over past four LTI cycles, 2015, 2019, 2020 and 2021, we see that only three of them have continuous improvement, or at least stagnation, over time: Surcin (32–42–53–62), with LTI 2021 score which is, even without certain competences, comparable with the best performers on the main table, Lazarevac (37–36–36–43) and Savski Venac (36–38–36–39). Steady improvement is noted with two city municipalities which were not included in 2015 research – Vranjska Banja and Sevojno, with the latter having a respectable LTI 2021 score of 51.

Zvezdara is stagnating with small variations (41–38–40–40). Mladenovac, which had 50 points in 2015 and then fell to 25 in LTI 2019 is slowly rising again (50–25–33–41). The same stands for Rakovica, but at lower level (35–21–31–37) and Stari Grad (51–23–28–35). Voždovac and Grocka are also steadily, but slowly, raising, with one small underachievement (2019 and 2020, respectively)

On the other side, 11 city municipalities have not managed not only to improve but to maintain the same performance as in 2020. Pantelej (Niš) lost 16 points (from 39 to 23), Obrenovac and Barajevo, both Belgrade municipalities, have six and five points, respectively, in the overall score.

## Influence of the pandemics on LSG's transparency

The pandemics and measures aiming to prevent spread of virus influenced the LTI 2021 score.

Some mechanisms or procedures were temporarily altered, canceled or abolished due to health protocols. This resulted in service centers not functioning in some municipalities, not organizing physical public debates, not organizing meetings of the mayors and citizens, etc. There were also indirect consequences to LTI scores – in some (or most) municipalities some (or most) of the employees worked from home, some of them were on sick leaves. Thus, it was difficult to keep updated websites or information booklets, to gather information to answer FOI requests or to regularly post certain documents on LSG's website.

While the exact impact of the pandemics on the score is not possible to fully determine, it should, however, be taken as one factor which contributed to the score. TS calculated that the negative influence of the pandemics on the average score could be as high as six points.

Namely, some indicators for determining the LTI have been changed between LTI 2020 and LTI 2021 research. The test has been performed and it was determined that this modification should have a positive impact on the score – raising it by an average of 3.8 points. If other impacts are considered (real annual progress expectancy, change of score after verification process), this could disclose that the impact of the pandemic not only nullified the influence of the indicators' modification, but also the expected real growth of at least two points (TS' assessment), making its overall negative influence approximately six points, as established in the preliminary report. However, this impact has been diminished in the verification process, when some of the missing documents had been posted, making the final negative impact of the pandemics on the LTI average score approximately four points.

Comparison of the LTI 2020 and LTI 2021 by individual indicators average scores indicate specific areas which were actually affected by the pandemics. The indicator "Has a public debate on the budget been held - citizen surveys or consultation meetings" total score plummeted from 76.6% to merely 39.3%. Some kinds of public debates have been organized, but not in the form this indicator envisages. Due to restricted access to premises of the administration and reorganized service centers (some parts were in the lobbies, for instance), several indicators related to information available at service centers decreased its total score. Such examples are "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" (from 78.6 to 62.1%) or "Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration" (going down from 20.7% to 16.6%) and "Are data on the contact of the mayor or deputy with the citizens visible on the premises" (9.0% to 6.2%).

All budget related indicators were lower in the preliminary research, but many of those had been posted in the verification process. However, several indicators still ended below the score achieved last year. Other indicators affected by the pandemics include providing response to FOI requests in time, publishing and updating Information Booklet (these were affected by the specific working procedures) or having defined permanent terms for mayor's meetings with citizens (abolished in several municipalities during the pandemics).

Apart from determining the influence of the pandemics on the transparency, we used one indicator to try determining the costs of the anti-viral measures, or at least the scope of costs' categories.

Using its "mystery shopper" indicator (the concept explained in the "Methodology" chapter), Transparency Serbia has sent a request for free access to information of public importance, by an email, to all of 170 local self-government units. We have requested information about all pandemics related extraordinary costs - amounts, categories – which local self-government units had during 2020 in order to enable the smooth operation of the administration in pandemic conditions (e.g., procurement of hygienic equipment and disinfectants, additional cleaning and disinfection services, procurement of computers and other equipment to enable employees to work from home).

There were 130 (out of 170) responses to the requests (76,47%). Out of that number, 112 responses arrived within a 15 days deadline, while 16 responses arrived within 40 days. Only 2 answers arrived after that deadline. Two municipalities (Bogatic, Dimitrovgrad) replied they needed additional time (up to 40 days) to deliver information, but at the end they would never do so.

Out of 130 responses, 9 responses were incomplete or negative, meaning that municipalities either replied that they did not have extraordinary expenses, or they stated that they didn't have requested information, or they otherwise avoided providing information. One specific example of such an answer came from in-city municipality of Kostolac, in which the electronic signature of the applicant was requested, in order for the request, sent by email, to be considered. The in-city municipalities of Vranjska Banja and Sevojno stated that the costs were covered by their home cities (Vranje and Uzice respectively), while seven LSGs only stated the total amount of costs they had, without specifying it.

Out of the total number of 130 received answers, 112 of them could be applied to analysis of costs by categories, according to the content of the answers sent by the LSG units.

TS has classified the costs into five categories: costs for medical needs and equipment, costs for computer equipment, costs for disinfection of streets and buildings, money spent on gift packages for citizens and other costs. Other costs include those not covered by any of the aforementioned categories, such as fuel, printing of promotional materials and wages for additional workers.

**Table no. 6: Types of COVID – 19 related expenditures of LSGs**

Cost's category	Number of LSG units that have listed this type of expense
Medical needs and protection equipment	112
Computer equipment	7
Disinfection of streets and buildings	50
Gift packages for citizens	13
Other costs	37

As shown in the table, 112 LSGs stated that they had costs related to medical needs, seven had costs related to the purchase of computer equipment, 50 LSGs had costs related to disinfection of streets

and buildings, 13 municipalities stated that they had costs related to the procurement of gift packages for citizens, and 37 LSGs had other various costs.

Regarding the framework in which the amounts of costs were, the highest amount of costs related to medical and protection equipment was 38,501,720.17 RSD (Sabac) (around 400,000 USD), and the lowest amount (apart from those which claimed they had no costs for this purpose) was 11,869.40 dinars (Golubac) (120 USD). In total, these costs amount up to 159,125,277.56 RSD (1.6 million USD), and the average cost per LSG unit was 13,260,000 RSD (135,000 USD).

In the case of costs for computer equipment, these amounts were 561,900.00 RSD (Ub) (5,700 USD) and 35,100.00 dinars (Paraćin) (355 USD), in total that amount was 1,593,124.00 RSD (16,150 USD), and an average amount was 227,600 RSD (2,300 USD); in the case of costs for disinfection of streets and buildings the highest reported amount was spent by Rača 8,412,451.55 RSD (85,400 USD) and the lowest by Čičevac 61,273.92 RSD (620 USD), in total that amount was 76,717,882 RSD (778,000 USD), and an average amount was 1,534,000 RSD (15,500 USD).

As for the gift packages for citizens, Požarevac spent 44,169,955 RSD (450,000 USD) and Bajina Bašta presented the smallest cost in this category - 1,000,000 RSD (10,500 USD), in total that amount was 133,567,321 RSD (1.3 million USD), and an average amount was 10,274,410 RSD (105,000 USD).

In the "other costs" category, the highest amount was 10,203,815 RSD (Smederevo) (103,000 USD) – this amount referred to the transport of passengers during the state of emergency, the engagement of labor and vehicles, as well as costs for other special purpose materials).

The highest stated individual LSG's total amount of costs was 52,105,324 dinars (Požarevac) (530,000 USD) and the total amount of all costs for 112 LSG units which provided data was 396,326,788 RSD (4 million USD). There are additional 103,000,000 RSD (1,044,000 USD) by 7 LSG units to which the cost analysis could not be applied because they provided only the total amount, not the categories. This makes total costs up to 500,000,000 RSD (around 5 million USD).



## Selected individual examples

### Assembly and Council

#### Good Practices (2021):

- Kanjiža - Good example of publishing Assembly decisions <http://www.kanjiža.rs/ujlap/site/index-sr.html?aid=2363&mnu=2>
- 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\\_Materijal-za-sednicu-SO.html/4](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_Materijal-za-sednicu-SO.html/4)
- Plandište - Useful web-pages on the Municipal Assembly and the Municipal Councils' work - <http://plandiste-opstina.rs/lokalna-vlast/skupstina-opstine/sednice-so>
- Pančevo – City council sessions' information: <http://www.pancevo.rs/lokalna-samouprava/gradsko-vece/odluke-gradskog-veca>
- Bački Petrovac- Official gazette with content, list of published decisions <http://www.backipetrovac.rs/dokumenti/sluzbeni-list-opstine-backi-petrovac>
- Kragujevac - Good example of publishing Council decisions <https://www.kragujevac.rs/lokalna-samouprava/gradsko-vece/odluke-gradskog-veca> and assembly decisions <https://www.kragujevac.rs/lokalna-samouprava/skupstina-grada/sednice-skupstine-grada>
- Leskovac – Good example of publishing Assembly decisions- <https://www.gradleskovac.org/index.php/lokalna-samouprava/skupstina-grada/sednice-skupstine/> <https://www.gradleskovac.org/index.php/lokalna-samouprava/gradsko-vece/sednice-gv>
- Gadžin Han - All the sessions of the Municipal Assembly (and the minutes)- <http://gadzinhan.rs/lokalna-samouprava/skupstina/akti-so/> and all decisions from municipal council meetings - <http://gadzinhan.rs/lokalna-samouprava/opstina/akti-veca>
- Sombor – Good example of citizen attendance at the Assembly sessions - <https://www.sombor.rs/lokalna-samouprava/skupstina-grada/prisustvo-gradjana-sednicama-skupstine-grada/> 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-grada/odbornici-skupstine-grada-sombora/>
- Krupanj - Information on all members of parliamentary working bodies found - <http://www.krupanj.org.rs/index.php?id=65>
- Žabari– Contact with assembly members: <https://zabari.org.rs/lokalna-samouprava/skupstina-opstine/odbornici/>, also in the Information Booklet: <https://zabari.org.rs/wp-content/uploads/2020/12/2020-Informator-dec-2020.pdf>
- Novi Sad - There is an android application for reviewing Assembly materials (not available on the site, however) - <https://play.google.com/store/apps/details?id=vpetrovic.skupstinans>



- Vrnjačka Banja - There are announcements of sessions of the Municipal Assembly - agenda and complete materials, which includes an excerpt from the minutes from the previous session <http://vrnjackabanja.gov.rs/aktuelnosti/skupstina-opstine>

- Novi Pazar – There is e-Assembly - <http://www.eskupstina.novipazar.rs>

All documents discussed at the meetings, including the minutes, were set up; Councilors presented in detail, with information on membership in the working bodies. There is a contact form where one can choose which councilor to ask the question.

- Bečej – There is a special Assembly web-page - <http://www.skupstina.becej.rs/sr/> and there is a working mechanism for asking councilors questions, who answer via e-mail; questions and answers are visible.

<http://www.skupstina.becej.rs/%D0%BF%D0%B8%D1%82%D0%B0%D1%98%D1%82%D0%B5-%D0%BE%D0%B4%D0%B1%D0%BE%D1%80%D0%BD%D0%B8%D0%BA%D0%B0/>

- Zrenjanin - Good example of publishing Assembly decisions

<http://www.zrenjanin.rs/sr-lat/skupstina-grada/prethodne-sednice-skupstine-grada>

## Budget

Good Practices (2021):

- Žitište- Good example - the public debate lasted from November 19 to December 4, however merely about capital investments, not the entire budget. <http://www.zitiste.org.rs/183-2019-01-25-12-57-12/2746-202015>

- Sombor - Good example - report from public debate, budget documents by year and monthly reports: <https://www.sombor.rs/dokumenti-organa-grada/budzet-grada-sombora/2021-godina>

- Ljubovija - Budget portal, with documents sorted by year. Publishing monthly reports on execution. [http://109.92.31.60/bportal/client/performances/IZVESTAJ\\_8](http://109.92.31.60/bportal/client/performances/IZVESTAJ_8)

- VelikoGradište – Public debate: <http://velikogradiste.rs/javna-rasprava-za-pripremu-odluke-o-budhetu-za-2021-godinu/> and budget portal with monthly execution reports: [http://109.92.20.178/bportal/client/performances/IZVESTAJ\\_8](http://109.92.20.178/bportal/client/performances/IZVESTAJ_8)

- Sokobanja – daily reports on execution: <https://sokobanja.ls.gov.rs/archives/category/realizacija-budzeta>

- Bač – Call and report from public debate: <http://www.bac.rs/sr/%D1%98%D0%B0%D0%B2%D0%BD%D0%B0-%D1%80%D0%B0%D1%81%D0%BF%D1%80%D0%B0%D0%B2%D0%B0-%D0%BE-%D0%BD%D0%B0%D1%86%D1%80%D1%82%D1%83-%D0%BE%D0%B4%D0%BB%D1%83%D0%BA%D0%B5-%D0%B1%D1%83%D1%9F%D0%B5%D1%82%D0%B0-%D0%BE%D0%BF%D1%88%D1%82%D0%B8%D0%BD%D0%B5-%D0%B1%D0%B0%D1%87-%D0%B7%D0%B0-2021-%D0%B3%D0%BE%D0%B4%D0%B8%D0%BD%D1%83-0>

- Žabari – Call for public debate with documents: <https://zabari.org.rs/dokumenti/budzet/poziv-za-javnu-raspravu-3>

- Kovin – Good example of report from public debate: <https://www.kovin.rs/javne-rasprave>  
<https://www.kovin.rs/wp-content/uploads/Izvestaj-o-procesu-konsultacija-sa-gradjanima.pdf>

- Apatin - Perfectly structured and transparent by year; all documents are categorized; the rationale is part of the budget - <http://www.soapatin.org/budzet>
- Vrnjačka Banja - Good example of a budget page: everything is on it, including a call for public budget debates and reports from the discussion - <http://vrnjackabanja.gov.rs/dokumenta/budzet>
- Vranje - Monthly budget implementation reports in the form of a citizen report are found at the page: <http://www.vranje.org.rs/dokumenta.php?id=11354>
- Petrovac – Good budget page: <https://www.petrovacnamlavi.rs/dokumenta/budzet>
- Nova Varoš - Good budget page: <http://www.novavaros.rs/index.php/2013-05-28-18-57-20.html>

## LSG and Citizens

### Good Practices (2021):

- Sombor – Mayor’s schedule: <https://www.sombor.rs/lokalna-samouprava/gradonacelnik/raspored-aktivnosti-gradonacelnika>
- Rakovica – Citizens’ friendly page: <https://rakovica.rs/servis-gradjana/gradjanska-stanja>
- Bač - Administrative procedures with description and given deadlines [http://www.bac.rs/administrativni\\_postupci](http://www.bac.rs/administrativni_postupci)
- Niš - Electronic Regulatory Register - <http://www.eservis.ni.rs/propisi/> and Electronic Register of administrative procedures <http://regap.ni.rs/>
- Vranje - Electronic Register of administrative procedures - <https://regap.vranje.org.rs/>
- Šabac – Allows citizens to monitor the status of their cases (administrative procedure)- <http://213.240.36.188/pls/apex/f?p=520:1:0:>
- Bor . Citizens can monitor the status of their cases [http://77.46.142.54:8888/web\\_portal\\_bor/default.cfm](http://77.46.142.54:8888/web_portal_bor/default.cfm)
- Boljevac- citizens can monitor the status of their cases <http://www.boljevac.org.rs/status-vaseg-predmeta>
- Novi Pazar– Status of the case <http://91.150.87.126/PublicWebUIsp>

## Access to Information of Public importance and Information Booklet

### Good Practices (2021):

- BačkaTopola - Detailed presentation of services in the Information Booklet [https://www.btopola.org.rs/sites/default/files/dokumenti/informator\\_o\\_radu.pdf](https://www.btopola.org.rs/sites/default/files/dokumenti/informator_o_radu.pdf)

- Zrenjanin – Good Information Booklet <http://www.zrenjanin.rs/sr-lat/gradska-vlast/informator-o-rad-u-organa-grada-zrenjanina>
- Pančevo – Information Booklet regularly updated <http://www.pancevo.rs/informator-o-rad-u/>
- Indija - Good presentation of services in the Information Booklet  
<https://www.indija.rs/upload/2021/%D0%98%D0%BD%D1%84%D0%BE%D1%80%D0%BC%D0%B0%D1%82%D0%BE%D1%80%20%D0%BE%20%D1%80%D0%B0%D0%B4%D1%83%20%D0%BE%D1%80%D0%B3%D0%B0%D0%BD%D0%B0%20%D0%BE%D0%BF%D1%88%D1%82%D0%B8%D0%BD%D0%B5%20%D0%98%D0%BD%D1%92%D0%B8%D1%98%D0%B0,%2001.02.2021.%20%D0%B3%D0%BE%D0%B4%D0%B8%D0%BD%D0%B5.pdf>
- Ruma – Information booklet -  
<https://www.ruma.rs/portal2/jupgrade/dokumenta/Informator%20o%20radu%20SO%20Ruma%20broj%2064%20oktobar%202020.g.pdf>
- Požarevac – Well-structured Information Booklet <https://pozarevac.rs/dokumentacija/>
- Varvarin - Good examples of presentign deadlines, services in the Information Booklet  
<http://varvarin.org.rs/wp-content/uploads/2020/12/Informator-o-rad-u-30.11.2020..pdf>
- Bečej - Very detailed instruction on access to information of public importance, including all authorities in the municipality from which information may be sought (including local communities, public administration and public enterprises) -  
<http://www.becej.rs/%d1%81%d0%b5%d1%80%d0%b2%d0%b8%d1%81-%d0%b3%d1%80%d0%b0%d1%92%d0%b0%d0%bd%d0%b0/%d0%b8%d0%bd%d1%84%d0%be%d1%80%d0%bc%d0%b0%d1%86%d0%b8%d1%98%d0%b5-%d0%be%d0%b4-%d1%98%d0%b0%d0%b2%d0%bd%d0%be%d0%b3-%d0%b7%d0%b0%d0%bd%d0%b0%d1%87%d0%b0%d1%98%d0%b0/>
- Vrnjačka Banja - Comprehensive webpage dedicated to applying for access to information of public importance - <http://vrnjackabanja.gov.rs/dokumenta/zahtev-za-informacije-od-javnog-znacaja>

## Public Procurements

### Good Practices (2021):

- Subotica - Well structured PP page: <http://www.subotica.rs/index/page/lg/sr/id/4093>
- Čoka – Good example of PP page: [http://www.coka.rs/sr/doc/javna\\_nabavka/#PJN](http://www.coka.rs/sr/doc/javna_nabavka/#PJN)
- Sremska Mitrovica Good example of PP page:  
[http://www.sremskamitrovica.rs/kategorija.php?cat\\_id=65](http://www.sremskamitrovica.rs/kategorija.php?cat_id=65)
- Valjevo - Good example of PP page: <https://www.valjevo.rs/javne-nabavke/>
- Medijana – Interesting page dedicated to public procurements (spreadsheet of documents) -  
<http://medijana.rs/javne/2021>
- Beograd - There is a special city portal about public procurements -  
<https://nabavke.beograd.gov.rs/Pretraga.aspx?tab=1>
- Sombor – Public procurement are grouped, separated by ongoing and completed ones. -  
<https://www.sombor.rs/gradska-uprava/javne-nabavke-2/>; the archive contains public procurements from previous years

## Public enterprises and Public Institutions

### Good Practices (2021):

- 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 PE's 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>
- Paraćin – PEs' documents presented on LSG's website.  
<https://www.paracin.rs/index.php/ustanove-jp/javna-preduzeca/javno-preduzece-vodovod>
- Čačak – PEs' documents presented on LSG's website. Also documents about directors' appointment: [https://www.cacak.org.rs/izvestaj\\_o\\_radu-280-1](https://www.cacak.org.rs/izvestaj_o_radu-280-1)
- Novi Pazar – Good examples – all documents on webpage:  
<https://www.novipazar.rs/lokalna-samouprava/javna-preduzeca#rukovodstvo-5>
- Leskovac – PEs' documents presented on LSG's website.  
<https://www.gradleskovac.org/index.php/vazna-dokumenta/izvestaji-o-radu-i-planovi>
- Ljubovija – Names of the members of the Management and Supervisory Boards elected by the Municipal Assembly - <http://www.ljubovija.rs/lokalna/66>
- Plandište – Good page on PEs and Pls - <http://plandiste-opstina.rs/lokalna-vlast/javna-preduzeca-ustanove/>
- Novi Sad – There are information about directors and members of boards of directors and supervisory boards of PEs, Public communal enterprises, public administration and school boards - <http://www.novisad.rs/articles/45>
- Niš – There is PE page with consolidated service pricing and business reports and financial statements - <http://www.gu.ni.rs/institucije/javna-preduzeca/>

## Public Debates and Public Competition

### Good Practices (2021):

- Bečej - record of the property (real estate) owned by municipality which is leased  
<http://www.becej.rs/wp-content/uploads/2021/03/ZAKUP.pdf>
- Boljevac - record of the property (real estate) owned by municipality which is leased  
<http://bor.rs/komunalni-poslovi/>
- Kučevo – Calls by the areas, comprehensive and clear:  
<http://www.kucevo.rs/servis-gradana/javni-konkursi-i-pozivi-u-2021.php>
- Kragujevac – Calls and decisions grouped - <https://www.kragujevac.rs/e-usluge/konkursi-stipendije-pozivi/>

- Bač - Calls and decisions grouped <https://www.bac.rs/sr/konkursi>
- Vladimirci – Calls and decisions grouped. It could be better edited in terms of graphic presentation, but it's basically a good example - <http://vladimirci.org.rs/web/oglas-i-konkursi/>
- Sombor – Reports on realized media projects:  
<https://www.sombor.rs/aktuelnosti/konkursi/odluke-po-konkursu/izvestaj-o-realizovanim-projektima-proizvodnje-medijskih-sadrzaja-u-2019-godini/>
- Vranje – reports on realized projects: <http://www.vranje.org.rs/dokumenta.php?id=17212>

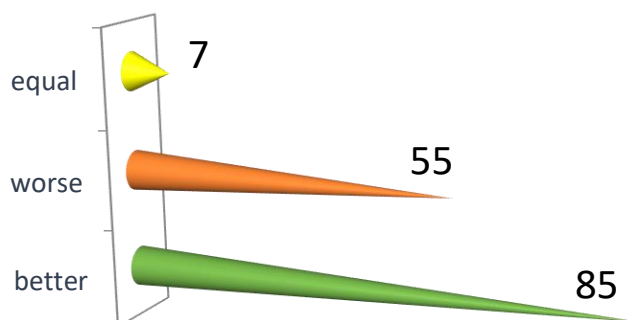
## Other issues

### Good Practices (2021):

- Beograd – Annual report on work of administration contains number of employees for each sector: [https://www.beograd.rs/images/file/2f34e1f06bbc63fd021a5e590487f712\\_5968975364.pdf](https://www.beograd.rs/images/file/2f34e1f06bbc63fd021a5e590487f712_5968975364.pdf)
- Čoka – Salaries presented in separate document: <http://www.coka.rs/sr/download/finizvestaji/2020-01.php>
- Petrovac – Banner for reporting corruption on the home page: <https://www.petrovacnamlavi.rs/prijavi-korupciju/>
- Rača - Banner for reporting corruption on the home page: <http://korupcija.bezbednost.org/prijavi-korupciju/>
- Zaječar- Reporting corruption: <http://www.zajecar.info/kontakt>
- Sombor - Number of employees: <https://www.sombor.rs/lokalna-samouprava/broj-zaposlenih-u-ogranima-ls/broj-zaposlenih-u-ogranima-ls-2020-godina/>
- Kovin - There is a register of employees for each month - <https://www.kovin.rs/registar-zaposlenih/>
- Novi Pazar - Register of lobbyists - <https://www.novipazar.rs/usluge/3645-registar-lobista>
- Sombor - Very detailed information about the local community: <https://www.sombor.rs/lokalna-samouprava/mesne-zajednice/>
- Žabari – Comprehensive page of spatial plans and plans of general and detailed regulation - <https://zabari.org.rs/dokumenti/category/planska-dokumenta/>
- Bač - Excellent search for documents by category and year - <https://www.bac.rs/sr/dokumenta>
- Sombor - There is a table with a list of all appointed and employed persons in the city government - <https://www.sombor.rs/dokumenti-organa-grada/imenovana-postavljena-i-zaposlena-lica/> and a list of staff members of the City, in budget inspection service and member of attorney general office who receive reimbursement of travel expenses . This is a great example: although it is not among the indicators it is a good measure to prevent abuse.
- Vrbas - Special site of the Department of Urbanism - <https://urbanizam.vrbas.net/> and one of the Inspection Services - <https://inspekcije.vrbas.net/>

## Comparisons with previous LTI's

**Graph No 5: Comparison 2021 vs.2020 - How many LSGs got better or worse, or performed equal**



**The overall average LTI score for 145 LSGs in 2021 (47.8) is higher than in the 2020 (45.9).** Seven cities and municipalities have the same score as last year. More than third LSGs (55) worsened their score from last year (in the 2020 final report only 28 worsened compared to 2019).

The fact that 62 out of 145 LSGs have not improved or worsened their score indicates that the space for improvements is still very huge, and that sustainability of the achieved transparency is one of the main challenges.

The best ranked is Bečej (90, had 83 in 2020), followed by Sombor with a score 88 (80 in 2020), and Kanjiža with 83 (77 in LTI 2020). Novi Pazar is fourth with 78 (82 in 2020). Sokobanja, Leskovac and Vranje share fifth place with 75 (68, 75, 73 in LTI 2020, respectively).

At the bottom of the table are Jagodina (23), Svilajnac (23), Bujanovac (21) and Preševo (21).

**Ten LSGs that improved their scores for 10 points or more in the last year** are Veliko Gradište (24), Boljevac (24), Požarevac (20), Novi Sad and Malo Crniće (17), Bor (16), Bela Crkva (15), Beograd (13), Pećinci (13), Koceljeva (13), Kragujevac (13), Despotovac (13), Voždovac (13), Kladovo (12), Kuršumlja (12), Čuprija (11), Čukarica (11), Sevojno (10) and Vlasotince (10).

On the other hand, Pantelejev lost 16, Golubac 15, Bujanovac 13, Gadžin Han 13 and Vrbas 10.

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

## Recommendations

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

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

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

This particularly relates to:

- page on the website dedicated to the activities of the assembly (as not merely presenting its jurisdiction and members), of the mayor and the council. This page should contain all relevant documents and information, such as announcements for the next session, with the agenda and materials (including the minutes from previous sessions), reports from the sessions, with adopted decisions or exact links to the Official Gazette issue in which the decisions are published;
- special "Budget" page, with not merely adopted budget, but all information and documents related to the budget (even if duplicated from the page with news, or public calls) - periodical reports on execution, 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.
- Information on public calls and competitions should be grouped with results or decision related to those calls (as it is done in 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;

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 opportunity to access the information (with possible assistance) at the register of administrative procedures on the computer in the LSG premises;

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



LSGs, having technical and financial capacities, should establish mechanisms to enable citizens to track their administrative cases and to receive data on the handling of appeals, complaints and grievances. If there are no such capacities, TS recommends publishing of phone numbers of civil servants that would provide these information on 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 database of administrative procedures) should be included in the budget;

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

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

LSGs should edit their pages dedicated to public enterprises, public utility companies and other public institutions. Transparency Serbia recommends LSGs to use these pages to create the 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 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 data about users and rents which are paid by users. 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
87. Is data about number of the employees in local administration published on the website?	97,9%
90. Are spatial plans / urban plans published on the site?	97,9%
33. Is the information on the working hours of administration available on the website or telephone number through which it is possible to get this information?	97,2%
48. Is there a section on the website dedicated to public procurements?	96,6%
50. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?	96,6%
46. Are information on the submission of a request for free access to information on the site? **	95,9%
75. Does the municipality regularly announce a call for leasing property in its possession?	95,2%
95. Has the mayor submitted a declaration of assets to ACAS?	95,2%
34. Are there inspections controlling lists on website?	94,5%
49. Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers ...)? **	94,5%
15. Is the budget for the current year available on the website? **	93,1%
27. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users?	92,4%
70. Are the data on the number of employees in the public institutions posted on the municipal website?	91,0%
11. Is the list of assembly members published on the website?	88,3%
55. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?	86,2%
45. The municipality has no unresolved decisions of the Commissioner?	85,5%
28. Does the municipal administration have a service centre through which it provides all the services?	83,4%

56. Is there a special segment on the municipal website dedicated to public institutions with PI data?	82,8%
13. Is the local Official Gazette available on the site? **	81,4%
77. Have the public calls for media allocation in the last 12 months been published on the website?	79,3%
43. Did the municipalities provide requested information (FOI request) in time? **	77,9%
57. Does the observed PE have its own website?	77,9%
86. Is the rulebook on internal organization and systematization of administration posted on the site?	77,9%
79. Have the public calls for the allocation for NGOs been published on the website?	76,6%
17. Is the budget published on the website in machine-readable or searchable form?	75,2%
23. Has a public call for public debate on the budget been published on the website?	71,0%
31. Is there a possibility on the website for citizens to report irregularities or violation of laws, including corruption?	71,0%
94. Has the Local anti-corruption plan been adopted?	69,7%
58. Does the observed PI have its own website	69,0%
59. Have public competitions for the selection of directors of public enterprises been conducted?	69,0%
16. Is the justification/explanation of the budget available on the website?	68,3%
72. Is the list with prices of services provided by PEs and PIs available on the website of the municipality or PI/PE website?	65,5%
30. Is there a possibility for citizens to report irregularities in the work or violation of the law, including corruption, in the service center or in the premises of the administration?	62,1%
60. Have public competitions for the selection of directors of public institutions been conducted?	62,1%
37. Is there information on the website about the services provided by the municipality?	60,7%
21. Is there a citizens' budget published and available on the website?	57,9%
53. Does the Information Booklet contain information about salaries of officials and employees?	57,9%
38. Are there contact information of local community councillors on the municipal website?	55,9%
52. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?	55,2%

25. Has the proposal for the final budget account months or the adopted budget account been considered at the session and published (on the website) in the last 12?	54,5%
73. Is there data on the website about the conducted public hearings/debates in the last 12 months (except for the budget)?	54,5%
78. Have the results of the competition for media allocation in the last 12 months been published on the website?	53,8%
9. Is the agenda of the next session of the assembly published on the website?	49,0%
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?	49,0%
14. Are the Assembly sessions broadcasted live or are there transcripts published or footage from the sessions broadcasted, or recordings of the whole session available on the website?	47,6%
51. Is the Information Booklet published on the site and updated in the last 3 months?	45,5%
80. Have the results of the competition for the allocation for NGOs been published on the website?	44,1%
88. Is there a code of ethics for employees and is it available on the site?	42,8%
44. No complaints were filed against municipalities in the last year due to ignoring requests for information of public importance?	40,0%
18. Are 6-month and 9-month reports on budget execution available on the website?	39,3%
22. Has a public debate on the budget been held - citizen surveys or consultation meetings?	39,3%
40. Are there defined permanent terms for mayor (or deputy mayor) meeting with citizens?	37,2%
39. Is there information on the website or in the Information Booklet that citizens can attend the assembly sessions and instructions on how to apply?	36,6%
24. Has the report on the public debate on the budget been published on the website?	35,9%
83. Has the municipality's development strategy been published on the website?	34,5%
66. Have the annual work plans of PEs been published on the website of the PE or municipality website?	33,8%
1. Are the decisions adopted by the Assembly published and available on the website? **	33,1%
71. Are the data on the number of employees in PEs published on the municipal site?	31,7%

68. Have the annual work plans of PIs been published on the website of the PI or municipality website?	26,2%
67. Have the reports on the work of PEs been published on the website of the PE or municipality website?	25,5%
3. Are the decisions adopted by the assembly in the past 24 months available on the website?	24,8%
74. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?	24,8%
69. Have the reports on the work of PIs been published on the website of the PI or municipality website?	24,1%
19. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?	21,4%
64. Have the documents from the selection procedure of the director of PE been published on the website?	20,7%
5. Have the proposed documents been published on the website before being considered at the session of the Assembly?	20,0%
6. Have the results of the voting at the last session of the assembly been published on the website?	20,0%
26. Has the audit of the final budget account been considered at the session and published (on the website) in the last 12 months?	20,0%
61. Is the systematization of PE published on the website of municipality or PE?	19,3%
10. Are there announcement of municipal/city council sessions on the website?	18,6%
42. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?	18,6%
65. Have the documents from the procedure for the election of the director of the PI been published on the website?	17,9%
62. Is the systematization of PI published on the website of municipality or PI?	17,2%
85. Has a report on the work of the administration for the previous year been published?	17,2%
93. Has the Integrity Plan been adopted and has the LSG report on its implementation?	17,2%
29. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration?	16,6%
12. Is there data for citizens' contact with assembly members published on the website?	15,9%
2. Are the decisions adopted by the city council published and available on the website?	13,8%
4. Are the decisions adopted by the city council in the past 24 months available on the website?	12,4%
32. Do (both/all) mechanisms for reporting allow anonymity?	11,0%

35. Can a citizen monitor the status of his case on the website?	10,3%
20. Are monthly reports (or cumulative monthly reports) on budget execution available on the website?	8,3%
36. Is there data on handling complaints, petitions and complaints available on the website?	7,6%
8. Are the amendments submitted on the draft acts that were considered at the last session (and the amendments' justifications/explanations) published on the website?	6,2%
41. Are data on the contact of the mayor or deputy with the citizens visible on the premises?	6,2%
81. Have the reports on the realization of media projects financed by the municipality been published on the website?	5,5%
82. Have the reports on the realization of NGO projects financed by the municipality been published on the website?	4,8%
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%
76. Are the rental lease reports (commercial premises, agricultural land) published on the site?	4,1%
47. Is information on the submission of a request for free access to information visible in the service centre or administration premises?	3,4%
84. Is the annual plan of work of municipal administration published on the site?	2,8%
91. Is there a report on contact with lobbyists published on the web site?	2,8%
92. Is there a daily or weekly schedule of the mayor's activities published on the website?	2,8%
89. Has the record of the property (real estate) owned by municipality which is leased published on the website, with data on leases, price and duration of lease?	2,1%
7. Has information been posted on individual members of the assembly votes on legislation debated?	0,0%

## Annex 2. Final scores of municipalities compared to the LTI 2020

		LTI	LTI	LTI		
	<b>Municipality</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>Growth 2021/2020</b>	<b>Growth 2021/2020 (%)</b>
1	Bečej	38	83	90	7	8,4%
2	Sombor	52	80	88	8	10,0%
3	Kanjiža	47	77	83	6	7,8%
4	Novi Pazar	66	82	78	-4	-4,9%
5	Sokobanja	46	68	75	7	10,3%
5	Leskovac	60	75	75	0	0,0%
5	Vranje	60	73	75	2	2,7%
8	Novi Sad	43	56	73	17	30,4%
9	Veliko Gradište	64	47	71	24	51,1%
10	Subotica	51	63	69	6	9,5%
11	Kragujevac	42	55	68	13	23,6%
12	Vladičin Han	43	60	65	5	8,3%
13	Boljevac	40	40	64	24	60,0%
13	Vrnjačka Banja	62	63	64	1	1,6%
15	Bor	42	46	62	16	34,8%
15	Užice	64	70	62	-8	-11,4%
17	Temerin	52	59	61	2	3,4%
17	Mali Zvornik	36	52	61	9	17,3%
17	Petrovac	51	59	61	2	3,4%
20	Žabalj	36	55	60	5	9,1%
21	Ruma	49	56	59	3	5,4%
21	Požarevac	57	39	59	20	51,3%
23	Indija	52	55	58	3	5,5%
24	Zrenjanin	44	63	57	-6	-9,5%
24	Srbobran	46	53	57	4	7,5%
26	Apatin	41	51	56	5	9,8%
26	Varvarin	51	49	56	7	14,3%
26	Kuršumlija	45	44	56	12	27,3%
29	Plandište	67	63	55	-8	-12,7%
29	Krupanj	48	58	55	-3	-5,2%
29	Ljubovija	45	52	55	3	5,8%
29	Knjaževac	54	54	55	1	1,9%
29	Nova Varoš	45	47	55	8	17,0%
29	Čajetina	43	57	55	-2	-3,5%
35	Bačka Topola	45	54	54	0	0,0%
35	Senta	51	58	54	-4	-6,9%
35	Bač	49	49	54	5	10,2%

35	Priboj	48	55	54	-1	-1,8%
35	Čačak	54	58	54	-4	-6,9%
35	Blace	37	46	54	8	17,4%
41	Smederevo	39	51	53	2	3,9%
41	Požega	40	54	53	-1	-1,9%
41	Ivanjica	46	55	53	-2	-3,6%
41	Kraljevo	57	47	53	6	12,8%
41	Raška	44	47	53	6	12,8%
46	Kula	45	48	52	4	8,3%
46	Mionica	37	47	52	5	10,6%
46	Osečina	33	53	52	-1	-1,9%
46	Kosjerić	30	43	52	9	20,9%
46	Vlasotince	35	42	52	10	23,8%
51	Novi Kneževac	39	50	51	1	2,0%
51	Negotin	45	48	51	3	6,3%
51	Arilje	39	53	51	-2	-3,8%
51	Bosilegrad	52	48	51	3	6,3%
55	Kikinda	49	47	50	3	6,4%
55	Odžaci	41	48	50	2	4,2%
55	Šabac	41	57	50	-7	-12,3%
58	Čoka	39	45	49	4	8,9%
58	Bački Petrovac	51	51	49	-2	-3,9%
58	Beočin	35	42	49	7	16,7%
58	Sremska Mitrovica	45	51	49	-2	-3,9%
58	Valjevo	40	45	49	4	8,9%
58	Babušnica	47	48	49	1	2,1%
64	Pančevo	45	49	48	-1	-2,0%
64	Loznica	38	46	48	2	4,3%
64	Ljig	29	39	48	9	23,1%
64	Kučevo	33	51	48	-3	-5,9%
64	Paraćin	66	50	48	-2	-4,0%
64	Aleksinac	40	43	48	5	11,6%
70	Despotovac	37	34	47	13	38,2%
70	Kladovo	28	35	47	12	34,3%
70	Kruševac	52	47	47	0	0,0%
70	Ražanj	33	45	47	2	4,4%
74	Beograd	30	33	46	13	39,4%
74	Opovo	33	42	46	4	9,5%
74	Lajkovac	35	41	46	5	12,2%
77	Novi Bečej	48	45	45	0	0,0%
77	Žabari	37	40	45	5	12,5%
77	Malo Crniće	38	28	45	17	60,7%

77	Bajina Bašta	34	46	45	-1	-2,2%
77	Bojnik	41	50	45	-5	-10,0%
82	Vrbas	40	54	44	-10	-18,5%
82	Irig	48	48	44	-4	-8,3%
82	Velika Plana	36	45	44	-1	-2,2%
82	Topola	50	52	44	-8	-15,4%
82	Trstenik	47	49	44	-5	-10,2%
82	Medveđa	26	37	44	7	18,9%
88	Vladimirci	36	38	43	5	13,2%
88	Prijepolje	37	42	43	1	2,4%
88	Gadžin Han	46	56	43	-13	-23,2%
88	Dimitrovgrad	38	51	43	-8	-15,7%
88	Crna Trava	41	41	43	2	4,9%
93	Žagubica	35	45	42	-3	-6,7%
93	Tutin	36	45	42	-3	-6,7%
93	Ćićevac	42	38	42	4	10,5%
93	Doljevac	33	41	42	1	2,4%
93	Surdulica	42	40	42	2	5,0%
98	Vršac	42	40	41	1	2,5%
98	Stara Pazova	26	40	41	1	2,5%
98	Rekovac	39	37	41	4	10,8%
98	Svrljig	43	37	41	4	10,8%
98	Pirot	46	45	41	-4	-8,9%
103	Žitište	37	44	40	-4	-9,1%
103	Rača	34	49	40	-9	-18,4%
103	Ćuprija	29	29	40	11	37,9%
103	Gornji Milanovac	28	49	40	-9	-18,4%
103	Niš	34	46	40	-6	-13,0%
108	Kovin	40	41	39	-2	-4,9%
108	Bačka Palanka	37	37	39	2	5,4%
108	Lapovo	39	37	39	2	5,4%
108	Sjenica	34	39	39	0	0,0%
108	Žitorađa	30	38	39	1	2,6%
113	Kovačica	28	36	38	2	5,6%
113	Sremski Karlovci	22	31	38	7	22,6%
113	Pećinci	29	25	38	13	52,0%
113	Šid	30	32	38	6	18,8%
113	Ub	20	40	38	-2	-5,0%
113	Smed. Palanka	12	41	38	-3	-7,3%
113	Golubac	33	53	38	-15	-28,3%
113	Knić	26	34	38	4	11,8%
113	Brus	35	41	38	-3	-7,3%



113	Bela Palanka	39	46	38	-8	-17,4%
123	Mali Idoš	36	39	37	-2	-5,1%
123	Alibunar	31	36	37	1	2,8%
123	Batočina	36	39	37	-2	-5,1%
123	Lučani	33	32	37	5	15,6%
127	Majdanpek	32	39	36	-3	-7,7%
127	Prokuplje	37	38	36	-2	-5,3%
127	Lebane	25	30	36	6	20,0%
127	Trgovište	34	32	36	4	12,5%
131	Titel	29	40	35	-5	-12,5%
131	Koceljeva	23	22	35	13	59,1%
133	Ada	26	37	34	-3	-8,1%
134	Sečanj	26	34	33	-1	-2,9%
134	Bela Crkva	21	18	33	15	83,3%
134	Arandjelovac	44	39	33	-6	-15,4%
134	Zaječar	43	42	33	-9	-21,4%
134	Aleksandrovac	37	39	33	-6	-15,4%
139	Nova Crnja	23	33	30	-3	-9,1%
140	Merošina	26	24	29	5	20,8%
141	Bogatić	19	31	28	-3	-9,7%
142	Jagodina	21	21	23	2	9,5%
142	Svilajnac	18	22	23	1	4,5%
144	Bujanovac	32	34	21	-13	-38,2%
144	Preševo	13	23	21	-2	-8,7%
	Municipality	LTI 2019	LTI 2020	LTI 2021	Growth 2021/2020	Growth 2021/2020 (%)
1	Barajevo *	32	47	42	-5	-10,6%
2	Voždovac *	24	22	35	13	59,1%
3	Vračar *	26	24	31	7	29,2%
4	Grocka *	31	28	37	9	32,1%
5	Zvezdara *	38	40	40	0	0,0%
6	Zemun *	26	38	29	-9	-23,7%
7	Lazarevac *	36	36	43	7	19,4%
8	Mladenovac *	25	33	41	8	24,2%
9	Novi Beograd *	27	28	25	-3	-10,7%
10	Obrenovac *	38	41	35	-6	-14,6%
11	Palilula *	29	24	31	7	29,2%
12	Rakovica *	21	31	37	6	19,4%
13	Savski Venac *	38	36	39	3	8,3%
14	Sopot *	13	20	23	3	15,0%
15	Stari Grad *	23	28	35	7	25,0%
16	Čukarica *	37	32	43	11	34,4%
17	Surčin *	42	53	62	9	17,0%

18	Medijana *	25	24	21	<b>-3</b>	<b>-12,5%</b>
19	Niška Banja *	31	35	26	<b>-9</b>	<b>-25,7%</b>
20	Palilula Niš *	31	28	33	<b>5</b>	<b>17,9%</b>
21	Pantelejš *	23	39	23	<b>-16</b>	<b>-41,0%</b>
22	Crveni Krst *	20	28	37	<b>9</b>	<b>32,1%</b>
23	Vranjska Banja *	10	25	27	<b>2</b>	<b>8,0%</b>
24	Kostolac *	23	30	24	<b>-6</b>	<b>-20,0%</b>
25	Sevojno *	37	42	52	<b>10</b>	<b>23,8%</b>

### Municipalities that lost more than 10 points since 2020

		LTI 2019	LTI 2020	LTI 2021	Growth 2021/2020	Growth 2021/2020 (%)
1	Pantelejš *	23	39	23	<b>-16</b>	<b>-41,0%</b>
2	Golubac	33	53	38	<b>-15</b>	<b>-28,3%</b>
3	Gadžin Han	46	56	43	<b>-13</b>	<b>-23,2%</b>
4	Bujanovac	32	34	21	<b>-13</b>	<b>-38,2%</b>
5	Vrbas	40	54	44	<b>-10</b>	<b>-18,5%</b>

## 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	LSGs	Assembly and Council (max 16)
2	Sombor	15
24	Zrenjanin	14
11	Kragujevac	14
5	Vranje	14
8	Novi Sad	14
5	Leskovac	13
12	Vladičin Han	13
1	Bečej	13
29	Plandište	12
46	Mionica	12
10	Subotica	12
13	Vrnjačka Banja	12

## Budget

Overall Rank	LSGs	Budget (max 14)
9	Veliko Gradište	14
5	Sokobanja	14
17	Petrovac	13
15	Bor	13
20	Žabalj	13
5	Vranje	13
26	Apatin	12
35	Bač	12
29	Ljubovija	12
29	Nova Varoš	12
2	Sombor	12
26	Varvarin	12
3	Kanjiža	12
51	Arilje	12
15	Užice	12
26	Kuršumlja	12
12	Vladičin Han	12
10	Subotica	12
35	Blace	12
1	Bečej	12

## Municipality and Citizens

Overall Rank	LSGs	Municipality and citizens (max 15)
1	Bečej	15
2	Sombor	14
4	Novi Pazar	13
5	Vranje	12
55	Odžaci	11
13	Boljevac	11
8	Novi Sad	11
5	Leskovac	11

## Free Access to Information

Overall Rank	LSGs	Free Access to Information (max 6)
1	Sombor	6
1	Bečej	6

## Information Booklet

Overall Rank	LSGs	Information Booklet (max 4)
26	Apatin	4
46	Kula	4
2	Sombor	4
1	Bač	4
108	Bačka Palanka	4
24	Srbobran	4
23	Indija	4
21	Ruma	4
58	Sremska Mitrovica	4
29	Krupanj	4
21	Požarevac	4
9	Veliko Gradište	4
82	Topola	4
70	Despotovac	4
41	Kraljevo	4
4	Novi Pazar	4
26	Varvarin	4
5	Leskovac	4
24	Zrenjanin	4
58	Čoka	4
55	Odžaci	4
1	Bečej	4
93	Žagubica	4
3	Kanjiža	4
8	Novi Sad	4

## Public enterprises and Public institutions

Overall Rank	LSGs	Municipals Utility Companies and Public Institutions (max 18)
3	Kanjiža	18
1	Bečej	18
4	Novi Pazar	16
17	Mali Zvornik	15
55	Šabac	15
5	Sokobanja	15
17	Petrovac	14
10	Subotica	14
9	Veliko Gradište	14
13	Boljevac	14

## Public debates and public competitions

Overall Rank	LSGs	Public Debates and Public Competitions (max 10)
15	Bor	10
2	Sombor	9
3	Kanjiža	9
5	Leskovac	9
29	Knjaževac	8
5	Vranje	8
9	Veliko Gradište	8

## Annex no. 4. LTI indicators comparison 2021 vs.2020

Indices	% of max score LTI 2020	% of max score LTI 2021	Increased %	% of improvement
87. Is data about number of the employees in local administration published on the website?		97,9%		
90. Are spatial plans / urban plans published on the site?	89,0%	97,9%	9,0%	10,1%
33. Is the information on the working hours of administration available on the website or telephone number through which it is possible to get this information?	100,0%	97,2%	-2,8%	-2,8%
48. Is there a section on the website dedicated to public procurements?	97,2%	96,6%	-0,7%	-0,7%
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%	0,0%	0,0%
46. Are information on the submission of a request for free access to information on the site? **	93,1%	95,9%	2,8%	3,0%
75. Does the municipality regularly announce a call for leasing property in its possession?	91,0%	95,2%	4,1%	4,5%
95. Has the mayor submitted a declaration of assets to ACAS?	94,5%	95,2%	0,7%	0,7%
34. Are there inspections controlling lists on website?	86,9%	94,5%	7,6%	8,7%
<b>49. Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers ...)? **</b>	94,5%	94,5%	0,0%	0,0%
<b>15. Is the budget for the current year available on the website? **</b>	93,8%	93,1%	-0,7%	-0,7%
27. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users?	85,5%	92,4%	6,9%	8,1%
70. Are the data on the number of employees in the public institutions posted on the municipal website?		91,0%		



11. Is the list of assembly members published on the website?	89,7%	88,3%	-1,4%	-1,5%
55. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?	77,9%	86,2%	8,3%	10,6%
45. The municipality has no unresolved decisions of the Commissioner?	84,1%	85,5%	1,4%	1,6%
28. Does the municipal administration have a service center through which it provides all the services?	82,1%	83,4%	1,4%	1,7%
56. Is there a special segment on the municipal website dedicated to public institutions with PI data?	69,0%	82,8%	13,8%	20,0%
<b>13. Is the local Official Gazette available on the site? **</b>	78,6%	81,4%	2,8%	3,5%
77. Have the public calls for media allocation in the last 12 months been published on the website?	80,0%	79,3%	-0,7%	-0,9%
<b>43. Did the municipalities provide requested information (FOI request) in time? **</b>	84,1%	77,9%	-6,2%	-7,4%
57. Does the observed PE have its own website?		77,9%		
86. Is the rulebook on internal organization and systematization of administration posted on the site?	53,8%	77,9%	24,1%	44,9%
79. Have the public calls for the allocation for NGOs been published on the website?	82,8%	76,6%	-6,2%	-7,5%
17. Is the budget published on the website in machine-readable or searchable form?	83,4%	75,2%	-8,3%	-9,9%
23. Has a public call for public debate on the budget been published on the website?	73,1%	71,0%	-2,1%	-2,8%
31. Is there a possibility on the website for citizens to report irregularities or violation of laws, including corruption?	50,3%	71,0%	20,7%	41,1%
94. Has the Local anti-corruption plan been adopted?	70,3%	69,7%	-0,7%	-1,0%
58. Does the observed PI have its own website		69,0%		
59. Have public competitions for the selection of directors of public enterprises been conducted?	74,5%	69,0%	-5,5%	-7,4%
16. Is the justification/explanation of the budget available on the website?	66,2%	68,3%	2,1%	3,1%

72. Is the list with prices of services provided by PEs and PIs available on the website of the municipality or PI/PE website?	56,6%	65,5%	9,0%	15,9%
30. Is there a possibility for citizens to report irregularities in the work or violation of the law, including corruption, in the service centre or in the premises of the administration?	78,6%	62,1%	-16,6%	-21,1%
60. Have public competitions for the selection of directors of public institutions been conducted?	70,3%	62,1%	-8,3%	-11,8%
37. Is there information on the website about the services provided by the municipality?		60,7%		
21. Is there a citizens' budget published and available on the website?	51,7%	57,9%	6,2%	12,0%
53. Does the Information Booklet contain information about salaries of officials and employees?	46,2%	57,9%	11,7%	25,4%
38. Are there contact information of local community councilors on the municipal website?	59,3%	55,9%	-3,4%	-5,8%
52. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?	15,9%	55,2%	39,3%	247,8%
25. Has the proposal for the final budget account or the adopted budget account been considered at the session and published (on the website) in the last 12?	57,9%	54,5%	-3,4%	-6,0%
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%	-17,9%	-24,8%
78. Have the results of the competition for media allocation in the last 12 months been published on the website?		53,8%		
09. Is the agenda of the next session of the assembly published on the website?	42,1%	49,0%	6,9%	16,4%
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 this information can be found?	20,7%	49,0%	28,3%	136,7%

14. Are the Assembly sessions broadcasted live or are there transcripts published or footage from the sessions broadcasted, or recordings of the whole session available on the website?	55,2%	47,6%	-7,6%	-13,8%
51. Is the Information Booklet published on the site and updated in the last 3 months?	51,7%	45,5%	-6,2%	-12,0%
80. Have the results of the competition for the allocation for NGOs been published on the website?		44,1%		
88. Is there a code of ethics for employees and is it available on the site?	42,8%	42,8%	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%	16,6%	70,6%
18. Are 6-month and 9-month reports on budget execution available on the website?	43,4%	39,3%	-4,1%	-9,5%
22. Has a public debate on the budget been held - citizen surveys or consultation meetings?	76,6%	39,3%	-37,2%	-48,6%
40. Are there defined permanent terms for mayor (or deputy mayor) meeting with citizens?	42,1%	37,2%	-4,8%	-11,5%
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%	-53,5%
24. Has the report on the public debate on the budget been published on the website?	42,8%	35,9%	-6,9%	-16,1%
83. Has the municipality's development strategy been published on the website?	77,9%	34,5%	-43,4%	-55,8%
66. Have the annual work plans of PEs been published on the website of the PE or municipality website?		33,8%		
<b>01. Are the decisions adopted by the Assembly published and available on the website? **</b>	30,3%	33,1%	2,8%	9,1%
71. Are the data on the number of employees in PEs published on the municipal site?	32,4%	31,7%	-0,7%	-2,1%
68. Have the annual work plans of PIs been published on the website of the PI or municipality website?	23,4%	26,2%	2,8%	11,8%

67. Have the reports on the work of PEs been published on the website of the PE or municipality website?		25,5%		
03. Are the decisions adopted by the assembly in the past 24 months available on the website?	27,6%	24,8%	-2,8%	-10,0%
74. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?	24,8%	24,8%	0,0%	0,0%
69. Have the reports on the work of PIs been published on the website of the PI or municipality website?	22,1%	24,1%	2,1%	9,4%
19. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?	26,2%	21,4%	-4,8%	-18,4%
64. Have the documents from the selection procedure of the director of PE been published on the website?		20,7%		
05. Have the proposed documents been published on the website before being considered at the session of the Assembly?	15,2%	20,0%	4,8%	31,8%
06. Have the results of the voting at the last session of the assembly been published on the website?	17,9%	20,0%	2,1%	11,5%
26. Has the audit of the final budget account been considered at the session and published (on the website) in the last 12 months?	22,1%	20,0%	-2,1%	-9,4%
61. Is the systematization of PE published on the website of municipality or PE?	16,6%	19,3%	2,8%	16,7%
10. Are there announcement of municipal/city council sessions on the website?		18,6%	18,6%	#DIV/0!
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%	0,0%	0,0%
65. Have the documents from the procedure for the election of the director of the PI been published on the website?		17,9%		
62. Is the systematization of PI published on the website of municipality or PI?	18,6%	17,2%	-1,4%	-7,4%

85. Has a report on the work of the administration for the previous year been published?	14,5%	17,2%	2,8%	19,0%
93. Has the Integrity Plan been adopted and has the LSG report on its implementation?	53,8%	17,2%	-36,6%	-67,9%
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%	-4,1%	-20,0%
12. Is there data for citizens' contact with assembly members published on the website?	21,4%	15,9%	-5,5%	-25,8%
02. Are the decisions adopted by the city council published and available on the website?	11,0%	13,8%	2,8%	25,0%
04. Are the decisions adopted by the city council in the past 24 months available on the website?	11,0%	12,4%	1,4%	12,5%
32. Do (both/all) mechanisms for reporting allow anonymity?	37,2%	11,0%	-26,2%	-70,4%
35. Can a citizen monitor the status of his case on the website?	11,0%	10,3%	-0,7%	-6,3%
20. Are monthly reports (or cumulative monthly reports) on budget execution available on the website?	10,3%	8,3%	-2,1%	-20,0%
36. Is there data on handling complaints, petitions and complaints available on the website?	9,7%	7,6%	-2,1%	-21,4%
08. Are the amendments submitted on the draft acts that were considered at the last session (and the amendments' justifications/explanations) published on the website?	3,4%	6,2%	2,8%	80,0%
41. Are data on the contact of the mayor or deputy with the citizens visible on the premises?	9,0%	6,2%	-2,8%	-30,8%
81. Have the reports on the realization of media projects financed by the municipality been published on the website?		5,5%		
82. Have the reports on the realization of NGO projects financed by the municipality been published on the website?	10,3%	4,8%	-5,5%	-53,3%

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%		
76. Are the rental lease reports (commercial premises, agricultural land) published on the site?	0,0%	4,1%	4,1%	#DIV/0!
47. Is information on the submission of a request for free access to information visible in the service centre or administration premises?	7,6%	3,4%	-4,1%	-54,5%
84. Is the annual plan of work of municipal administration published on the site?	2,1%	2,8%	0,7%	33,3%
91. Is there a report on contact with lobbyists published on the web site?	0,7%	2,8%	2,1%	300,0%
92. Is there a daily or weekly schedule of the mayor's activities published on the website?	0,7%	2,8%	2,1%	300,0%
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%	1,4%	200,0%
07. Has information been posted on individual members of the assembly votes on legislation debated?	0,0%	0,0%	0,0%	

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

Indicators	2021	2020	2019	2017	2015
1. Are the decisions adopted by the Assembly published and available on the website? **					
2. Are decisions adopted by the city council published and available on the website?					/
3. Are decisions adopted by the assembly in the past 24 months available on the website?					
4. Are decisions adopted by the city council in the past 24 months available on the website?					/
5. Have the proposed documents been published on the website before being considered at the session of the Assembly?					
6. Have the results of the voting at the last session of the Assembly been published on the website?					
7. Has information been posted on individual members of parliament votes on legislation debated?				/	/
Have the results of the voting of the Assembly in the past 24 months been published on the website?	/				
8. Are the amendments submitted on the draft acts that were considered at the last session (and the amendments' justifications/explanations) published on the website?					
Are justifications/explanations regarding the amendments published?	/			/	/

9. Is the agenda of the next session of the Assembly published on the website?					
10. Are there announcement of municipal/city council sessions on the website?		/	/	/	/
11. Is the list of assembly members published on the website?					
12. Is there data for citizens' contact with assembly members published on the website?					
13. Is the local Official Gazette available on the site? **					
Do rules of procedure envisage public questions of the councilors to the mayor and/or the city council?	/				
14. Are the Assembly sessions broadcasted live or are there transcripts published, or footage from the sessions broadcasted, or recordings of the whole session available on the website?					
15. Is the budget for the current year available on the website? **					
Is the budget published on 6 digits of the economic classification?	/	/	/	/	
16. Is the justification/explanation of the budget available on the website?					
17. Is the budget published on the website in machine-readable or searchable form?				/	/
18. Are 6-month and 9-month reports on budget execution available on the website?					/



19. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?					
Are the data on budget execution in the last three months available on the site?	/	/	/	/	
Are the data on budget execution updated in the last 30 days and available on the site?	/	/	/	/	
20. Are monthly reports (or cumulative monthly reports) on budget execution available on the site?					/
21. Is there a citizens' budget published and available on the site?					
22. Has a public debate on the budget been held - citizen surveys or consultation meetings?					
23. Has a public call for public debate on the budget been published on the website?					
24. Has the report on the public debate on the budget been published on the website?					
25. Has the proposal for the final budget account or the adopted budget account been considered at the session and published (on the website) in the last 12?		/	/	/	/
Has the proposal for the final budget account been published in the last 12 months or the adopted budget account?	/				
26. Has the audit of the final budget account been considered at the session and published (on the website) in the last 12 months?					
27. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users?					
28. Does the municipal administration have a service center through which it provides all the services?					

29. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration?					
Are there information about reporting of corruption visible in the service center or administration offices?	/				
30. Is there a possibility for citizens to report irregularities in the work or violation of the law, including corruption, in the service center or in the premises of the administration?					
Are there mechanisms for reporting corruption on the website?	/				
31. Is there a possibility on the website for citizens to report irregularities or violation of laws. including corruption?					
32. Do (both/all) mechanisms for reporting allow anonymity?				/	/
33. Is the information on the working hours of administration available on the website or telephone number through which it is possible to get this information?					
34. Are there inspections controlling lists on website?				/	/
35. Can a citizen monitor the status of his case on the website?					
36. Is there data on handling complaints, petitions and complaints available on the website?					
37. Is there information on the website about the services provided by the municipality?		/	/	/	/
38. Are there contact information of local community councilors on the municipal website?					

39. Is there information on the website or in the Information Booklet that citizens can attend the assembly sessions and instructions on how to apply?					/
Assembly allows the presence of citizens at sessions?	/	/	/	/	
40. Are there defined permanent terms for mayor (or deputy mayor) meeting with citizens?					
41. Are data on the contact of the mayor or deputy with the citizens visible on the premises?					
Are regular press conferences held (at least once a month) by the mayor?	/				
42. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?					
43. Did the municipalities provide requested information (FOI request) in time?**				/	/
44. No complaints were filed against municipalities in the last year due to ignoring requests for information of public importance?					
45. The municipality has no unresolved decisions of the Commissioner?					
46. Are information on the submission of a request for free access to information on the site?					
47. Is information on the submission of a request for free access to information visible in the service center or administration premises?					
48. Is there a section on the website dedicated to public procurements?					

49. Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers ...)? **					
50. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?					
51. Is Information Booklet published on the site and updated in the last 3 months?					
52. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?					
53. Does the Information Booklet contain information about salaries of officials and employees?					
Does the Information Booklet contain rulebook on salaries of officials?	/	/	/	/	
54. Does the Information Booklet contain information on the services provided by the municipality and deadlines for their provision or a link to the register or place on the website where these information can be found?					
55. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?					/
56. Is there a special segment on the municipal website dedicated to public institutions with PI data?					/
57. Does the observed PE have its own website?		/	/	/	/
58. Does the observed PI have its own website		/	/	/	/
59. Have public competitions for the selection of directors of public enterprises been conducted?					

60. Have public competitions for the selection of directors of public institutions been conducted?					
61. Is the systematization of PE published on the website of municipality or PE?					
62. Is the systematization of PI published on the website of municipality or PI?					
63. Is there, on the municipality website, a page of the Commission for the Election of the Director of POEs with all the documents, including the minutes from the meetings?		/	/	/	/
64. Have the documents from the selection procedure of the director of PE been published on the website?					
65. Have the documents from the procedure for the election of the director of the PI been published on the website?					
66. Have the annual work plans of PEs been published on the website of the PE or municipality website?		/	/	/	/
67. Have the reports on the work of PEs been published on the website of the PE or municipality website?		/	/	/	/
Have the annual work plans and reports on the work of PEs been published on the website of the PE (or municipality)?	/				
69. Have the work plans of PIs been published on the website of the PI or municipality website?					
69. Are there reports on the work of public institutions on the website of the municipality or PI?					/
Are reports on consideration of reports on the work of PE published on site?	/	/	/	/	

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

Have the public calls/ results of the competition for media allocation in the last 12 months been published on the website?	/				
77. Have the public calls for media allocation in the last 12 months been published on the website?		/	/	/	/
78. Have the results of the competition for media allocation in the last 12 months been published on the website?		/	/	/	/
Have the public calls/ results of the competition for the allocation for NGOs been published on the website?	/				
79. Have the public calls for the allocation for NGOs been published on the website?		/	/	/	/
80. Have the results of the competition for the allocation for NGOs been published on the website?		/	/	/	/
81. Have the reports on the realization of media projects financed by the municipality been published on the website?		/	/	/	/
82. Have the reports on the realization of NGO projects financed by the municipality been published on the website?					
Is the data on the amount of funds allocated annually to local communities published?	/	/	/	/	
83. Has the municipality's development strategy been published on the website?					
84. Is the annual plan of work of municipal administration published on the site?					
Is the annual plan of work of municipal administration prepared and adopted in accordance with the planned dynamics?	/	/	/	/	
85. Has a report on the work of the administration for the previous year been published?					

86. Is the rulebook on internal organization and systematization of administration posted on the site?					
87. Is data about number of the employees in local administration published on the website?					
Are there information on the activities of the Council for the implementation of Ethical codes and its contacts with citizens on the website?	/				
88. Is there a code of ethics for employees and is it available on the site?					
89. Has the record of the property (real estate) owned by municipality which is leased published on the website, with data on leases, price and duration of lease?					/
Does the administration have a public register with data on the assets of the local self-government unit and the way of its using?	/	/	/	/	
90. Are spatial (or urban) plans published on the site?					
Are the urban plans published on the site?	/				
91. Is there a report on contact with lobbyist published on the web site?				/	/
92. Is there a daily or weekly schedule of mayor's activities published on the website?				/	/
Has the Integrity Plan been adopted?	/				
93. Has the Integrity Plan been adopted and has the LSG report on its implementation?		/	/	/	/
94. Has the Local anticorruption plan been adopted?				/	/
95. Has the mayor submitted a declaration of assets to ACAS?					



## Annex no. 6. Explanation and justification for changes of indicators/questions

The indicators for determining the Local Government Transparency Index (LTI) have been changed several times in previous research cycles. The reason for that were "lessons learned" in practice - problems faced by researchers in assessments, when it was not possible to determine / confirm the situation with certainty for certain indicators, new legal obligations, practice that indicated that certain indicators imply standards which are unattainable (also in the long run) for the vast majority or all of the municipalities, etc.

In the previous two cycles, within the USAID-supported research, the indicators were not changed, in order to be able to determine precisely whether there were changes in transparency, and in which areas (categories). However, the TS research team determined in that period that there is room for improvement of research, through changes in certain indicators.

These changes will:

- bring a clearer picture of transparency in individual areas (for example, by separating individual indicators that required a positive assessment to meet two obligations into two separate indicators),
- make a better balance for the overall assessment in relation to individual areas
- place greater emphasis on areas that pose a higher risk of corruption (increasing the share of public tenders and public companies).

At the same time changes will include erasing indicators that were an obstacle in practice (the assessment often depended on the unverifiable response of local governments, there were "halfway" situations in which it was difficult to decide whether the current situation was 0 or 1, and there were few indicators not extremely important for transparency or prevention of corruption).

These changes directly or indirectly affect 23 indicators. Some of them are merged - two into one, so in order to get a positive grade, it is necessary to meet at least one of the previously separated criteria, some were deleted (for the previously mentioned reasons), and some separated into two indicators. Several completely new indicators were introduced.

### These are the changes:

Category **Assembly and Council** had too much specific weight in relation to the whole LTI. Therefore, TS removed the indicator no. 8 and 15 and merged indicators 9 and 10:

8 deleted:

8. Have the results of the voting of the Assembly in the past 24 months been published on the website?

Three indicators (6, 7 and 8) were scored positively (in almost all municipalities where this was the case) when the minutes from the assembly sessions were published. By deleting indicator 8 (rather

than 6, for example, which refers to the results of the previous session), local self-government units (LSU) that are introducing this practice for the first time will be stimulated - publishing minutes containing the data required by indicators 6 and 7.

9 and 10 are merged, and for a positive assessment it is necessary that both criteria are met, i.e. that the explanations are published (which means that the amendments are published separately) or the case when the minutes in which the proposer explained the amendment were published.

9. Are the amendments submitted on the draft acts that were considered at the last session, published on the website?

10. Are justifications / explanations regarding the amendments published?

15 deleted

15. Do rules of procedure envisage public questions of the councilors to the mayor and / or the city council?

TS asks for an answer to this question with a request. Almost all of the Rules of Procedure provide for the possibility of asking questions, and most of the zero grades are consequences either that we did not receive an answer or that the local self-government did not understand the question well. The team checked in a couple of cases, when the Rules of Procedure were publicly available, and determined that the grade should be 1, and a response was received upon a request that was not provided for in the Rules of Procedure.

N1 is introduced as a new indicator

N1 - (new No 10). Are there announcements of municipal / city council sessions on the website?

#### **Budget category:**

27 and 28 merged - for a positive assessment it is necessary that it has been published (which practically means that it has been considered)

27. Has the final budget account been considered?

28. Has the proposal for the final budget account been published in the last 12 months or the adopted budget account?

#### **Category Municipality and citizens:**

33 and 34 merged so that for a positive assessment the possibility of reporting any illegality is sought, which includes corruption, but not just the mechanism for reporting communal problems

33. Is there information about reporting corruption visible in the service center or administration offices?

34. Is there a possibility for citizens to report irregularities in the work or violation of the law in the service center or in the premises of the administration?

35 and 36 merged (same explanation as previous)

35. Are there mechanisms for reporting corruption on the website?

36. Is there a possibility on the website for citizens to report irregularities or violations of laws?

46 is deleted:

46. Are regular press conferences held (at least once a month) by the mayor?

We rely on the answers of LGUs and possibly information from the web site. In practice, however, it is possible that some LGUs maintain press conferences but do not allow access or do not invite certain journalists / media, in some (small) LGUs there is no reason for press conferences because there are few media, and they are really open to everyone. In fact, this criterion does not measure the availability of the mayor well, so for its transparency it is more important to insist on the schedule / plan of activities of the mayor (already existing indicator).

#### Category **Information Booklet**

59 - separate the deadlines from the existence of information about services and expand in such a way that it is possible for a positive assessment and that this information will be published on the site and not only in the newsletter.

59. Does the Information Booklet contain information on the services provided by the municipality and deadlines for their provision?

The current indicator measures what is in the Information Booklet, because we want a picture of the situation in the Information Booklet. However, if the information is not in the Information Booklet, but exists on the site, it is something that should also be stimulated. In addition, deadlines seem to be too much at the moment, so it is necessary to separate - especially whether there is information about services (which is also important for citizens and we stimulate local governments to publish this, at least), and separately deadlines, with additional point (through separate indicator) for those who also have that important additional information.

59 (practically does not change): Information Booklet should include services and deadlines or a link to the register or a place on the site where the services and deadlines are

New indicator NI2 - 37. Is there information on the website about the services provided by the municipality?

#### Category **Municipals Utility Companies (Public Enterprises) and Public Institutions**

Two new indicators are introduced

NI 3 and NI 4:

57. Does the observed PE have its own website?

58. Does the observed PI have its own website?

Regarding the selection of the director - the standard is set extremely high, therefore:

A new indicator is introduced:

NI5 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?

For indicators 66 and 67, minutes are not required, but applications, ranking lists, selection decisions with explanation

66. (new 64.) Have the documents from the selection procedure of the director of PE been published on the website?

67 (new 65.) Have the documents from the procedure for the election of the director of the PI been published on the website?

Indicator 68 is divided into two - whether there are annual plans of PEs and whether there are reports on the work of PEs

old 68. Have the annual work plans and reports on the work of PEs been published on the website of the PE (or municipality)?

new 66. Have the annual work plans of PEs been published on the website of the PE or municipality website?

new 67. Have the reports on the work of PEs been published on the website of the PE or municipality website?

Indicator 71 is divided into two - the existence of data on the number of employees in the local self-government and the data on the number of employees in the Public Institution is assessed separately (it can be found in the budget, in the Information Booklet, etc.)

old 71. Are the data on the number of employees in the municipality and the public institutions posted on the site?

new 87. Is data about the number of employees in local administration published on the website?

new 70. Are the data on the number of employees in the public institutions posted on the municipal website?

74 is deleted: (Very few positive ones -5 in LTI 2020). We depend on the response of the local self-government. Instead of this topic, which does not carry significant corruption risk or anti-corruption potential, we should insist on involving citizens in the public debates, especially on the budget).

74. Are there consultations with 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)?

### Category **Public Debates and Public Competitions**

separating both 79 and 80 into two indicators each - the competition is scored separately, the results of the competition separately

old 79. Have the public calls / results of the competition for media allocation in the last 12 months been published on the website?

new 77. Have the public calls for media allocation in the last 12 months been published on the website?

new 78. Have the results of the competition for media allocation in the last 12 months been published on the website?

old 80. Have the public calls / results of the competition for the allocation for NGOs been published on the website?

new 79. Have the public calls for the allocation for NGOs been published on the website?

new 80. Have the results of the competition for the allocation for NGOs been published on the website?

In indicator 81, separating NGOs and the media

old 81. Have the reports on the realization of NGO projects financed by the municipality been published on the website?

new 81. Have the reports on the realization of media projects financed by the municipality been published on the website?

new 82. Have the reports on the realization of NGO projects financed by the municipality been published on the website?

#### Category **Other**:

Deleting 86 (the concept of the Council is currently completely dead)

86. Are there information on the activities of the Council for the implementation of Ethical codes and its contacts with citizens on the website?

Merging 89 and 90 in order that there is either one or the other

old 89. Are spatial plans published on the site? old 90. Are the urban plans published on the site?

NI: 90. Are spatial plans / urban plans published on the site?

#### **Test results**

TS performed testing with these changes. A total of six LGUs were assessed according to the old methodology and then according to the new methodology. For indicators that do not change or only merge (and for a new assessment it is necessary to meet the criteria for at least one to be positive or both to be positive), the existing LTI 2020 data were used, and for other and newly introduced indicators a new research was performed.

Two LGUs with grades above 60, two with grades around average and two with low grades (around 30) were taken as a sample.

Results that were obtained indicate that (in this sample of 6 LGUs) the average score would be increased by 3.8 (range 2 to 5). This would be the expected impact of the new methodology on the growth of the average LTI, as well as the expected (with a deviation of +/- 2) impact on the growth of individual grades. In the period of research, especially verification, additional growth of LTI is expected, but in the final report it would be clearly indicated that (possible) additional growth is partly due to changes in indicators (which on the other hand brought the possibility of better insight into the situation in some areas). and partially as a consequence of the really increased transparency.

#### **Zrenjanin (LTI 2020: 63)**

Current sum of grades (from LTI 2020 table) for indicators that do not change: 50

Old methodology: other indicators 13

sum according to the **old methodology**, with new insight **63**

New methodology: other indicators 15

sum according to the **new methodology**, with new insight **65**

#### **Subotica (LTI 2020: 63)**

Current sum of grades (from LTI 2020 table) for indicators that do not change: sum 52

Old methodology: other indicators 11

sum according to the **old methodology**, with new insight **63**

New methodology: other indicators 16

sum according to the **new methodology**, with new insight **68**

#### **Valjevo (LTI 2020: 45)**

Current sum of scores (from LTI 2020 table) for indicators that do not change: sum 36

Old methodology: other indicators 10

sum according to the **old methodology**, with new insight **46**

New methodology: other indicators 14

sum according to the **new methodology**, with new insight **50**

### **Smederevo** (LTI 2020: 51)

Current sum of grades (from LTI 2020 table) for indicators that do not change: sum 41

Old methodology: other indicators 10

sum according to the **old methodology**, with new insight **51**

New methodology: other indicators 12

sum according to the **new methodology**, with new insight **53**

### **Lucani** (LTI 2020: 32)

Current sum of grades (from LTI 2020 table) for indicators that do not change: sum 28

Old methodology: other indicators 4

sum according to the **old methodology**, with new insight **32**

New methodology: other indicators 9

sum according to the **new methodology**, with new insight **37**

### **Lebane** (LTI 2020: 30)

Current sum of scores (from LTI 2020 table) for indicators that do not change: sum 23

Old methodology: other indicators 7

sum according to the **old methodology**, with new insight **30**

New methodology: other indicators 12

sum according to the **new methodology**, with new insight **35**

Testing was also performed in order to establish effect that change of indicators has on the assessments in certain areas:

**Annex no. 6, Table no. 1. Indices by categories (old methodology)**

	LTI		Indices by categories (old methodology)								
			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
LSGs			max 18	max 15	max 17	max 6	max 4	max 4	max 15	max 7	max 10
Subotica	63		11	11	8	2	4	4	10	5	8
Zrenjanin	63		15	12	9	4	4	3	5	4	10
Valjevo	46		8	10	5	1	4	0	6	5	8
Smederevo	51		6	12	8	4	4	0	6	4	8
Lučani	32		3	7	4	4	1	0	7	3	6
Lebane	30		1	5	5	1	4	0	5	4	4
Average	48		Average	7	10	7	3	4	1	7	4

As previously indicated, the most significant changes relate to the areas that carry the greatest risk of corruption or the greatest anti-corruption potential - Public enterprises and public institutions and Public hearings and public competitions. As expected, changes in the average grade were also recorded here (the table rounds off without decimals and changes greater than 0.51 were registered), by two points each.

From the comparison of these two tables, the redistribution of points is also significant, ie the reduction of the influence of the area "Assembly and council" (maximum number of points reduced from 18 to 16) and "LGUs and citizens" (from 17 to 15).



**Annex no. 6, Table no. 2: Indices by categories (new methodology)**

	LT I		Indices by categories (new methodology)								
			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
LSGs			max 16	max 14	max 15	max 6	max 4	max 4	max 18	max 10	max 10
Subotica	68		12	10	8	2	4	4	13	7	8
Zrenjanin	65		14	11	9	4	4	3	7	6	10
Valjevo	50		7	9	7	1	4	0	8	7	8
Smederevo	53		5	10	9	4	4	0	8	6	8
Lučani	37		2	7	5	4	1	0	8	5	6
Lebane	35		1	5	5	1	4	0	8	6	4
Average	51		Average	7	9	7	3	4	1	9	6



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