



Local Self-Government Transparency Index 2020 (Local Transparency Index – LTI) Final Report

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Executive Summary

The Local Transparency Index (LTI) 2020 represents Transparency Serbia's research¹, evaluation and ranking of 145 cities and municipalities and 25 in-city municipalities in Serbia. This is the fourth year 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 18 and 83 along the Index.

The average score for the 2020 LTI is 46, which even though is still rather low, it represents an improvement in comparison to the average 2019 LTI score of 40. This is also the first improvement in the overall LTI score since 2015. In addition, almost three quarters of local governments improved their scores in comparison to the previous year. The largest increases were noted in the areas of publishing budget information and adopting Local Anti-Corruption Plans. This points to the fact that publicizing the LTI rankings on an annual basis and the follow-up work with local governments to implement reforms is helping to build momentum to increase transparency. In addition, the lead up to elections may have also incentivized local governments to adopt more transparency reforms, which also shows that such measures are attractive to voters.

On a more disappointing note, five local governments registered decreases of 10 points or more in the past year, highlighting that reforms do not guarantee long term sustainability if the government is not committed to true transparency. Only 13 out of 145 municipalities have an LTI greater than 60, and only three received a score above 80. Therefore, significant and continuous efforts are still greatly needed to improve and maintain transparency even among best performers. Far better results were seen in the areas where transparency is clearly prescribed by laws. Therefore, introducing more legal obligations by the central government authorities would certainly contribute to local government transparency.

It is also an important reminder that most of the negative findings identified in the LTI 2019 still persist: failure to regularly update information booklets or to publish all mandatory information; lack of information on decision-making processes; and a lack of information on real estate and other municipal properties.

Individually, Bečej municipality scored highest (83), by more than doubling its 2019 score (38). The second place took Novi Pazar (82) and third Sombor with 80. These scores are well above the top scores in last year's index. The winning scores from the 2019 LTI would only be sufficient for ninth place in this year's Index. The lowest ranking municipalities are Bela Crkva (18), Svilajnac and Koceljeva (22 each), while the city of Jagodina remained the worst among its peers (21). Things are moving forward when it comes to the bottom of the list as well. Namely, in LTI 2019, there were five municipalities with the score of 20 or lower and now there is only one.

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

Overall, LTI 2020 results demonstrate even more clearly that dedicated civil servants can make a difference and their actions can significantly improve transparency of local administrations. It also shows that voters want increased transparency and are happy when their local administrations take such steps. Finally, such long-term tracking measures are a good way of incentivizing governments and helping citizens to better understand what their local governments can and should be doing to improve transparency.

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.² 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 2020, as in 2019, TS applied again nation-wide research, first out of four in the row envisaged to be supported by the USAID.

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 is therefore convinced that sustainable funding for nation-wide LTI in 2019/2022 period will help not just to measure 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. This year, same as in LTI 2019, 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, the Anti-Corruption Agency). 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)³ 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 municipalities. For example, some of the in-city municipalities do not have “local communities”, public utility companies or public institutions

² 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.

³ 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“).

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 municipalities may work in a very different environment and some indicators could be irrelevant (e.g. whether the municipality established its institutions or not). Therefore, the trend of transparency for these municipalities can be observed best through several cycles of evaluation by identical indicators.

When comparing results with LTI 2015, one should have in mind that Transparency Serbia in the meantime adjusted indicator questions⁴. Indicators in LTI 2020 are the same as in LTI 2019.

In the work on data collection, researchers of Transparency Serbia thoroughly reviewed websites of all 170 LSGs. After that the research coordinator, before entering all collected data into the master table, reviewed all indicated web sources of information once again. In order to overcome possible omissions and to prevent some LSGs from being downgraded, our researchers send to all LSGs the list of missing information so they can provide TS with the exact link to the required information, if they are missing in the first round and if that information exists after all. However, if an LSG provided only a claim that the information exists on its web site, but did not provide clear evidence, the score remained unchanged. Only 37 LSGs replied to these letters. Some of them provided evidence for changing scores from 0 to 1. In some instances, they pointed to exact location of some data which was difficult to find, and it has been omitted by researcher, but in numerous cases LSGs used this as opportunity to add information and thus to improve their score. It should be noted that only 37 out of 170 responded (it was 74 in 2019), and probable cause for this are problems with Corona-virus which started in the period of verification, and preparations for local elections.

In order to collect the data for several indicators, we sent 510 requests for access to information of public importance.

One set of requests (170) contained questions related to 11 indicator questions. These were not responded by total of 21 LSGs.⁵ Second set of requests (170) relates to three topics not

⁴ The reasons for the change were the results and experiences from the research, changes in regulations, and introducing new legal obligations related to corruption prevention and increasing of 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.

⁵ Cities of Prokuplje, Vršac, municipalities Alibunar, Bela Crkva, Bogatić, Čuprija, Lebane, Nova Crnja, Pećinci, Plandište, Požega, Ruma, Sečanj, Stara Pazova, Svilajnac and city municipalities Rakovica, Sopot, Vračar, Vranjska Banja and Zemun. Kostolac responded they needed additional time (up to 40 days) to deliver information, but finally failed to do so.

assessed within the indicators, but in addition to LTI 2020. These pilot researches include openness of City council sessions for press/citizens, publishing of information on person in charge for data protection and information about public – private partnerships. In this case 20 LSGs did not respond in a timely manner and two requested additional time or (unnecessary) clarification.⁶ Not all responses were satisfactory, as some of them referred to the non-functional links.

We also sent to all municipalities one request for free access to information using the “secret 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 gain an insight into LSGs practice of providing information and responding to requests when they come officially (from TS in this case) or from unofficially (ordinary citizens) 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, 138 of the local self-governments responded to the citizen’s request and provided requested information, fewer than in LTI 2019 (150), thus indicating lower compliance with the Law on Free Access to Information in general.⁷

Transparency Serbia 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 report⁸. If there is no response, nor indirect evidence of information’s existence⁹, the score is zero within this category. This is similar as in 2019, when 23 LSGs did not respond to requests with indicator questions.

While collecting the information from the websites, we found no major problems with accessibility. In some instances, LSGs recently created new websites, but significant parts were not populated with information. In several cases we identified that two parallel official websites were available, after moving to the new domain. In those situations, Transparency Serbia reviewed new web presentations only.

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 7 indicators.

While visiting the premises on several occasions TS researchers were confronted with the suspicion of employees in service centers or security workers. As the researcher should determine what the citizen sees and can find there, the problem occurred when our associates tried to document observed situations by photographing a notice board or other documents.

⁶ Kostolac and Palilula (Belgrade).

⁷ There were no responses from: Beograd, Subotica, Novi Bečej, Alibunar, Bela Crkva, Vršac, Plandište, Bogatić, Vladimirci, Loznica, Valjevo, Paraćin, Svilajnac, Kosjerić, Požega, Sjenica, Čačak, Čičevac, Niš, Babušnica, Piro, Lebane, Vranje and city municipalities Barajevo, Voždovac, Zemun, Palilula Bgd, Palilula Niš, Pantelej, Vranjska Banja, Kostolac and Sevojno.

⁸ Due to huge number of appeals and low level of capacities, Commissioner’s decisions on appeals are usually delayed for several months.

⁹ For example, if the website has a call for a public debate about the budget and/or the report from the public debate, even without the response from the LSG, it will be evident that the public debate was organized.

However, the majority of employees of local governments that we faced during the research were attentive and helpful.

The final result **presents the status of transparency as assessed at the moment 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.

General observations

General evaluation of LSG transparency and perspectives for improvement

The most general observation of the researchers about the state of transparency is the same as before – **transparency is higher in those fields in which the law prescribes explicitly a duty to publish information and sanctions for their violation.** A typical example of this are many documents related to public procurement. At the same time, a legal obligation to publish information does not always mean that this information will be made public. Even though the Law on Public Enterprises prescribes the obligation and penalties for unpublished data, **there is still a high number of public enterprises without even their own website.**

Still, there are not many cases of taking measures for improving the transparency level and prevention of corruption which are not mandatory. The effects of implementation of **Local Anti-Corruption Plans (LAP)**, adopted by the most of LSGs are still not visible.¹⁰

This year, the **research identified that some examples of good practices, found in LTI 2019 were replicated elsewhere. However, the most of bad practices also persist,** in particular when it comes to the content of web-site. These include insufficient budget information, unavailable or inaccessible information on the decisions of the local assemblies, insufficient information about the management of public enterprises, and inaccurate information booklets. Some of those deficiencies were already tackled through USAID project “Government Accountability Initiative”¹¹ or within similar initiatives of the Standing Conference of Cities and Municipalities.

Selected systemic problems and observations

LTI 2020 shows how **the lack of transparency decreases possibilities to hold local government accountable.** For example, the agenda of the upcoming session of the Assembly can be found on less than half of websites, and the decisions made at those sessions on less than one third of websites. That is worrying regarding the fact that more than 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.

Financial transparency is still an issue and the **implementation of budget system rules is not ensured.** The current budget was not published in the websites of 7% units of the local self-government. Many budgets are not published in a machine-readable or at least searchable format. That means that many of them are published in non-searchable form (images in PDF). It is encouraging, on the other hand, that the “citizens’ budget” is published by half LSGs. Newly introduced duties to organize public debates on certain budget issues resulted in organizing of such consultations by 77% of LSGs. However, the practice of such debates has yet to be improved. There is an improvement recorded also when it comes to the publishing of planned expenditures of indirect budget users.

¹⁰ Some of the foreseen Model LAP measures that coincide with LTI indicators relate to the state of the websites, information booklets, information available in the service centers and working premises of the administration, on acting upon the requests for access to information, regulation of the procedures and practice regarding the work of the Assembly, regarding budget, public debates, public enterprises, etc.

¹¹ <https://www.usaid.gov/sr/serbia/fact-sheets/usaid-government-accountability-initiative>

LSGs are not making sufficient and systemic efforts to address suspicions of wrongdoing in the **management of public enterprises and other public institutions**. 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.

The **absence of a systemic approach in ensuring transparency** is visible in several batteries of related indicators. For example, not a single local self-government published reports about their property leases, even though the public calls were found on the websites of as many as 91% municipalities and cities. Similarly, there are significantly more public competitions, calls, and advertisements on websites than reports and decisions for those competitions and calls in other areas, such as project funding.

The most comprehensive way to provide proactive transparency in Serbian legal system is the publishing of accurate and comprehensive Information Booklets. However, even 16 years after the beginning of implementation of the Law on Free Access to Information of Public Importance, **Information Booklets are often poor in quality**. These documents 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 (a typical example are public procurement reports), with data 5-6 years old, although the information booklets are allegedly "updated", according to a note in the booklet itself. Furthermore, LSGs do not even publish within these documents information that they are ready to publish on other sections of the web page. In upcoming years, development of Information booklets in the context of LSGs web pages would depend on implementation of the Law on E-Government adopted in 2018 and eventual amendments to the Law on free access to information. The first law and related by-laws regulate content of public authorities' web-sites in general and provide Informative Directory its integral part. Envisaged changes of Law on free access to information would widespread number of institutions that would have to publish such documents (including local utility companies) and provide for e-forms. This all is expected to result in a fewer number of mistakes in preparation of Informative directories and better connection with the rest of web-site content. However, such rules could not help if there is no willingness to provide full amount of data or to update it regularly.

The structure and maintenance policy of web-sites should be significantly improved. Within this research, we identified a large number of LSGs that have a formal framework for raising transparency to a higher level (appropriate sections) on their 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. In general, it may be concluded that LSGs do not have strict policies on what will be published in the "info" and "news" section of the websites. Some publish information about events in the city, a large number of sports information about local clubs, schedules of worship during religious holidays, and similar things. There are also good examples of separating service information from news.

The format and layout of published information is an issue, even when data are generally transparent. For example, we identified several models for editing a page dedicated to public procurement that could serve as a positive example nationwide. Unfortunately, there are also web-sites where all information on public procurements are sorted chronologically, so there are new calls, along with old decisions, notifications, and questions answered, all mixed. In such cases, file names are an additional problem, as they do

not indicate which public procurement the document refers to. Aside from public procurement, separate portals or web-pages have been identified as a good practice, for budget, urban planning, regulation and administrative services.

E-registers are helpful. They are useful not just for the sake of “user-friendliness” and search facility, but also for providing a greater amount of information. For example, there are a few instances where deadlines are announced for resolving requests and cases unless there is an electronic register of administrative procedures on the web site. Such information may be found where the law mandates the information (e.g. in the area of planning and construction). A detailed description of jurisdictions, necessary forms, notifications for citizens on who is in charge were found on numerous websites (and especially in Informative booklets). However, information about deadlines is mostly omitted.

Transparency is not always considered useful, but rather as an additional burden. For example, in direct contacts with researchers some LSG representatives claimed that it is not necessary to post details about the services that they provide to citizens because "even when there is such information, citizens rarely read it and always ask." Similarly, several reports of public hearings were found, stating that no one would want to participate. It indicates the existence of broader problems – lack of trust in participatory mechanisms and their effectiveness. On the other hand, employees in LSGs, especially the managers with whom the researchers were in contact, expressed a desire to better regulate these areas, but they complained of a lack of capacity.

The amount of information is significantly higher online than in the premises of LSGs, which is not always justifiable. Researchers noted if LSGs informed citizens on the spot about their rights and ways of accomplishing their rights (procedures, deadlines, necessary documentation). That type of information does not always appear on the notice boards. Some municipalities published brochures, but these are often incomplete. From the contacts of researchers with employees while visiting the LSG premises, the impression is that corruption is a taboo. Information is missing even about ways to report such a phenomenon. Employees of LSGs are relaxed with their answers to the questions, but when corruption reporting mechanisms are mentioned, they immediately claim their “incompetence” to answer such a question. Anyhow, corruption is not reported. On the other hand, citizens complain about alleged work irregularities of civil servants, usually when they think their interests were harmed in administrative procedures.

Opportunities for cooperation with citizens are not sufficiently used. There are innovative mechanisms of cooperation that may be helpful both for citizens to fulfill their needs and administration to perform their role. So, on several web-sites the mechanisms of "citizen inspectors" for reporting to the communal inspection were out through that channel possible violations of regulations by other citizens or business entities.

Published information is insufficient. For example, citizens may find in the Information Booklet a citation to a legal provision that the sessions of the assembly are public and that the chair of the assembly will decide about granting an individual request to attend the session, based on stated criteria. However, there is no information on how and whom citizens can contact to get information on the time and location of the sessions or the outcome of the sessions.

Performance of LSGs in the specific areas of the research

Overview

Transparency is higher when law explicitly prescribes a duty to publish information, and provides sanctions for non-compliance. For example, the law requires the publication of many documents related to public procurement. At the same time, a legal obligation to publish information does not always mean that this information will be made public. Even though the Law on Public Enterprises prescribes the obligation and establishes penalties for unpublished data, **many public enterprises still do not even have their own website.**

Few effective measures for improving transparency and preventing corruption are voluntary. However, one positive innovation is the Anti-Corruption Agency's **Model Local Anti-Corruption Plan (LAP)**, which foresaw numerous measures and activities. Some of those measures are ranked within the LTI, as indicators¹². All LSG's have to adopt their Local Anti-Corruption Plans in accordance with that model. Therefore, it will be interesting to monitor the changes in LTI in years to come, with particular focus on measures planned in the LAP.

Even if this year the **research identified a higher number of examples of good practices, bad practices persist, in particular when it comes to the content of web-sites:** insufficient budget information, unavailable or inaccessible information on the decisions of the local assemblies, too little information about public enterprise management, and inaccurate information booklets. However, progress could be expected here with the adoption of recommendations for the content of the local self-government websites, where experts are engaged within the USAID project "Government Accountability Initiative"¹³ or within similar initiatives of the Standing Conference of Cities and Municipalities.

The **budget for 2020 is not published on websites of 17** LSG's (out of 170, including city municipalities). It is encouraging, on the other hand, that the **"citizens' budget" is published on 90 observed websites.** In 2015, it was possible to find citizens' budgets on only six websites, and in 2019 on 60 websites.

Only six LSGs published the complete documentation from the election process of directors of public enterprises or at least documents which can provide a relatively high level of transparency. Not a single unit of the local self-government published the reports about property leases, even though the public calls were found on the websites of as many as 150 municipalities, cities and city municipalities.

As in the previous research, the best scores municipalities, cities and city municipalities have in the field of public procurements. Between 162 and 165 of them have positive scores on the three indicators from this segment. As mentioned earlier, the sole reason for this is legal duty to publish most of the related documents on the web-site.

¹² Some of the foreseen Model LAP measures that coincide with LTI indicators relate to the state of the websites, information booklets, information available in the service centers and working premises of the administration, on acting upon the requests for access to information, regulation of the procedures and practice regarding the work of the Assembly, regarding budget, public debates, public enterprises, etc.

¹³ <https://www.usaid.gov/sr/serbia/fact-sheets/usaid-government-accountability-initiative>

LSGs also performed relatively well in the area of “free access to information” which was the second best area. Namely, they complied in 92% of cases **with duty to inform citizens on how to submit requests** and in responding requests. Still, there are huge problems in this area as well, as **three-quarters of municipalities did not respect deadlines** for responding to requests for information in a timely manner in the previous year, and **17% did not follow all Commissioners’ decisions** to provide information.

Third best performances were in the budget category, where LSGs earned half of the possible points. While current municipal budget documents are usually available on the web – page, in most instances in MS Excel or Word or searchable PDF (which was the case in more than $\frac{3}{4}$ of instances), **performance worsens when it comes to the availability of data on budget spending**, where only one fourth of LSGs published at least those reports that they have to share with the Ministry of Finance. Audit reports were discussed less than 20% of the time. It is encouraging, however, that **some form of public consultation about the budget was held in more than two thirds of LSGs**, which is slightly better than last year.

Publishing and updating of the “Information Booklet”, a Serbian-specific channel of pro-active citizen information launched in 2005, **proved again to be a serious challenge for LSGs in 2020**. Only 50% of them have the Booklet published on the internet and updated during the last three months, and even fewer published the three types of mandatory information that are included in LTI. This confirms the findings of previous TS research on non-compliance of Information Booklets with applicable law.

Even **greater problems for transparency than the city administration and assembly are local public enterprises and institutions**. Most LSGs (around 70%) decided to open special sections on their websites for these two entities that are founded and supervised by the LSG, which is a matter of good practice. Mandatory by law, public competitions for directors were published in 74.5% of cases for enterprises, and in 70,3% for other public institutions. However, documents on the competition process were almost non-existent on LSG web pages (only 6 for PEs and 3 for PIs). The internal transparency of these institutions is very weak; their systematization acts (staff plans) are visible on 16.6%, of observed public enterprises’ websites and 18.6% of observed public institutions’ websites. **Even information about the number of employees was hidden** in 80.3% of public enterprises and in almost 70% of other public institutions. Work plans and reports are also weak points from the perspective of transparency, in both cases (public enterprises and public institutions) being published by less than one quarter. The list of prices for their services is available in 56 % of LSGs, but these prices were discussed with the citizens through an advisory body in 5.5% LSGs only (almost three times worse than in 2019), even if that kind of consultation is envisaged in the Law on Consumer Protection.

When it comes to public debates, **72.4% of LSGs published information of some hearing/debate held during the last 12 months**. Although somewhat better than in 2019, these are still far from fully consultative processes. Namely, only less than one fourth of them published a report on public debate that contained information on the received proposals of citizens and reasons for acceptance/refusal of those proposals. Even higher is the disparity between the announced leasing of municipal property (91%) and the published information about the outcome of that announcement (none). Performance improves when it comes to the publishing of information about the distribution of municipal funds for media (80%) and CSO projects (82.8%), since last year it was around 60%, but publishing reports on realization of the projects is very weak in this case again – only in 10.3% of all cases.

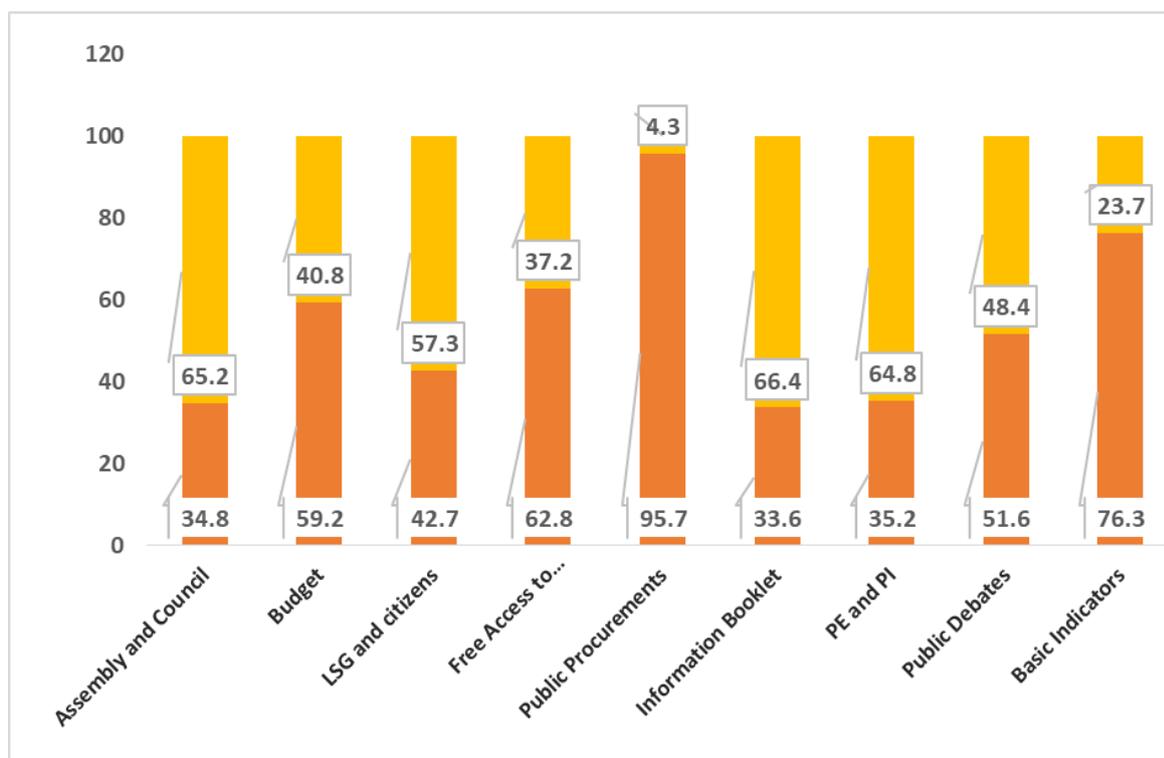
When it comes to the **relationship between the municipality and citizens**, all LSGs publish information on working hours. **LSGs also largely follow the requirement to publish inspection lists** (these are published in more than 86% of municipalities) and **establish service centers for communication with the citizens**. Less than **one fifth of LSGs evaluated citizen satisfaction** with services during the last four years, and half of them **provide an opportunity to report wrongdoing in person or on the web page**. An even greater problem for citizens is the fact that **only one fifth of LSGs publish deadlines for issuing documents in the service centers** or premises of administration and only 11% provide access to the status of the case on the web-site. **Mayors are often visible in the local press, but only 22.8% of them hold regular press-conferences** on a monthly basis.

The only aspect of transparency where **Assemblies and councils** performed well was the publishing of the list of their members (89.7%). **The agenda of the next Assembly's session is not visible in over a half of LSGs**, while voting results and amendments submitted are available in about 15% of cases. In addition, only half of those publishing agendas also publish draft documents to be discussed at the session of local parliament. City/municipality council decisions are available in 11% of LSGs only, and those of assemblies are available 30.3% .

In other, non-categorized indicators, **LSGs performed best** when it comes to the mayors submitting a declaration of assets to ACAS: 94,5% of them did it. **Publishing of local development strategy** has made improvement in comparison with the previous research, from two thirds in 2019 has jumped to 77.9% of all cases. Systematization act of municipal administration was available at 54%. Code of Ethics for civil servants was available on the web in 42.8% of cases. **Preventive anti-corruption documents**, although mandatory for all LSGs, **were identified in 54% cases (integrity plan) and 70,3% (local anti-corruption plan)**. **Spatial plans and urban plans are mostly published** on the web page (89%, 78.62%), but the **information of municipal property leased to other entities is found in just one case**.

It is important to mention that **poor scores** in some categories **does not necessarily mean that the 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 depend 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 the certain category (red) while the rest of the column presents the percentage of maximum points that LSGs failed to earn.

Fields of the research

Overview

The LTI observes transparency within eight broad areas. Fourteen 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 (95.7 % of maximum score).

As noted elsewhere 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), and while 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.**

Aside from public procurements, 145 LSGs obtained more than half of possible scores in the areas of free access to information (62.8%) and budget (59.2%), and slightly above half of the possible points only in the public debates category.

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

Area	Assembly and Council	Budget	LSG and Citizens	Free Access to Information	Public Procurements	Information Booklet	PE and PI	Public Debates
Average score	6.3	8.9	7.3	3.8	3.8	1.3	5.3	3.6
Max score	18	15	17	6	4	4	15	7
% of max score	34.8	59.2	42.7	62.8	95.7	33.6	35.2	51.6

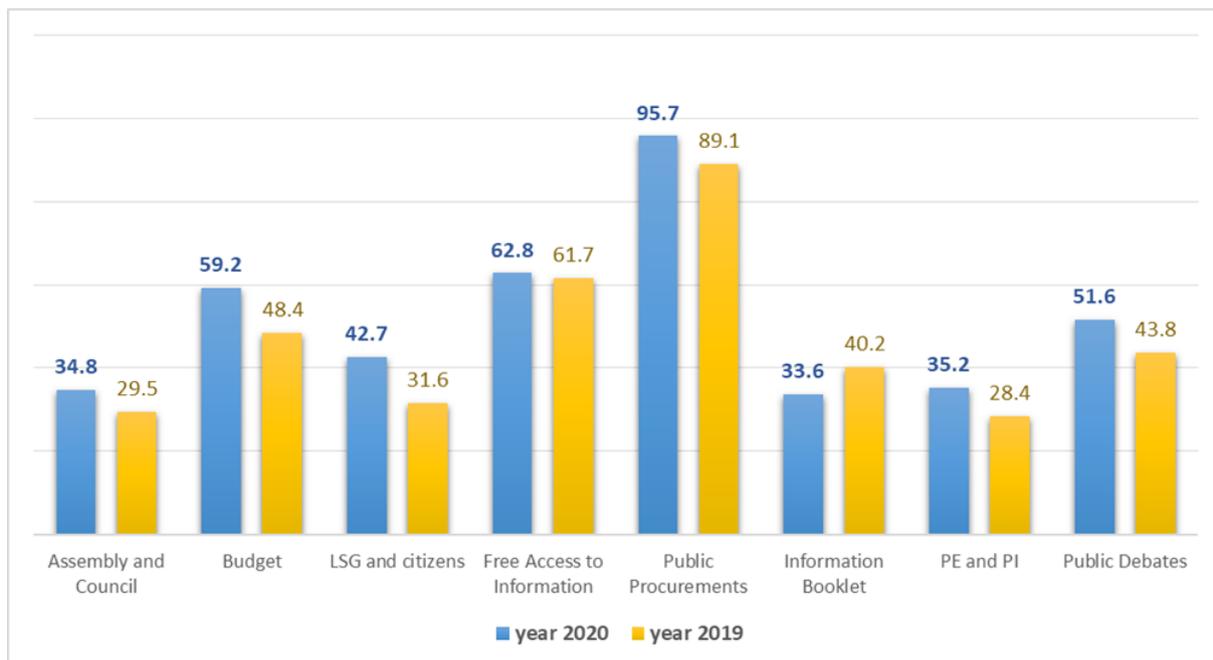
Legend: Score range 0 to Max score for certain category

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

On the other hand, performance was worst in categories “assembly and council”, “public enterprises and public institutions” and “information booklet”.

In comparison with previous year, LSGs performed much better in almost all fields but “information booklet” category (as noticed above, that category is one of the worst this year). The biggest improvements were noticed in “LSG and citizens”.

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



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

When it comes to the individual indicators, in eight out of 95 did cities and municipalities excel, with more than 90% of those publishing LTI relevant information (in LTI 2019 only two). On the other hand, for three indicators LSGs in Serbia earned a score of zero.

The individual performance of LSGs within the categories may differ significantly from the overall one, although in most of the cases, LSGs performed good or bad more or less consistently.

Public procurements

The category of “**public procurements**” was generally the best one, where as many as 135 (out of 145) scored maximal 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.

Mostly transparent information

LSGs have separate sections on their websites, dedicated to public procurement in 97.2% of cases. Since 2012, it’s been mandatory for LSGs to publish this information on their websites. The Law on Public Procurements made it easy, and it represents at the same time a good practice.

The very high average score for the indicator “Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers...) - 94.5%”. It indicates that still some 5.5% of LSGs municipalities **actually violated the Public Procurement Law**.

Free access to information

As transparency may never be fully ensured through proactive publishing of information, it is essential for LSGs to provide access to their documents also on the basis of free access to information requests. It is also possible that in some cases access would not be provided, based on the grounds recognized in the Law on Free Access to Information of Public Importance. In these cases, the issue should be resolved in an appeal procedure, before the Commissioner for Information.

LSGs performed relatively well in the area of “free access to information” category. Among others, 93.1% of them comply with the duty to inform citizens on how to submit requests and in responding to requests. Interestingly, almost the same percentage of LSG’s **failed to provide the same information** in their administrative premises (only 7.6% did it). That might be the consequence of the fact that Serbian citizens got general legal right to request government information only in 2004, i.e. during the internet era. Informing citizens about their rights in the premises of LSGs would help those “digitally illiterate” to ask for information of their interest.

Still, there are huge problems in this area, as 76.6% (10% more than in LTI 2019) of municipalities did not respect deadlines for responding with information in a timely manner in the previous year and 15.9% did not follow all Commissioners’ decisions to provide information. In LTI 2019 the percentage of those non-complying with Commissioner’s decision was even higher - 30%. Further analysis is needed in order to establish whether LSGs actually complied better with Commissioner’s orders, or the overall number of such orders decreased in previous year.

In the category of “**Free access to information**” four municipalities had a maximum score of 6: Lajkovac, Zaječar, Sokobanja and Brus, while 29 LSGs had a very good score of 5. It is interesting that none of those who were best in LTI 2019 (Trstenik, Blace and Kikinda) repeated such results.

Mostly transparent information

Municipalities again scored a good result when providing the requested information (FOI request) to the “mystery shopper”, 84.1% of them. Having in mind that the request submitted for the purpose of this research was not signed by Transparency Serbia, but by a common citizen, the response rate was better than expected, although lower than last year (when it was 90.3%) It is hard to estimate whether decrease is the consequence of broader worrying trends to limit access to information, or was it rather caused by other, circumstantial factors, e.g. inability of responsible person to provide concrete information requested.

Budget

Performance in the “budget” category is third best, where LSGs earned more than a half of possible points. While current budget document is usually available on the LSGs, web-page and in most instances in MS Excel or other machine readable or at least searchable format (83.4%, improved from 69% in LTI 2019), the situation is significantly worse when it comes to the availability of data on budget spending, where only 43% of LSGs published at least those reports that they have to share with the Ministry of Finance (slightly more than previous year). Audit reports were discussed in 22% of instances. Last year, we interpreted as encouraging the fact that some form of public consultation about the budget was held in two thirds of LSGs. Even if the share of LSGs that organized public debate increased in LTI 2020 (76.6%), it is now a reason for concern. Namely, organizing public debate about part of municipal budget is now a legal requirement, and research shows that one quarter of LSGs did not comply. Another worrying trend is noticed when it comes to the discussions on end-year budget reports, that decreased in comparison to LTI 2019 (now 61.4% of LSGs had such discussion).

In the category of “**Budget**”, the city of Sombor had the maximum score of 15, while last year’s best municipality Veliko Gradište ended up with one point less (14), sharing the second position with Vrnjačka Banja, Raška, Vladičin Han, Bečej, Užice, Vranje and Kanjiža. Another 13 municipalities scored 13. In comparison with last year’s performance, 11 LSGs have improved their performance the most (by 6 points or more), while 26 of them slipped into minus (between -1 and -4).

Mostly transparent information

The most important “law” for cities, their budget, should also be available on their web pages. We looked for clearly identified budget information, in the form of a separate banner, web page, section, or document, and not just for general links to the Official Gazette, where the budget must exist. However, 6.2% of LSGs did not have their budgets published in a way that would make it transparent for web-site visitors. Furthermore, a budget explanation that is essential to understand the reasoning and purpose of the expenditure was not available in 33.8% of LSGs.

Since budget decisions of municipalities are large documents, it is also essential to provide budget information in a machine readable or at least searchable format on the website, so those interested may search for, assess and compare data as they want. That is also in line with national legislation on e-government, the Government’s commitment to the Open Government Initiative and ongoing Open Data Initiative. This time LSGs’ budgets were available in such format, i.e. in MS Excel or Word files, in 83.4% of cases (better than last year when it was 68.97%), while the other municipalities published PDF documents.

Non-transparent areas

When it comes to the budget execution, that is crucial information for holding the local government accountable, yet the level of transparency is still rather low. In 99.7% of all cases monthly spending and income reports are missing, while those published on quarterly level are provided by ¼ of LSGs Draft end-year reports are available in only 57.9% instances.

Public debates during the budget process are organized in $\frac{3}{4}$ of LSGs, but half of reports on that activity are missing. However, it should be noted that there is a positive trend, as the number of published reports on budget public debate reports doubled since LTI 2019. The level of compliance with the standard to publish and discuss the annual budget audit in an assembly session during the last 12 months is still surprisingly low (22.1%, previous year 17.9%).

Information Booklets

The publishing and updating of the “Information booklet”, a Serbian-specific channel of pro-active informing of citizens since 2005, was a serious challenge for LSGs in 2020 again. This is actually the only field where the overall average score of all 145 LGSs was worse compared with the one from 2019. Although almost 52% of them had the Booklet published on the internet and updated during the last three months, only one fifth of them published three types of mandatory information that are included in LTI. This confirms the findings of previous TS research on non-compliance of Information Booklets with Commissioner’s Instructions for creating and publishing information about the work of the state body.

Examples of good practice, although rare, are also found in the category of “**Information booklet**”: Nine LSGs had the maximum score of 4 (Pančevo, Novi Pazar, Sombor, Leskovac, Subotica, Ruma, Sremska Mitrovica, Vranje, Topola), and 17 of them scored 3 points.

Mostly transparent information

The very good score when it comes to the updating of the public procurement chapter in the Information Booklet or elsewhere on the website is also an indication of a problem, but to the significantly lesser degree than in LTI 2019. Namely, 3.4% of LSG’s did not update this information for more than a year (in LTI 2019, 13%), while **the law mandates the publication of accurate information** of that kind, at least on a monthly basis (Commissioner’s Rulebook on Information Booklets).

Public Debates and Public Competitions

When it comes to public debates, more than 72% of LSGs (8% more than in LTI 2019) published information of some hearing/debate held during the last 12 months (other than consultation on municipal budget). However, it is still far from a fully consultative process. Namely, only 36 LGSs published reports on public debates which contained information on proposals received from citizens and reasons for the acceptance/refusal of those proposals. However, there is an obvious positive trend, as the number of public debate reports more than doubled. Even greater is the disparity between the announced leasing of municipal property (91.3%) and published information about the outcome of those announcements (none). The situation is significantly better when it comes to the publishing of information about the distribution of municipal funds for media and CSO projects, where we found both announcements and results in about 80% of LSGs (previous year slightly above 60%).

In this category, 73 municipalities have made a progress compared to 2019, while 72 have not (36 have not changed their performances, another 36 have gone worse.) No municipality has maximum score of 7, while Bor, Sokobanja, Aleksinac, Sombor, Krupanj and Kanjiža have very good score of 6 and 28 of them are among the very well- ranked municipalities whose score is 5. It is interesting that Bor, as one of the best positioned municipality in this field, is 69th in the overall ranking, while Aleksinac is at the 84th place. Paracin, which used to be best positioned here in LTI 2019, worsened the score.

Mostly transparent information

LSGs in a high percentage of cases regularly announce a call for leasing property in its possession (91%) on their web pages. It is theoretically possible that the rest of LSGs did not have such leasing in a recent period, but it is not very likely, having in mind that some of mid-size cities earned zero points under this category.

Non-transparent areas

The report on public debates still usually does not contain information on proposals made by citizens and the reasons for their acceptance / refusal. Rental or lease reports for commercial premises and agricultural land are also not published on municipal or city web-sites (not a single one found), although it is reasonable to believe that most of the LSGs have such contracts.

While all LSGs distribute part of their budgets to the NGOs implementing projects of public interest, few published reports on the realization of NGO projects financed by the municipality, only 10.3% of them.

In Serbia, there is no legal requirement for municipal administration to produce their annual work plan. However, we considered that matter to be part of good internationally recognized practice. Furthermore, such plans exist on the central government administration level. Only 3 LSGs however published such document in this research round, but it is improvement in comparison to LTI 2019, when there were only two such LSGs

A huge issue in Serbia exists with respect to the management of public property, both on the central and local government levels. Many of the recommendations of the Supreme Audit Institution are aimed to resolve problems of public property registers and usage and to prevent eventual abuses, including the performance audit report published for biggest cities in 2019. There are efforts of central and local government to establish accurate registers of real estate and other property. However, even if such information is potentially subject to abuse, only one LSG (same as in LTI 2019) provided their own citizens with information about the real estate possessed by them that is leased to the citizens and business entities.

Mayors perform many activities in the public interest which are broadcasted. However, activities are usually published only after the fact. There was only one LSG identified in LTI 2020 that informed citizens and journalists about the mayor's schedule of activities in advance through the official web-page.

LSGs and citizens

When it comes to the relationship between the municipality and citizens, the most transparent aspect is information on working hours (everywhere). LSGs also largely followed the duty to publish inspections' lists (which was the case in more than 85% of instances) and to establish service centers for communication with the citizens. In almost 60% (last year 50%) of municipalities, citizens may easily obtain contacts of their local community councilors. Information on attending local assembly sessions is now available in 78,6% cases, while it was only in 51% the year before. On the other hand, information about the time when citizen could meet the mayor was available in the same number of LSGs - 42%. Less than one fifth of LSGs conducted research on satisfaction with their services during the last four years. An even greater problem for the citizens was the fact that only 20,7% of LSGs publish deadlines for the issuing of documents in the service centers or the premises of the administration and only 16 of them provide access to the status of citizens' requests on their web-site. There are some positive trends as well, as deadlines were available in 5.5% cases only a year before. Mayors are often visible in local press, but only one fifth of them hold regular press-conferences on a monthly basis (last year 15%).

Once again no municipality reached a maximum score in the category of “**Municipality and citizens**”. Bečej is at the top with 16, followed by Novi Pazar with 15 points out of max 17 (3 points better than in 2019), and Sombor and Vranje with 13.

Mostly transparent information

Working hours of municipal administration were published on the web, or at least the telephone number where such information could be obtained in all municipalities. While publishing working hours is the kind of information that predates the internet and other modern tools of transparency, publishing telephone information is a direct consequence of a legal requirement, thus all LSGs followed the rule.

For another legal obligation, to publish inspection control lists, as defined in the Law on Inspections, LSGs earned 86.9% of the maximum score. Again, it means that **some 13% of them then did not fulfill mandatory legal requirements** in that field.

Service centers were developed for years at the municipal level. It is also a matter of wider governmental policy, encouraged by donor support. Therefore it is not surprising that 82,1% of LSGs in this research round have such centers, although it is just a small shift from last year (80%.)

Municipalities are not required to ensure direct communication with the mayor or with the councilors. However, such practice exists, or at least is published in 60 LSGs.

Unlike previous years, when it was the case in 1/4, a half of LSGs now provide the possibility to report wrongdoing on their web page.

Non-transparent areas

For many citizens a visit to the LSG's premises is more convenient than obtaining information via a web-page. However, only one fifth service centers published deadlines for issuing documents and instructions in the service center or at the premises of the municipal or

city administration. Even worse was the situation with information about reporting of corruption being visible in the service center or administration offices (11.7%.)

Information about the reporting of corruption is not widely published on the website either. It is also not always clear whether mechanisms for reporting allow anonymity. Similarly, there is a lack of information on handling petitions and complaints, the contact of the mayor or deputy with the citizens and submission of a request for free access to information when it comes to their visibility in the service center or at administration premises. In a vast majority of cases (89%) a citizen cannot monitor the status of his/her case on the website.

While LSGs largely publish information related to the submission of information on their web-sites, most of them failed to visibly post such information in their service centers or administrative premises, even if such information would be highly relevant for citizens that are not satisfied with the information provided by civil servants on the spot. It shows that reforms aimed to facilitate citizens' communication with municipal administrations do not sufficiently address their legal right to obtain LSG documents on the basis of requests and not only to obtain information that civil servants consider relevant for their case.

Assembly and Council

The only aspect of transparency where assemblies and councils performed well was publishing of the list of their members (89,7%). Even the agenda of the next Assembly's session was not visible in more than a half of LSGs, while voting results and amendments submitted are available in less than 15% of cases. However, only one third of those publishing agendas for municipal sessions also publish draft documents to be discussed at the session of the local parliament. Municipality council decisions are available in 11% of LSGs only, and those of assemblies are available in 30%. The improvements of transparency within this category exist, but are not significant yet.

In this category, none of the municipalities had the maximum score of 18. The best ranked are Leskovac and Vranje with a score of 16, second place is shared between Kragujevac, Novi Pazar, Sombor, Užice and Zrenjanin with a score of 15.

Mostly transparent information

The transparency of key office holders' names is relatively high as well. We found names of city councilors in 130 out of 145 LSGs. There is no good reason for the rest of LSGs for not publishing it, but there is no legal obligation either.

The basic transparency of rules and regulations issued by municipalities' assemblies and other organs is ensured by publishing them in the Official Gazette. For a long time, it has been technically possible to ensure a greater level of transparency by publishing these rules on the web as well. That standard is achieved by 78.6% of LSGs, slightly better than the year before.

Assembly sessions were broadcasted live or there were transcripts published or footage from the sessions, or recordings of the whole session were available on the website in more than a half municipalities (55.2%) which is better than last year.

Non-transparent areas

City assemblies are not required to publish individual voting results. However, that information could significantly increase the accountability of city councilors, which is not considered very high in any case. In practice, citizens may learn from the news or TV broadcasts of the assembly's plenary session how a particular political party or representatives of citizens' groups voted for decisions of their particular interest, but the only way to establish individual accountability would be to provide information about the actions of each and every councilor, as they are not legally bound to obey the party leadership's decision. Another reason for greater transparency on the local government level is the fact that this type of information already exists on the central government level, i.e. for the Serbian Parliament.

City and municipal councils discuss and decide on many important issues. Unlike assemblies, their sessions are not broadcast by the local media. That is why it is important to ensure the transparency of their decisions in other ways. However, the vast majority of municipalities failed to do this, either currently or for decisions made during the last two years.

Although the work of the Assembly may be followed through news or direct broadcasting, the quality of these transparency and accountability mechanisms is very limited due to inability to access and analyze in advance the proposed documents before these are considered at the session of the Assembly. We found such draft documents in 15.2% of LSGs. Similarly, LSGs usually do not publish previous voting results nor amendments proposed during the parliamentary debate and explanations for these amendments. Even if citizens have the possibility to get in contact with the councilors, information about this mechanism is mostly not presented on the web page.

Public Enterprises and Public Institutions

An even greater problem for transparency than the city administration and assembly are local public enterprises and institutions. Around 70% of LSGs decided to open a special section of their websites for those two kinds of entities that are founded and supervised by the LSG, which is a matter of good practice. While required by law, public competitions for directors were published in 74.5% of cases for enterprises and in 70.3% of cases for other institutions (improved from 57%). However, comprehensive documents on the competition process were almost non-existent on LSG web pages. The internal transparency of these public institutions is very weak; their systematization acts are visible on 16.6% (last year 11%), of observed public enterprises' websites and 18.6% (last year 7.5%) of observed public institutions' websites. Even information about the number of employees was hidden in 80% (last year 95%) of public enterprises and in almost 70% (last year 80%) of other public institutions. Work plans and reports are another weak points from the perspective of transparency, and the situation is again better with public enterprises (app. 1/3 published) than in public institutions working in the field of culture, sports, social care etc. 23.4%), probably as a matter of more strict legal rules applicable to public enterprises. There is however improvement from the LTI 2019, where work plans and reports were published by only 1/4 of public enterprises and 1/10 of other institutions. The list of prices for their services is available in 82 LSGs, but these prices were discussed with the citizens through an advisory body in only 8 of them, even if that kind of consultation is envisaged in the Law on protection of customers.

In the category “**Public enterprises and Public institutions**” the best ranked are the municipalities of Bečej with the score of 14 of a maximum of 15, Požarevac, Plandište and Veliko Gradište with 12 points.

Mostly transparent information

Another legal duty of LSGs is to hold an open competition for the selection of public enterprise directors. Evidence of such procedure (for all PEs in observed LSG) was found in 108 cases.

Having in mind that citizens are receiving some key services not directly from municipal administration, but from public enterprises, it is important for LSGs to present information on public enterprises established by the LSG assembly. That kind of information was available on a special segment of municipal web pages in more than three quarters of LSGs.

Similarly, many services for the citizens are provided by other public institutions, established by the LSG, in areas such as education, sports, culture and health. Those institutions are overseen to a certain extent by LSGs, and there are good reasons to provide citizens with information about the work of such institutions through a centralized section on the LSG web-site. That was the case in 69% of instances.

Non-transparent areas

Another area of complete non-transparency is the procedure for the election of the directors of public institutions established by the city, i.e. those in institutions such as pre-schools, cultural centers and alike. This lack of transparency fosters an already widespread perception of politically based appointments.

The systematization act is the basic act of local administration that explains its structure, jobs and number of employees. However, it is still rarely publically available, although some information of that kind is presented within municipal or city information booklets. Even worse is the situation with the publication of the acts of municipal public institutions, in health, education and culture sectors.

For public enterprises it is rarely possible to find comprehensive information on the procedure that preceded the selection of the director, but is still somehow better than the information of the selection of directors in other public institutions.

The level of transparency is still very low when it comes to the annual work plans of public institutions, and the number of employees in public enterprises. Similarly, we found an insignificant number of consultations with the citizens when determining the prices of the services of PIs and PEs, through consultative meetings, surveys or through an advisory body that would be based on Consumer Protection Act, Art. 83.

Other indicators

In non-categorized indicators (other), LSGs performed best when it comes to a declaration of assets to the Anti-Corruption Agency of Serbia (ACAS) by the mayor (94,5%) , followed by the spatial plans published on LSGs website (89%). Publishing local development strategies, last year' winner in this category, this time slipped to the third spot, with 77,9%. The systematization act of municipal administration was available in 53.8% of LSGs, which is also deterioration from last year's 57%.

While there was almost no activity when it comes to the Council for implementation of Ethical code of public officials, in more than 40% of all cases the code of ethics for civil servants was available on the municipal website. Preventive anti-corruption documents, although mandatory for all LSGs, were identified in 54% of cases (in the case of integrity plans) and 70,3% (in the case of local anti-corruption plans). While in the former there has been no change in comparison with last year, in the latter we found some important progress (41% in LTI 2019).

Spatial plans and urban plans are mostly published on the web pages (89% spatial plans and 78.6% urban plans), but the information of municipal property leased to other entities is not published at all.

Mostly transparent information

Good performance was found in the category: "Has the mayor submitted a declaration of assets to ACAS?" However, what is supposed to be a very good result judging by numbers (137 of 145 LSGs), it is not entirely since all **mayors have to submit these declarations according to the law. The failure of doing it** constitutes a misdemeanor or even a criminal offence

Spatial plans are another category with a relatively high transparency level, as four fifths of LSG's published them. However, the lack of these documents in 18 municipalities constitute a serious problem as well, considering that those documents are possessed by all LSGs and thus should be available on web pages.

Similarly to spatial plans, urban plans were available on the site in 114 LSGs.

Aside from regulation adopted by the LSG, it is also important to publish information on key policy documents adopted by the city or municipality. Among various strategies, the most important one on municipal level is its actual development strategy. Such documents were published on the website in 113 LSGs.

Non-transparent areas

A useful initiative brought by the Standing Conference of Serbian Towns and Municipalities to adopt Ethical Codes of Conduct of municipal officials was followed by the huge wave of LSG assemblies beginning in 2005 that adopted the Codes. The Codes cover a broad spectrum of issues, including conflict of interest, relations with the citizens and civil servants,

accountability in dealing with budget and municipal assets and the like¹⁴. The text of such Codes is still seen in many of LSG offices all around Serbia. However, only a minority of LSGs established a separate body (committee, board, council) to oversee Code implementation. In recent years, the activity level of established monitoring boards decreased. This year’s research identified information on the activities of such bodies in only 2 LSGs. The Standing Conference in 2019 developed the new Code, intended to replace the previous one, but there is no further information available about possible efforts to foster implementation.

Lobbying in Serbia is a newly regulated activity and the implementation of the Law on Lobbying started in August 2019. However, some form of unregulated lobbying always existed both on the central and local government levels. Contacts of registered lobbyists and interested individuals with the municipal administration, mayor and councilors are matters of high public interest, due to the potential influence to the content of general and individual acts that LSGs adopt. Only one municipality published a report on contact with lobbyists until now. Even if the result is poor it is still better than on central government level

Graph. 3: Percentage of score improvement 2020/2019 for 145 LSGs

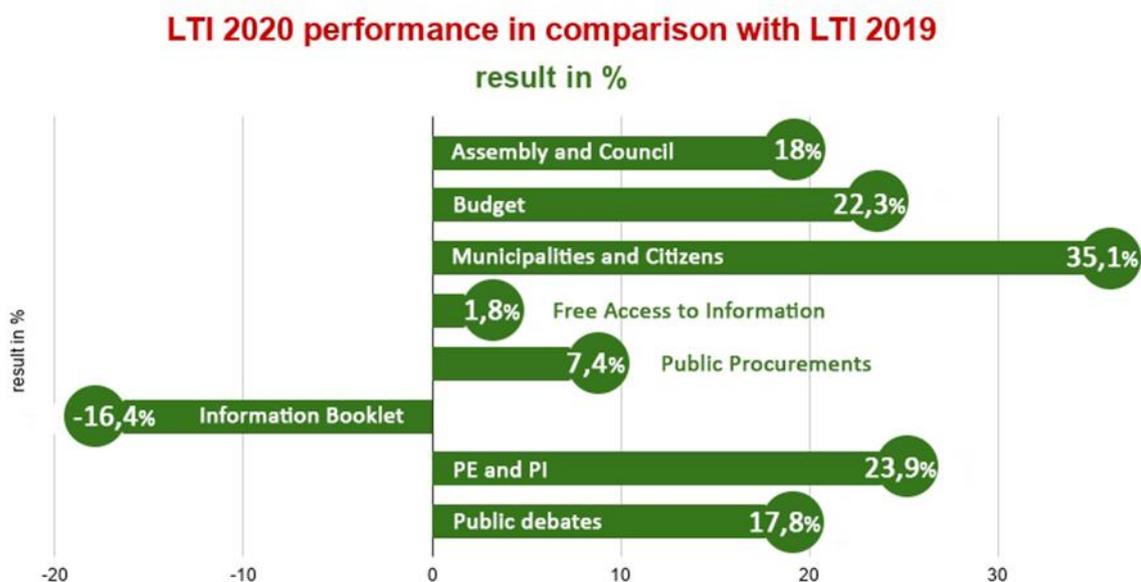


Table no. 2: How many LSGs and in what field got better, equal or worse in 2020 vs. 2019

Assembly and Council			Budget			Municipality and citizens			Free Access to Information			Public procurements			Information Booklet			Municipal Utility PE & PI			Public Debates & Competition			Basic indicators		
↓	→	↑	↓	→	↑	↓	→	↑	↓	→	↑	↓	→	↑	↓	→	↑	↓	→	↑	↓	→	↑	↓	→	↑
23	52	70	26	21	98	18	19	108	46	48	51	6	118	21	68	29	48	41	25	79	36	36	73	22	76	47

¹⁴ <https://www.osce.org/sr/serbia/108495?download=true>

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 2020 with two previous years (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: LTI Index jumped from 28 in 2019 to 32 in 2020. Interestingly enough, this year's LTI Index for both 2020 and 2019 is lower than the one from 2015 (34), when we started our research, but it is important to highlight again that we adjusted indicator questions in the meantime, adding some new and more in-depth questions to some categories.



As for the state of transparency of city municipalities, we have found the same pattern as in LSGs: transparency is higher in those fields in which the law prescribes rules and sanctions, such as public procurement. This year city municipalities has the highest possible index in “public procurement” – 4 out of 4.

On the other hand, performance is worst in category “public enterprises and public institution”, where 25 city municipalities’ index is 3 out of maximum 15 points, although it is important to recall that not all of these city municipalities have public enterprises on their territories. “Assembly and council” follows with the Index 4,5 times lower than maximum points (4 out of 18). In all other categories, LTI index is two or more time lower compared to the maximum number of points for each category.

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 “**assembly and council**” category (maximum 18 points), with worst average index among comparable fields, only Sevojno with 15, and Pantelej and Surcin with 11 points have accomplished a decent results. Sevojno was the absolute winner last year as well (with 12 points, twice as many as the runner-up), while Pantelej and Surcin have increased their score five times since 2019. Both municipalities now have decisions adopted by their assemblies published and available on the websites (Sevojno had it last year as well). Only one more municipality (Vranjska Banja) has these decisions available on the website, which means that 21 city municipalities have not even bothered to publish these documents.

Surcin, although has made a significant progress still does not have the local Official Gazette available on the site, otherwise its performance this year would be better given the fact that basic transparency of rules and regulations issued by municipalities’ assemblies and other organs is ensured by publishing them in the Official Gazette. Of all city municipalities, only five have the Official Gazette published (Barajevo, Obrenovac, Kostolac, Pantelej and Sevojno).

City municipalities have been most devoted to publishing the list of councilors on the websites (only Vranjska Banja does not have it) and to providing time for public questions to the councilor to the mayor or city council by their Rules of Procedure. 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 slightly better than last year (increased from 5 to 6) but the level of transparency is still very weak. Sevojno and Surcin have best score – 11 out of maximum 15, and are only two city municipalities with double digit performance. Surcin has the same amount of points as in 2019, while Sevojno has increased its score by one point. Vranjska Banja with overall score significantly lower than average (25) but still much better than the year before (10), is the third on the list in this field together with Barajevo, with 9 point. Zvezdara, Rakovica, Niska Banja and Crveni Krst follow with 8 points. Novi Beograd and Palilula are at the zero.

While current budget documentation is mostly available on the webpage (68 per cent), in most instances in MS Excel, the situation is significantly worse when it comes to the availability of data on budget spending (one-third). Second best area is the citizens' budget, published on the site of 15 municipalities. On the other side, the level of compliance with the standard to publish and discuss the annual budget audit in an assembly session during the last 12 months has been surprisingly at zero.

As for the **“municipalities and citizens”** category, most of municipalities have all competencies and similar results, with the overall index 6 (out of maximum 17). Barajevo (with 10 points) is 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 is possible to get this information. Twenty two city municipal administrations have a service center through which it provide all the services. Eighteen of them provide on their websites a possibility for citizens to report irregularities or violation of laws, while only one (Novi Beograd) has available data on handling complaints, petitions and complaints.

“Free access to information” is the only category where the result is worse compared to 2019. City municipalities scored 4 out of maximum 6 points last year, but have slid to 3 in 2020. The only promising segment is a duty to inform citizens on their websites on the submission of a request for free access to information – 88 per cent of city municipalities have met this criterion.

Obviously, there are still big problems in this area – barely two-third of municipalities provide requested information (FOI request) in time, six municipalities did not resolve decisions of the Commissioner from 2019, and only two of them (Zvezdara and Obrenovac) have information on the submission of a request for free access to information visible in the service centers or administration premises.

Year by Year

Sixteen city municipalities have improved from last year, eight performed worse and one have the same overall score (Lazarevac). Among the improved ones, six of them have increased their overall score by ten or more points: Pantelej (16), Vranjska Banja and Barajevo (each 15), Zemun (12), Surcin (11) and Rakovica (10), followed by Mladenovac and Crveni Krst (8), and Sopot and Kostolac (7).

Pantelej’s successful performance is due to improvements in almost all categories but two. Significant improvements are noticed in “assembly and council” by 8 points and “budget” by five points. Vranjska Banja has got 8 new points this year in “budget” and 4 on both “assembly and council” and “basic indicators”, while Barajevo has scored most points in “public enterprises and public institutions” (8) and “municipalities and citizens” (4), although lost 2 points in basic indicators. Zemun has a very steady growth in all categories except in “free access to information”, and Surcin has jumped 9 points in “assembly and council” and 2 points in basic indicators, while the rest of indicators have gone up or down but has not influenced further the overall score.

The only city municipality that has maintained the same overall result as in last year is Lazarevac (36), although there have been changes in individual indicators, for better or worse. Interestingly enough, back in 2015, Lazarevac had almost identical score: 37.

Comparing LTI indexes of city municipalities over three years of research - 2015, 2019 and 2020, we see that only three of them have continuous improvement over time: Surcin (32–42–53), Kostolac (16–23–30) and Niska Banja (13–31–35), while five have gone into different direction: Palilula (Beograd), Cukarica, Medijana, Palilula Nis and Vracar, the latter being the worst: from 48 in 2015 it felt to 26 in 2019, and has lost two more index points since then.

On the other side, eight city municipalities have not managed not only to improve but to maintain the same performance as in 2019. Palilula and Cukarica, both Belgrade municipalities, have lost five points in the overall score, the former messing up with “budget” indicator (from 6 has fallen to zero) and basic indicators (from 6 to 2), and the latter having very sloppy website that does not provide many required information and documents important for transparent performance. Six more city municipalities performed worse in 2020 - Palilula Nis, Grocka, Vracar, SavskiVenac, Vozdovac and Medijana, although each of them has shown slight advancement in some indicators but also deterioration in others.

When we look back and compare this year with 2015, we find that 14 city municipalities performed better five years ago, seven of them have improved in the meantime, while two has the same result – CrveniKrst (28) and SavskiVenac (36), the former being worse in 2019 (20 points) and the latter being better last year (38). Vranjska Banja and Sevojno were not included in 2015 research, but both have made progress in their overall scores from last year.

Comparing LTI indexes of city municipalities in all three years, 2015, 2019 and 2020, we find that only three city municipalities have continuous improvement over time: Surcin (32–42–53), Kostolac (16–23–30) and Niska Banja (13–31–35), while five have gone into different direction: Palilula (Beograd), Cukarica, Medijana, Palilula Nis and Vracar, the latter being the worst: from 48 in 2015 it felt to 26 in 2019, and have lost two more index points since then.

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

Additional research

Additional research

Transparency Serbia conducted additional research on three topics which are not included in LTI as indicators in this cycle. One of these questions has been raised in order to get a picture on certain aspect of transparency which caught the attention of the public and the media in September 2019, when one municipality decided to ban presence of the media at the sessions of the city council¹⁵. The second question portraits in which way and how transparent LSGs fulfill the obligation set by the Personal Data Protection Act. The third question should present the insight on public-private partnerships at the local level. Better insight would make possible to decide if transparency of the documents related to PPPs could be included in LTI.

TS requested data on these three issues from all 170 LSGs. 20 of them didn't reply at all, one asked for additional 40 days to provide information, but finally failed to do so, and one claimed that our request was deficient, and that we should rectify the deficiencies in the request. This was just an attempt to avoid providing information, because this municipality (Palilula, Belgrade) used same tactics replying to our "mystery shopper".

Some of the responses did not contain answers to all three questions or referred to links that were not functional, therefore the number of responses vary between 141 and 143.

Question 1: Are city / municipal council sessions open to the public?

We processed the answers, and treated as positive only those when it was unambiguously clear that LSG claims that sessions were open.

There were 141 responses, and, surprisingly 114 LSGs claimed that sessions of city/municipals council were open to the public or the media.

Question 2: Where, on the Internet site or on the premises of the LSG, can be found the information in accordance with Article 56, paragraph 10 of the Law on Personal Data Protection (The manager or processor is obliged to publish the contact details of the person for personal data protection and submit them to the Commissioner)?

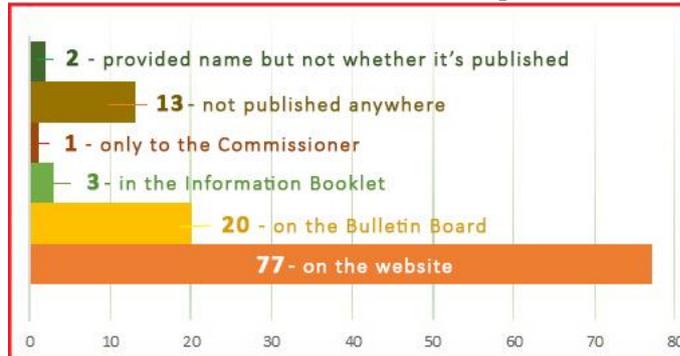
Responses were first analyzed to determine that the person has been named, and then further analyzed in order to get the picture where this information had been published (website, bulletin board, intranet)

There were 143 responses to this question. Out of these 143, 116 LSG named the person in accordance with the Law.

¹⁵ <https://www.cenzolovka.rs/drzava-i-mediji/medijski-skandal-u-pancevu-novinari-nepozeljni-na-sednicama-gradskog-veca/>

In analysis where the information about person in charge has been published, there were cases with multiple answers (for example, published on the website and on the bulletin board). In those cases, only the first choices were taken into calculation. Priority was given to posting on the website. Also, several JLS replied that they had posted information on the website (or on the bulletin board) and provided the information to the Commissioner. We didn't summarize how many LSGs provided information to the Commissioner, because that information was not even requested (the question was where the information has been published), but we did take a note in cases when information was only provided to the Commissioner and not published anywhere else.

Thus, of 116 LSGs which named the person in charge, 77 posted information on the website,



20 posted it only on the bulletin board, 3 in the Information Booklet, 1 LSG only provided it to the Commissioner, 13 replied that it had not been published anywhere and two did not respond where it was published neither confirmed that it was not published, they only provided the name of the person of charge, confirming thus it has been named.

Question 3: Provide information about procedures for public-private partnerships, with or without concession, in accordance with the Law on Public-Private Partnerships, initiated, implemented (concluded earlier) or concluded in 2019 by a local government unit or a company founded by LSG.

There were 142 replies to this question. TS analyzed responses in order to get the picture how many LSGs were implementing PPPs in 2019, and, as a subcategory, how many have been initiated or concluded in 2019.

However, the significant number of responses claimed merely that there were no PPPs concluded in 2019, although the question also concerned PPPs that were concluded earlier and are still being implemented. Therefore, the information that in 49 LSGs PPPs are started or concluded in 2019 or being implemented from previous years should be taken with reserve.

Of those 49, which stated unequivocally that they had a PPP, in 22 cases these were PPPs that were concluded in 2019. In 11 cases, the procedure was initiated in 2019 but has not yet been completed. In 3 cases, new PPPs were concluded in 2019 and there were also PPPs from earlier, and in 10 cases LSGs are implementing PPPs concluded earlier, but new ones were concluded in 2019. From three answers it was clear that PPPs exist, but not when they were concluded.

As far as the PPPs' area is concerned, in most cases it was urban or suburban transport:

PPPs' AREAS	
Public transport	19
City lighting	16
Waste management	7
Field of biomass processing, thermal energy or heat sources	3
Pharmacy	3
Traffic (road and/or river terminal, road maintenance)	6
Public garage	1
Cemetery maintenance	1

Selected individual examples

Assembly and Council

Good Practices:

- Leskovac – Good example of publishing Assembly decisions- <https://www.gradleskovac.org/index.php/lokalna-samouprava/skupstina-grada/sednice-skupstine> i veća <https://www.gradleskovac.org/index.php/lokalna-samouprava/gradsko-vece/sednice-gv>
- Gadžin Han - a modest site, but contains 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/>
- Krupanj - Information on all members of Assembly's working bodies found - <http://www.krupanj.org.rs/index.php?id=65>
- Plandište - Useful web-pages on the Municipal Assembly and the Municipal Councils' work - <http://plandiste-opstina.rs/lokalna-vlast/skupstina-opstine/sednice-so/>
- Bački Petrovac - Content of each issue of the Official Gazette can be seen before downloading the document <http://www.backipetrovac.rs/dokumenti/sluzbeni-list-opstine-backi-petrovac>
- 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>
- Kraljevo - There is a database of regulations, the last update is from December 2018 http://79.101.44.220:82/intranet_base/odluke.php
- 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, with session transfer and question forms to address councilors - <http://www.skupstina.becej.rs/sr/>
- Sokobanja - Municipal council acts are available - <https://www.opstinasokobanja.com/node/1409>
- Kovin - There is a register of employees for each month - <https://www.kovin.org.rs/gradjani-meni/eobrasci/reg-zaposlenih-doc/2019-g-din-1>
- Sombor - The list of councilors is downloadable in a Word document with a table that includes e-mail addresses, place of residence and council group they belong to - <https://www.sombor.rs/lokalna-samouprava/skupstina-grada/odbornici-skupstine-grada-sombora/>

- Bečej - 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/>

Budget

Good practices:

- Apatin - Perfectly structured and transparent by year; all documents are categorized; the rationale is part of the budget. <http://www.soapatin.org/budzet>
- Ljubovija - There is a budget portal that gives citizens more information about their money - <http://109.92.31.60/bportal/client/dashboard>
- 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>
- Sombor - All about the budget, broken down by year, along with a public hearing - report <https://www.sombor.rs/dokumenti-organa-grada/budzet-grada-sombora/2020-godina/>
- Titel - Good example: monthly budget executions - <https://www.opstinatitel.rs/e-uprava/budzet-opstine/budzet-2019-godina/>
- 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>
- Šabac - Direct voting in local communities on projects that will be financed from the return of property tax (noted in several other units of local self-government) - <http://sabac.rs/aktuelnosti/direktno-odlucivanje.htm>
- Sokobanja - "Execution of the Budget" banner provides monthly and daily reports - <http://www.opstinasokobanja.com/budzet>
- Lajkovac - Citizens' budget provided from a presentation for public budget debates - <http://www.lajkovac.org.rs/gradjanski-vodic-kroz-budzet/>
- Požarevac - Invitation to discuss a draft capital investment plan - <https://pozarevac.rs/poziv-za-ucescu-u-javnoj-raspravi-o-nacrtu-zakljucka-o-donosnju-plana-kapitalnih-ulaganja-grada-pozarevca-za-period-2019-2022-godina/>
- Palilula (Niš) - Citizen guide to the draft budget decision was published in October - http://palilula.eu/wp-content/uploads/gopBudzet/Gradjanski_vodic_kroz_nacrt_Odluke_o_budzetu_2019.pdf
- Beograd - Citizen's Guide to Budget Execution - <https://www.beograd.rs/cir/gradska-vlast/1764408-vodic-kroz-izvršenje-budžeta-grada-beograda-za-2018-godinu/>

LSG and Citizens

Good practices:

- Šabac – Allows citizens to monitor the status of their cases (administrative procedure)- <http://sabac.rs/usluge/proverite-status-predmeta.htm>
- Ada – All services and deadlines are listed - <http://www.ada.org.rs/sr/usluzni-centar/por-prava-dec-dodatak>
- Sombor – Allows citizens to track their subject <http://wp.sombor.rs:8180/opisportal/>
- Sremska Mitrovica - Citizens can follow the course of the caseS - http://89.110.202.144/web_portal_sremskamitrovica/default.cfm?action=mod&sta=list2&koliko=list22
- Bač - Administrative procedures with description and given deadlines http://www.bac.rs/administrativni_postupci
- Niš - Electronic Regulatory Register - <http://www.eservis.ni.rs/propisi/> and Electronic Register of administrative procedures <http://regap.ni.rs/>
- Vranje - Electronic Register of administrative procedures - <https://regap.vranje.org.rs/>
- Stari grad - Process procedures with deadlines for service delivery- <http://www.starigrad.org.rs/dokumenti/procesne-procedure/>
- Požarevac - There is a register of regulations - <https://pozarevac.rs/wp-content/uploads/2019/05/Registar-Propisa-2019.pdf>
- Bač - Application to report problems with the ability to track the application - <https://play.google.com/store/apps/details?id=dunavnet.com.mojbac>

Acces to Information of Public importance and Information Booklet

Good practices:

- 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/>
- Varvarin – Provides a great example of an Information Booklet. It contains deadlines for the services provided by the municipality; officials' salaries, and a review of the fees paid in the previous period - <http://varvarin.org.rs/wp-content/uploads/2019/06/Informator-31.05.2019.pdf>
- Plandište – Another good example of the Information Booklet, announce deadlines for particular services - <http://plandiste-opstina.rs/dokumenti/informator-o-radu/>
- Šabac - Very detailed information on access to information of public importance - <http://sabac.rs/usluge/pristup-informacijama-od-javnog-znacaja-i-zastita-podataka-o-licnosti.htm>
- Vrnjačka Banja - Comprehensive website 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:

- Medijana Pantelej (Niš) – Interesting page dedicated to public procurements (spreadsheet of documents) - <http://medijana.rs/javne/2019>
- Beograd - There is a special city portal about public procurements - <https://nabavke.beograd.gov.rs/>
- Sombor – Public procurement are grouped, separated by ongoing and completed ones. Very easy to search - <https://www.sombor.rs/gradska-uprava/javne-nabavke-2/> ; the archive contains public procurements from previous years

Public enterprises and Public Institutions

Good practices:

- Novi Pazar – Good web-page about PE and PI - <https://www.novipazar.rs/lokalna-samouprava/javna-preduzeca> <http://www.novipazar.rs/lokalna-samouprava/javne-ustanove> . Almost all data are published, including the number of employees and the documents on the work of PE and PI. Calls for proposals and decisions on the appointment of directors have been published, which is good practice, but for the positive scoring of indicators 66 and 67, minutes from the meetings of the director selection committee need to be published.
- Kanjiža - Minutes from the meetings of the director selection committee - <http://www.kanjiža.rs/ujlap/site/index-sr.html?mnu=2&art=3-5-3-dokumenti-sr.html>
- Bečej - Good pages on PE and pi, including minutes of PE's directors' selection committee meetings - <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%0%b0-%d0%bf%d1%80%d0%b5%d0%b4%d1%83%d0%b7%d0%b5%d1%9b%d0%b0/>
- <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/%d0%be%d0%b1%d1%80%d0%b0%d0%b7%d0%be%d0%b2%d0%b0%d1%9a%d0%b5/>
- Vrnjačka Banja – PEs and PIs with basic data and links are available - <http://vrnjackabanja.gov.rs/privreda/javna-preduzeca-i-budzetski-korisnici> it is immediately clear which does not have a site, required by law
- Ljubovija - Names of the members of the Management and Supervisory Boards elected by the Municipal Assembly - <http://www.ljubovija.rs/lokalna/66>

- Niš – There is a page "Commission for the competition for selection of directors of public companies in the city of Nis", which contains the decisions on appointments and rank lists, but there are no minutes from the commission's session - <http://www.gu.ni.rs/komisija-za-sprovodjenje-konkursa-za-izbor-direktora-javnih-preduzeca-grada-nisa/>
- Plandište – Good page on PEs and PIs - <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 are PE page with consolidated service pricing and business reports and financial statements - <http://www.gu.ni.rs/institucije/javna-preduzeca/>
- Mali Zvornik - One of a very few examples that on a Public utility company site can be found a systematization and up-to-date business program as well as business reports - <http://jkpdrina.rs/>

Public Debates and Public Competition

Good practices:

- Sokobanja - There is a tabular overview of the competition with supporting documents - <http://www.opstinasokobanja.com/%D0%BE%D1%83/%D0%B0%D0%BA%D1%82%D1%83%D0%B5%D0%BB%D0%BD%D0%B8-%D0%BA%D0%BE%D0%BD%D0%BA%D1%83%D1%80%D1%81%D0%B8>
- Nova Crnja - Good example of a public hearing report - <http://www.sonovacrnja.org.rs/images/2018/Vesti/IJR.pdf>
- Krupanj – Continuation fo a good practice of publishing reports on the implementation of co-financed media projects - http://www.krupanj.org.rs/index.php?id=97&file=tl_files/css/IZVESTAJ%20o%20realizaciji%20sufinansiranih%20projekata%20na%20konkursu%20za%20sufinansiranje%20projekta%20proizvodnje%20medijskih%20sadrzaja%20u%20oblasti%20javnog%20inf.%20u%202019.god..doc
- Aleksinac – There is a report on the funds spent in the competition for media projects. It is not an evaluation, but it states how the beneficiaries proved that they produced what they committed to and how they justified the money spent - <http://www.aleksinac.org/images/zoo/oglasna-tabla/konkursi/2019/Izvestaj%20o%20utrosenim%20opravdanim%20sredstvima.pdf>
- Blace – There is a report on how beneficiaries of projects for financing of media contents fulfill their obligations - https://www.blace.org.rs/images/dokumenta/Analiza_medijskih_projekata_u_2019.godini.pdf
- Krupanj – Invitations and reports on Budget Discussion - <http://www.krupanj.org.rs/index.php?id=58&items=2670>
<http://www.krupanj.org.rs/index.php?id=58&items=2701>
<http://www.krupanj.org.rs/index.php?id=58&items=2707>
<http://www.krupanj.org.rs/index.php?id=58&items=2718>

- Crna Trava - Great example of a response to a public hearing - <http://www.opstinacrnatrava.org.rs/assets/izvestaj-sa-javne-rasprave-povodom-nacrta-novog-statuta-opstine-crna-trava.pdf>
- Kragujevac - Integrated competitions and following decisions - <https://www.kragujevac.rs/e-usluge/konkursi-stipendije-pozivi/>
- Bač - Competitions and decisions by competition are presented in groups - <https://www.bac.rs/sr/konkursi>
- Bač – Godo example of reporting from the public debate: <http://www.bac.rs/sr/%D1%80%D0%B5%D0%B2%D0%B8%D0%B7%D0%B8%D1%98%D0%B0-%D1%81%D1%82%D1%80%D0%B0%D1%82%D0%B5%D0%B3%D0%B8%D1%98%D0%B5-%D0%BE%D0%B4%D1%80%D0%B6%D0%B8%D0%B2%D0%BE%D0%B3-%D1%80%D0%B0%D0%B7%D0%B2%D0%BE%D1%98%D0%B0-%D0%BE%D0%BF%D1%88%D1%82%D0%B8%D0%BD%D0%B5-%D0%B1%D0%B0%D1%87>
- Vladimirci – “Ads and Contests” page lists ads and some decisions and solutions. 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/>

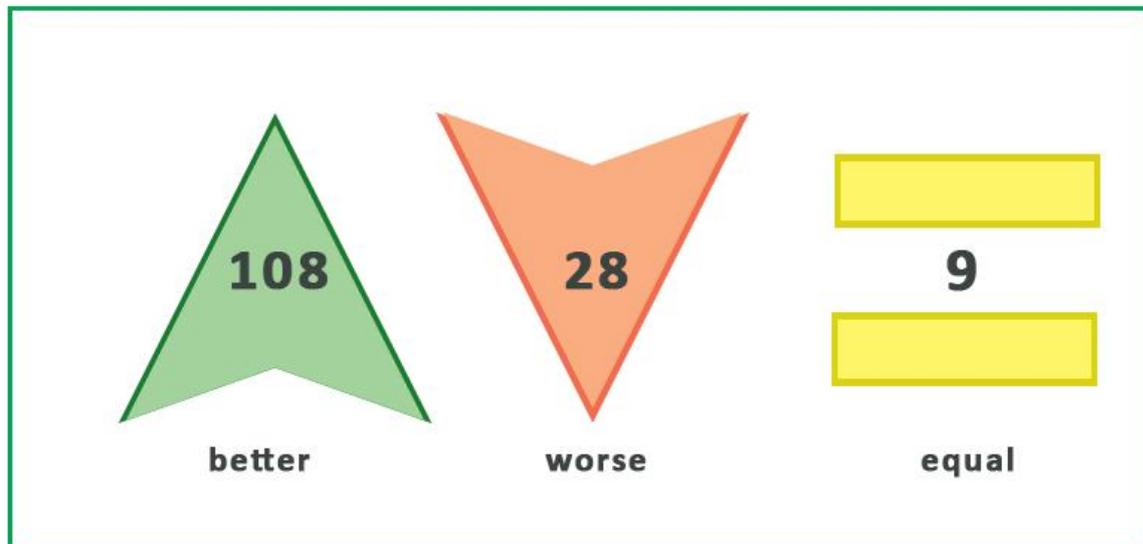
Other issues

Good practices:

- Novi Pazar - Register of lobbyists - <https://www.novipazar.rs/usluge/3645-registar-lobista>
- Novi Pazar - City administration work plan - https://www.novipazar.rs/images/dokumenti/plan_rada/Plan_rada_GUIPP_2020.pdf
- Sombor - Very detailed information about the local community: <https://www.sombor.rs/lokalna-samouprava/mesne-zajednice/>
- Sombor - Number of employees in all LSG bodies - monthly reports sent to the Treasury Directorate - <https://www.sombor.rs/lokalna-samouprava/broj-zaposlenih-u-ogranima-ls/broj-zaposlenih-u-ogranima-ls-2019-godina/> uključuje i JU i JP
- 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 - <https://www.sombor.rs/dokumenti-organa-grada/imenovana-postavljena-i-zaposlena-lica/> . 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 4: Comparison 2020 vs.2019 - How many LSGs got better or worse, or performed equal



The overall average LTI score for 145 LSGs in 2020 (45.9) changed six points in comparison to 2019, but also in comparison to 2015 when it was the same as in 2019.

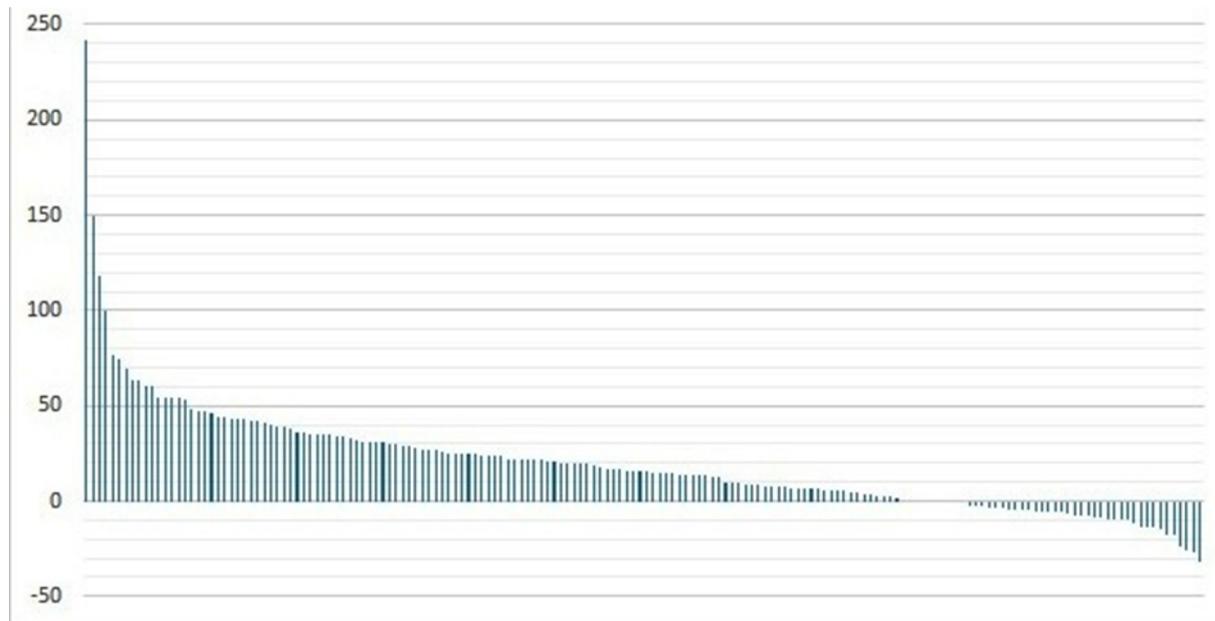
Nine cities and municipalities have the same score as last year. About 20% of LSGs (28) worsened their score from last year.

The fact that 37 LSGs have not improved or worsened their score indicates that the space for improvements is still very huge, including possibility to make significant progress through dedicated engagement in a relatively short time.

The best ranked is the municipality of Bečej, with the grade of 83, second is Novi Pazar with 82, and third place belongs to Sombor with 80 points. Kanjiža is fourth with 77, followed by Leskovac with 75 points and Vranje, being sixth, with 73. Compared to the 2019 overall performance, Bečej made huge progress, from 78th place with score 38, and Kanjiža climbed from 31st place and score 47 to fourth with 77.

At the bottom of the table are Pećinci (25), Merošina (24), Preševo (23), Koceljeva and Svilajnac (22 each), Jagodina (21) and Bela Crkva (18). While Pećinci, Preševo and Jagodina have the same score as in 2019, Svilajnac and Bela Crkva get somewhat better but still stay at the bottom of the list.

Graph 2: Percentage of score improvement 2019/2020 for 145 LSGs



Legend:

x-axis: LSGs' score improvement/deterioration in LTI 2020 as compared with LTI 2019 as a basis

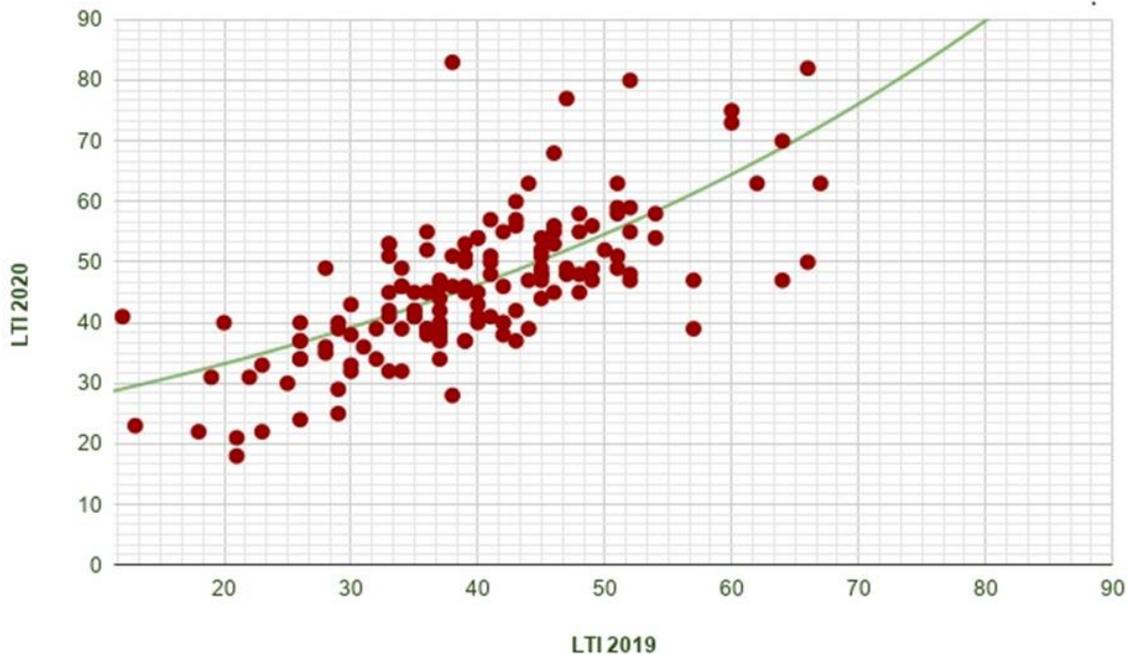
y-axis: % of score improvement/deterioration in LTI 2020 as compared with LTI 2019 as a basis

Nine LSGs that improved their scores for 20 points or more in the last year are Ub, Golubac and Osečina (20), Gornji Milanovac (21), Sokobanja (22), Sombor (28), Smederevska Palanka (29), Kanjiža (30) and a 2020 winner Bečej that scored 45 point more. On the other hand, Požarevac lost 18, Veliko Gradište 17, and Paraćin 16. Worrying trends are also identified in Malo Crniće (-10) and Kraljevo (-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.**

Improvements were greatest in three LSGs that have very low starting points. For example, the City of Smederevska Palanka raised its score over the last year, more than 3 times (from 12 to 41) but this was sufficient only to achieve an overall score that is close to the country's average. At the same time Bečej more than doubled its score (from 38 to 83) and came to the 1st position.

Graph 6: Distribution on LSGs according to their LTI 2019 and LTI 2020 Score



Comparisons of results in various research fields

When comparing LTI 2020 to the LTI 2019, the results are generally better (except in the field of Information Booklet) but very modest. The biggest improvement happened in the area of LSG and citizens (11 percent in total, or relative improvement of 35%) while free access to information slightly got better, hardly over one percent.

LSGs performed better in almost all fields but “Information booklet” category (as noticed above, that category is one of the worst this year). The biggest improvements were noticed in “LSG and citizens” and “Budget”.

Some differences could be to certain extent explained with changes in the legislation or national policies. It is probable that the improvement of budget performance might be related to good examples from the central government and donor support, e.g. in the area of “citizens budget” preparation, preparation of central government budget on time in late 2019, and encouraging to organize public debates based on the new statutes’ provisions based on the Law on Local Self Administration, Law on the Planning System, Local Anti-corruption Plans and CSO initiatives. On the other hand, weaker discipline in the area of “Information booklets” might be connected with lack of Administrative inspection oversight and insufficient capacities of the Commissioner to perform oversight and of the municipal administration to fulfill duties related to the preparation of that document. The overall improvement of transparency in various research fields may also be **impacted by LTI 2019 promotion, related follow-up activities and individual efforts** of civil servants in LSGs most interested to improve their scores in new research rounds. Another possible factor of influence might be **upcoming local elections**.

Recommendations

Transparency Serbia with certain modifications, repeats the following 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**. Within this recommendation especially:

- LSGs should open the special webpage on the site **dedicated to the activities of the assembly** (as well as the activities of the mayor and the council) containing all relevant documents and information, such as announcements for the next session with the agenda and materials (including the minutes from previous sessions), reports from the sessions, with adopted decisions or exact links to the Official Gazette issue in which the decisions are published;
- LSGs should open a **special "Budget" page**, which would include not just adopted budget decision, but all information and documents related to the budget - periodical reports on execution, final accounts (annual report), rebalances, citizens' budgets, calls for public budget discussions and reports from public debates;
- Information on **public competitions and calls should be published along with information on the results of the competition**. Transparency Serbia recommends publishing of reports on the implementation of NGOs / media projects funded by LSGs as well;

Electronic register of administrative procedures should be introduced in all cities and municipalities, and **information** on procedures and deadlines for municipal administrations published **in service centers -alternatively** - enabling (with possible assistance) for citizens to access 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;

Those LSGs, who have 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. This would be regulated also by the electronic registry of administrative procedures;

LSGs should clearly notify citizens on their **mechanisms for reporting wrongdoings** and mechanisms for reporting the suspicion of corruption. They should post such information on websites and in service centers (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 to 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**. Such pages were identified on the websites in 113/100 of 145 municipalities and cities. Within the page, Transparency Serbia recommends LSGs to create the segment devoted to the work of the Commission for the Election of the Directors of Public Enterprises and Public Utilities Companies and on which all the documents regarding the work of the Commission should be published. This especially applies to the sessions' minutes. The purpose would be to see how candidates are scored and rank list created. Transparency Serbia recommends LSGs to publish on these pages also the plans of work of PE and PI (or the link to them), systematization act and the data about the actual number of employees (or links to these data on the websites of the public enterprises/public utilities companies and public institutions);

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 is paid by users. They may either create their own database or use the application prepared by the Republican Directorate for property register.

Conclusions

The Local Transparency Index (LTI) 2020 represents Transparency Serbia's research, evaluation and ranking all cities, municipalities and in-city municipalities in Serbia. The research covers 145 units of local self-government and 25 in-city municipalities. TS applied it for the second time in a row using the same methodology and indicators, while the first nation-wide LTI was conducted in 2015.

The average score is 46, which is relatively low. However, the very fact that there is an undeniable improvement recorded after just one year, compared to the stagnation in 2015/2019 period is encouraging.

LTI 2020 shows that dedicated civil servants can make a difference and significantly improved transparency of local administration. However, they do this mostly without the benefit of a nation-wide policy, which would ensure that transparency reforms are sustained with a change in local governments. This research also proves that a transparency level once achieved is by no means a guarantee of sustainable good practice.

Only 13 out of 145 municipalities have LTI greater than 60, and only three greater than 80, thus, significant and continuous efforts are necessary to improve and maintain transparency even among best performers. Far better results are recorded in areas where transparency is clearly prescribed by laws. However, even if legal obligation to publish documents exists, significant number of municipalities failed to meet that duty, such as is the case with the Law on Public Enterprises.

This cycle of research noted some positive changes or novelties which might bring such changes in the future. Significantly more LSGs are publishing information on voting in the local assemblies, amendments to the local acts in procedure, councilors' contacts, reports on budget execution, reports on public consultations on budget, financial plans of budget beneficiaries, deadlines for issuing of documents, information on reporting irregularities, reports on work of public institutions, reports on public debates and information on number of employees.

More than 70% of LSGs adopted Local Anti-Corruption Plans (LAP). Full implementation of LAPs would increase LTI score as well, since the LAP concept relies largely on transparency as a corruption prevention mechanism.

Most of the negative findings identified in the LTI 2019, persist: failure to regularly update Information Booklets or to publish all mandatory information; lack of information on decision-making processes, and a lack of information on real estate and other municipal property. When it comes to Information Booklets accuracy and comprehensiveness the results even worsened.

This report identifies both good practices and opportunities for improvement. It is therefore dedicated to the local self-governments to use it as a tool for advancement of their transparency of work.

Annexes

Annex 1. Average score per indicator

Indices	% of max score
36. 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%
53. Is there a section on the website dedicated to public procurements?	97.2%
55. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?	96.6%
54. Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers ...)? **	94.5%
95. Has the mayor submitted a declaration of assets to ACAS?	94.5%
17. Is the budget for the current year available on the site? **	93.8%
51. Are information on the submission of a request for free access to information on the site?	93.1%
77. Does the municipality regularly announce a call for leasing property in its possession?	91.0%
12. Is the list of councilors published on the site?	89.7%
89. Are spatial plans published on the site?	89.0%
39. Are there inspections controlling lists on website?	86.9%
30. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users	85.5%
48. Did the municipalities provide requested information (FOI request) in time?***	84.1%
50. The municipality has no unresolved decisions of the Commissioner in 2019?	84.1%
15. Do rules of procedure envisage public questions of the councilors to the mayor and/or the city council?	83.4%
19. Is the budget published in machine readable format on the website?	83.4%
80. Have the public calls/ results of the competition for the allocation for NGOs been published on the website?	82.8%
31. Does the municipal administration have a service center through which it provides all the services?	82.1%
79. Have the public calls/ results of the competition for media allocation in the last 12 months been published on the website?	80.0%
14. Is the local Official Gazette available on the site? **	78.6%
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?	78.6%
43. 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%
90. Are the urban plans published on the site?	78.6%

60. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?	77.9%
82. Has the municipality's development strategy been published on the website?	77.9%
24. Has a public debate on the budget been held - citizen surveys or consultation meetings? **	76.6%
62. Have public competitions for the selection of directors of public enterprises been conducted?	74.5%
25. Has a public call for public debate on the budget been published on the website?	73.1%
75. Is there data on the website about the conducted public hearings/debates in the last 12 months (except for the budget)?	72.4%
63. Has there been a public competition for the selection of the director of public institutions?	70.3%
94. Has the Local anti corruption plan been adopted?	70.3%
61. Is there a special segment on the site dedicated to public institutions with PI data?	69.0%
18. Is the explanation of the budget available on the site?	66.2%
27. Has the final budget account been considered?	61.4%
42. Are there contact information of local community councilors on the municipal website?	59.3%
28. Has the proposal for the final budget account been published in the last 12 months or the adopted budget account?	57.9%
73. 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%
16. Are the Assembly sessions broadcasted live or are there transcripts published, or footage from the sessions o broadcasted, or recordings of the whole session available on the website?	55.2%
85. Is the rulebook on internal organization and systematization of administration posted on the site?	53.8%
93. Has the Integrity Plan been adopted?	53.8%
23. Is there a citizens' budget published and available on the site?	51.7%
56. Is the Information Booklet published on the site and updated in the last 3 months?	51.7%
36. Is there a possibility on the website for citizens to report irregularities or violation of laws?	50.3%
58. Does the Information Booklet contain information about salaries of officials and employees?	46.2%
20. Are 6-month and 9-month reports on budget execution available on the site?	43.4%
26. Has the report on the public debate on the budget been published on the website?	42.8%
87. Is there a code of ethics for employees and is it available on the site?	42.8%
11. Is the agenda of the next session of the Assembly published on the +A49:B72website?	42.1%
44. Are there defined permanent terms for the mayor meeting with citizens?	42.1%
37. Do (both/all) mechanisms for reporting allow anonymity?	37.2%
68. Have the annual work plans and reports on the work of PEs been published on the website of the PE (or municipality)?	34.5%

71. Are the data on the number of employees in the municipality and the public institutions posted on the site?	32.4%
1. Are the decisions adopted by the Assembly published and available on the website? *	30.3%
3. Are decisions adopted by the assembly in the past 24 months available on the website?	27.6%
21. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?	26.2%
76. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?	24.8%
49. No complaints were filed against municipalities in 2019 due to ignoring requests for information of public importance?	23.4%
70. Are annual work plans of PIs published on the website of public institutions or on the municipal website?	23.4%
46. Are regular press conferences held (at least once a month) by the mayor?	22.8%
29. Has the audit of the final budget account been published and reviewed at the session in the last 12 months?	22.1%
69. Are there reports on the work of public institutions on the website of the municipality or PI?	22.1%
13. Is there data for citizens' contact with councilors published on the website?	21.4%
32. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration?	20.7%
59. Does the Information Booklet contain information on the services provided by the municipality and deadlines for their provision?	20.7%
72. Are the data on the number of employees in PEs published on the municipal website?	20.7%
47. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?	18.6%
65. Is the systematization of PI published on the website of municipality or PI?	18.6%
6. Have the results of the voting at the last session of the Assembly been published on the website?	17.9%
9. Are the amendments submitted on the draft acts that were considered at the last session, published on the website?	17.2%
64. Is the systematization of PE published on the website of municipality or PE?	16.6%
57. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?	15.9%
5. Have the proposed documents been published on the website before being considered at the session of the Assembly?	15.2%
84. Has a report on the work of the administration for the previous year been published?	14.5%
8. Have the results of the voting of the Assembly in the past 24 months been published on the website?	13.1%
33. Is there information about reporting of corruption visible in the service center or administration offices?	11.7%
2. Are decisions adopted by the city council published and available on the website?	11.0%

4. Are decisions adopted by the city council in the past 24 months available on the website?	11.0%
40. Can a citizen monitor the status of his case on the website?	11.0%
22. Are monthly reports (or cumulative monthly reports) on budget execution available on the site?	10.3%
81. Have the reports on the realization of NGO projects financed by the municipality been published on the website?	10.3%
41. Is there data on handling complaints, petitions and complaints?	9.7%
45. Are data on the contact of the mayor or deputy with the citizens visible?	9.0%
35. Are there mechanisms for reporting corruption on the website?	7.6%
52. Is information on the submission of a request for free access to information visible in the service center or administration premises?	7.6%
74. 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)?	5.5%
66. Have the documents from the selection procedure of the director of PE been published on the website of municipality or PE?	4.1%
10. Are justifications/explanations regarding the amendments published?	3.4%
67. Have the documents from the procedure for the election of the director of the PI been published on the website of municipality or PI?	2.1%
83. Is the annual plan of work of municipal administration published on site?	2.1%
86. Are there information on the activities of the Council for the implementation of Ethical codes and its contacts with citizens on the website?	1.4%
88. 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%
91. Is there a report on contact with lobbyists published on the web site?	0.7%
92. Is there a daily or weekly schedule of the mayor's activities published on the website?	0.7%
7. Has information been posted on individual members of parliament votes on legislation debated?	0.0%
78. Are the rental lease reports (commercial premises, agricultural land) published on the site?	0.0%

Annex 2. Final scores of municipalities compared to the LTI 2019

Full list

2020 score is **bolded**

(Improvement or deterioration ratio higher than 30% highlighted)

	ALL MUNICIPALITIES	LTI 2019	LTI 2020	Improvement points	% of improvement
1	Bečej	38	83	45	118%
2	Novi Pazar	66	82	16	24%
3	Sombor	52	80	28	54%
4	Kanjiža	47	77	30	64%
5	Leskovac	60	75	15	25%
6	Vranje	60	73	13	22%
7	Užice	64	70	6	9%
8	Sokobanja	46	68	22	48%
9	Subotica	51	63	12	24%
10	Zrenjanin	44	63	19	43%
11	Plandište	67	63	-4	-6%
12	Vrnjačka Banja	62	63	1	2%
13	Vladičin Han	43	60	17	40%
14	Temerin	52	59	7	13%
15	Petrovac	51	59	8	16%
16	Senta	51	58	7	14%
17	Krupanj	48	58	10	21%
18	Čačak	54	58	4	7%
19	Šabac	41	57	16	39%
20	Čajetina	43	57	14	33%
21	Novi Sad	43	56	13	30%
22	Ruma	49	56	7	14%
23	Gadžin Han	46	56	10	22%
24	Žabalj	36	55	19	53%
25	Indija	52	55	3	6%
26	Kragujevac	42	55	13	31%
27	Priboj	48	55	7	15%
28	Ivanjica	46	55	9	20%
29	Bačka Topola	45	54	9	20%
30	Vrbas	40	54	14	35%

31	Knjaževac	54	54	0	0%
32	Požega	40	54	14	35%
33	Srbobran	46	53	7	15%
34	Osečina	33	53	20	61%
35	Golubac	33	53	20	61%
36	Arilje	39	53	14	36%
37	Ljubovija	45	52	7	16%
38	Mali Zvornik	36	52	16	44%
39	Topola	50	52	2	4%
40	Apatin	41	51	10	24%
41	Bački Petrovac	51	51	0	0%
42	Sremska Mitrovica	45	51	6	13%
43	Smederevo	39	51	12	31%
44	Kučevo	33	51	18	55%
45	Dimitrovgrad	38	51	13	34%
46	Novi Kneževac	39	50	11	28%
47	Paraćin	66	50	-16	-24%
48	Bojnik	41	50	9	22%
49	Pančevo	45	49	4	9%
50	Bač	49	49	0	0%
51	Rača	34	49	15	44%
52	Gornji Milanovac	28	49	21	75%
53	Varvarin	51	49	-2	-4%
54	Trstenik	47	49	2	4%
55	Kula	45	48	3	7%
56	Odžaci	41	48	7	17%
57	Irig	48	48	0	0%
58	Negotin	45	48	3	7%
59	Babušnica	47	48	1	2%
60	Bosilegrad	52	48	-4	-8%
61	Kikinda	49	47	-2	-4%
62	Mionica	37	47	10	27%
63	Veliko Gradište	64	47	-17	-27%
64	Nova Varoš	45	47	2	4%
65	Kraljevo	57	47	-10	-18%
66	Raška	44	47	3	7%
67	Kruševac	52	47	-5	-10%
68	Loznica	38	46	8	21%
69	Bor	42	46	4	10%
70	Bajina Bašta	34	46	12	35%
71	Niš	34	46	12	35%
72	Blace	37	46	9	24%

73	Bela Palanka	39	46	7	18%
74	Novi Bečej	48	45	-3	-6%
75	Čoka	39	45	6	15%
76	Valjevo	40	45	5	13%
77	Velika Plana	36	45	9	25%
78	Žagubica	35	45	10	29%
79	Tutin	36	45	9	25%
80	Ražanj	33	45	12	36%
81	Pirot	46	45	-1	-2%
82	Žitište	37	44	7	19%
83	Kuršumlja	45	44	-1	-2%
84	Kosjerić	30	43	13	43%
85	Aleksinac	40	43	3	8%
86	Opovo	33	42	9	27%
87	Beočin	35	42	7	20%
88	Zaječar	43	42	-1	-2%
89	Prijepolje	37	42	5	14%
90	Vlasotince	35	42	7	20%
91	Kovin	40	41	1	2%
92	Lajkovac	35	41	6	17%
93	Smederevska Palanka	12	41	29	242%
94	Brus	35	41	6	17%
95	Doljevac	33	41	8	24%
96	Crna Trava	41	41	0	0%
97	Vršac	42	40	-2	-5%
98	Titel	29	40	11	38%
99	Stara Pazova	26	40	14	54%
100	Ub	20	40	20	100%
101	Žabari	37	40	3	8%
102	Boljevac	40	40	0	0%
103	Surdulica	42	40	-2	-5%
104	Mali Idoš	36	39	3	8%
105	Ljig	29	39	10	34%
106	Požarevac	57	39	-18	-32%
107	Arandjelovac	44	39	-5	-11%
108	Batočina	36	39	3	8%
109	Majdanpek	32	39	7	22%
110	Sjenica	34	39	5	15%
111	Aleksandrovac	37	39	2	5%
112	Vladimirci	36	38	2	6%
113	Ćićevac	42	38	-4	-10%
114	Žitorađa	30	38	8	27%

115	Prokuplje	37	38	1	3%
116	Ada	26	37	11	42%
117	Bačka Palanka	37	37	0	0%
118	Lapovo	39	37	-2	-5%
119	Rekovac	39	37	-2	-5%
120	Svrljig	43	37	-6	-14%
121	Medveđa	26	37	11	42%
122	Alibunar	31	36	5	16%
123	Kovačica	28	36	8	29%
124	Kladovo	28	35	7	25%
125	Sečanj	26	34	8	31%
126	Knić	26	34	8	31%
127	Despotovac	37	34	-3	-8%
128	Bujanovac	32	34	2	6%
129	Beograd	30	33	3	10%
130	Nova Crnja	23	33	10	43%
131	Šid	30	32	2	7%
132	Lučani	33	32	-1	-3%
133	Trgovište	34	32	-2	-6%
134	Sremski Karlovci	22	31	9	41%
135	Bogatić	19	31	12	63%
136	Lebane	25	30	5	20%
137	Ćuprija	29	29	0	0%
138	Malo Crniće	38	28	-10	-26%
139	Pećinci	29	25	-4	-14%
140	Merošina	26	24	-2	-8%
141	Preševo	13	23	10	77%
142	Koceljeva	23	22	-1	-4%
143	Svilajnac	18	22	4	22%
144	Jagodina	21	21	0	0%
145	Bela Crkva	21	18	-3	-14%
146	Surčin *	42	53	11	26%
147	Barajevo *	32	47	15	47%
148	Sevojno *	37	42	5	14%
149	Obrenovac *	38	41	3	8%
150	Zvezdara *	38	40	2	5%
151	Pantelejev *	23	39	16	70%
152	Zemun *	26	38	12	46%
153	Lazarevac *	36	36	0	0%
154	Savski Venac *	38	36	-2	-5%
155	Niška Banja *	31	35	4	13%

156	Mladenovac *	25	33	8	32%
157	Čukarica *	37	32	-5	-14%
158	Rakovica *	21	31	10	48%
159	Kostolac *	23	30	7	30%
160	Grocka *	31	28	-3	-10%
161	Novi Beograd *	27	28	1	4%
162	Stari Grad *	23	28	5	22%
163	Palilula Niš*	31	28	-3	-10%
164	Crveni Krst *	20	28	8	40%
165	Vranjska Banja *	10	25	15	150%
166	Vračar *	26	24	-2	-8%
167	Palilula *	29	24	-5	-17%
168	Medijana *	25	24	-1	-4%
169	Voždovac *	24	22	-2	-8%
170	Sopot *	13	20	7	54%

Municipalities that lost more than 10 points since 2019 *

LSGs	LTI 2019	LTI 2020	improvement points	% of improvement
Paraćin	66	50	-16	-24%
Veliko Gradište	64	47	-17	-27%
Požarevac	57	39	-18	-32%
Kraljevo	57	47	-10	-18%
Malo Crniće	38	28	-10	-26%

* No in-city municipality lost more than 10 points (Čukarica and Palilula (Belgrade) lost the highest number of points from 2019 - five points). Only 5 LSGs lost ten or more points.

Next page:

Annex no. 3. Results of LSG's per indicator groups

LSGs - Indicators by category 2020 vs.2019

LSGs	Assembly and Council (max 18)			Budget (max 15)			Municipality and citizens (max 17)			Free Access to Information (max 6)			Public procurements (max 4)			Information Booklet (max 4)			Munic. Utility Co's - PE & PI (max 15)			Public Debates and Public Competitions (max 7)			Basic indicators (max 10)		
	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score
	Ada	3	5	↑	0	0	→	2	6	↑	3	5	↑	4	4	→	0	4	↑	6	9	↑	1	2	↑	6	6
Aleksandrovac	2	2	→	10	10	→	5	7	↑	4	3	↓	4	4	→	2	4	↑	0	3	↑	4	3	↓	6	6	→
Aleksinac	5	5	→	5	8	↑	5	6	↑	4	3	↓	4	4	→	3	4	↑	5	5	→	4	6	↑	8	8	→
Alibunar	3	5	↑	6	6	→	4	5	↑	3	2	↓	4	4	→	2	4	↑	2	1	↓	4	4	→	8	6	↓
Apatin	4	5	↑	9	12	↑	4	11	↑	5	4	↓	4	4	→	2	4	↑	5	7	↑	3	2	↓	8	8	→
Arandjelovac	4	4	→	8	4	↓	8	9	↑	4	4	→	4	4	→	2	4	↑	5	3	↓	3	3	→	8	8	→
Arilje	9	12	↑	5	4	↓	5	9	↑	4	4	→	4	4	→	2	4	↑	2	10	↑	3	3	→	8	10	↑
Babušnica	4	5	↑	11	12	↑	6	5	↓	5	1	↓	4	4	→	1	4	↑	4	7	↑	4	5	↑	8	6	↓
Bač	6	5	↓	10	11	↑	7	8	↑	4	4	→	4	4	→	3	4	↑	4	4	→	5	5	→	8	8	→
Bačka Palanka	5	5	→	8	4	↓	4	7	↑	4	4	→	4	4	→	2	3	↑	4	3	↓	2	4	↑	8	6	↓
Bačka Topola	8	9	↑	8	11	↑	6	8	↑	4	5	↑	4	4	→	1	3	↑	4	7	↑	4	4	→	8	8	→
Bački Petrovac	13	11	↓	7	8	↑	5	7	↑	5	5	→	4	4	→	1	3	↑	4	5	↑	4	4	→	10	10	→
Bajina Bašta	3	8	↑	4	6	↑	4	5	↑	5	4	↓	4	4	→	2	3	↑	5	8	↑	3	4	↑	8	10	↑
Batočina	3	5	↑	6	7	↑	3	3	→	5	5	→	4	4	→	2	3	↑	4	4	→	3	4	↑	8	8	→
Bečej	5	14	↑	7	14	↑	8	16	↑	3	5	↑	4	4	→	1	3	↑	3	14	↑	2	5	↑	8	10	↑
Bela Crkva	2	3	↑	0	1	↑	4	2	↓	0	1	↑	0	0	→	2	3	↑	6	2	↓	2	3	↑	0	2	↑
Bela Palanka	1	2	↑	9	11	↑	5	9	↑	4	3	↓	4	4	→	0	3	↑	5	5	→	4	3	↓	6	6	→
Beočin	4	4	→	1	4	↑	6	8	↑	1	4	↑	4	4	→	2	3	↑	9	5	↓	1	4	↑	4	8	↑
Beograd	3	3	→	5	6	↑	3	4	↑	1	1	→	4	4	→	2	3	↑	5	6	↑	1	1	→	6	6	→
Blace	3	5	↑	6	9	↑	5	7	↑	6	5	↓	4	4	→	0	3	↑	2	3	↑	3	4	↑	8	8	→
Bogatić	1	2	↑	0	6	↑	3	6	↑	4	2	↓	1	4	↑	2	3	↑	4	3	↓	0	3	↑	2	4	↑
Bojnik	5	9	↑	7	8	↑	8	10	↑	5	5	→	3	4	↑	2	3	↑	4	4	→	3	2	↓	8	10	↑

Indicators by category 2020 vs.2019

LSGs	Assembly and Council (max 18)			Budget (max 15)			Municipality and citizens (max 17)			Free Access to Information (max 6)			Public procurements (max 4)			Information Booklet (max 4)			Munic. Utility Co's - PE & PI (max 15)			Public Debates and Public Competitions (max 7)			Basic indicators (max 10)		
	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score
	Boljevac	4	3	↓	5	7	↑	8	8	→	3	4	↑	4	4	→	1	3	↑	5	2	↓	4	5	↑	8	8
Bor	5	5	→	9	12	↑	7	7	→	4	4	→	4	4	→	1	3	↑	5	2	↓	3	6	↑	8	8	→
Bosilegrad	9	8	↓	13	11	↓	5	8	↑	3	4	↑	4	4	→	2	3	↑	5	5	→	4	3	↓	10	8	↓
Brus	3	5	↑	7	9	↑	6	6	→	4	6	↑	4	4	→	1	3	↑	1	2	↑	5	4	↓	8	8	→
Bujanovac	7	7	→	7	5	↓	8	9	↑	4	4	→	0	0	→	1	2	↑	0	4	↑	3	4	↑	6	6	→
Čačak	13	13	→	9	10	↑	7	8	↑	3	1	↓	1	4	↑	3	2	↓	8	11	↑	4	4	→	8	8	→
Čajetina	3	6	↑	9	12	↑	6	11	↑	2	4	↑	4	4	→	2	2	→	6	7	↑	5	4	↓	6	8	↑
Ćićevac	4	4	→	10	9	↓	5	6	↑	4	2	↓	4	4	→	1	2	↑	5	5	→	5	4	↓	8	6	↓
Čoka	4	6	↑	6	9	↑	4	7	↑	5	5	→	4	4	→	3	2	↓	8	2	↓	1	4	↑	6	8	↑
Crna Trava	5	3	↓	7	8	↑	6	9	↑	4	4	→	3	4	↑	2	2	→	6	4	↓	4	3	↓	8	8	→
Ćuprija	5	4	↓	3	4	↑	3	5	↑	2	4	↑	4	4	→	0	2	↑	6	0	↓	4	3	↓	6	8	↑
Despotovac	9	5	↓	8	6	↓	3	6	↑	5	4	↓	4	2	↓	3	2	↓	0	2	↑	3	3	→	10	6	↓
Dimitrovgrad	8	12	↑	0	6	↑	4	5	↑	4	3	↓	4	4	→	0	2	↑	7	9	↑	4	4	→	8	10	↑
Doljevac	4	5	↑	4	8	↑	4	6	↑	3	5	↑	4	4	→	1	2	↑	1	1	→	4	5	↑	6	8	↑
Gadžin Han	11	11	→	9	8	↓	5	8	↑	3	4	↑	4	4	→	0	2	↑	4	8	↑	3	4	↑	8	8	→
Golubac	1	2	↑	10	9	↓	5	7	↑	3	5	↑	4	4	→	0	2	↑	4	8	↑	2	3	↑	6	6	→
Gornji Milanovac	3	5	↑	0	6	↑	4	11	↑	5	4	↓	4	4	→	1	2	↑	3	11	↑	3	4	↑	6	8	↑
Indija	10	10	→	9	9	→	8	9	↑	5	4	↓	4	4	→	3	2	↓	6	10	↑	1	2	↑	10	10	→
Irig	8	7	↓	8	10	↑	6	5	↓	4	5	↑	4	4	→	3	2	↓	5	4	↓	3	3	→	8	8	→
Ivanjica	5	5	→	9	11	↑	5	9	↑	4	3	↓	4	4	→	3	2	↓	5	9	↑	5	4	↓	8	8	→
Jagodina	1	3	↑	0	0	→	3	3	→	3	3	→	4	3	↓	2	2	→	3	3	→	3	3	→	4	4	→
Kanjiža	12	14	↑	8	14	↑	4	11	↑	4	5	↑	4	4	→	2	2	→	7	11	↑	4	6	↑	8	10	↑

Indicators by category 2020 vs.2019

LSGs	Assembly and Council (max 18)			Budget (max 15)			Municipality and citizens (max 17)			Free Access to Information (max 6)			Public procurements (max 4)			Information Booklet (max 4)			Munic. Utility Co's - PE & PI (max 15)			Public Debates and Public Competitions (max 7)			Basic indicators (max 10)		
	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score
	Kikinda	5	5	→	10	11	↑	9	7	↓	5	4	↓	4	4	→	1	2	↑	7	5	↓	2	3	↑	8	8
Kladovo	1	5	↑	7	7	→	11	9	↓	2	4	↑	4	4	→	1	2	↑	2	1	↓	0	1	↑	6	8	↑
Knić	4	3	↓	1	4	↑	5	3	↓	4	4	→	1	4	↑	0	2	↑	7	8	↑	1	4	↑	4	6	↑
Knjaževac	5	7	↑	11	12	↑	6	7	↑	5	4	↓	4	4	→	2	2	→	7	4	↓	5	5	→	8	8	→
Koceljeva	1	2	↑	6	4	↓	1	3	↑	4	4	→	4	2	↓	0	2	↑	2	4	↑	1	0	↓	6	4	↓
Kosjerić	6	8	↑	2	8	↑	4	8	↑	3	2	↓	4	4	→	0	2	↑	6	6	→	2	3	↑	6	8	↑
Kovačica	4	5	↑	1	4	↑	3	6	↑	4	4	→	4	4	→	2	2	→	1	3	↑	2	4	↑	6	8	↑
Kovin	3	3	→	10	10	→	7	7	→	5	4	↓	4	4	→	1	2	↑	4	2	↓	2	4	↑	8	8	→
Kragujevac	9	15	↑	6	9	↑	6	5	↓	4	4	→	3	4	↑	1	2	↑	6	7	↑	2	3	↑	8	10	↑
Kraljevo	12	5	↓	9	8	↓	9	7	↓	4	4	→	4	4	→	4	2	↓	4	8	↑	3	4	↑	10	8	↓
Krupanj	7	10	↑	13	13	→	5	7	↑	4	5	↑	2	4	↑	2	2	→	2	4	↑	7	6	↓	6	10	↑
Kruševac	6	5	↓	12	12	→	6	5	↓	4	5	↑	4	4	→	2	2	→	6	4	↓	4	3	↓	8	10	↑
Kučevo	6	6	→	9	10	↑	4	5	↑	1	3	↑	4	4	→	0	2	↑	3	5	↑	2	3	↑	8	8	→
Kula	5	6	↑	9	5	↓	5	10	↑	4	5	↑	4	4	→	1	2	↑	9	11	↑	3	4	↑	8	8	→
Kuršumlja	4	3	↓	9	10	↑	5	10	↑	5	4	↓	4	4	→	2	1	↓	6	1	↓	3	4	↑	8	8	→
Lajkovac	6	6	→	7	8	↑	5	7	↑	5	6	↑	4	4	→	1	1	→	2	1	↓	1	5	↑	8	8	→
Lapovo	4	5	↑	6	6	→	5	4	↓	4	5	↑	4	4	→	2	1	↓	6	3	↓	3	4	↑	8	8	→
Lebane	1	1	→	5	5	→	2	6	↑	4	1	↓	4	4	→	1	1	→	0	4	↑	4	4	→	6	4	↓
Leskovac	14	16	↑	11	13	↑	5	10	↑	3	3	→	4	4	→	3	1	↓	5	11	↑	6	5	↓	10	10	→
Ljig	5	5	→	6	8	↑	2	5	↑	3	4	↑	1	4	↑	2	1	↓	2	5	↑	2	1	↓	6	8	↑
Ljubovija	3	5	↑	13	13	→	3	7	↑	3	3	→	4	4	→	4	1	↓	6	8	↑	3	5	↑	6	8	↑
Loznica	6	8	↑	6	10	↑	6	6	→	3	2	↓	4	4	→	3	1	↓	5	8	↑	0	5	↑	10	8	↓

Indicators by category 2020 vs.2019

LSGs	Assembly and Council (max 18)			Budget (max 15)			Municipality and citizens (max 17)			Free Access to Information (max 6)			Public procurements (max 4)			Information Booklet (max 4)			Munic. Utility Co's - PE & PI (max 15)			Public Debates and Public Competitions (max 7)			Basic indicators (max 10)		
	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score
	Lučani	3	3	→	8	7	↓	3	5	↑	3	4	↑	4	1	↓	2	1	↓	4	7	↑	2	2	→	8	6
Majdanpek	4	4	→	4	7	↑	8	7	↓	3	3	→	4	4	→	2	1	↓	3	2	↓	2	4	↑	8	8	→
Mali Idoš	3	3	→	3	6	↑	4	6	↑	5	4	↓	4	4	→	2	1	↓	6	4	↓	3	4	↑	8	8	→
Mali Zvornik	5	6	↑	5	10	↑	5	8	↑	4	4	→	4	4	→	1	1	→	2	7	↑	4	5	↑	6	8	↑
Malo Crniće	3	4	↑	9	12	↑	2	6	↑	4	5	↑	4	4	→	1	1	→	4	5	↑	4	4	→	8	8	→
Medveđa	2	4	↑	7	7	→	4	7	↑	5	4	↓	0	4	↑	2	1	↓	1	4	↑	1	1	→	4	6	↑
Merošina	1	1	→	0	1	↑	5	7	↑	5	4	↓	4	4	→	0	1	↑	2	1	↓	4	1	↓	4	4	→
Mionica	7	13	↑	4	8	↑	3	6	↑	5	4	↓	4	4	→	4	1	↓	4	3	↓	3	1	↓	8	10	↑
Negotin	5	5	→	12	10	↓	8	10	↑	5	4	↓	1	4	↑	2	1	↓	5	6	↑	1	2	↑	6	8	↑
Niš	5	5	→	9	13	↑	5	7	↑	2	2	→	4	4	→	1	1	→	3	6	↑	3	4	↑	4	4	→
Nova Crnja	2	2	→	0	3	↑	3	7	↑	4	4	→	4	4	→	1	1	→	4	0	↓	3	5	↑	6	8	↑
Nova Varoš	5	5	→	13	13	→	5	5	→	2	4	↑	4	4	→	3	1	↓	3	3	→	4	4	→	6	8	↑
Novi Bečej	4	5	↑	11	10	↓	6	9	↑	4	3	↓	4	4	→	1	1	→	5	4	↓	4	4	→	8	6	↓
Novi Kneževac	5	5	→	10	9	↓	4	9	↑	4	4	→	4	4	→	1	1	→	5	8	↑	3	4	↑	8	8	→
Novi Pazar	14	15	↑	7	13	↑	11	15	↑	4	5	↑	4	4	→	4	1	↓	10	11	↑	4	4	→	10	10	→
Novi Sad	12	12	→	6	10	↑	7	8	↑	3	3	→	0	4	↑	3	1	↓	7	7	→	2	3	↑	8	10	↑
Odžaci	6	5	↓	7	9	↑	5	9	↑	2	4	↑	4	4	→	3	1	↓	6	8	↑	4	3	↓	8	8	→
Opovo	3	4	↑	2	6	↑	4	6	↑	5	5	→	4	4	→	3	1	↓	3	8	↑	3	3	→	6	8	↑
Osečina	5	11	↑	7	12	↑	3	5	↑	3	5	↑	2	4	↑	2	1	↓	3	6	↑	3	3	→	2	10	↑
Pančevo	6	5	↓	9	12	↑	6	5	↓	4	4	→	4	4	→	2	1	↓	4	6	↑	4	3	↓	8	8	→
Paraćin	11	6	↓	13	12	↓	10	10	→	2	2	→	4	2	↓	2	1	↓	9	6	↓	7	5	↓	8	4	↓
Pećinci	0	0	→	5	5	→	5	5	→	4	3	↓	4	4	→	2	1	↓	5	2	↓	1	2	↑	6	6	→

Indicators by category 2020 vs.2019

LSGs	Assembly and Council (max 18)			Budget (max 15)			Municipality and citizens (max 17)			Free Access to Information (max 6)			Public procurements (max 4)			Information Booklet (max 4)			Munic. Utility Co's - PE & PI (max 15)			Public Debates and Public Competitions (max 7)			Basic indicators (max 10)		
	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score
	Petrovac	3	5	↑	11	13	↑	8	11	↑	5	4	↓	4	4	→	1	1	→	6	8	↑	5	5	→	8	8
Pirot	3	3	→	13	10	↓	5	8	↑	3	1	↓	4	4	→	2	1	↓	7	9	↑	3	4	↑	6	4	↓
Plandište	15	14	↓	12	12	→	6	6	→	5	2	↓	4	4	→	3	1	↓	12	12	→	3	4	↑	10	8	↓
Požarevac	8	5	↓	11	9	↓	9	10	↑	4	5	↑	4	4	→	3	1	↓	5	12	↑	4	4	→	8	8	→
Požega	12	12	→	5	8	↑	5	7	↑	2	2	→	4	4	→	1	1	→	3	7	↑	3	5	↑	8	8	→
Preševo	1	2	↑	1	2	↑	4	7	↑	3	4	↑	0	4	↑	0	1	↑	2	2	→	2	2	→	2	4	↑
Priboj	10	10	→	7	10	↑	10	10	→	3	4	↑	4	4	→	1	1	→	5	6	↑	3	4	↑	10	10	→
Prijepolje	5	5	→	8	11	↑	5	7	↑	3	2	↓	4	4	→	0	1	↑	3	5	↑	3	1	↓	8	8	→
Prokuplje	5	4	↓	8	7	↓	5	7	↑	4	3	↓	4	4	→	0	1	↑	2	3	↑	4	4	→	8	8	→
Rača	5	13	↑	1	7	↑	8	7	↓	2	4	↑	4	4	→	1	1	→	3	2	↓	4	3	↓	4	10	↑
Raška	6	6	→	11	14	↑	4	5	↑	4	4	→	4	2	↓	2	1	↓	2	2	→	3	4	↑	8	6	↓
Ražanj	4	4	→	8	12	↑	3	4	↑	4	4	→	4	4	→	0	1	↑	3	8	↑	3	2	↓	8	8	→
Rekovac	4	4	→	10	8	↓	3	4	↑	4	4	→	4	4	→	1	1	→	3	3	→	2	3	↑	8	8	→
Ruma	9	10	↑	10	11	↑	8	7	↓	4	4	→	4	4	→	3	1	↓	2	5	↑	5	4	↓	8	8	→
Šabac	4	6	↑	6	10	↑	7	12	↑	3	3	→	4	4	→	1	0	↓	6	7	↑	4	5	↑	8	8	→
Sečanj	1	2	↑	8	12	↑	4	5	↑	3	4	↑	3	4	↑	1	0	↓	3	2	↓	1	1	→	6	6	→
Senta	6	12	↑	12	10	↓	5	10	↑	5	5	→	4	4	→	1	0	↓	7	7	→	6	4	↓	8	10	↑
Šid	3	3	→	3	3	→	4	7	↑	4	4	→	4	4	→	2	0	↓	4	4	→	2	2	→	6	6	→
Sjenica	3	5	↑	6	8	↑	4	5	↑	5	2	↓	4	4	→	1	0	↓	2	4	↑	2	2	→	8	6	↓
Smederevo	2	6	↑	8	12	↑	9	7	↓	4	4	→	4	4	→	2	0	↓	3	7	↑	0	4	↑	6	8	↑
Smederevska Palanka	0	5	↑	0	6	↑	4	6	↑	2	3	↑	3	4	↑	0	0	→	2	2	→	0	1	↑	4	8	↑
Sokobanja	6	11	↑	9	13	↑	6	11	↑	4	6	↑	4	4	→	1	0	↓	5	8	↑	4	6	↑	8	10	↑

Indicators by category 2020 vs.2019

LSGs	Assembly and Council (max 18)			Budget (max 15)			Municipality and citizens (max 17)			Free Access to Information (max 6)			Public procurements (max 4)			Information Booklet (max 4)			Munic. Utility Co's - PE & PI (max 15)			Public Debates and Public Competitions (max 7)			Basic indicators (max 10)		
	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score
	Sombor	6	15	↑	7	15	↑	11	13	↑	4	5	↑	4	4	→	2	0	↓	5	9	↑	5	6	↑	8	10
Srbobran	6	7	↑	9	10	↑	6	7	↑	4	5	↑	4	4	→	2	0	↓	6	8	↑	3	4	↑	8	8	→
Sremska Mitrovica	3	3	→	9	13	↑	7	8	↑	4	5	↑	4	4	→	3	0	↓	7	5	↓	3	5	↑	8	8	→
Sremski Karlovci	3	3	→	1	6	↑	3	4	↑	3	4	↑	4	4	→	0	0	→	0	2	↑	3	3	→	6	8	↑
Stara Pazova	2	2	→	6	8	↑	6	8	↑	3	3	→	4	4	→	1	0	↓	3	4	↑	0	5	↑	6	6	→
Subotica	10	11	↑	9	11	↑	8	8	→	3	2	↓	4	4	→	2	0	↓	6	10	↑	3	5	↑	10	8	↓
Surdulica	2	1	↓	6	8	↑	4	4	→	3	4	↑	4	4	→	2	0	↓	7	4	↓	5	4	↓	6	6	→
Svilajnac	1	2	↑	2	3	↑	5	5	→	2	2	→	0	0	→	2	0	↓	0	1	↑	3	3	→	0	0	→
Svrljig	3	2	↓	6	7	↑	7	6	↓	4	5	↑	4	4	→	2	0	↓	6	6	→	3	1	↓	6	6	→
Temerin	11	11	→	13	13	→	4	7	↑	4	5	↑	4	4	→	0	0	→	4	3	↓	4	5	↑	10	10	→
Titel	4	4	→	10	8	↓	2	8	↑	4	4	→	4	4	→	2	0	↓	1	4	↑	0	4	↑	8	8	→
Topola	9	10	↑	12	9	↓	3	5	↑	3	5	↑	4	4	→	3	0	↓	6	4	↓	4	3	↓	10	10	→
Trgovište	2	2	→	7	6	↓	6	6	→	4	4	→	4	4	→	1	0	↓	3	2	↓	2	3	↑	6	6	→
Trstenik	5	5	→	9	9	→	5	6	↑	6	4	↓	4	4	→	1	0	↓	5	8	↑	4	5	↑	8	8	→
Tutin	3	5	↑	13	13	→	7	9	↑	5	4	↓	1	4	↑	0	0	→	1	2	↑	2	4	↑	6	8	↑
Ub	5	5	→	0	6	↑	5	8	↑	2	4	↑	2	4	↑	0	0	→	2	5	↑	0	3	↑	2	8	↑
Užice	14	15	↑	13	14	↑	5	10	↑	3	4	↑	4	4	→	2	0	↓	10	10	→	5	5	→	10	10	→
Valjevo	5	8	↑	7	10	↑	4	6	↑	3	1	↓	4	4	→	0	0	→	6	4	↓	3	5	↑	8	8	→
Varvarin	4	4	→	12	13	↑	6	7	↑	5	4	↓	4	4	→	4	0	↓	5	4	↓	4	3	↓	8	8	→
Velika Plana	5	10	↑	7	8	↑	4	8	↑	3	3	→	4	4	→	1	0	↓	4	4	→	3	3	→	8	10	↑
Veliko Gradište	10	6	↓	15	14	↓	6	8	↑	5	4	↓	4	4	→	4	0	↓	7	12	↑	4	4	→	10	8	↓
Vladičin Han	6	10	↑	10	14	↑	5	9	↑	5	4	↓	1	4	↑	1	0	↓	4	5	↑	4	5	↑	6	8	↑

Indicators by category 2020 vs.2019																											
LSGs	Assembly and Council (max 18)			Budget (max 15)			Municipality and citizens (max 17)			Free Access to Information (max 6)			Public procurements (max 4)			Information Booklet (max 4)			Munic. Utility Co's - PE & PI (max 15)			Public Debates and Public Competitions (max 7)			Basic indicators (max 10)		
	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score	2019	2020	score
	Vladimirci	3	4	↑	4	6	↑	5	5	→	4	2	↓	4	4	→	2	0	↓	5	7	↑	3	4	↑	4	4
Vlasotince	6	4	↓	8	11	↑	4	8	↑	3	4	↑	3	4	↑	0	0	→	1	2	↑	4	4	→	8	6	↓
Vranje	11	16	↑	12	14	↑	10	13	↑	3	2	↓	4	4	→	2	0	↓	4	6	↑	6	5	↓	10	8	↓
Vrbas	5	5	→	6	9	↑	9	11	↑	2	4	↑	4	4	→	1	0	↓	6	5	↓	3	5	↑	8	8	→
Vrnjačka Banja	14	14	→	12	14	↑	9	8	↓	4	4	→	4	4	→	0	0	→	5	7	↑	6	5	↓	10	10	→
Vršac	6	6	→	5	7	↑	5	5	→	4	2	↓	4	4	→	2	0	↓	6	5	↓	3	3	→	8	6	↓
Žabalj	4	4	→	12	13	↑	6	10	↑	4	4	→	2	4	↑	2	0	↓	2	4	↑	2	5	↑	6	8	↑
Žabari	4	4	→	9	12	↑	5	5	→	4	5	↑	4	4	→	1	0	↓	4	4	→	2	3	↑	8	8	→
Žagubica	4	9	↑	6	6	→	5	7	↑	4	4	→	4	4	→	2	0	↓	2	2	→	4	3	↓	8	8	→
Zaječar	3	4	↑	8	12	↑	8	7	↓	5	6	↑	4	4	→	3	0	↓	5	3	↓	3	2	↓	8	8	→
Žitište	5	6	↑	2	7	↑	6	7	↑	4	4	→	4	4	→	2	0	↓	5	5	→	4	3	↓	6	8	↑
Žitorađa	2	1	↓	7	9	↑	3	7	↑	1	4	↑	0	3	↑	1	0	↓	6	5	↓	3	2	↓	2	6	↑
Zrenjanin	11	15	↑	9	12	↑	5	9	↑	4	4	→	4	4	→	2	0	↓	3	5	↑	2	4	↑	10	10	→
average	5	6	↑	7	9	↑	5	7	↑	4	4	→	4	4	→	2	1	↓	4	5	↑	3	4	↑	7	8	↑

Annex 4: Best performers in categories

Assembly and Council

Overall rank	LSGs	Assembly and Council (max 18)
5	Leskovac	16
6	Vranje	16
25	Kragujevac	15
2	Novi Pazar	15
3	Sombor	15
7	Užice	15
12	Zrenjanin	15
4	Kanjiža	14
10	Plandište	14
1	Bečej	14
9	Vrnjačka Banja	14
63	Mionica	13
17	Čačak	13
54	Rača	13

Budget

Overall rank	LSGs	Budget (max 15)
3	Sombor	15
64	Veliko Gradište	14
9	Vrnjačka Banja	14
110	Raška	14
13	Vladičin Han	14
1	Bečej	14
7	Užice	14
6	Vranje	14
4	Kanjiža	14
15	Temerin	13
18	Krupanj	13
37	Ljubovija	13
14	Petrovac	13
8	Sokobanja	13
65	Nova Varoš	13

78	Tutin	13
51	Varvarin	13
71	Niš	13
5	Leskovac	13
26	Žabalj	13
45	Sremska Mitrovica	13
2	Novi Pazar	13

Municipality and Citizens

Overall rank	LSGs	Municipality and citizens (max 17)
1	Bečej	16
2	Novi Pazar	15
3	Sombor	13
6	Vranje	13
20	Šabac	12
40	Apatin	11
32	Vrbas	11
14	Petrovac	11
8	Sokobanja	11
19	Čajetina	11
50	Gornji Milanovac	11
4	Kanjiža	11

Free Access to Information

Overall rank	LSGs	Free Access to Information (max 6)
92	Lajkovac	6
90	Zaječar	6
8	Sokobanja	6
94	Brus	6
29	Bačka Topola	5
116	Ada	5
4	Kanjiža	5
16	Senta	5
75	Čoka	5
86	Opovo	5

55	Kula	5
3	Sombor	5
41	Bački Petrovac	5
1	Bečej	5
36	Srbobran	5
15	Temerin	5
60	Irig	5
45	Sremska Mitrovica	5
18	Krupanj	5
33	Osečina	5
105	Požarevac	5
34	Golubac	5
103	Žabari	5
138	Malo Crniće	5
107	Batočina	5
39	Topola	5
118	Lapovo	5
2	Novi Pazar	5
67	Kruševac	5
95	Doljevac	5
120	Svrljig	5
72	Blace	5
47	Bojnik	5

Information Booklet

Overall rank	LSGs	Information Booklet (max 4)
53	Pančevo	4
2	Novi Pazar	4
3	Sombor	4
5	Leskovac	4
11	Subotica	4
23	Ruma	4
45	Sremska Mitrovica	4
6	Vranje	4
39	Topola	4

Public enterprises and Public institutions

Overall rank	LSGs	Public Enterprises and Public Institutions (max 15)
1	Bečej	14
105	Požarevac	12
64	Veliko Gradište	12
10	Plandište	12
14	Kanjiža	11
55	Kula	11
50	Gornji Milanovac	11
17	Čačak	11
2	Novi Pazar	11
5	Leskovac	11
24	Indija	10
35	Arilje	10
11	Subotica	10
7	Užice	10

Public debates and public competitions

Overall rank	LSGs	Public Debates and Public Competitions (max 7)
69	Bor	6
8	Sokobanja	6
84	Aleksinac	6
3	Sombor	6
18	Krupanj	6
4	Kanjiža	6

City municipalities do not have the same competencies as cities and towns and indices can not be compared with other indices

Annex no. 5. Percentage of LTI improvement 2020 vs.2019

L T I	2019	2020	Increased %	% of improvement
1. Are the decisions adopted by the Assembly published and available on the website?	22.80%	30.3%	7.5%	33%
2. Are decisions adopted by the city council published and available on the website?	11.70%	11.0%	-0.7%	-6%
3. Are decisions adopted by the assembly in the past 24 months available on the website?	20.70%	27.6%	6.9%	33%
4. Are decisions adopted by the city council in the past 24 months available on the website?	11.70%	11.0%	-0.7%	-6%
5. Have the proposed documents been published on the website before being considered at the session of the Assembly?	16.60%	15.2%	-1.4%	-9%
6. Have the results of the voting at the last session of the Assembly been published on the website?	11.00%	17.9%	6.9%	63%
7. Has information been posted on individual members of parliament votes on legislation debated?	0.00%	0.0%	0.0%	0%
8. Have the results of the voting of the Assembly in the past 24 months been published on the website?	6.90%	13.1%	6.2%	90%
9. Are the amendments submitted on the draft acts that were considered at the last session, published on the website?	7.60%	17.2%	9.6%	127%
10. Are justifications/explanations regarding the amendments published?	4.80%	3.4%	-1.4%	-28%
11. Is the agenda of the next session of the Assembly published on the website?	33.80%	42.1%	8.3%	24%
12. Is the list of councilors published on the site?	86.20%	89.7%	3.5%	4%
13. Is there data for citizens' contact with councilors published on the website?	9.70%	21.4%	11.7%	120%
14. Is the local Official Gazette available on the site?	75.90%	78.6%	2.7%	4%
15. Do rules of procedure envisage public questions of the councilors to the mayor and/or the city council?	68.30%	83.4%	15.1%	22%
16. Are the Assembly sessions broadcasted live or are there transcripts published, or footage from the sessions o broadcasted, or recordings of the whole session available on the website?	44.80%	55.2%	10.4%	23%
17. Is the budget for the current year available on the site?	81.40%	93.8%	12.4%	15%
18. Is the explanation of the budget available on the site?	60.70%	66.2%	5.5%	9%

19. Is the budget published in machine readable format on the website?	69.00%	83.4%	14.4%	21%
20. Are 6-month and 9-month reports on budget execution available on the site?	34.50%	43.4%	8.9%	26%
21. Are the 6-month and 9-month reports on budget execution published on 6 digits of the economic classification?	16.60%	26.2%	9.6%	58%
22. Are monthly reports (or cumulative monthly reports) on budget execution available on the site?	9.70%	10.3%	0.6%	7%
23. Is there a citizens' budget published and available on the site?	37.20%	51.7%	14.5%	39%
24. Has a public debate on the budget been held - citizen surveys or consultation meetings? **	66.20%	76.6%	10.4%	16%
25. Has a public call for public debate on the budget been published on the website?	48.30%	73.1%	24.8%	51%
26. Has the report on the public debate on the budget been published on the website?	17.90%	42.8%	24.9%	139%
27. Has the final budget account been considered?	67.60%	61.4%	-6.2%	-9%
28. Has the proposal for the final budget account been published in the last 12 months or the adopted budget account?	57.90%	57.9%	0.0%	0%
29. Has the audit of the final budget account been published and reviewed at the session in the last 12 months?	17.90%	22.1%	4.2%	23%
30. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users	60.00%	85.5%	25.5%	43%
31. Does the municipal administration have a service center through which it provides all the services?	79.30%	82.1%	2.8%	3%
32. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration?	5.50%	20.7%	15.2%	276%
33. Is there information about reporting of corruption visible in the service center or administration offices?	3.40%	11.7%	8.3%	245%
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?	18.60%	78.6%	60.0%	323%
35. Are there mechanisms for reporting corruption on the website?	5.50%	7.6%	2.1%	38%
36. Is there a possibility on the website for citizens to report irregularities or violation of laws?	97.90%	50.3%	-47.6%	-49%
37. Do (both/all) mechanisms for reporting allow anonymity?	25.50%	37.2%	11.7%	46%

36. 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?	9.00%	100.0%	91.0%	1011%
39 Are there inspections controlling lists on website?	84.80%	86.9%	2.1%	2%
40. Can a citizen monitor the status of his case on the website?	9.00%	11.0%	2.0%	23%
41. Is there data on handling complaints, petitions and complaints?	5.50%	9.7%	4.2%	76%
42. Are there contact information of local community councilors on the municipal website?	55.90%	59.3%	3.4%	6%
43. Is there information on the website or in the Information Booklet that citizens can attend the assembly sessions and instructions on how to apply?	51.70%	78.6%	26.9%	52%
44. Are there defined permanent terms for mayor meeting with citizens?	41.40%	42.1%	0.7%	2%
45. Are data on the contact of the mayor or deputy with the citizens visible?	9.70%	9.0%	-0.7%	-8%
46. Are regular press conferences held (at least once a month) by the mayor?	15.20%	22.8%	7.6%	50%
47. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?	20.70%	18.6%	-2.1%	-10%
48. Did the municipalities provide requested information (FOI request) in time?	90.30%	84.1%	-6.2%	-7%
49. No complaints were filed against municipalities in 2019 due to ignoring requests for information of public importance?	26.20%	23.4%	-2.8%	-11%
50. The municipality has no unresolved decisions of the Commissioner in 2019?	71.00%	84.1%	13.1%	19%
51. Are information on the submission of a request for free access to information on the site?	86.20%	93.1%	6.9%	8%
52. Is information on the submission of a request for free access to information visible in the service center or administration premises?	6.20%	7.6%	1.4%	22%
53. Is there a section on the website dedicated to public procurements?	94.50%	97.2%	2.7%	3%
54. Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers ...)?	87.60%	94.5%	6.9%	8%
55. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?	86.90%	96.6%	9.7%	11%
56. Is the Information Booklet published on the site and updated in the last 3 months?	58.60%	51.7%	-6.9%	-12%

57. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?	17.20%	15.9%	-1.3%	-8%
58. Does the Information Booklet contain information about salaries of officials and employees?	62.80%	46.2%	-16.6%	-26%
59. Does the Information Booklet contain information on the services provided by the municipality and deadlines for their provision?	22.10%	20.7%	-1.4%	-6%
60. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?	76.60%	77.9%	1.3%	2%
61. Is there a special segment on the site dedicated to public institutions with PI data?	68.30%	69.0%	0.7%	1%
62. Have public competitions for the selection of directors of public enterprises been conducted?	74.50%	74.5%	0.0%	0%
63. Has there been a public competition for the selection of the director of public institutions?	60.00%	70.3%	10.3%	17%
64. Is the systematization of PE published on the website of municipality or PE?	11.70%	16.6%	4.9%	41%
65. Is the systematization of PI published on the website of municipality or PI?	7.60%	18.6%	11.0%	145%
66. Have the documents from the selection procedure of the director of PE been published on the website of municipality or PE?	2.10%	4.1%	2.0%	97%
67. Have the documents from the procedure for the election of the director of the PI been published on the website of municipality or PI?	0.00%	2.1%	2.1%	NA
68. Have the annual work plans and reports on the work of PEs been published on the website of the PE (or municipality)?	26.90%	34.5%	7.6%	28%
69. Are there reports on the work of public institutions on the website of the municipality or PI?	8.30%	22.1%	13.8%	166%
70. Are annual work plans of PIs published on the website of public institutions or on the municipal website?	13.10%	23.4%	10.3%	79%
71. Are the data on the number of employees in the municipality and the public institutions posted on the site?	20.70%	32.4%	11.7%	57%
72. Are the data on the number of employees in PEs published on the municipal website?	5.50%	20.7%	15.2%	276%
73. Is the list with prices of services provided by PEs and PIs available on the website of the municipality or PI/PE website?	46.20%	56.6%	10.4%	22%

74. 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)?	13.10%	5.5%	-7.6%	-58%
75. Is there data on the website about the conducted public hearings/debates in the last 12 months (except for the budget)?	63.40%	72.4%	9.0%	14%
76. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?	9.70%	24.8%	15.1%	156%
77. Does the municipality regularly announce a call for leasing property in its possession?	86.90%	91.0%	4.1%	5%
78. Are the rental lease reports (commercial premises, agricultural land) published on the site?	14.50%	0.0%	-14.5%	-100%
79. Have the public calls/ results of the competition for media allocation in the last 12 months been published on the website?	66.90%	80.0%	13.1%	20%
80. Have the public calls/ results of the competition for the allocation for NGOs been published on the website?	60.00%	82.8%	22.8%	38%
81. Have the reports on the realization of NGO projects financed by the municipality been published on the website?	5.50%	10.3%	4.8%	88%
82. Has the municipality's development strategy been published on the website?	70.30%	77.9%	7.6%	11%
83. Is the annual plan of work of municipal administration published on the site?	1.40%	2.1%	0.7%	48%
84. Has a report on the work of the administration for the previous year been published?	14.50%	14.5%	0.0%	0%
85. Is the rulebook on internal organization and systematization of administration posted on the site?	62.10%	53.8%	-8.3%	-13%
86. Are there information on the activities of the Council for the implementation of Ethical codes and its contacts with citizens on the website?	0.00%	1.4%	1.4%	NA
87. Is there a code of ethics for employees and is it available on the site?	44.10%	42.8%	-1.3%	-3%
88. 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?	0.70%	0.7%	0.0%	0%
89. Are spatial plans published on the site?	81.40%	89.0%	7.6%	9%
90. Are the urban plans published on the site?	75.20%	78.6%	3.4%	5%
91. Is there a report on contact with lobbyists published on the web site?	0.00%	0.7%	0.7%	NA
92. Is there a daily or weekly schedule of the mayor's activities published on the website?	0.70%	0.7%	0.0%	0%

93. Has the Integrity Plan been adopted?	54.50%	53.8%	-0.7%	-1%
94. Has the Local anti corruption plan been adopted?	41.40%	70.3%	28.9%	70%
95. Has the mayor submitted a declaration of assets to ACAS?	89.00%	94.5%	5.5%	6%

Annex no. 6. The list of LTI 2015, 2017, 2019 & 2020 LTI 2019 indicators

Indices	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?			/	/
8. Have the results of the voting of the Assembly in the past 24 months been published on the website?				
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?			/	/
11. Is the agenda of the next session of the Assembly published on the website?				
12. Is the list of councilors published on the site?				

13. Is there data for citizens' contact with councilors published on the website?				
14. Is the local Official Gazette available on the site? **				
15. Do rules of procedure envisage public questions of the councilors to the mayor and/or the city council?				
16. Are the Assembly sessions broadcasted live or are there transcripts published, or footage from the sessions o broadcasted, or recordings of the whole session available on the website?				
17. Is the budget for the current year available on the site? **				
Is the budget published on 6 digits of the economic classification?	/	/	/	
18. Is the explanation of the budget available on the site?				
19. Is the budget published in machine readable format on the website?			/	/
20. Are 6-month and 9-month reports on budget execution available on the site?				/
21. 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?	/	/	/	
22. Are monthly reports (or cumulative monthly reports) on budget execution available on the site?				/
23. Is there a citizens' budget published and available on the site?				
24. Has a public debate on the budget been held - citizen surveys or consultation meetings? **				
25. Has a public call for public debate on the budget been published on the website?				

26. Has the report on the public debate on the budget been published on the website?				
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?				
29. Has the audit of the final budget account been published and reviewed at the session in the last 12 months?				
30. Have the financial plans of indirect budget users been published, with visible structure of funds intended for individual users?				
31. Does the municipal administration have a service center through which it provides all the services?				
32. Are the deadlines for issuing documents and instructions visible in the service center or at the premises of the administration? **				
33. Is there information about reporting of 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. Are there mechanisms for reporting corruption on the website?				
36. Is there a possibility on the website for citizens to report irregularities or violation of laws?				
37. Do (both/all) mechanisms for reporting allow anonymity?			/	/
38. 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?				
39. Are there inspections controlling lists on website?			/	/
40. Can a citizen monitor the status of his case on the website?				

41. Is there data on handling complaints, petitions and complaints?				
42. Are there contact information of local community councilors on the municipal website?				
43. 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?	/	/	/	
44. Are there defined permanent terms for mayor meeting with citizens?				
45. Are data on the contact of the mayor or deputy with the citizens visible?				
46. Are regular press conferences held (at least once a month) by the mayor?				
47. Did the municipality conduct a survey about satisfaction of the users of municipal administration services in the last four years?				
48. Did the municipalities provide requested information (FOI request) in time?***			/	/
49. No complaints were filed against municipalities in the last year due to ignoring requests for information of public importance?				
50. The municipality has no unresolved decisions of the Commissioner?				
51. Are information on the submission of a request for free access to information on the site?***				
52. Is information on the submission of a request for free access to information visible in the service center or administration premises?				
53. Is there a section on the website dedicated to public procurements?				

54. Is the data on the PP in accordance with the PP Law published on the website (competitions, documentation, changes, questions and answers ...)? **				
55. Are the information on the completed PP in the past 12 months published on the website or in the Information Booklet?				
56. Is the Information Booklet published on the site and updated in the last 3 months? **				
57. Does the Information Booklet contain the current annual plan of public procurement or link to the plan?				
58. Does the Information Booklet contain information about salaries of officials and employees?				
Does the Information Booklet contain rulebook on salaries of officials?	/	/	/	
59. Does the Information Booklet contain information on the services provided by the municipality and deadlines for their provision?				
60. Is there a special segment on the municipal website dedicated to public enterprises with data on PE?				/
61. Is there a special segment on the site dedicated to public institutions with PI data?				/
62. Have public competitions for the selection of directors of public enterprises been conducted?				
63. Has there been a public competition for the selection of the director of public institutions?				
64. Is the systematization of PE published on the website of municipality or PE?				
65. Is the systematization of PI published on the website of municipality or PI?				

66. Have the documents from the selection procedure of the director of PE been published on the website? **				
67. Have the documents from the procedure for the election of the director of the PI been published on the website? **				
68. Have the annual work plans and reports on the work of PEs been published on the website of the PE (or municipality)?				
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 annual work plans of PIs published on the website of public institutions or on the municipal website?				
71. Are the data on the number of employees in the municipality and the public institutions posted on the site?				/
72. 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? **	/	/	/	
73. Is the list with prices of services provided by PEs and PIs available on the website of the municipality or PI/PE website?				
74. 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)?				
75. Is 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?	/	/	/	
76. Does the report on public debates contain information on proposals made by citizens and the reasons for acceptance / refusal?				
77. Does the municipality regularly announce a call for leasing property in its possession?				
78. Are the rental lease reports (commercial premises, agricultural land) published on the site?				
79. Have the public calls/ results of the competition for media allocation in the last 12 months been published on the website?				
80. Have the public calls/ results of the competition for the allocation for NGOs been published on the website?				
81. 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?	/	/	/	
82. Has the municipality's development strategy been published on the website?				
83. 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?	/	/	/	
84. Has a report on the work of the administration for the previous year been published? **				
85. Is the rulebook on internal organization and systematization of administration posted on the site? **				

86. Are there information on the activities of the Council for the implementation of Ethical codes and its contacts with citizens on the website?				
87. Is there a code of ethics for employees and is it available on the site?				
88. 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?	/	/	/	
89. Are spatial plans published on the site?				
90. Are the urban plans published on the site?				
91. Is there a report on contact with lobbyists published on the web site?			/	/
92. Is there a daily or weekly schedule of the mayor's activities published on the website?			/	/
93. Has the Integrity Plan been adopted?				
94. Has the Local anti corruption plan been adopted?			/	/
95. Has the mayor submitted a declaration of assets to ACAS?				