WESTERN BALKAN
PAR MONITOR

2021/2022

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FOREWORD

By Maja Handjiska-Trendafilova

Strong and resilient institutions matter. Along with sound and inclusive policies and processes, skilled administrative capacities and technological enablers – they are crucial to *delivering better lives and livelihoods.* Their importance is paramount, especially in the current volatile, non-linear context and amidst the various societal concerns we face. And even more so in our Western Balkans (WB) region that still grapples with politicization, low level of public trust, weak administrative capacities, along with a wide range of accountability, transparency, efficiency, integrity, policy coherence and other governance challenges. Concerted and stepped-up efforts for more effective, agile and efficient governance are sorely needed, while the cost of inaction is simply too high in a region as ours.

A reform agenda as long-lasting and strenuous as the public administration one is - necessitates *broad-based alliances with an empowered and vibrant civil sector.* That is why, as ReSPA's Director, it brings me *immense pleasure to prepare the Foreword for the third WeBER's PAR Monitor Report.* Building on the Principles of Public Administration, the PAR Monitor is a *highly welcome and anticipated contribution* to better understanding the state of play and developments in the region's public administrations. Moreover, it represents *CSO's substantive contribution towards a meaningful and result-orient dialogue with governments.* With its wealth of data, evidence, insights and findings, it is both an essential, as well as a complimentary monitoring framework that *needs to be fully factored in shaping the public sector modernization agendas ahead.* Its *"citizens first" lenses* and approach are *crucial to gauge the legitimacy and impact of the reform agendas and public administration performance overall -* as the reforms need to ultimately meet citizens' expectations for effective public services and policies.

The *impact-changing potential of the data and findings of this report is tremendous* and needs to be fully leveraged and capitalized upon. While it will be for sure *a distinctive source of reference for shaping and deploying ReSPA's learning, networking and policy dialogue activities - its potential goes beyond.* Its value added is further

enhanced given the continuous nature of the monitoring process that enables grasping comparative trends and trajectories over time. I am confident that the report will *spur reflection* on the side of policymakers, the EU and other reform-minded partners and further *encourage the reform impetus*. Yet, for the public administration reforms (PAR) to be substantive, irreversible and transformative – *full ownership, political will and commitment at the national level is decisive*. The high-level regional Ministerial dialogue on PAR that we in ReSPA are honored to steer on a regular basis is an important contribution in this regard.
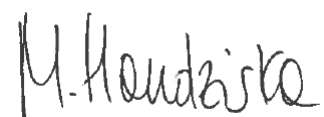
Greatly complementary to the "Citizens first" motto of WeBER, ReSPA motto for "Building Together Governance for the Future" puts the human capital within the public sector at the core of our activities. With both ReSPA and WeBER leveraging on the regional approach, we are determined to pursue even more resolute synergetic support activities for the benefit of the citizens of the region. Identifying and addressing common public sector organizational, technological and cultural challenges in a region with a shared EU integration vision remains a broad avenue for future joint collaborations between ReSPA and WeBER.

In ReSPA, we will continue to empower public servants by enhancing regional cooperation and knowledge transfer and providing tailor-made expertise and capacity-building tools to better equip them for addressing significant societal challenges. By ensuring their constant improvements, we will jointly work towards progress in professionalization and building public trust in the institutions and towards collaborative public administrations that are the backbone of all the reforms.

Efficient *public administrations remain a crucial and determining factor for more prosperous economies, more resilient societies, and for our accelerated EU integration*. That is why we are particularly *happy to step up our partnership under the new WeBER 3.0 action,* aimed at strengthening the role of civil society in monitoring and evaluating public services, promoting citizen participation in decision-making, and improving the efficiency and effectiveness of government institutions.

Dear readers,

Inviting us all to *deep dive into the rich analyses and assessments*, I do hope that the *findings and recommendations of this issue will inspire you* all as much as they inspired us in ReSPA and that they will *spark further actionable discussions about sustainable, citizens-oriented public sector reforms*.

M. Houdziska

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ABOUT WEBER2.0

The Western Balkan Civil Society Empowerment for a Reformed Public Administration (WeBER 2.0) is a three-and-a-half-year project primarily funded by the European Union implemented from December 2019 to June 2023.

Activities related to the development, preparation, printing, and publishing of the Western Balkan PAR Monitor 2021/2022 were implemented with the support of the "SMART Balkans – Civil Society for Shared Society in the Western Balkans" regional project implemented by Centar za promociju civilnog društva (CPCD), Center for Research and Policy Making (CRPM) and Institute for Democracy and Mediation (IDM) and financially supported by the Norwegian Ministry of Foreign Affairs (NMFA). Other activities of the WeBER 2.0 project were co-funded by the "Protecting Civic Space – Regional Civil Society Development Hub" project financed by the Swedish International Development Agency (SIDA) and implemented by the Balkan Civil Society Development Network (BCSDN); Royal Norwegian Embassy in Belgrade and German Marshall Fund of the U.S. through Balkan Trust for Democracy; Open Society Foundation in Serbia; Swedish International Development Agency in Albania; Ministry of Public Administration of Montenegro; Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) in Bosnia and Herzegovina.

WeBER 2.0 project is a direct continuation of the Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform (WeBER), a project implemented from 2015 to 2018 and funded by the European Union and co-funded by the Kingdom of Netherlands. Moreover, the third cycle of funding for the WeBER continuation has been approved by the European Commission in December 2022, and the Western Balkan Enablers for Reforming Public Administrations WeBER 3.0 project has begun in February 2023.

The initial WeBER project played a significant role in increasing the relevance, participation, and capacities of CSOs and the media in the Western Balkans to advocate for and influence design and implementation of public administration reform (PAR). WeBER 2.0 builds upon the previous WeBER's accomplishments and further enhances the engagement of CSOs in PAR by conducting evidence-based monitoring of PAR in line with EU requirements. It also aims to promote dialogue between CSOs and government at the regional, national, and local levels, strengthening participatory democracy and exerting pressure on governments to continue to implement administrative reforms and bring administrations closer to citizens. WeBER 2.0 encompasses a diverse range of activities that have collectively contributed to the fulfilment of the project's objective:

● Through the Regional WeBER Platform and its National PAR Working Groups, which gather more than 170 CSOs, WeBER facilitates dialogue on PAR for creating and implementing inclusive and transparent policy and contributes to the sustainability of administrative reforms to the benefit of the citizens.

● Through its research and monitoring work and production of PAR Monitor reports, WeBER 2.0 has created and gathered evidence for a meaningful dialogue.

● Through the "Mind (y)our reform!" online regional citizens' campaign and platform for collecting and sharing citizens' views on PAR and their experience with administrations (https://citizens.par-monitor.org/), WeBER 2.0 has collected citizens' input to influence authorities, thus contributing to the creation of more citizen-oriented public administrations.

● By piloting the monitoring approach to the mainstreaming of PAR in sectoral policies and equipping CSOs with the capacities to do it, WeBER 2.0 helped improve the embeddedness of PAR across the region's administrative systems, thus increasing the sustainability of these reforms.

● Through a small grants scheme, WeBER 2.0 increased the capacity of 31 CSOs in the Western Balkans to participate in PAR.

● Through the CSO PAR Knowledge Centre, WeBER 2.0 provides a searchable database of analyses and reports on PAR produced by the region's civil society.

WeBER 2.0 products and further information about them are available on the project's website at www.par-monitor.org.

WeBER 2.0 is implemented by the Think for Europe Network (TEN), composed of six EU policy-oriented think tanks in the Western Balkans:

EUROPEAN POLICY CENTRE
Project Coordinator
European Policy Centre - CEP
Belgrade

European Policy Institute. Skopje
European Policy Institute - EPI
Skopje

FOREIGN POLICY INITIATIVE BH
Foreign Policy Initiative - FPI BH
Sarajevo

TEN Think for Europe Network

GROUP FOR LEGAL AND POLITICAL STUDIES
Group for Legal and Political Studies - GLPS
Pristina

institut alternativa
Institut Alternative
Podgorica

Institute for Democracy and Mediation Instituti për Demokraci dhe Ndërmjetësim
The Institute for Democracy and Mediation - IDM
Tirana

By partnering with the European Policy Centre (EPC) from Brussels, WeBER 2.0 has ensured EU-level visibility.

EPC
EUROPEAN POLICY CENTRE
European Policy Centre - EPC
Brussels

Who do we cooperate with?

Building upon the foundations of the original project, WeBER 2.0 has fostered and sustained successful collaborations with key regional and national stakeholders, ensuring the long-term viability of PAR in the Western Balkans. In each of the countries in the region, our project partners have maintained active engagement with PAR ministries and offices, serving as valuable project associates. Through the WeBER Platform, a regional forum, and the National PAR Working Groups, we have expanded our cooperation with over 170 local and regional CSOs. At the regional level, our partnership with the Regional School of Public Administration (ReSPA) has endured, enabling us to exchange knowledge and expertise. Furthermore, we have reinforced our ties with the Southeast Europe Leadership for Development and Integrity (SELDI) coalition, strengthening our collective efforts in promoting good governance and integrity. We are proud to mention our continued collaboration with the Support for Improvement in Governance and Management initiative (SIGMA), a joint venture of the EU and OECD. Through its regular assessments, SIGMA provides invaluable insights and feedback on the progress of Western Balkan countries in implementing the Principles of Public Administration. These assessments play a crucial role in the period leading up to the EU accession, informing policymakers and guiding the region towards effective governance practices.

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EXECUTIVE SUMMARY

The PAR Monitor 2021/2022 is the result of monitoring work performed during 2022 by the Think for Europe Network, and it represents a compilation report of all the key findings for the entire Western Balkan region in six areas of PAR defined by the SIGMA Principles of Public Administration. Furthermore, as the third systematic PAR monitoring in the region by civil society, this report offers benchmarking between WB administrations and comparison with the baseline 2017/2018, and 2019/2020 monitoring cycles.

PAR Monitor reports are based on a comprehensive methodological framework designed by the WeBER research team, combining quantitative and qualitative evidence sources. With the EU-SIGMA Principles as the building blocks of monitoring work, PAR Monitor reports complement the same type of work of the SIGMA/OECD and the European Commission and offer citizen and civil society perspectives on these Principles. Together with this comparative regional report, the PAR Monitor package consists of six national reports, each including findings on the 23 compound indicators to monitor a selection of SIGMA Principles.

In line with the WeBER mission, these monitoring exercises are driven by the necessity to strengthen domestic, bottom-up pressure for PAR from the civil society in the region, especially from the view of keeping demand for this reform ongoing in the event of loosening of the EU's conditionality in PAR domain eventually. All findings from this report, PAR Monitor 2019/2020, and the baseline PAR Monitor 2017/2018 can be accessed and compared via the Regional PAR Scoreboard at https://www.par-monitor.org/regional-par-scoreboards/.

Strategic Framework for PAR

Resembling the previous two PAR Monitor editions, findings suggest that all administrations involve CSOs and the public in developing strategic PAR documents to a certain degree. Nevertheless, practices regarding meeting basic consultation requirements vary between (or within) administrations. Overall, consultations were opened to the wider public for all or at least some of the key strategic PAR documents adopted in the Western Balkans countries. On the other hand, consultations with CSOs only sometimes occur in the early phase of the development of these documents, except for Montenegro and Serbia in this cycle. In both administrations, responsible authorities involved CSOs in consultations for all documents from the beginning of the design phase. Serbia and Montenegro also stand out in terms of fully open invitations for CSOs to participate in the consultations for strategic PAR documents. On the other hand, civil society actors in Albania and North Macedonia, who participated in developing PAR strategies, were provided with complete information and necessary documents in advance. However, this was not universally the case in other administrations.

When it comes to civil society involvement in the PAR monitoring and coordination structures, administrative bodies for coordination and monitoring, in general, do not foresee an involvement of CSOs, apart from Serbia, where six CSOs are full-right members of the Inter-ministerial Project Group, together with Serbia's association of cities and municipalities. On the other hand, the involvement of CSOs is foreseen in the political-level bodies in Albania and Montenegro; however, still only formal in the case of the latter and more substantial for the former. Moreover, despite the formal membership of the association of cities and municipalities in the PAR Council of Serbia and newly introduced possibilities for civil society to participate in the PAR Council's sessions once a year and upon invitation, there is no standing participation of broader civil society in the political-level PAR dialogue. Overall, the format of meetings of PAR coordination and monitoring bodies does not fully allow for genuine contribution and feedback.

Policy Development and Coordination

In this area, WeBER monitors the transparency of governments' reporting and decision-making, the use of civil society analyses and evidence in policymaking, and the inclusiveness of policymaking practices through public consultations.

As in the past monitoring cycles, governments in the region still need to publish performance information on their work adequately. In every Western Balkans administration, public availability of information on the government's work is low, with the situation particularly worrying in Albania, North Macedonia, and Kosovo when it comes to the regularity of publishing annual work reports.

The same applies to civil society's perception of the governments' planning and reporting practices. Surveyed CSOs in all six WB administrations do not think there is a direct connection between the work plan of governments and actual developments in policy areas. At the same time, they hold that governments do not regularly report to the public on the progress in achieving the objectives set in their work plan and that ministries irregularly publish monitoring reports on sectoral strategies. In addition, most respondents disagree that the governments' reports incorporate updates on the progress in the EU accession process.

Furthermore, in no administration of the region CSOs consider government decision-making as transparent, as evidenced by nearly half of them who do not see this process as transparent (49%) and almost a third who are neutral (30%). At the same time, governmental sessions are not transparent enough, meaning governments in the region do not make entire documentation from their sessions fully public. In four administrations, government do not publish most of the observed items regularly (agenda, session minutes, press release, adopted acts). North Macedonia's Government emerged as the most transparent, with regular publishing of agendas and minutes online, but adopted acts are only published in the Official Gazette, which requires a subscription.

Regarding the use of evidence provided by think tanks, independent institutes, and other CSOs in policy development, the assessment remains low throughout the region. Although occasional referencing to CSOs research, or even regular in the case of Serbia and North Macedonia, is found in the official policy documents (e.g., strategies, programmes, action plans), the frequency of referencing external evidence is significantly lower in *ex-ante or ex-post policy* analyses. For instance, no reference was found in Kosovo in the sampled documents. Regarding CSOs' perception, less than 30% of respondents in Albania, BIH, and Serbia report that government institutions invite their organisations to prepare or submit policy papers, studies, or impact assessments. Results are slightly better in North Macedonia and Montenegro, while in Kosovo, more than 50% of surveyed CSOs said that their organisation is frequently invited. On the other hand, most of them do not believe that ministries consider proposals from civil society during the working groups for policy development.

Regarding inclusiveness and openness of policymaking, most of the observed draft laws and policy documents adopted in WB countries were subjected to consultation. However, the early phase of consultations, before the production of drafts, is still a rarity, with policy authorities in Serbia and Kosovo being the only noteworthy examples. Regarding CSOs' perception, only around 30% of respondents in Albania, BIH, and Kosovo consider formal consultation procedures to be applied consistently, and perception is much lower in the rest of the region. Furthermore, when CSOs were asked if relevant ministries provide written feedback to consultees on their inputs, a dominant perception in the entire WB is that this happens rarely or never (50%).

Public Service and Human Resource Management

In Public Service and Human Resource Management, WeBER focuses on the public availability of information related to public service, hiring of temporary staff, transparency and merit character of civil service recruitment, selection and the position of senior civil servants, and civil service integrity measures.

Insufficiency and irregularity of public reporting on the civil service and its employees still need to be addressed in the region. At the same time, in very few cases, governments collect and publish data on the structure of employees, broken down by number, institution, position/rank, and other elements. Publishing such data in an open format is consequently almost inexistent. The only positive outlier is the Civil Service Agency of BIH institutions, which uploads this information online through an easy-to-navigate section on its portal.

Temporary engagements remain an unresolved issue in the region. The number of such engagements is not strictly limited (except in Serbia), and the selection criteria often do not exist in practice, save for Kosovo, where such requirements are either the same as for regularly employed or more demanding and duration is limited in time. At the same time, the engagement process is not transparent – in the entire region, recruiting institutions either do not publish competition announcements or do it selectively. From the point of view of civil servants, less than a third (28%) believe that temporarily hired persons are selected based on qualifications and skills, often or always.

Fairness, openness, and transparency of recruitment to civil service remain low to moderate. On the positive side, information about public competitions is mostly made publicly available. Nevertheless, important deficiencies in the entire region, such as no options for candidates to supplement missing documents during application processes or lack of full public disclosure of outcomes of recruitment processes, remain present. Moreover, the public and civil servants still hold that meritocracy principles and equal opportunities do not fully permeate these processes. It is compelling that 68% of the population in WB holds that civil servants are not recruited through public competitions that are based on merit.

When it comes to acting senior managers, there are either no limitations for their appointment or the set deadlines are not respected. The scope of uncompetitive appointments to senior civil service positions remains worrisome in Serbia, Montenegro, and North Macedonia, as it accounts for all or most appointments annually. Political interception into recruitment to senior positions is still highly present in Serbia and Montenegro, where procedures allow governments' personnel committees to alter the outcomes of selection procedures, and in North Macedonia, where public officials directly select top civil service managers. In addition, 60% of surveyed civil servants in WB believe that their senior colleagues are, often or always, appointed thanks to political support and just a third that they never or rarely get dismissed for political motives (32%).

Finally, legal and policy frameworks for public sector integrity are in place in all WB administrations except BIH. Region-wide, legal frameworks cover whistle-blower protections, ethical guidelines, and requirements to disclose assets. Nevertheless, surveyed civil servants in the region are generally pessimistic about the effectiveness of integrity measures, with only 12% stating they would feel protected as whistle-blowers.

Accountability

In the Accountability area, WeBER monitors how consistently is the right to access public information is applied in practice. To this end, WeBER looks at the experiences CSOs in using freedom of information rights and analyses the proactive informing of the public through the websites of sampled public authorities.

Civil society's perception of the quality of legislation and practice of access to public information did not signal major improvements over the monitoring cycles. In all WB, 25% of surveyed CSOs, on average, agreed that public authorities record sufficient information to enable the public to fulfil to freedom of information right. However, the perception of the legal framework is only slightly better, with around 30% agreeing that the national legislation prescribes adequate exceptions to the public character of information produced by public authorities.

Furthermore, though CSOs largely hold that public authorities provide information within prescribed deadlines, and in a requested format, the relative or absolute majority in every administration, apart from Albania, disagreed that sanctions prescribed for violating freedom of information lead to adequate consequences. In addition, it is noteworthy that less than one-third of surveyed CSOs say that portions not containing personal data are released when requesting access to information that contains personal data material (29%).

In proactive informing, public authorities in the region fare better in publishing complete and up-to-date than easily accessible and citizen-friendly information on their websites, as in previous monitoring cycles. A significant portion of information from their work remains presented without using simple, easy-to-understand language or presentation. Overall, the websites of public authorities contain complete, up-to-date, easily accessible, and citizen-friendly information on the scope of work and contacts. However, the key issues remain the same - proactive informing on annual budgets and work reports is frequently lacking. On the other hand, information on contact points for cooperation with civil society and other external stakeholders is available and fully complete in Montenegro and Bosnia and Herzegovina only. When it comes to open data, a general conclusion is that public authorities in the region rarely share data in open formats, except in North Macedonia, where more than half of sampled authorities proactively pursued open data policy in the 2021/2022 monitoring cycle.

Service Delivery

WeBER's approach to monitoring administrative service delivery is citizen-oriented, relying largely on public and civil society perceptions about the availability and accessibility of services, but also on a review of websites of frequent service providers.

Citizens across the region consider the government's efforts to simplify administrative procedures less common in 2022 than in 2020. With 53% of them agreeing there were such efforts, perception is lower for five percentage points compared to the previous PAR Monitor. However, majority of WB citizens believes it has become easier to deal with administrative procedures in the past two years (52%) and that the time necessary to obtain administrative services has decreased (53%).

Public perception survey data further shows that around 67% of the WB population is aware of the e-service - seven percentage points more than in 2020 - signalising that digitalisation is slowly expanding. With the increase in awareness of the existence of e-services came an increase in preference for using them and usage rates. Namely, the portion of those who used e-services sometimes or often increased by ten percentage points, from 39% in 2020, reaching almost one-half in 2022. Also, about 45% of citizens in WB agree on having the possibility to give an opinion on the quality of administrative services, which slightly fewer compared to the previous survey instalment. In practice, administrative service providers rarely reveal reports on user feedback; however, governments in Albania and Montenegro commissioned nationwide surveys on user satisfaction, for which reports were made public by the government or donor agency.

As in previous monitoring cycles, the critical view of CSOs in the region on the accessibility of administrative services to vulnerable groups directly opposes the favourable public opinion on service delivery in general. Except for opinions regarding the possibility of choosing channels for accessing services (such as digital or face-to-face), CSOs express widespread negative views on the adequacy of territorial distribution of service providers and on how adapted service provision is for vulnerable.

Finally, regarding online availability of service-related information, regional practices continue to vary. Administrative service providers publish information on contact points, rights and obligations, and fees. What is still lacking is information on basic procedures and how to access services. Moreover, not all administrative services are digitised. Nevertheless, the first examples of open data have emerged, most notably on vehicle registrations in Albania.

Public Financial Management

In the area of Public Financial Management, WeBER monitors the availability of budgetary data along with external communication practices. For example, official websites are reviewed to assess the transparency and accessibility of annual budget data, how governments communicate with citizens about public internal financial control, the availability of public procurement information, and the degree to which information is publicly available about the work of supreme audit institutions.

Ministries of finance regularly publish annual state budgets, and various in-year budgetary reports are publicly available. In Montenegro and Serbia, mid-year reports remain unpublished, and in this cycle, in North Macedonia too. Public availability of non-financial performance information has increased, with four administrations disclosing some performance data, except for Kosovo and Montenegro. Annual budgetary data is largely available in some open data formats, but all administrations still need to strictly follow the open data policy.

On public internal financial control, transparency has only slightly improved in Montenegro and Serbia. Ministries of finance in the region publish annual consolidated reports on PIFC; however, they still need more proactivity regarding the publication of internal audit quality reviews and more engagement with the public. In addition, line ministries scarcely disclose basic information on financial management and control online, although slight improvements are observed.

Additionally, central procurement bodies in WB regularly publicise reports on annual public procurement implementation, except in BiH. The main procurement outcomes are generally reader-friendly, and report documents are easily accessible. E-procurement portals offer different user-friendly functions, but practices vary. Ministries in the region publicise annual procurement plans more regularly than reports, with those in Montenegro and Serbia being the most diligent. The public procurement portal in Serbia is the only one to offer clear options for exporting some open data; however, the decision of the Public Procurement Agency in Albania to publish 2010-2023 procurement data in open format stands out as a good practice in this PAR Monitor.

Once more, external communication of supreme audit institutions in the region, and their practices of engagement with the public, receive high assessments, especially in Bosnia and Herzegovina and North Macedonia. Since the 2019/2020 PAR Monitor, all institutions have adopted communication strategies and have kept job positions for proactive communication with stakeholders. In addition, citizen-friendly summaries of completed audits are regularly published in four administrations. Moreover, supreme audit institutions continue to explore and test new communication tools and products for informing the public about their work. However, they still need to embrace social media more openly or start engaging in data visualisations.

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Third PAR Monitor shows that governments in the region still face challenges and drawbacks when it comes to meeting citizens' needs. A similar trend of results since the baseline monitoring tells that, except for service delivery and public finance management topics covered by PAR Monitor, governments are still primarily focused on internal reform aspects, with little to no human-centricity in PAR agendas. Yet, as always, the newest monitoring findings have brought forward some positive developments and practices, as well as those to avoid, presented in the next sections of this report.

LIST OF ABBREVIATIONS AND ACRONYMS

ACC	Accountability
ADISA	Agency for the Delivery of Integrated Services Albania
ALB	Albania
ALSAI	Supreme State Audit Institution of Albania
APIGP	Action Plan for Implementation of Government Programme
BIH	Bosnia and Herzegovina
CAF	Common Assessment Framework
CASI	Computer-assisted self-interviewing
CATI	Computer-assisted telephone interviewing
CAWI	Computer-assisted web interviewing
CHU	Central harmonisation unit
CoM	Council of Ministers
CSA	Civil Service Agency
CSL	Civil Service Law
CSO	Civil Society Organization
DoPA	Department of Public Administration
ENP	European Neighbourhood Policy
ERP	Economic Reform Programme
EU	European Union
EC	European Commission
FAQ	Frequently asked questions
FMC	Financial management and control
FOI	Freedom of Information
FS	Fiscal Strategy
GAWP	Government Annual Work Plan
GDDS	General data dissemination system
GFFBP	Government Framework of Fiscal Balance and Policies
GP	Government Programme
GSB	Government Service Bus
HR	Human Resource
HRM	Human Resource Management
HRMA	Human Resource Management Authority
HRMIS	Human Resource Management Information Systems
HRMS	Human Resource Management Service
IA	Internal Audit
IMPG	Inter-Ministerial Project Group
IPA	Instrument for Pre-Accession
IPI	Investment Intervention Plan
ISO	International Organisation for Standardisation
KNAO	National Audit Office of Kosovo

KS	Kosovo
LGAP	Legal frameworks on general administrative procedures
MBP	Medium Term Budget Programme
MISA	Ministry of Information Society and Administration
MKD	Macedonia
MNE	Montenegro
MPALSG	Ministry of Public Administration and Local Self-Government
MTWP	Medium-Term Work Programme of the Council of Ministers
NAIS	National Agency for Information Society
NDS	National Development Strategy
NGO	Non-governmental organisation
NPAA	National Programme for the Adoption of Acquis of the EU
NPEI	National Plan for European Integration
NPISAA	National Programme for Implementation of the Stabilisation and Association Agreement
NSDI	National Strategy for Development and Integration
OBS	Open Budget Survey
OECD	Organisation for Economic Co-operation and Development
PAR	Public Administration Reform
PARCO	Public Administration Reform Coordinator's Office
PDC	Policy development and coordination
PER	Programme of Economic Reforms
PFM	Public Financial Management
PIFC	Public Internal Financial Control
PPS	Public Policy Secretariat
PSHRM	Public Service and Human Resource Management
RIA	Regulatory impact assessment
RS	Republic of Srpska
RTI	Global Right to Information Rating
SAI	Supreme Audit Institution
SCS	Senior Civil Service/Senior civil servants
SD	Service delivery
SFPAR	Strategic framework for public administration reform
SIGMA	Support in Improvement in Governance and Management
SRB	Serbia
VAT	Value-added tax
WB	Western Balkans
WCAG	Web Content Accessibility Guidelines
WeBER	Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform
WeBER2.0	Western Balkan Civil Society Empowerment for a Reformed Public Administration

CONTENTS

I.
Introduction

PAR Monitor three cycles in – continuing relevance of public administration reform monitoring for the Western Balkans' EU integration

The WeBER initiative embarked on monitoring of public administration reforms (PAR) in the Western Balkans (WB) in 2016, publishing the first, baseline PAR Monitor in 2018. Since then, the PAR Monitor has become an increasingly important source of credible and evidence-based findings on the region's administrations' successes and challenges, particularly concerning their openness, transparency, and accountability to the citizens. The PAR Monitor has thus helped strengthen the role of civil society in monitoring and informing PAR policies in the region, as well as the Commission's annual reports on each candidate and potential candidate country in the WB. This new edition – PAR Monitor 2021/2022 – is the result of the third consecutive biennial monitoring cycle implemented by the WeBER research team, using the state-of-the-art methodology developed by the civil society for the civil society, relying on the EU principles of good administration.

With each new step in the enlargement policy, the Commission has reaffirmed PAR as an essential area for achieving EU membership. In its communication *Enhancing the accession process - A credible EU perspective for the Western Balkan* from February 2020, which calls for more credibility, political steering, and predictability of the enlargement process, it has proposed clustering of negotiating chapters and reform areas, placing PAR in Cluster 1 – *Fundamentals*, together with rule of law, economic governance, and the functioning of democratic institutions.[1] Thus, PAR found its place within the key group of reform areas whose assessment determines the overall progress in the EU integration process.

The EU's framework for defining, guiding, and assessing administrative reforms in the context of enlargement remains embedded in the *Principles of Public Administration*, first published in 2014. Also known as the "SIGMA principles" (since they are assessed regularly by the OECD's SIGMA programme),[2] they offer a roadmap for EU candidates and potential candidates to follow and comply with in PAR while working to become successful EU member states. The European Commission (EC) and SIGMA worked together to define the scope of these principles of public administration,[3] structured around six key areas:

1. strategic framework for public administration reform

2. policy development and coordination

3. public service and human resource management

4. accountability

5. service delivery

6. public financial management

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1   "Fundamentals" cluster includes Chapter 23 - Judiciary and fundamental rights, 24 - Justice, Freedom and Security, economic criteria, functioning of democratic institutions, public administration reform, as well as chapters 5 - Public procurement, 18 – Statistics, and 32 - Financial control. In: *European Commission, Enhancing the accession process - A credible EU perspective for the Western Balkans*, February 2020, available at: https://ec.europa.eu/commission/presscorner/detail/en/IP_20_181.

2   SIGMA (Support for Improvement in Governance and Management) is a joint initiative of the OECD and the EU, principally funded by the EU. Its key objective is to strengthen the foundations for improved public governance, hence supporting socioeconomic development in the regions close to the EU by building capacities in the public sector, enhancing horizontal governance, and improving the design and implementation of public administration reforms, including proper prioritisation, sequencing, and budgeting. More information is available at: http://www.sigmaweb.org/.

3   Principles of Public Administration for EU candidates and potential candidates: https://bit.ly/395diWq. A separate document entitled The Principles of Public Administration: A Framework for ENP Countries has been developed for the countries falling under the European Neighbourhood Policy (ENP): http://bit.ly/2fsCaZM.

Nine years since the publication of the Principles, SIGMA and DG NEAR initiated their review, reflecting on the implementation feedback and introducing significant novelties. For example, principles addressing elements of multi-level governance have been introduced, whereas in the past the framework mainly concerned central governance level. At the time of the finalisation of this report, the revised Principles were still being finalised, following an online consultation process with external stakeholders that closed in February 2023. PAR Monitor 2021/2022 entirely relies on the 2014 framework of Principles, also valid during the past cycles of WeBER monitoring.[4]

Since its inception, WeBER[5] adopted the Principles of Public Administration as the main building block of its PAR Monitor. The main reasons for such a decision remain the same to date. First, the Principles are a common denominator for PAR in the region, allowing for regional comparisons, peer learning and peer pressure among the WB administrations. Second, they guide the reforms in the region towards the fulfilment of EU membership conditionalities, thus helping their transformation into capable future EU member states.

That said, WeBER's monitoring approach lies from the onset in the understanding that until the EU accessions of the WB, SIGMA/OECD will be engaged in the region, relying also on the hard EU conditionalities as an external driving force of reforms. Until that time, local civil society can deliver complementary findings in their focus areas, but also gradually expand the scope of its monitoring and seek ways to continue with this process in a more holistic way in the post-accession period, when SIGMA will no longer have the mandate to perform external assessments of PAR. By that time, local civil society actors should have a developed approach in identifying critical areas of intervention on which to focus their monitoring efforts. As previous enlargement rounds have demonstrated, without the EU conditionality, and regular external monitoring and assessment of reforms, countries can easily backslide in their reforms post-accession, effectively moving away from good governance standards.

To that end, WeBER's rationale remains as relevant as when WeBER was initiated - that only by empowering local non-governmental actors and strengthening participatory democracy at the national and local levels can put pressure on governments to implement often painful and inconvenient administrative reforms in the post-accession period. WeBER team has continually worked over the years on preparations for such a scenario, in which local civil societies, as domestic accountability seekers, lead and initiate PAR demand, and closely and credibly observe PAR in WB. Range of WeBER support to regional civil society in the previous period is broad and it included multiple awareness raising and capacity building initiatives. Additionally, this support meant the involvement of CSOs in the PAR monitoring process and the creation of the PAR monitor reports, mentoring of local CSOs who monitor local governments and regular consultations with CSOs on the implementation of the PAR Monitor and national and regional PAR developments. Also, we have introduced novel civil society approaches to PAR such as piloting monitoring of mainstreaming PAR in different policy sectors,[6] and the creation of online portals through which citizens are invited to share their experiences in interacting with public administrations.[7]

The outbreak of the COVID-19 pandemic in 2020, still ongoing during the third monitoring cycle, was again an additional reminder of the importance of well-functioning public administrations able to exercise primary functions of serving the needs of citizens. This global, outstanding circumstance has brought to the fore the issue of public administrations' ability to adapt and go the extra mile in delivering services digitally, enabling contactless, yet unhampered communication with citizens, and providing teleworking options for civil service employees.

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4   For more information on the process of revision of SIGMA Principles of Public Administration please visit https://www.sigmaweb.org/publications/principles-public-administration-consultation.htm.
5   Starting from December 2019, WeBER is being implemented under the title "WeBER2.0 - Western Balkan Civil Society Empowerment for a Reformed Public Administration".
6   Regional and national reports on mainstreaming the Principles of Public Administration into policy sectors available at: https://www.par-monitor.org/mainstreaming-principles-of-public-administration-into-policy-sectors/.
7   The citizens portals for the six administrations are available at: https://citizens.par-monitor.org/.

However, unlike the previous round for 2019/2020, PAR monitoring work for 2021/2022 was less affected by the measures for mitigating coronavirus spread in the region, meaning that communication and coordination within the WeBER research team as well as research work (team meetings, focus groups, interviews) were conducted both in virtual space and in person. Effects that the COVID-19 pandemic had on the operations of public administrations, for the better or worse, are highlighted in the research findings, where applicable.

The methodological approach of the PAR Monitor is given in the methodology appendix of this report, that provides details on the OECD/SIGMA principles of PA as regional framework for monitoring, rationale behind selecting principles, WeBER indicator design, the PAR Monitor package, quality assurance procedures applied, monitoring timeframe and limitations of WeBER's scope and approach. The WeBER team did not make methodological changes in the 2021/2022 monitoring cycle, the last, notable methodology revisions being from the PAR Monitor 2019/2020 (see *Methodology Appendix* for details). The 2021/2022 monitoring was conducted between January and November 2022 and, for the most part, focused on practices of administrations in the region implemented in 2021 and the first half of 2022.

Finally, this report follows a standard outline established for the two previous PAR Monitors and is divided into six chapters: 1) strategic framework for public administration reform, 2) policy development and coordination, 3) public service and human resource management, 4) accountability, 5) service delivery, and 6) public finance management. Each chapter follows an identical structure. In a brief chapter introduction, the scope and relevance of a given area for PAR overall is provided. The following section contextualises this analysis by providing a brief overview of the regional state of play in the observed area. The state of play sections in this PAR Monitor edition largely rely on the latest European Commission progress reports for the Western Balkans, but also on the latest SIGMA Monitoring reports published in 2021.

Following the state of play section, the report clarifies WeBER's monitoring focus, describing the project's methodological steps in greater detail and illustrates the structure of each principle and indicator, including methods of data collection and analysis. A crucial section of each chapter is the presentation of comparative PAR Monitor findings, the result of thorough and methodologically robust regional research processes. Finally, each chapter finishes with a succinct summary of the key findings for the PAR area in question.

The report ends with a conclusion chapter which provides the "big picture" of the findings and trends observed across the region and between the three monitoring cycles. As per usual approach to compiling regional, comparative PAR Monitor, this report offers no specific recommendations and does not seek to explore practices of individual administrations in depth. Rather, the six national PAR Monitor reports, which elaborate the findings for each administration in detail, extract actionable recommendations for responsible government authorities and provide an overview of track record in fulfilment of past PAR Monitor recommendations. Finally, in addition to noting the main commonalities and trends which emerge across the WB, the conclusion of the regional report also discusses how this information could be interpreted regarding the EU accession progress of these administrations. It is the authors' hope that such conclusions will continue to inspire relevant regional and EU-level actors to plan their policies, messages, and actions and encourage effective reform in the coming years.

II.
Strategic Framework for Public Administration Reform

The wide scope of public administration reform (PAR) as a policy area means that it extends to a multitude of institutions and processes. As these processes and institutions are, as a rule, of a horizontal character, spanning across different government bodies, all changes required by PAR require implementation across administrative systems. The Principles of Public Administration, with its six areas, clearly demonstrate the width and depth of PAR. Five of these areas tackle specific thematic segments or groups in administrative reform, while a separate chapter precisely tackles the necessity of strategic and institutional frameworks for the design and implementation of this policy.

A proper strategic framework is important because changes in an administrative system need to be planned based on a profound understanding of its current functioning, with a reliance on regularly collected data from the policy implementation. The priorities and objectives of PAR policies need to be made clear, along with performance indicators, targets, and responsibilities. Policies also need to take into consideration the voices of external stakeholders, such as CSOs, as well as facilitate input from the public. A sound strategic framework for PAR also needs to ensure the regular monitoring of its implementation, to ensure good coordination between the multitude of institutions on which its results depend, and to include regular reporting and periodical evaluations to ensure the creation of feedback loops necessary for maintaining evidence-based and relevant policies.

II.1 State of play in the region and developments since 2020[8]

The core strategic framework for PAR has been established in all administrations in the region. However, since the PAR Monitor 2019/20, almost all strategic documents formally expired, so this framework needed to be updated and revised across the region. Renewed strategic frameworks were adopted in the majority of administration, while in other cases, they are in the drafting stage or waiting for final approval. Namely, in 2021 and 2022, new PAR strategies were adopted in Serbia, Montenegro and Kosovo, while in Albania and North Macedonia, new PAR strategies are expected to be adopted soon. Regarding BiH, although PAR Strategy formally expired at the end of 2022, its validity was effectively extended until 2023 through the implementation of the Action Plan. In terms of the PFM strategic framework, five countries adopted new documents in 2021 or 2022, while in Albania, the adoption of the new PFM Strategy is expected in 2023. The table below lists currently effective strategies and action plans regarding PAR and PFM.

Table 1: The latest strategic documents and action plans on PAR and PFM in the region

	PAR STRATEGY	TIMEFRAME	ACTION PLAN	PFM STRATEGY	TIMEFRAME	ACTION PLAN
ALB	expired[9]	2015-2020 (extended until 2022)	×	expired[10]	2019-2022	×
BIH	in effect	2018-2022 (extended until 2023)	2021-2023	in effect	2021-2025	×
KOS	in effect	2022-2027	×	in effect	2022-2026	2022-2024
MKD	expired[11]	2018-2022	×	in effect	2022-2025	2023
MNE	in effect	2022-2026	2022-2024	in effect	2022-2026	×
SRB	in effect	2021-2030	2021-2025	in effect	2021-2025	2021-2025

8   The state of play is largely based on the European Commission's reports published in 2022 and SIGMA Monitoring reports for 2021 (which are therefore not cited individually). Reports of the European Commission are available at: https://ec.europa.eu/commission/presscorner/detail/%20en/ip_22_6082 (last accessed on 1 February 2023). SIGMA Monitoring reports are available at: https://www.sigmaweb.org/publications/monitoring-reports.htm (last accessed on 1 February 2023)

9   A new PAR Strategy in Albania is currently being developed.

10   At this moment, the consultative process for developing a new PFM Strategy in Albania has not yet started.

11   SIGMA has sent its opinion on the draft version of the PAR Strategy in North Macedonia, and it is expected that Strategy will be adopted in May 2023.

Apart from PAR and PFM strategies and programmes, strategic frameworks entail other documents directly targeting certain PAR areas. For instance, the strategic framework of PAR in Albania is based on five strategic documents. Besides the Cross-cutting PAR Strategy and PFM Strategy, it is comprised of the Decentralisation Strategy, the Anti-corruption Strategy and the Digital Albania Strategy. According to the last SIGMA reports, together with Albania, North Macedonia was the only country that had valid and complete strategic frameworks covering all key areas of PAR. However, taking into account that a lifetime of strategic frameworks in Albania and North Macedonia mostly expired in 2022, new documents have to be adopted soon. It is important to note that Serbia's PAR strategic framework was completed soon after the SIGMA assessment, with the adoption of the missing Programme for Improving Public Policy Management and Regulatory Reform in November 2021.[12]

Regarding BiH, aside from PAR Strategy 2018-2022 and Action Plan, the strategic framework was completed by adopting the Strategy for Improving Public Financial Management in the Institutions of BiH for the period 2021-2025. Together with the state-level PFM Strategy, there are also separate strategies for two BiH entities and Brčko District. However, the fact that BiH's PAR Strategy expired at the end of 2022 and the development of the new strategic document has not started yet – even though its Action Plan is still being implemented in 2023 – represents a shortcoming that needs to be addressed soon as possible.

After 2021 passed without a strategic framework in Kosovo and Montenegro, new PAR and PFM strategies have been adopted in both countries. Namely, at the very end of 2021, the Montenegrin government adopted a new PAR Strategy for 2022-2026 and Action Plan for the first two years. European Commission emphasised that civil society organisations were actively involved in the process of developing the strategic framework.[13] Regarding the new PAR Strategy in Kosovo, which was adopted in November 2022, it merges previous strategies on modernisation of the administration, on policy planning and coordination, and on better regulation into one umbrella framework.[14]

Regarding the PAR coordination and monitoring structures, although bodies at both political and administrative have been established in most of the countries, insufficient political support for the reform process remains a chronic problem throughout the region. Only in BiH the Commission clearly pointed out that it is necessary to establish a political decision-making body which would steer reforms.[15] In Kosovo, for instance, the Ministry of Internal Affairs, which is competent for PAR coordination on a technical level, lacks the capacity to perform its function effectively.[16] Similar applies to North Macedonia's Ministry of Information Society and Administration, which department for PAR lacks human resources for years.[17] On the other hand, political support for PAR provided by PAR Council in Montenegro and Serbia is positively assessed by the Commission. Nonetheless, Serbia's PAR Council did not meet on a regular basis, and after two sessions in 2021, it did not meet again until January 2023.[18]

Finally, one of the biggest issues regarding PAR across the region is still related to financial sustainability. In other words, substantial reliance on donor funding prevents the reform from becoming self-sustainable. However, there are also some positive developments in few countries. As an example, there was a noticeable increase in the annual budget allocation for PAR in North Macedonia.[19] In addition, the new PAR Strategy in Montenegro is linked to annual budgeting and the mid-term budgetary framework,[20] which significantly contribute to the financial sustainability of PAR, although donor funding still represents an important element.

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12 Programme for Improving Public Policy Management and Regulatory Reform with the Action Plan for 2021–2025, Official Gazette of RS, No. 113/2021-3.
13 European Commission, Montenegro 2022 Report, p. 16, available at: https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Montenegro%20Report%202022.pdf
14   European Commission, Kosovo 2022 Report, p. 12, available at: https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Kosovo%20Report%202022.pdf
15 European Commission, BiH 2022 Report, p. 14, available at: https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Bosnia%20and%20Herzegovina%20Report%202022.pdf
16   European Commission, Kosovo 2022 Report, p. 12.
17 European Commission, North Macedonia 2022 Report, p. 13, available at: https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/North%20Macedonia%20Report%202022.pdf
18 https://monitoring.mduls.gov.rs/strukture/savet-za-reformu-javne-uprave.html
19 European Commission, North Macedonia 2022 Report, p. 13.
20 European Commission, Montenegro 2022 Report, p. 16.

II.2 WeBER monitoring focus

Monitoring the Strategic Framework for Public Administration Reform is based on three SIGMA Principles in this area, focusing on the existence of effective PAR agendas, the implementation and monitoring of PAR, as well as on the existence of PAR management and coordination structures at the political and administrative levels.

> **Principle 1:** The government has developed and enacted an effective public administration reform agenda that addresses key challenges;
>
> **Principle 2:** Public administration reform is purposefully implemented; reform outcome targets are set and regularly monitored;
>
> **Principle 4:** Public administration reform has robust and functioning management coordination structures at both the political and administrative levels to steer the reform design and implementation process.

The selected principles are assessed entirely from the view of the quality of involvement of civil society and the public in the processes of developing PAR strategic documents and in the monitoring and coordination structures that should ensure their purposeful implementation. A focus on inclusiveness and participation aims to determine the extent to which relevant stakeholders' needs and views are consulted and taken into consideration when developing and implementing reform agendas.

For this purpose, two WeBER indicators were developed. The first one focuses on the existence and quality of consultation processes in the development of key PAR strategic documents. A sample of up to six key PAR strategic documents was assessed in each Western Balkan administration. The most comprehensive PAR documents (PAR strategies or similar) and PFM reform documents were selected as mandatory sample units, while the selection of other strategic documents covering the remaining PAR areas was dependent on PAR agendas currently in place. Monitoring was performed by combining data sources to ensure the reliability of results, including the qualitative analysis of strategic documents and official data that is publicly available or obtained from institutions responsible for PAR. Moreover, the analysis of documents was corroborated with the results of semi-structured interviews with representatives of institutions responsible for PAR and focus groups with civil society representatives who participated in consultation processes (where it was impossible to organise focus groups, they were replaced with interviews with civil society representatives). Since strategic documents usually cover multiple years, and their adoption or revision does not necessarily coincide with WeBER monitoring cycles, findings from the baseline PAR Monitor 2019/2020 were carried over for strategic documents that did not undergo revision or were not updated at the time of WeBER monitoring.

The monitoring of the participation of civil society in PAR implementation (in PAR coordination and monitoring structures) considered only the most comprehensive PAR strategic documents being implemented as units of analysis. The intention of this approach was to determine whether efforts exist to better facilitate monitoring and coordination structures in PAR agenda generally. As for the first indicator, a review and qualitative assessment of official documents pertaining to the organisation and functioning of these structures was performed, and other data sources were used to corroborate the findings.

II.3 Comparative PAR Monitor findings

Principle 1: The government has developed and enacted an effective public administration reform agenda that addresses key challenges

In relation to Principle 1, WeBER monitors the **use of participatory approaches in the development of key PAR strategic documents** (indicator SFPAR_P1_I1). In each administration, the analysed strategic framework included the overall PAR Strategy or the PFM Strategy, with additional relevant strategies also included. The specific elements of these participatory approaches are analysed through nine elements.

Table 2: Element scores and corresponding indicator values for SFPAR_P1_I1 "Use of participatory approaches in the development of key strategic PAR documents"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. Consultations with civil society are conducted when documents are developed	**4**	0	2	0	0	0	4
E2. Consultations with civil society are conducted in an early phase of the development of documents	**4**	0	0	0	2	4	4
E3. Invitations to civil society to participate in consultations are open	**4**	4	2	2	2	4	4
E4. Responsible government bodies are proactive in ensuring that a wide range of external stakeholders become involved in the process	**2**	0	0	0	0	1	0
E5. Civil society is provided complete information for the preparation of consultations	**4**	4	2	2	4	0	2
E6. Comments and input received in consultation processes are considered by responsible government bodies	**4**	0	2	0	0	4	2
E7. Responsible government bodies publicly provide feedback on the treatment of received comments	**2**	0	1	0	0	0	0
E8. Responsible government bodies engage in open dialogue with civil society on contested questions	**2**	0	1	0	0	2	1
E9. Consultations in the development of strategic PAR documents are open to the public	**4**	2	4	2	2	4	4
Total points	**30**	**10**	**14↑**	**6**	**10**	**19↓**	**21↑**
Indicator value 2021/2022[21]	**0-5**	**1**	**2**	**1**	**1**	**3**	**4**
Indicator value 2019/2020	*0-5*	*1*	*2*	*1*	*1*	*3*	*2*
Indicator value 2017/2018		*2*	*1*	*1*	*2*	*3*	*2*

It is important to emphasise that findings from the PAR Monitor 2019/20 or the PAR Monitor 17/18, related to the strategic documents that were not revised or updated in the meantime, were not reassessed in this monitoring cycle. Instead, the results of these analyses were transferred from the previous monitoring cycles, and the findings focus only on newly adopted, changed, or updated strategic frameworks. Table 3 provides information on which strategic documents were analysed for each administration.

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21   Conversion of points: 0-5 points = 0; 6-10 points = 1; 11-15 points = 2; 16-20 points =3; 21-25 points = 4; 26-30 points = 5.

Table 3: Newly analysed PAR strategic framework, and results taken from the PAR Monitors 2017/2018 and 2019/2020

	NEWLY ANALYSED	TAKEN FROM THE PAR MONITORS 2017/2018 and 2019/2020
ALB	Action Plan (2020-2022) of the Cross-cutting Strategy Digital Agenda of Albania 2015-2020	PAR Strategy Action Plan 2018-2022 Public Finance Management Strategy 2018-2022 Long-Term Policy Document on the Delivery of Citizen Centric Services 2016-2025
BIH	Public Financial Management Improvement Strategy in the Institutions of BIH 2021-2025	Action Plan for the Implementation of PAR Strategy of BIH 2021-2023
KOS		Action Plan 2019-2020 of the PFM Reform Strategy 2016-2021 Action Plan Implementing the Strategy for the Modernization of Public Administration 2018-2020 Strategy for Improving Policy Planning and Coordination in Kosovo 2017-2021 Revised Better Regulation Strategy 2017-2021
MKD		Revised Action Plan for the PAR Strategy 2018-2022 Action Plan 2020 of the PFM Programme 2018-2021
MNE	Public Administration Reform Strategy 2022-2026 Digital Transformation Strategy 2022-2026	
SRB	Public Administration Reform Strategy 2021-2030 Public Policy Management and Regulatory Reform Programme 2021-2025 Public Finance Management Reform Programme 2021-2025 Local Self-Government System Reform Programme 2021-2025	

In this monitoring cycle, Serbia improved its practices and now stands out as the only country where consultations with civil society were conducted and met the minimum required criteria in the development of all key strategic PAR documents.[22] Aside from Serbia, consultations related to the Action Plan for implementation of the PAR Strategy of BiH also met all criteria. Still, the process of developing the PFM Improvement Strategy in the Institutions of BiH failed to fulfil them. In other countries, consultations on the majority of analysed strategies, programmes or action plans, including the overall PAR strategy, only partially met the necessary criteria.

Considering consultations in the early phase of the documents' development, they were conducted for all documents only in the cases of Montenegro and Serbia, both of which have made notable progress in this regard. In Serbia, for example, before drafting PAR Strategy even started, CSOs had the opportunity to apply for full-right membership in the Special Working Group and then to become a member of the Sub-group for one specific goal of the PAR Strategy, according to their interests and expertise. On the other hand, Action Plan for PAR Strategy in North Macedonia was subjected to early consultations, but this was not the case with Action Plan for PFM Programme. In the remaining three countries, no consultation with external stakeholders was conducted in the early phase of the development of documents.

◼ Good practices: Consultations with civil society conducted in the early phase of the development of strategic documents in Serbia

Serbia's Ministry of Public Administration and Local Self-Government published on its webpage the beginning of PAR Strategy drafting, together with the call for CSOs to apply for membership in the **Special Working Group for the PAR Strategy development**. Also, the call was published through the former Office for Cooperation with the Civil Society of the Government. All six CSOs that applied for membership, as well as representatives of the Standing Conference of Towns and Municipalities (SCTM), became full-fledged members of the Special working group, together with representatives from public authorities. The Special working group was divided into six Sub-groups for each specific goal, and CSOs had the opportunity to choose in which of them they would prefer to participate. Through Sub-groups for specific goals, CSOs were involved in the early phase of the development of other strategic documents aside from the overall PAR Strategy. In addition, the Special Working Group for drafting Local Self-Government System Reform Programme was established separately with a membership of two associations (The National Alliance for Local Economic Development and the SCTM) as well as representatives of the scientific and academic community.

Overall, invitations to civil society to participate in consultations during the development of strategic frameworks are generally open. However, there is a division between the three administrations where this practice is present in the development of all documents (Albania, Montenegro, Serbia) and the rest where it only occurs during consultations for the one key strategic document (BiH, Kosovo, North Macedonia). Still, responsible authorities across the region are far from being proactive in ensuring that a wide range of external stakeholders with particular interests and focuses[23] become involved in the consultation process. Montenegrin Ministry of Public Administration stands out as the only exemption, which is a significant improvement compared to PAR Monitor 2019/2020. Namely, a wide range of consultations on the new PAR Strategy were realised with different types of organisations, including business associations, trade unions and organisations dealing with people with disabilities,[24] while the workshop dedicated to writing strategy put special focus on the actualisation of gender equality in the strategy. Still, in the process of the Digital Transformation Strategy development in Montenegro, only one business association was invited by the Ministry of Public Administration and participated in the early phase of consultation.

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22 The indicator element methodology requires the following minimum criteria: 1. Duration of at least 15 days for consultations; 2. Publication of an invitation for contributions together with the draft document(s) through the website of the responsible government body; 3. At least one proactive invitation from the responsible government body to CSOs (mainstream or social media, using the channels of consultative bodies or institutions in charge of CSO relations); 4. At least one face-to-face or virtual meeting with external stakeholders based on an open invitation and containing a discussion session time slot.

23 This refers to business associations, trade unions, organisations focusing on gender equality and/or women organisations, organisations dealing with the people with disabilities.

24   Government of Montenegro, Ministry of Public Administration, Report from the focus group Public Administration Reform Strategy 2022–2026, Available from: https://www.gov.me/en/documents/ec924896-5446-48f7-9551-df6461c6fffa (Accessed 16 March 2023).

Table 4: Participation of different stakeholder groups in strategy development

	Trade unions	Business associations	CSOs focused on gender equality and women's rights	CSOs focused on disability issues and vulnerable groups
ALB[25]			Albanian Human Rights Group Civil Rights Defenders	
BIH		RS Chamber of Commerce		BiH Foundation for Social Inclusion
KOS		American Chamber of Commerce	Civikos[26]	Civikos
MNE	Union of Civil Servants and General Employees; Administration and Judiciary Union; Association of managers Association of Free Trade Unions;	American Chamber of Commerce; Foreign Investors Council; Employers' union; Union of young entrepreneurs		Union of the Blind of Montenegro; Association of Youth with Disabilities of Montenegro
SRB		National Alliance for Local Economic Development; Chamber of Commerce and Industry of Serbia		

Note: None of the specified stakeholder groups participated in consultations in North Macedonia.

In terms of how CSOs and their comments are treated by public authorities during the consultation process, practices vary. For instance, only CSOs in Albania and North Macedonia were provided with complete information and necessary documents for preparations for consultations on all documents, which was not always the case in other administrations. For example, in Montenegro, the consultation process, both on PAR Strategy and the Digital Transformation Strategy, lacked draft documents and other supporting documentation. Regarding treatments of comments received from CSOs by responsible authorities, only in Montenegro the evidence exists that individual comments for all strategic documents were considered.

However, responsible bodies across the region failed to provide written feedback to civil society on the comments and inputs received in the consultation process. Although in Montenegro, in both PAR Strategy and Digital Transformation Strategy, all comments are clearly visible per topic, and the names of organisations which sent them are written, there is no available information on how these comments are treated. In the cases of Serbia and BiH, comments were considered and included in minutes/reports from the consultation process, but only for some of the analysed documents. For instance, Serbia's Public Policy Management and

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25   Two other invitations provided by the Albanian Ministry of Finance and Economy referred to a LGBTI organisation and to a social enterprise for people with disabilities, but the names of these organisations were not specified in the PFM reform document.

26   Civikos is a civil society platform established for the purpose of institutionalising cooperation between the civil and state sectors and currently has 207 members, including CSOs focused on gender equality and disability issues. See more at: http://www.civikos.net/en/about-us (last accessed on 17 March 2023).

Regulatory Reform Programme contains comments and suggestions where, in most cases, senders are clearly indicated, while a brief explanation of comments treatment is also provided. Still, there was no such practice in other analysed documents, nor in the overall PAR Strategy. Therefore, BiH stands out as the only partially positive example, with a published report after the consultations on the PAR Action Plan, which includes all the comments and proposals with explanations of why a comment or proposal has been accepted or rejected.

It was also examined whether any kind of follow-up discussions between the responsible government bodies and civil society regarding any contested issues was organised at the end of the consultation process. The research findings have shown that some additional consultations between competent authorities and civil society were held in Montenegro, Serbia and BiH, although not always for all strategic documents. For instance, over forty participants attended a panel discussion organised by Montenegro's Ministry of Public Administration that was also live streamed on YouTube. In addition, Serbia's Ministry of Finance organised a Dialogue on PFM policy as an online meeting on 20 May 2021, bringing together representatives from state institutions, international organisations and CSOs, and thus providing additional opportunity for stakeholders to express their attitudes towards any contested question, even though public debate had formally expired forty-five days before that.

Regarding public debates, in the final stages of the strategy development, the findings have shown that these processes have been improved in Serbia and BiH, and the general impression is that the wider public is enabled to participate in the discussion when the PAR strategic framework is being adopted. Namely, both strategic documents in Montenegro and BiH, and all four documents in the case of Serbia, were subjected to public debates which met all necessary criteria. This means that a call for participation was published online, accompanied by a proposal of the strategic document and the information on the ways for submitting comments and inputs. On the other hand, while consultations for the overall PAR strategy were also open to the wider public in Albania, Kosovo, and North Macedonia, public debates on other strategic documents were usually held, but some important criteria were not met. However, in few cases, such as for the PFM Strategy in Albania or Strategy for Improving Policy Planning and Coordination in Kosovo, no public debate was held at all.

■ **Good practices: Involvement of a wide range of interested parties in the development of the PAR Strategy in Montenegro**

The Montenegrin Ministry of Public Administration, Digital Society, and Media invested effort into including a diverse range of stakeholders in the early stages of developing the Public Administration Reform Strategy 2022-2026. To create a broad framework for consultation with relevant stakeholders, focus groups with various organisations and individuals were held in April 2021, and which had the opportunity to provide proposals, suggestions, and comments. Representatives from small businesses, the academic community, the business community, trade unions, public administration employees, students, citizens, and representatives from various CSOs, including those representing people with disabilities, participated in these focus groups. Focus groups, as well as online workshops that were organised, provided high inclusivity of the consultation process by reaching individuals and groups who are unlikely to respond to traditional methods of consultation or public debate.

Overall, the use of participatory approaches in the development of key strategic PAR documents remains largely at the same level compared to the previous PAR Monitor. Excluding Kosovo and North Macedonia, where no new documents were adopted, there were no changes in the results in Albania, while minimal changes were recorded in BiH and Montenegro, which did not affect the indicator value. The only country with significant change is Serbia, whose final score was practically doubled, making it a regional leader in this area and the only country where this indicator has a value of 4. However, even in Serbia, there is still much room for improvement in order to conclude that the processes of creating the strategic framework for public administration reform are fully inclusive in this country.

Chart 1: Indicator values for SFPAR_P1_I1 - comparison of values for the 2017/2018, 2019/2020, and 2021/2022 monitoring cycles
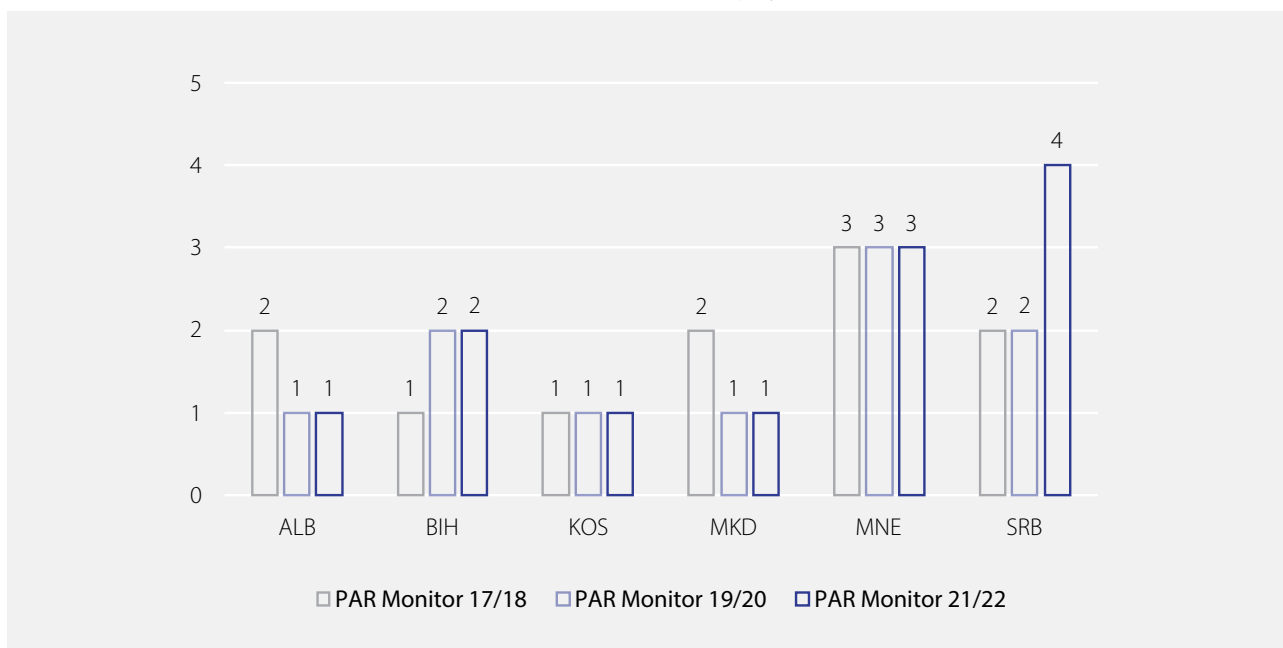
Principle 2: Public administration reform is purposefully implemented; reform outcome targets are set and regularly monitored

Principle 4: PAR has robust and functioning management coordination structures at both the political and administrative levels to steer the reform design and implementation process

WeBER's approach to these two principles is combined into a single indicator measuring the level of **civil society involvement in PAR monitoring and coordination structures** (indicator SFPAR_P2&4_I1). More specifically, the research looked into the following elements for this indicator:

Table 5: Element scores and corresponding indicator values for SFPAR_P2&4_I1 "Civil society involvement in PAR monitoring and coordination structures"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. Administrative structures for PAR coordination and monitoring foresee the involvement of CSOs	**2**	0	0	0	0	0	2
E2. Political level structures for PAR coordination foresee the involvement of CSOs	**2**	2	0	0	0	2	0
E3. Format of CSO involvement in administrative structures for PAR coordination and monitoring	**4**	0	0	0	0	0	4
E4. Format of CSO involvement in political structures for PAR coordination and monitoring	**4**	2	0	2	0	4	0
E5. Involvement of CSOs is achieved based on an open competitive process	**4**	2	0	0	0	2	2
E6. Meetings of the PAR coordination and monitoring structures are held regularly with CSO involvement	**4**	0	0	0	0	2	0
E7. The format of meetings allows for discussion with, and contributions and feedback from, CSOs	**4**	0	0	0	0	2	2

E8. CSOs get consulted on the specific measures of PAR financing	**2**	0	0	0	0	0	0
Total points	**26**	**6**	**0**	**2**	**0**	**12↑**	**10**
Indicator value 2021/2022[27]	**0-5**	**1**	**0**	**0**	**0**	**2**	**2**
Indicator value 2019/2020	*0-5*	*1*	*0*	*0*	*0*	*1*	*2*
Indicator value 2017/2018		*1*	*0*	*0*	*0*	*2*	*1*

Overall, PAR Monitor 2021/2022 brought very few changes compared to the previous two monitoring cycles. With the exception of Montenegro, indicator values were not changed in any of the countries. Namely, greater regularity in holding PAR structures' meetings, as well as the improved format of them, led to an increase in the indicator value in Montenegro. Still, in the WB region, Albania, Montenegro, and Serbia remain the only administrations where CSO involvement in any of the PAR monitoring and coordination structures is formally envisaged. However, aside from insufficiently inclusive monitoring and coordination structures across the region, the format and regularity of meetings reflect their poor functionality. The table below provides an overview of these structures for overall PAR strategies.

Table 6: PAR coordination and monitoring structures and participation of CSOs

	POLITICAL LEVEL	**CSO membership**	**ADMINISTRATIVE LEVEL**	**CSO membership**
ALB	Integrated Policy Management Group for Good Governance and PAR	CSO members of the National Civil Society Council; subject to invitation	Technical secretariat (Directorate for Policy and Good Governance under the Prime Minister's Office and the Department of Public Administration)	
BIH	CoM BIH Chairman, FBIH and RS Prime Ministers, Brčko District Mayor		PAR Coordinator's Office (PARCO)	
KOS	Ministerial Council for PAR		Department for PAR Management	
MKD	PAR Council		Ministry of Information Society and Administration	
MNE	PAR Council	Two full-time members; openly selected	Department for Strategic Planning, International Cooperation and IPA projects Intergovernmental operational team[28]	
SRB	PAR Council	Representative of the Standing Conference on Towns and Municipalities; envisaged by the PAR Strategy[29]	Ministry of Public Administration and Local Self-Government Inter-Ministerial Project Group	Seven full-time members of Inter-Ministerial Project Group; openly selected

27 Conversion of points: 0-5 points = 0; 6-9 points = 1; 10-13 points = 2; 14-17 points =3; 18-21 points = 4; 22-26 points = 5.

28 According to new PAR Strategy 2022-2026, PAR Secretariat for technical and expert support is planned to be formed through the project support. The Secretariat for PAR is not formed yet, and it is not foreseen by the PAR Strategy whether the CSO representatives will participate in its work.

29 PAR Strategy also foresees the possibility that, once a year, the PAR Council invite representatives of CSOs elected to the Inter-ministerial Project Group to participate in a Council's session.

Starting with administrative structures for PAR coordination and monitoring, it should be noted that the involvement of CSO representatives is only foreseen in the Inter-Ministerial Project Group (IMPG) in Serbia. CSOs elected for the Special Working Group for PAR Strategy, through a public call of the former Office for Cooperation with civil society, were invited to express their interest in joining the new IMPG. Consequently, the Decision on Establishing the IMPG recognises the same seven CSO representatives as members with all rights and obligations, together with representatives from state bodies.[30]

Regarding political level structures, CSOs participate in them in two countries (Albania and Montenegro). Although Serbia's Government's Decision on the Establishment of the PAR Council envisaged that a representative of the Standing Conference on Towns and Municipalities is a full-fledged member of the PAR Council, this could not be assessed as CSOs involvement in political structures for PAR coordination and monitoring. Taking into account that the SCTM does not fully meet the criteria set by the Council of Europe, it could not be classified as a CSO. Namely, following the Council of Europe's definition, civil society refers to all forms of social action carried out by individuals or groups who are neither connected to nor managed by state authorities.[31] While it is officially registered as an association, SCTM is not a citizens' association but rather represents local self-governments, which are political entities.

CSO representatives are recognised as full-fledged members only in Montenegro, while in Albania, their involvement is subject to an invitation for each meeting. Montenegrin Government elected two representatives from NGOs and one from the University in the new PAR Council, while in Albania, CSOs that could be invited to the meeting of Integrated Policy Management Group for Good Governance and PAR (IPMG-PAR) are limited to those which are members of the National Civil Society Council. It should be emphasised that the practice of CSOs' involvement in the political level structures in Albania and Montenegro has existed since the first monitoring cycle. Also, it is worth noting that although Ministerial Council for PAR in Kosovo does not foresee explicit involvement of CSO representatives, the head of the Council has the authority to invite representatives of other institutions and organisations if the issues discussed fall within the scope of work of such organisations. This option formally exists in Serbia, where the PAR Council's Rules of Procedure stipulate that the PAR Council's president may invite CSOs representatives to the session, but this possibility has never been used in practice.[32]

Concerning the process of involvement of CSOs in structures for PAR coordination and monitoring, they are usually involved after the open and competitive selection process. For instance, the Montenegrin Ministry of Public Administration issued an open invitation to CSOs to apply for membership in the PAR Council, and they had the opportunity to nominate their representatives for election to this body. As a result, two civil sector representatives who met all criteria were appointed as full-right members of the PAR Council.[33] Furthermore, CSOs involved in the IMPG in Serbia are those who passed a public call for the Special Working Group in which any CSO registered for at least one year and with basic project experience and expertise could apply.

In terms of the regularity of holdings meetings of the PAR coordination and monitoring structures which include CSOs, the situation is substandard throughout the region. For example, in Serbia, meetings of both the IMPG and the PAR Council were not held on a regular basis, meaning that more than six months had passed between the two meetings of these bodies. In the case of Albania, although meetings at the technical level were held regularly, CSOs did not participate in them. However, Montenegro stands out as the only country where the PAR Council, which involves two CSO representatives, meets at least once every six months, which represents progress compared to the last PAR Monitor.

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30   More about establishing, structure, rules of procedure and meeting notes of Inter-Ministerial Project Group session at: https://monitoring.mduls. gov.rs/strukture/medjuministarska-projektna-grupa.html (last accessed on 30 March 2023).

31   EUR-Lex, Glossary of summaries, Civil society organisation, available at: https://bit.ly/43ByRHJ (last accessed on 30 March 2023).

32   Rules of Procedures of the PAR Council, Article 11 (7), available at: https://monitoring.mduls.gov.rs/strukture/savet-za-reformu-javne-uprave.html (last accessed on 30 March 2023).

33   Decision on appointing the members of the PAR Council, available at: https://www.gov.me/dokumenta/455b90c8-bd13-42aa-ac1e-14d7d185e56a (last accessed on 30 March 2023).

Regarding the format of these meetings, partially positive assessments can be made only in the case of Montenegro and Serbia. Although the Rules of procedure of IMPG in Serbia stipulate that all members participate in the discussion on every agenda point, can propose the session agenda, make comments or suggestions, as well as to provide a dissenting opinion which must be noted in the minutes, a few shortcomings were revealed in practice. A focus group with CSOs that participated in these meetings indicated that the agenda was not well organised and with very limited time for discussion, while there were also complaints about the format of the IMPG meetings, as well as CSOs' inputs treatment.[34] For instance, CSOs had a perception that decisions were already made before the IMPG meeting. The fact that the essence of decisions cannot be changed, regardless of CSOs' disagreement, makes those meetings a mere formality.

In Montenegro, research findings show that format of the PAR Council's meetings provides opportunities for every participant to express their opinion, and there is no limitation to the discussion. Additionally, interviewed CSOs confirmed that they were allowed to send their own material, propose points for the agenda, etc.[35] In Albania, on the other hand, a review of the publicly available documentation, as well as interviews with relevant CSOs, revealed that the format of the political-level meetings does not allow for significant contribution and feedback. Furthermore, in this monitoring cycle, there was no evidence that any CSO was invited to participate in the IPMG-PAR's meetings in Albania, which was confirmed by the CSOs who participated in the focus group.

Finally, CSOs were not consulted on PAR financing in any country of the region. The situation did not differ significantly among the three countries where CSOs were involved in some of the PAR coordination and monitoring structures.

Overall, in this monitoring cycle, no changes were recorded in the majority of countries. However, Montenegro is the only country that stands out for its progress, which enabled it to increase indicator value by one point. In this country, progress has been recorded in terms of the format of PAR Council meetings, as well as their regularity. As a result, Montenegro returned to the indicator value from the baseline monitoring after a drop in points in the second cycle, caused by the PAR Council not being functional. In Serbia, the Government's decision to involve the SCTM in the PAR Council was not considered enough for points to be allocated. Although the SCTM is formally registered as an association, taking into account that only towns and municipalities can be its members, it cannot be labelled as CSO, so the indicator value for Serbia rests the same as in the last PAR Monitor.

Chart 2: Indicator values for SFPAR_P2&4_I1 - comparison of values for the 2017/2018, 2019/2020, and 2021/2022 monitoring cycles
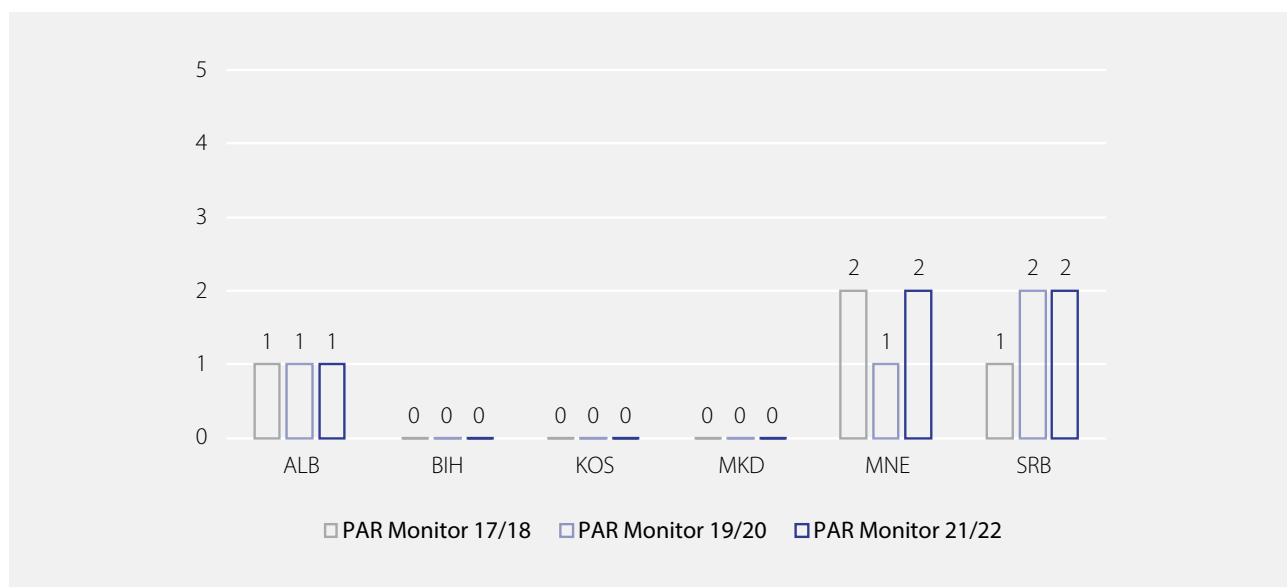
34 Focus group with representatives of relevant CSOs' representatives in Serbia that took part either in the IMPG (National Coalition for Decentralisation, Local Democracy Agency, Belgrade Open School, Civic Initiatives) or in the PAR Council (Standing Conference on Town and Municipalities) was held on 13 July 2022.

35 Interviews with CSOs that are members of the PAR Council in Montenegro were held in May 2022.

II.4 Summary of results in the strategic framework for PAR area

Similar to the previous two PAR Monitors, CSOs are very limitedly involved in the processes of developing key strategic documents, though practices vary greatly between different administrations. Although in all countries CSOs were invited to participate in consultations regarding the PAR Strategy, this is not the case with other strategic documents. Additionally, CSOs were not always involved in the early stages of documents development, except in the cases of Montenegro and Serbia, and partially North Macedonia. At the same time, responsible authorities did not make sufficient efforts to enable the inclusion of a diverse range of stakeholders representing specific interests, with Montenegro standing out as the sole exception. On the other hand, there has been a regression in Montenegro in terms of timely providing information and documents to CSOs participating in the consultative process. The competent authorities in Albania and North Macedonia were the only ones who made sure that CSOs received all the necessary information for the preparation of consultation. Moreover, in half of the countries (Albania, Kosovo and North Macedonia), neglect of comments and inputs coming from civil society has been noted, while consultative processes throughout the region, with the partial exception of BiH, still suffer from insufficient and non-transparent provision of feedback. Regarding follow-up discussions with CSOs on any contested questions, they were organised in Montenegro, for half of the documents in Serbia and BiH, and for one document in Kosovo, while no such dialogue was held in Albania and North Macedonia. Finally, the debate on strategic PAR documents is mostly open to the wider public throughout the region, and the progress made by BiH and Serbia in this regard makes them, along with Montenegro, the most inclusive in this area.

The participation of civil society in PAR monitoring and coordination is still not a standard practice in the region, with Serbia's administration being the only one where CSOs are involved in the administrative level of PAR coordination. CSOs' involvement is formally envisaged at the political level only in Albania (upon invitation) and in Montenegro (as full-rights members of the PAR Council). Still, irregular holding of meetings of PAR monitoring and coordination structures, together with the lack of CSOs' consultation regarding PAR financing, represents the biggest deficiency and also a chronic issue across the region. In Montenegro, progress was noted regarding the format of PAR Council meetings, as well as their regularity, which makes this country an exception in this regard. Overall, CSOs' involvement in the PAR coordination and monitoring structures is insufficient, and even in those countries where CSOs participate, their influence on the agenda and decision-making is very limited. The PAR Monitor 2021/22 confirmed the existence of pervasive disregard for the function of civil society in monitoring PAR.

III.
Policy Development and Coordination

Policy development and coordination has major significance for citizens, businesses, and all the other members of society, as the policy that governments adopt and implement directly affects how individual rights are exercised in practice and how market actors operate. Since such policy also defines how state institutions interact and communicate with citizens, policy development and coordination procedures and standards consequently shape relations within a society.

Therefore, it is of utmost importance that policymaking practices in society are transparent, evidence-based, inclusive, and based on sound problem analysis, in which all members of society can inform themselves on their rights and obligations and participate in the co-creation of policy. Inclusive policymaking means that those affected by the adopted solutions are the first to be consulted and that policy responds to their needs. For this reason, transparency and inclusiveness should feature in all phases of the policy cycle, from policy creation to evaluation, so that governments can be held accountable for the results of chosen policy solutions.

III.1 State of play in the region and developments since 2020

This state of play is largely based on the most recent progress reports of the European Commission and the SIGMA regarding administrations in the WB.[36] Where needed, other sources have been used and cited individually.

Since the previous PAR Monitor, policy development and coordination (PDC) reform documents have been in place across the region with no exception, and their implementation has continued. Reform goals and measures are laid down either in the umbrella PAR strategies or dedicated policy documents for improving policy management, regulatory reform, or red tape reduction. However, in half the region, the PAR strategies have ended in 2022 (Albania, BIH, North Macedonia), and PAR authorities are expected to adopt a new strategic framework. It is noteworthy that in Kosovo, a new PAR Strategy for the period 2022-2026 became an umbrella document for the three previous strategies that had PDC in focus. Also, in 2021, the Government in Serbia adopted the Programme for the Improvement of Public Policy Management and Regulatory Reform, a stand-alone PDC-focused document, which is an extension of the PAR Strategy in this domain.

Table 7. Policy development and coordination reform documents in WB administrations

	PDC reform Document(s)	PERIOD
ALB	Amended Action Plan of the Cross-cutting PAR Strategy	2018-2022
BIH	PAR Strategy, Section 5.1: Policy Development and Coordination	2018-2022
KOS	Public Administration Reform Strategy National Development Strategy Administrative Burden Prevention and Reduction Programme	2022-2026 2022-2027 until 2030
MKD	Public Administration Reform Strategy	2018-2022
MNE	Public Administration Reform Strategy	2022-2026
SRB	Public Administration Reform Strategy Programme for the Improvement of Public Policy Management and Regulatory Reform	2021-2030 2021-2025

As in the previous PAR Monitors, the sub-sections that follow focus on those aspects of PDC that are most relevant for the public and civil society, i.e., those that have an *outward facing* character rather than being internal procedures of the government (the same elements and principles that the PAR Monitor methodology focuses on).

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36   All reports are available at: https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports_en, and https://www.sigmaweb.org/publications/monitoring-reports.htm   (last accessed on 03 May 2023).

Decision-making, planning and reporting by the government

When it comes to transparency of decision-making of the governments in WB, the state of play has remained mostly the same as in the previous cycles. Decisions of governments are made publicly available in half the region, while in Kosovo and in Serbia, there is still no full transparency (including certain levels of government in BIH). More importantly, preparatory materials for the government sessions, such as agenda documents, do not get published in advance, ahead of the meetings (transparency of materials from government sessions is analysed thoroughly by the PAR Monitor in the Section III.3 below).

In terms of transparency of planning and reporting, the governments did not reach a satisfactory level, and at the same time, the quality of these critical functions is often sub-standard. Issues include weaknesses in central coordination and guidance, weak linkages between sectoral plans and governmental work plans, as well as weak alignment of the EU integration plans with other central planning documents. Also, problem of alignment of governmental policy planning with budgeting is present in the entire region. As for transparency, administrations still do not regularly publish reports on the implementation of key governmental plans. While all WB administrations encounter these challenges, fully or partly, there are national-level specifics that require additional attention. For instance, in BIH, priorities between different levels of government are insufficiently interlinked, while publication of implementation reports continues to be a challenge due to absence of standards. In Serbia, dedicated information system gets more frequently used for policy planning, however, its use did not effectively contribute to more transparency of implementation reports.

Overall, opportunities for public scrutiny over the governments' work remain limited. Most governments do communicate to the public via press releases and reports on their work, but coherent and integrated monitoring and reporting on all government planning documents is lacking (BIH, Albania). Also, publication of annual reports tends to get delayed or is sometimes completely lacking (North Macedonia, Serbia). Even in the event of regular publication, government's often do not reveal achievements, but rather prove a record of activities (Montenegro, Serbia), or the public cannot easily access reports from the official websites (Serbia).

Evidence-based policymaking

Regulatory impact assessments (RIA) are formally established in all the WB administrations, with Albania being the last one to formally install this practice in 2019. Nevertheless, as indicated in the previous PAR Monitors, public authorities lack full consistency in using these tools for evidence-based policy making. In all the region, administrative capacities, data collection and monitoring remain key issue in implementation. Also, RIA systems in the region remain focused primarily on draft laws, although some administrations explore options of extending the RIA scope.

Albania has made improvements recently in the use and quality of RIAs as well as in delivering trainings for civil servants, though significant policy areas remain exempt from RIA requirements.[37] Consistency in implementation is lacking in BIH, including systematic assessment of financial impacts. In Kosovo, there is limited progress in boosting evidence-based policy making, while SIGMA highlights the need for the enhancement of the Office of the Prime Minister's quality control function as well as for bolstering up ministries' capacities for more frequent and effective use of RIAs. Another major systemic issue in Kosovo is that the RIA process is prepared and finalised early, in the stage of concept documents and well before the actual policy design and finalisation of the draft of a law, which questions relevancy of RIA in informing the final decisions.

On the other hand, RIA implementation has been gradually improving, such as in North Macedonia and Montenegro; however, it is either partially in place with further steps needed to improve quality and usage, or majority of acts is being sent to parliament without RIA, for adoption in shortened procedures (North Macedonia). Additionally, it is noteworthy that the quality of administrative data hampers the RIA quality in North Macedonia (i.e., incomplete digitisation of registers within the administration and problems with data sharing).

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37   Among others, these areas include national security, international relations, taxation and customs, and budgetary issues.

Finally, in Serbia, RIA implementation also needs consistent application. Nevertheless, at the quality control level, the EC repeatedly highlights the need for closing the coordination gap between the Ministry of Finance and Public Policy Secretariat (PPS), to avoid potential discrepancies between data in fiscal impact assessment, required by the former, and financial data from RIA process, on which the latter provides opinions. When it comes to opinions on RIAs, it is also stressed that the assessment of RIA processes as partially compliant with the RIA regulations adversely affects the quality of evidence-based policy making in Serbia.

■ **Inclusiveness of policymaking (public consultations)**

According to SIGMA, practices of holding public consultations in the region have significantly improved compared to 2017; however, the impact of public consultations on adopted policies did not see much progress ever since. What is still missing, across the board, is detailed analysis of feedback collected during public consultation processes, and its use to improve policies. Although WB administrations share this common challenge, each administration individually should invest efforts to be able to speak of inclusive policy making at the national level.

Namely, in Albania, e-consultations saw a decrease in a number of acts undergoing public consultations in the recent period, while quality control still needs to shift away from the process to content-related aspects.[38] In BiH, consistency in applying consultations at all levels is still a challenge, as is the capacity of authorities to conduct them. On the other hand, in Kosovo, public consultations are organised in later stages of policy development, which prevents genuine intervention of the public in the policy design. One of the key shared challenges in administrations with regular public consultation practices is how to ensure systematic follow-up to feedback and quality control (Kosovo, North Macedonia, Montenegro, Serbia). In North Macedonia, the number of legal acts that did not undergo public consultations due to the shortened procedure has shown signs of decline. However, it still accounts for a significant share of law making, according to the latest SIGMA report. In Serbia, the scope of public consultations has improved too, and the new e-consultation portal is operational since late 2021. Nevertheless, the effects of the portal still need to be assessed, while reports on concluded public consultations, on the whole, fall short of providing details on handling the entire body of feedback received from the interested public.

III.2 WeBER monitoring focus

In the Policy Development and Coordination area, WeBER monitoring is performed based on four SIGMA Principles:

> **Principle 5**: Regular monitoring of the government's performance enables public scrutiny and supports the government in achieving its objectives;
>
> **Principle 6**: Government decisions are prepared in a transparent manner and based on the administration's professional judgement; legal conformity of the decisions is ensured;
>
> **Principle 10**: The policy-making and legal-drafting process is evidence-based, and impact assessment is consistently used across ministries;
>
> **Principle 11**: Policies and legislation are designed in an inclusive manner that enables the active participation of society and allows for co-ordination of different perspectives within the government;

In this edition of the PAR Monitor, five WeBER indicators are used for analysis in the Policy Development and Coordination area. As explained in the introductory chapter, unlike in the baseline PAR Monitor 2017/2018, SIGMA

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38   The share of adopted laws undergoing public consultation may also partly decrease because of lower number of initiatives put forward than in previous period.

Principle 12 was not included in this monitoring cycle, as and consequently an indicator on the accessibility of legislation was not measured.[39]

The first indicator measures the extent of openness and availability of information about governments' performance to the public, through analysis of the most comprehensive websites through which governments communicate their activities and publish reports. Written information published by governments relates to press releases and the online publishing of annual (or semi-annual) reports. The WeBER monitoring covers a period of two annual reporting cycles, except for press releases, which are assessed for a one-year period (due to the frequency of their publishing). Other aspects of government performance information analysed include the understandability of published materials, usage of quantitative and qualitative information, presence of assessments/descriptions of concrete results, availability of gender-segregated and open-format data, and the online availability of reports on key whole-of-government planning documents.

The second indicator measures how CSOs perceive government planning, monitoring, and reporting on its work and objectives. To explore perceptions, a survey of CSOs in the WB was implemented in the period from late March to the beginning of September 2022 using an online surveying platform.[40] A uniform questionnaire with 28 questions was used throughout the region, ensuring an even approach in survey implementation. It was disseminated in local languages through the existing networks and platforms of civil society organisations with large contact databases, and through centralised points of contact such as governmental offices in charge of cooperation with civil society. To ensure that the survey targeted as many organisations as possible in terms of types of organisations, geographical distribution, and activity areas, and hence be representative as much as possible, additional boosting was done where needed to increase overall responses. A focus group with CSOs served to complement survey findings with qualitative information.

The third indicator measures the transparency of decision-making by the government (in terms of the Council of Ministers), combining survey data on the perceptions of civil society with analysis of relevant government websites. Besides looking for published information on government decisions, the website analysis considers the completeness, citizen-friendliness, timeliness, and consistency of information. Monitoring was done for each government session in a six-month period – roughly from the beginning of August 2021 until the end of January 2022. The only exception is element 5, where the time period of observation is in the following three mounts.

The fourth indicator measures whether government institutions invite civil society to prepare evidence-based policy documents and whether evidence produced by CSOs is considered and used in policy development processes. Again, this measurement combines expert analysis of official documents and a survey of civil society perceptions. Regarding document analysis, the frequency of references to CSOs' evidence-based findings is analysed for official policy and strategic documents, policy papers, and ex-ante and ex-post policy analyses and impact assessments in a sample of three policy areas.[41]

Finally, the fifth indicator, focusing on the quality of involvement of the public in policymaking through public consultations, modified in the 2019/2020 monitoring cycle, includes perceptions of CSOs collected by online survey, and additional qualitative data gathered through the analysis of a sample of public consultations as well as assessments of online governmental portals used for public consultations. More precisely, apart from CSOs perceptions, it focuses on qualitative document analysis of the scope and impact of public consultations on policy documents and legislation adopted in the last six months of the year preceding measurement (from July to December 2021), the availability and quality of reporting on public consultations, functionalities of the public consultation portals, and proactiveness of information provided by the responsible institutions.

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39 SIGMA Principle 12: Legislation is consistent in structure, style, and language; legal drafting requirements are applied consistently across ministries; legislation is made publicly available. WeBER indicator used for monitoring this principle in 2017/2018: Perceptions of the availability and accessibility of legislation and related explanatory materials by civil society.

40 The survey of CSOs was administered through an anonymous, online questionnaire. The data collection method was CASI (computer-assisted self-interviewing).

41 Policy areas where a substantial number of CSOs actively work.

III.3 Comparative PAR Monitor findings

Principle 5: Regular monitoring of the government's performance enables public scrutiny and supports the government in achieving its objectives

Regarding Principle 5, the PAR Monitor methodology looks at the availability of information on government performance. More specifically, it measures the extent to which information about government performance is open and publicly available online and the extent to which CSOs consider that governments pursue and achieve their objectives. Thus, WeBER approaches this principle with two indicators. The first indicator, **"Public availability of information on government performance"** (Indicator PDC_P5_I1), consists of seven elements based on website and document analysis. The second indicator, "**Civil society perception of the Government's pursuit and achievement of its planned objectives**" (indicator PDC_P5_I2), is measured through six elements based on the civil society survey.

Table 8: Element scores and corresponding indicator values for PDC_P5_I1 "Public availability of information on Government performance"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. The government regularly publishes written information about its activities	4	0	4	0	0	4	4
E2. The information issued by the government on its activities is written in an understandable way	2	0	2	0	0	0	0
E3. The information issued by the Government is sufficiently detailed, including both quantitative data and qualitative information and assessments	4	0	4	0	0	2	2
E4. The information issued by the Government includes assessments of the achievement of concrete results	4	0	2	0	0	0	0
E5. The information issued by the Government about its activities and results is available in open data format(s)	2	0	0	0	0	0	0
E6. The information issued by the Government about its activities and results contains gender segregated data	2	0	1	0	0	0	0
E7. Share of reports on Government strategies and plans which are available online	2	0	0	1	0	2	1
Total points	**20**	**0**	**13↓**	**1**	**0↓**	**8↑**	**7↑**
Indicator value 2021/2022[42]	**0-5**	**0**	**3**	**0**	**0**	**1**	**1**
Indicator value 2019/2020	*0-5*	*0*	*4*	*0*	*2*	*1*	*0*
Indicator value 2017/2018		*0*	*3*	*3*	*0*	*1*	*0*

The PAR Monitor 2021/2022 findings have brought certain changes in this indicator compared to the previous two monitoring cycles. The most notable change is the decline of North Macedonia, while the only improvement is seen in Serbia, thanks to the availability of reports on government performance. In addition, there was a slight decline in BiH, while minimal progress was recorded in Montenegro. As for Albania and Kosovo, the situation remains unchanged, and these two countries are once again among the lowest rated.

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42   Conversion of points: 0-4 points = 0; 5-8 points = 1; 9-11 points = 2; 12-14 points = 3; 15-17 points = 4; 18-20 points = 5.

The regularity of publishing information on government performance was assessed by analysing the practice of publishing press releases on government websites, as well as the availability of government annual reports. Although governments throughout the region issue press releases on a weekly basis, annual reports on their performance have been published in only three countries. In addition to BiH and Montenegro, where this good practice was noted in previous monitoring cycles, this time, government work reports for the last two observed years (2019 and 2020) were also available in Serbia.

It is worth noting that press releases remain written in a language that is understandable to the public, without unnecessary bureaucratic and technical terminology. On the other hand, the same cannot be said for government reports. Namely, only in BiH were both reports assessed positively, given that they contained citizen-friendly summaries. The positive practice was also found in Montenegro, where the government report for 2021 contains a summary outlining key achievements and other citizen-friendly elements. However, given that practice of such reporting was only introduced for 2021 and for 2020, it remains to be seen whether this good example will become a regularity in Montenegro.

■ Good practices: Citizen-oriented reporting of the Montenegro Government

In **Montenegro**, press releases for the Government's sessions are always summarised, listing the important documents that were adopted and are written in a way everyone can understand. Most of the news is written in clear language, and the overall perception is that the Government is trying to present their activities to the citizens in an understandable manner. In addition, the last analysed annual report on the Government performance improved significantly in comparison to the previous practice of the Government in several ways. First, it was adopted timely in January 2022, it summarises the key achievements, contains graphs that expose what was done and what was not completed, as well as a chart with a statistical overview for each institution.

Regarding three countries where government annual reports are available, these reports are usually detailed and contain both quantitative data and qualitative assessments. The only exemption is the Montenegrin Government work report for 2020, where qualitative information is completely lacking. On the other hand, the noted problem in BiH and Serbia is that these reports are mostly comprised of individual bodies' reports and lack information regarding the Government's performance. However, the introduction and a few other parts of BiH's Council of Ministers report contain general information on its achievements. Another chronic deficiency regarding the information on governments' performance in the WB is that information from reports is not available in open data format. In addition, there are practically no gender-segregated data in annual reports, with a small exception in BiH, since the report for 2019 contains information on employees segregated by gender.

■ Practices to avoid: Serbia's Government performance reporting in obscurity

As in previous monitoring cycles, Serbia's Government work reports contain very few information on the activities and performance of the government as a collective body. On the contrary, government work reports are entirely based on inputs of central administration bodies (ministries, special organisations, etc.), and not even the section on the Government's General Secretariat provided an overview of governmental work.

In terms of reports on all governmental planning documents, their online availability has dropped compared to the PAR Monitor 2019/2020. Same as in the first two monitoring cycles, in none of the countries all reports are available, though Montenegro stands out with three out of four reports available. In Serbia, the Annual Report on Results of the Action Plan for Implementation of Government Programme was again missing, but in this monitoring cycle, there was also no Report on National Programme for the Adoption of Acquis of the EU available. In Kosovo, the same two reports were missing as before, while in Albania and BiH, this was the case for the three of them. In contrast to the previous PAR Monitor, which found that 60% of the reports were available to the public, the latest findings indicate that there are no reports on the four Government strategies and three plans in North Macedonia.

Table 9. Share of reports on whole-of-government strategies and plans available online for the last full reporting year[43]

	Strategies and plans of governments	Reports published	Share
ALB	National Strategy for Development and Integration (NSDI)	0	25%
	National Plan for European Integration (NPEI)	0	
	Medium-Term Budget Programme (MBP)	1	
	Government Programme (GP)	0	
BIH	Economic Reform Programme (ERP)	1	40%
	Government Annual Work Plan (GAWP)	0	
	Medium-Term Work Programme of the CoM (MTWP)	1	
	Global Framework of Fiscal Balance and Policies (GFFBP)	0	
	The National Programme for the Adoption of Acquis of the EU (NPAA)	0	
KOS	Economic Reform Programme (ERP)	1	50%
	National Plan for the Implementation of the Stabilisation and Association Agreement (NPISAA)	1	
	National Development Strategy (NDS)	0	
	Government Annual Work Plan (GAWP)	0	
MKD	Strategy for One Society and Interculturalism	0	0%
	National Strategy for Cooperation with Diaspora	0	
	Transparency Strategy	0	
	Strategy for strengthening the capacities for conducting financial investigations and confiscation of property for the period 2021-2023 with an Action plan	0	
	Plan for accelerated economic growth (2022-2026)	0	
	Investment intervention plan (IPI 2021-2027)	0	
	Clean Air Plan	0	
MNE	Programme of Economic Reforms (PER)	1	66.6%
	Government's Annual Working Programme (GAWP)	1	
	Medium-term Working Plan of the Government	1	
	Programme of Accession of Montenegro to the EU	1	
	Fiscal strategy (FS)	0	
	National Strategy of Sustainable Development	0	
SRB	Economic Reform Programme (ERP)	1	60%
	Government Annual Work Plan (GAWP)	1	
	National Programme for the Adoption of Acquis of the EU (NPAA)	0	
	Action Plan for Implementation of Government Programme (APIGP)	0	
	Fiscal Strategy/Mid-term Budgetary Framework (FS)	1	

In comparison to the PAR Monitor 2019/2020, this monitoring cycle revealed the unchanged state of play in many aspects. Namely, it still happens quite often that government work reports are not publicly available, and even when they are, they often contain numerous shortcomings from point of view of public scrutiny. This primarily refers to the way governments in the region report on achievements of concrete results, where it often happens that these reports do not show the achievements of governments, but rather represent a collection

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43   At the time of monitoring, the last full reporting year was 2021. In some cases, where the legal deadline for publishing a new report was not expired, a report for 2020 was observed. Reports on sectoral strategic documents and plans were not subject to analysis under this element.

of reports from individual administration bodies. Furthermore, information on the activities and performance of governments is still not available in an open data format, and gender-segregated data is rare. With regards to reports on government's other strategies and plans, this monitoring cycle showed a decrease in their online availability in four administrations.

Chart 3: Indicator values for PDC_P5_I1 – comparison of values for the 2017/2018, 2019/2020, and 2021/2022 monitoring cycles
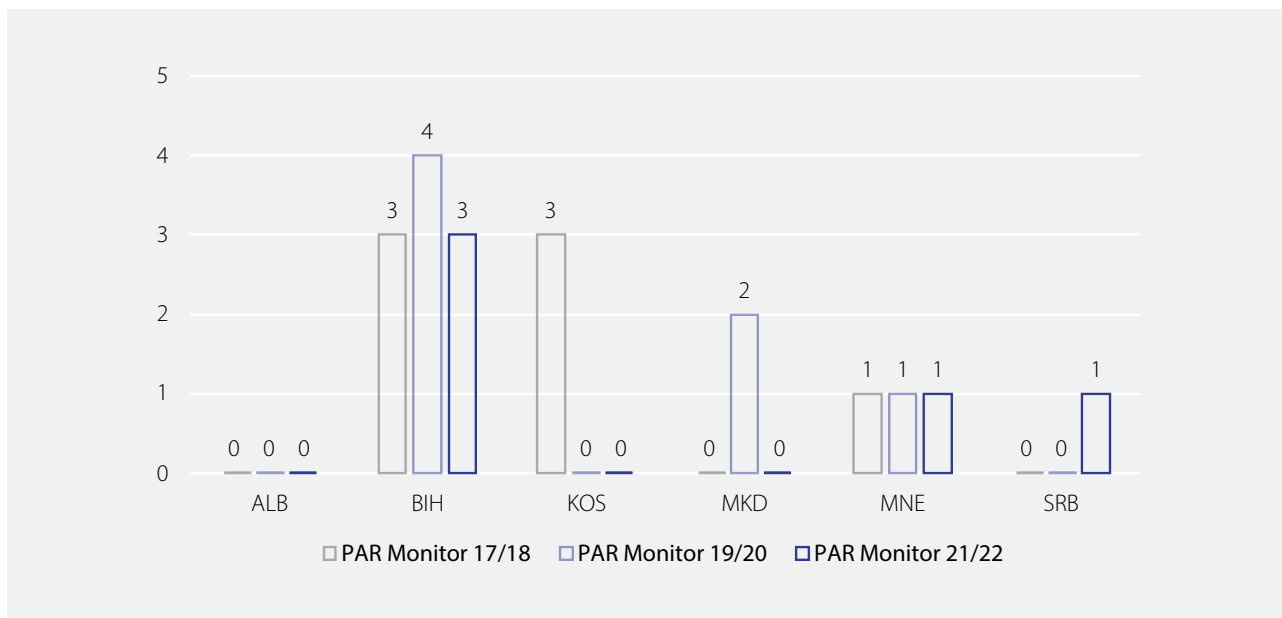

Table 10: Element scores and corresponding indicator values for PDC_P5_I2 "Civil society perception of the Government's pursuit and achievement of its planned objectives"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. CSOs consider government's formal planning documents as relevant for the actual developments in the individual policy areas	**2**	0	0	0	0	0	0
E2. CSOs consider that the Government regularly reports to the public on progress against the set objectives	**4**	0	0	0	0	0	0
E3. CSOs consider that official strategies determine governments' or ministries' action in specific policy areas	**2**	1	0	0	1	0	0
E4. CSOs consider that the ministries regularly publish monitoring reports on their sectoral strategies	**4**	0	0	0	0	0	0
E5. CSOs consider that the EU accession priorities are adequately integrated into the government's planning documents	**2**	1	0	1	1	0	0
E6. CSOs consider that the Government's reports incorporate adequate updates on the progress against the set EU accession priorities	**2**	0	0	0	0	0	0
Total points	**16**	**2↑**	**0**	**1**	**2↑**	**0**	**0**
Indicator value 2021/2022[44]	**0-5**	**0**	**0**	**0**	**0**	**0**	**0**
Indicator value 2019/2020	*0-5*	*0*	*0*	*0*	*0*	*0*	*0*
Indicator value 2017/2018		*0*	*0*	*0*	*1*	*0*	*0*

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44   Conversion of points: 0-4 points = 0; 5-8 points = 1; 9-11 points = 2; 12-14 points = 3; 15-17 points = 4; 18-20 points = 5.

The perception of civil society regarding this indicator remained unchanged, with CSOs continuing to express significant criticism towards the government's efforts to achieve the intended objectives. The overwhelming perception of CSOs across the region is that their governments do not pursue or achieve planned objectives. Only 18% of CSOs across the region consider that there is a direct connection between the workplan of the government and actual developments in specific policy areas. Compared to the regional average, the perception is slightly more positive in Albania (21%) and a bit better in BiH and North Macedonia (27% in both countries). Montenegro stands out as the only country where the absolute majority of CSOs (54%) disagree with the above statement, while only 4% of respondents express a positive opinion that their governments indeed do what they plan. It is indicative that a third of CSOs in the region express neutral stances, which suggests that CSOs do not have strong opinions or perhaps do not closely follow the planning processes of the governments. Although these findings do not differ much compared to the last PAR Monitor, the repetition of unfavourable CSOs' attitude suggests weak planning on the part of government.

Chart 4: CSO responses to the question "There is a direct connection between the workplan of the government and actual developments in specific policy areas" (%)
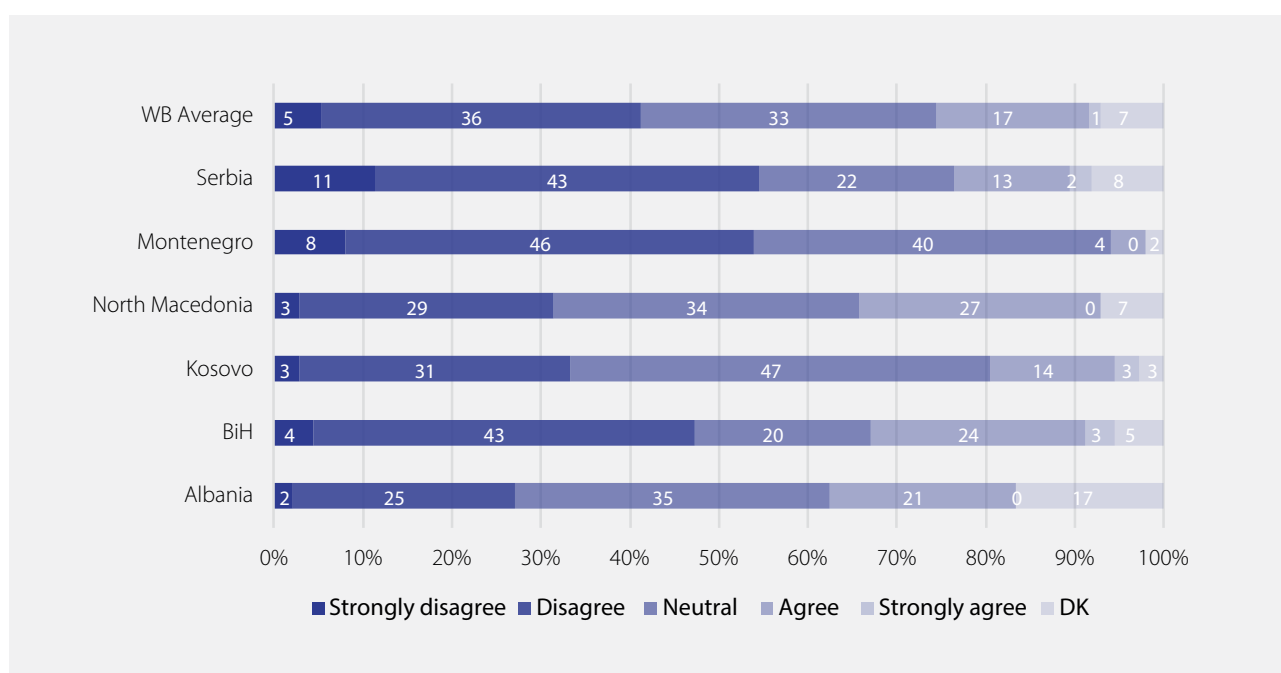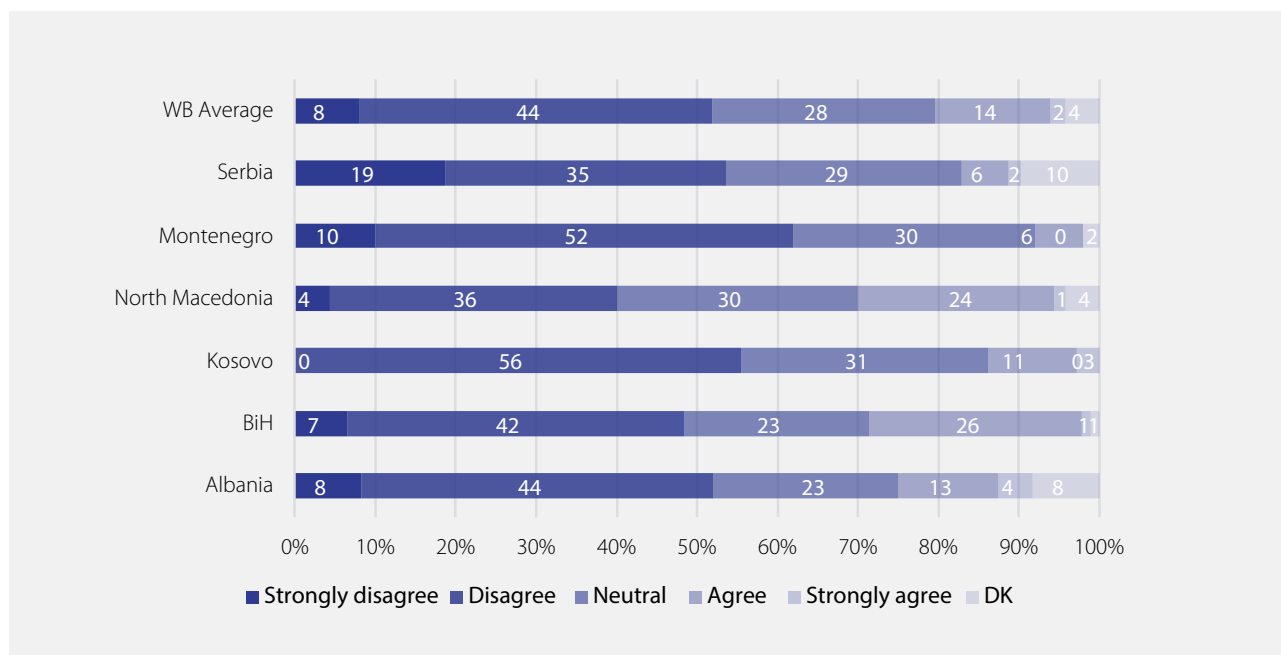

Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 581 and refers to the total number of respondents in the WB.*

Regarding the regularity of governments' reporting to the public on the progress towards objectives set in their work plans, CSOs express even more critical viewpoints. Namely, in almost all countries, the absolute majority of respondents believe that the government does not regularly report progress to the public (52%, on average). Although the same critical stance was noted in the previous monitoring cycles, there have been certain changes in perception. While in the previous PAR Monitors CSOs from Kosovo had the most negative perception, the highest level of negative responses was now recorded in Montenegro (62%). Furthermore, only 6% of CSOs in Montenegro think that the Government regularly report progress to the public, while the perception is just slightly better in Serbia, with 8% of agreement. On the other hand, BiH and North Macedonia are the sole examples where at least a quarter of organisations positively assess the practice of government reporting on progress.

It is important to note that the perceptions of CSOs do not always match up with the findings obtained through website and document analysis. For example, although both government annual work reports, as well as the majority of reports on government strategies and plans, were published in Montenegro and Serbia, CSOs from these two countries emerged as the most critical. On the other hand, in North Macedonia, where no report could be found online, CSOs express notably more positive attitudes compared to Montenegro or Serbia. The somewhat more positive perception among CSOs in North Macedonia on this issue compared to the rest of the region, which repeats from cycle to cycle, can also indicate CSOs' acquired trust in the Government, even when its actions objectively do not merit a positive grade.

Chart 5: CSO responses to the question "Governments regularly report to the public on their progress in the achievement of objectives set in their workplans" (%)
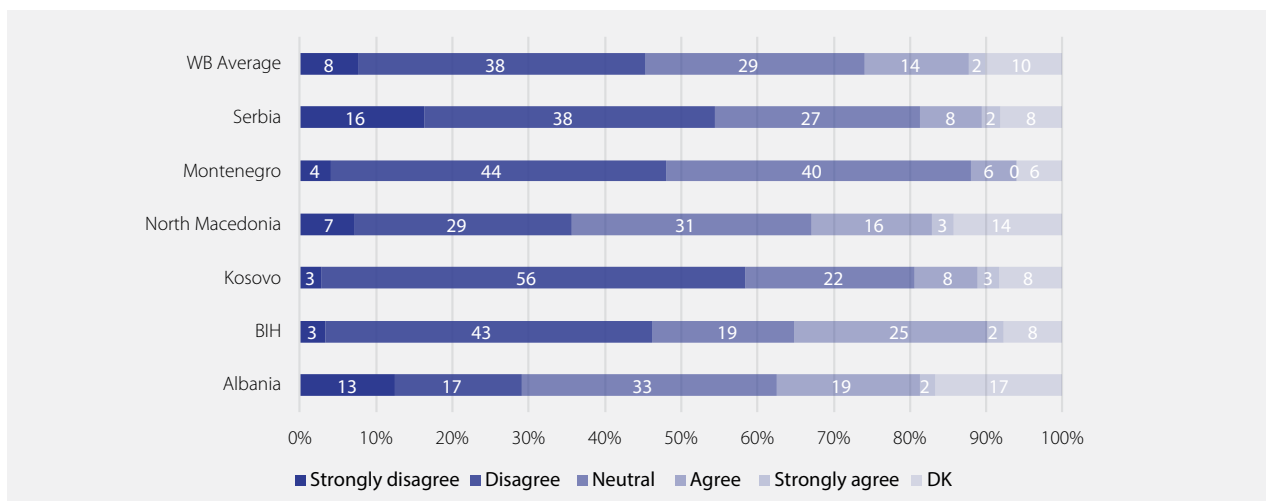

Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 581 and refers to the total number of respondents in the WB.*

A slightly higher level of respondents, on average, agree that the governments' or ministries' actions in certain areas are really determined by the official strategies. Above the regional average of 26%, more than 30% of CSOs from Albania and North Macedonia recognise the relationship between official strategies and the actions of ministries and governments. While CSOs in Montenegro and Serbia are once again the most critical (with 18% and 21% of agreement, respectively), CSOs' perception in BiH and Kosovo is close to the regional average. Notably, one-third of respondents in the region remain neutral on this issue, and in Kosovo, almost half of them.

In addition, a significant amount of CSOs in the region still do not believe that ministries regularly publish monitoring reports on sectoral strategies. Compared to the last PAR Monitor, the level of disagreement decreased to lower than 50%, and could be considered as marginal progress. Still, only 16% of CSOs recognise that such reports are published, only a minor improvement compared to 12% in the 2019/2020 and 15% in the 2017/2018 cycle. Agreement level among administrations is also very low and ranges from 6% in Montenegro to 27% in BiH.

Chart 6: CSO responses to the question "Ministries regularly publish monitoring reports on their sectoral strategies" (%)

Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 581 and refers to the total number of respondents in the WB.*

On the other hand, when asked whether government plans adequately reflect the priorities of the EU accession process in policy areas related to their expertise, CSOs expressed the highest level of agreement. Namely, this is the only area where more than 30% of CSOs, on average, have a positive view. In terms of individual countries, CSOs from Albania and Kosovo recognise that their governments' plans do reflect priorities of European integration to the greatest extent (about 45% of respondents in both countries). On the other hand, CSOs from Montenegro and Serbia, countries widely regarded as front-runners in the accession process, are not persuaded that their governments are truly responsive to the needs of the EU integration (about 20% of agreement in both countries). Regarding BiH and North Macedonia, the perception of their CSOs is nearly equivalent to the regional average (29% and 30%, respectively). However, it can be concluded that, since the last PAR Monitor, positive attitudes among CSOs across the region have slightly increased in this area, although still not enough to increase indicator values.

Chart 7: CSO responses to the question "In the policy area in which my organisation works, priorities of the EU accession process are adequately integrated into governments' plans" (%)
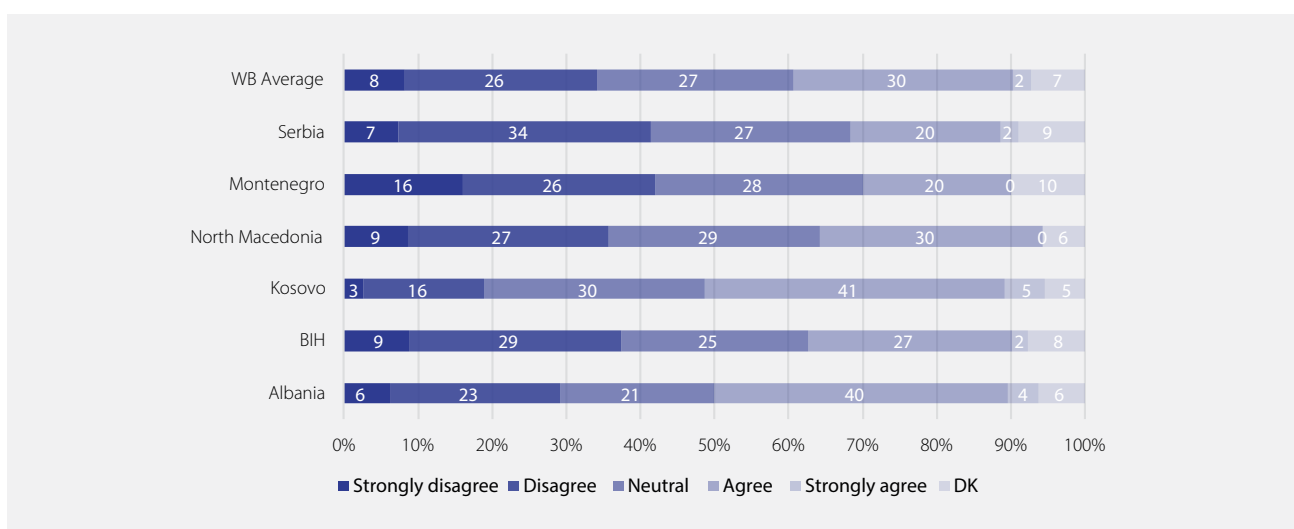
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 581 and refers and refers to the total number of respondents in the WB.*

In contrast, a far smaller number of CSOs positively assess the government's reports in the context of information on the progress towards EU accession. Namely, only about 23% of respondents from CSO in the region agree that the government's reports incorporate adequate updates on the progress towards the EU accession. The perception is, again, the most positive in Albania and Kosovo, but in this regard, it did not reach 30%. Same as for the previous statement, the lowest share of the agreement is noted among CSOs in Serbia and Montenegro (15% and 18%, respectively), while Bosnian and Macedonian organisations are again in the middle.

Chart 8: CSO responses to the question "In the policy area my organisation works, government's reports incorporate adequate updates on the progress against the set of EU accession" (%)
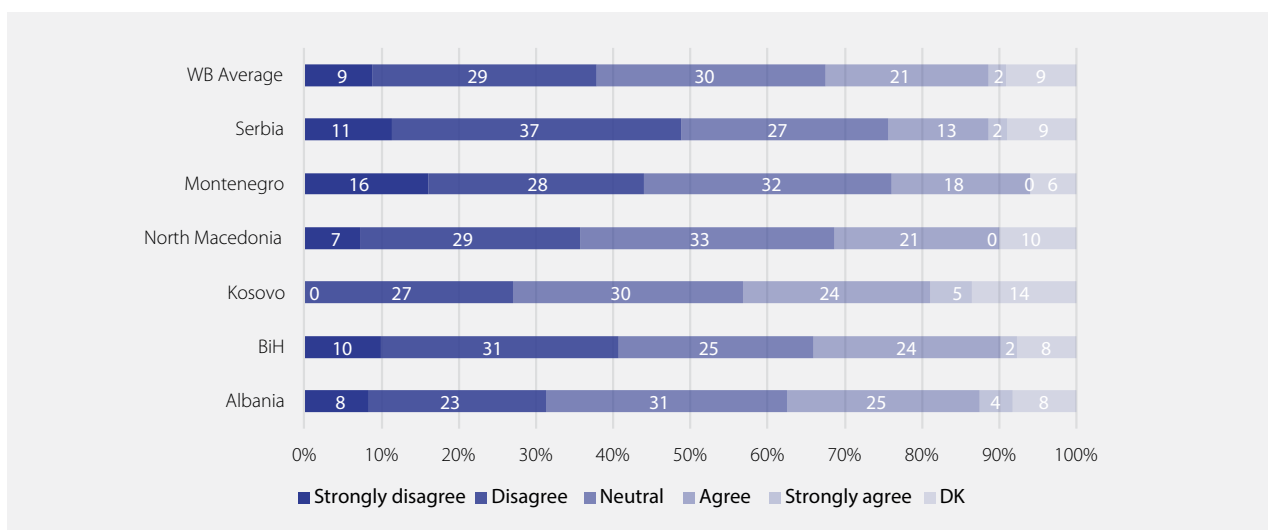
All in all, the findings of the CSO survey signal that organisations see their governments as insufficiently accountable to their citizens when planning and reporting on their policy priorities and results. Although the perception is slightly better in a few aspects, such as the impression that the EU accession priorities are adequately integrated into the government's planning documents, these minor improvements did not change indicator value in any of the countries. The most striking impression is the extremely negative perception among CSOs in Montenegro and Serbia, but also the overall positive attitudes in Albania and Kosovo regarding government planning and reporting in the context of European integration. However, same as in the previous monitoring cycle, the entire region has an indicator value of 0.

Chart 9: Indicator values for PDC_P5_I2 – comparison of values for the 2017/2018, 2019/2020, and 2021/2022 monitoring cycles
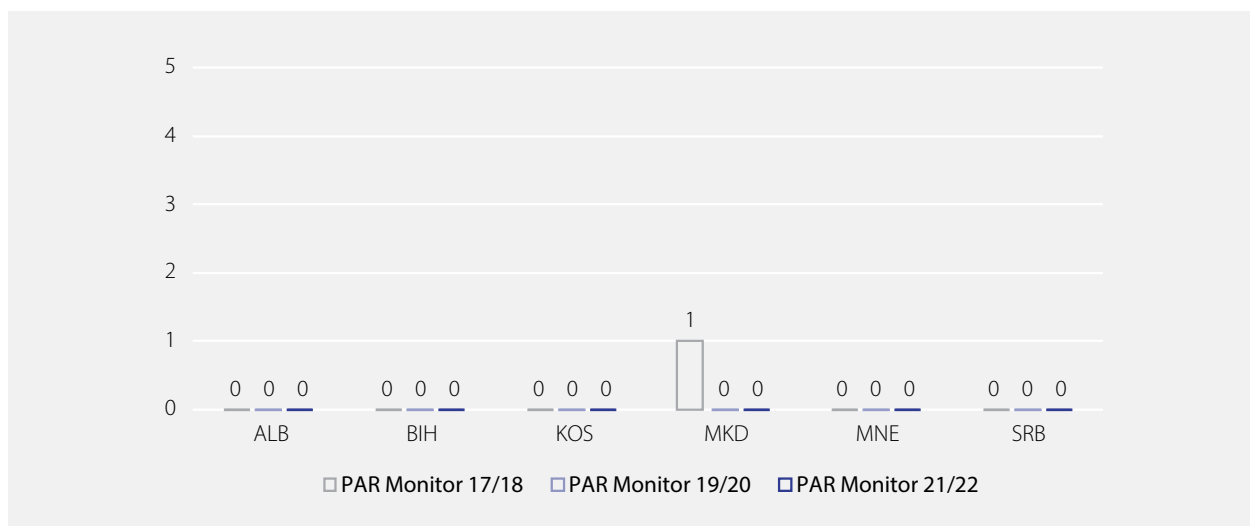
Principle 6: Government decisions are prepared in a transparent manner and based on the administrations' professional judgement; legal conformity of the decisions is ensured

The PAR Monitor addresses Principle 6 by focusing exclusively on the aspect of transparency in government decision-making. The monitoring approach entails measuring the extent to which government decision-making processes, as well their direct outputs (decisions), are transparent, along with the function of external communication. The "**Transparency of governments' decision-making**" (indicator PDC_P6_I1) indicator comprises five elements.

Table 11: Element scores and corresponding indicator values for PDC_P6_I1 "Transparency of the Government's decision-making"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. CSOs consider government decision-making to be generally transparent	**2**	0	0	0	0	0	0
E2. CSOs consider the exceptions to the rules of publishing Government's decisions to be appropriate	**2**	0	0	0	0	0	0
E3. The Government makes publicly available the documents from its sessions	**4**	0	0	2	2	0	0
E4. The Government communicates its decisions in a citizen-friendly manner	**4**	0	4	4	4	2	2
E5. The Government publishes adopted documents in a timely manner	**4**	2	0	4	0	0	2
Total points	**16**	**2↓**	**4↓**	**10**	**6**	**2↓**	**4**
Indicator value 2021/2022[45]	**0-5**	**0**	**1**	**3**	**2**	**0**	**1**
Indicator value 2019/2020	*0-5*	*1*	*2*	*3*	*2*	*2*	*1*
Indicator value 2017/2018		*1*	*2*	*3*	*2*	*2*	*1*

The research findings in this indicator combine the result of the survey of CSOs and governments' websites analysis. There is no notable change regarding CSOs' perception. Namely, only 17% of CSOs across the region, on average, consider the government's decision-making process as transparent. However, the perceptions differ between the administrations. While only 8% of CSOs in Serbia and 10% in Montenegro assess the decision-making process of their government as transparent, in BiH and North Macedonia, one-quarter of respondents have a positive opinion. Same as in the previous two PAR Monitors, almost a third of CSOs across the region remain neutral on this question, possibly suggesting that organisations are not much interested in the government decision-making process as such, but rather in the government's achievements.

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45 Conversion of points: 0-2 points = 0; 3-5 points = 1; 6-8 points = 2; 9-11 points = 3; 12-14 points = 4; 15-16 points = 5.

Chart 10: CSO responses to the question "In general, the government's decision-making process is transparent" (%)
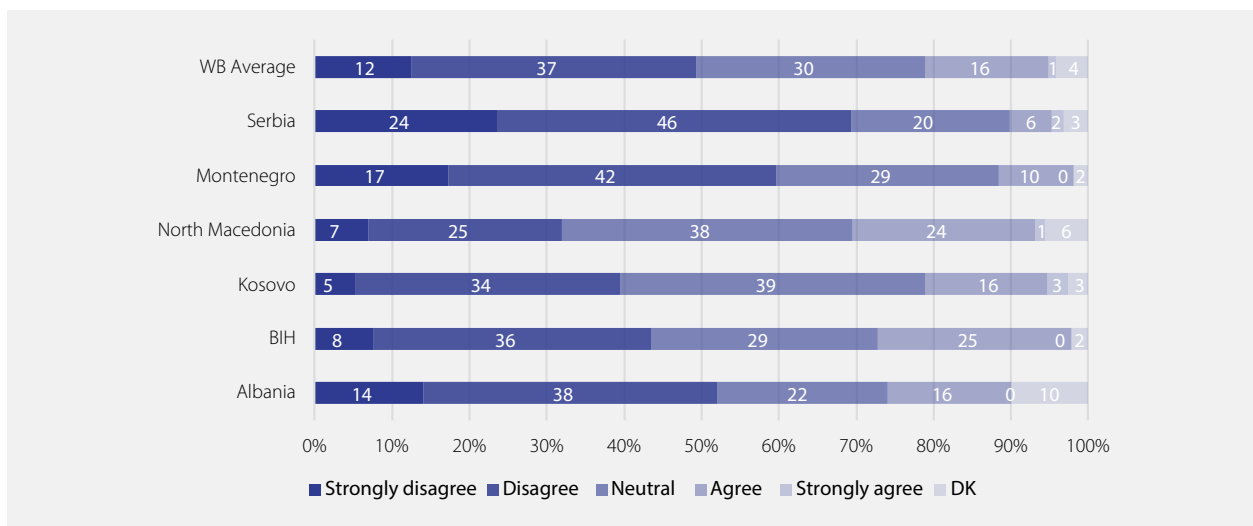
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 581 and refers to the total number of respondents in the WB.*

Asked to estimate whether exceptions to the obligation of publishing the government's decisions are appropriate, CSOs were even more critical. The share of agreement is only about 13% on average, while BiH is the only country where more than one-fifth of CSOs positively answered the above question (23%). On the other hand, only 5% of respondents in Kosovo and 7% in Serbia consider that exceptions to the requirements to publish the government's decisions are appropriate, while more than half think the opposite. Notably, as much as 11% of the organisations stated that they do not know the answer to this question, which, combined with those expressing a neutral stance, amounts to over 40%.

Chart 11: CSO responses to the question "Exceptions to the requirements to publish Government's decisions are appropriate" (%)
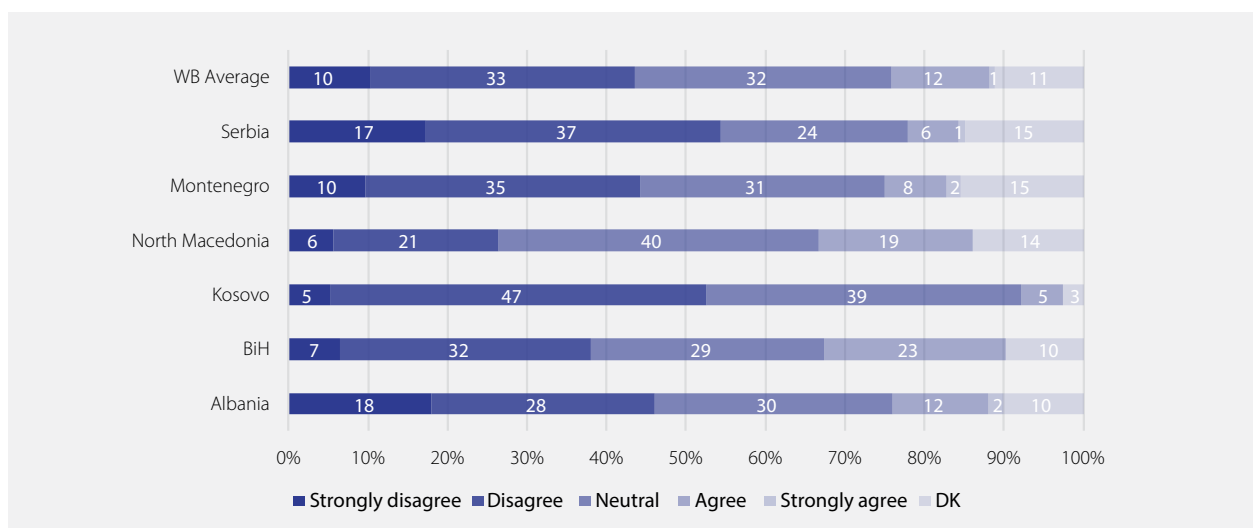
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 581 and refers to the total number of respondents in the WB.*

To determine the transparency of government sessions, researchers conducted an expert analysis of relevant websites. Although the results are far better than CSOs' perception, findings in this PAR Monitor have slightly worsened compared to previous monitoring cycles. For the government to be rated as fully transparent, it

should make all documents related to its sessions publicly available (agendas, minutes, press releases, as well as all adopted documents that are not formally labelled as confidential). However, in the three monitoring cycles conducted so far, no government in the region has deserved to be considered fully transparent, as none of them have published all four types of required materials.

In this monitoring cycle, only Kosovo's and North Macedonia's governments regularly published at least two out of four types of documents. North Macedonia's Government stands out as the most transparent, having in mind that it published agendas and press releases for every session, minutes for most of them, while adopted documents were published in the Official Gazette. However, access to the Official Gazette is still not free and requires a subscription, and neither North Macedonian Government could receive the highest assessment. Regarding Kosovo's Government, documents and press releases from all 35 analysed sessions were published. However, there were no agendas published, while the minutes are confidential in accordance with the regulation on the work of the government.

In other countries, only press releases are published regularly. In BiH, the Council of Ministers held only eight sessions during the period of analysis, and two sessions entailed all required information, and other sic usually lacked three or even all four types of materials. In Albania, although speeches or extracts from interviews given by the Prime Minister during or after government sessions were published, they did not coincide with all the sessions in the observed period. It is important to note that the Montenegrin Government only published adopted documents from its regular sessions held on Thursdays, while no acts were available when the government adopted them without holding a formal session. Also, agendas of the Montenegrin Government's sessions were publicly available, but not for the "extraordinary sessions", which are not held according to the regular schedule. Furthermore, Serbia's Government negatively stands out, with nine out of 41 sessions being completely non-transparent, without even a basic record from these sessions available.

Table 12. Online availability of materials from WB governments' sessions
(1 August 2021 to 1 February 2022) –

# OF GOV SESSIONS		# WITH AGENDAS PUBLISHED	# WITH MINUTES PUBLISHED	# WITH PRESS RELEASEs PUBLISHED	# WITH ADOPTED DOCS PUBLISHED
ALB	29	0	0	0	29
BIH	8	2	2	7	2
KOS	35	0	0	35	35
MKD	50	50	40	50	0
MNE[46]	34	34	0	34	22
SRB	41	0	0	28	32

Note: *Compilation based on data collected through the monitoring process.*

This indicator further examines whether the government communicates its decisions in a citizen-friendly manner. It was analysed whether documents and decisions from the government's session were accompanied by a summary or press release, which could be found not more than three clicks away from the homepage of the government's websites. Kosovo and North Macedonia once again stand out as the two best examples, where all observed sessions were followed by a user-friendly press release, that could be reached within three clicks. Regarding BiH, as previously mentioned, press releases were published for most sessions, and they were generally written in a citizen-friendly manner. Although press releases were regularly published in Montenegro as well, these were not citizen-friendly enough, with adopted documents often being summarised in bureaucratic jargon. In Serbia, adopted documents are accessible within three clicks, though many of them, such as government conclusions, are not published since the baseline PAR Monitor 2017/2018. However, out

46   In Montenegro, numerous extraordinary sessions were held without any documents being published before or after them. Many of them were organised in an online format, and the fact that they were held at all is known from the speeches of government officials (ministers and prime ministers).

of 32 sessions where documents were posted, 28 were accompanied by press releases which used simple and understandable language.

Finally, it was also analysed whether governments in the region published adopted documents on official websites in a timely manner, meaning a maximum of one week after the session at which they were adopted.[47] This monitoring cycle did not reveal many new developments. As in the last PAR Monitor, Kosovo's Government stands out as the only one which made available all adopted decisions and documents, shortly after the sessions. In Albania and Serbia, this was the case for the vast majority of government sessions. Namely, Albania's Council of Ministers adopted 173 decisions during the observed period, out of which 145 were published on the day they were approved, whilst 28 were not published at all. In Serbia, the Government held 21 sessions, and 16 of them had at least one document published. On the other hand, Montenegro's Government published materials within seven days for less than half of its sessions, while in BiH no materials were published at all.

Overall, after two monitoring cycles with almost identical results, the newest PAR Monitor exposed regression in half of the region. Although CSOs' perception remained negative across the region, the expert analysis showed a decline in the transparency of the government decision-making process. The biggest regression was noted for Montenegro, where indicator value has dropped from 2 points to 0. The decline is also noted in Albania and BiH, while the rest of the governments stagnated.

Chart 12: Indicator values for PDC_P6_I1 – comparison of values for the 2017/2018, 2019/2020, and 2021/2022 monitoring cycles

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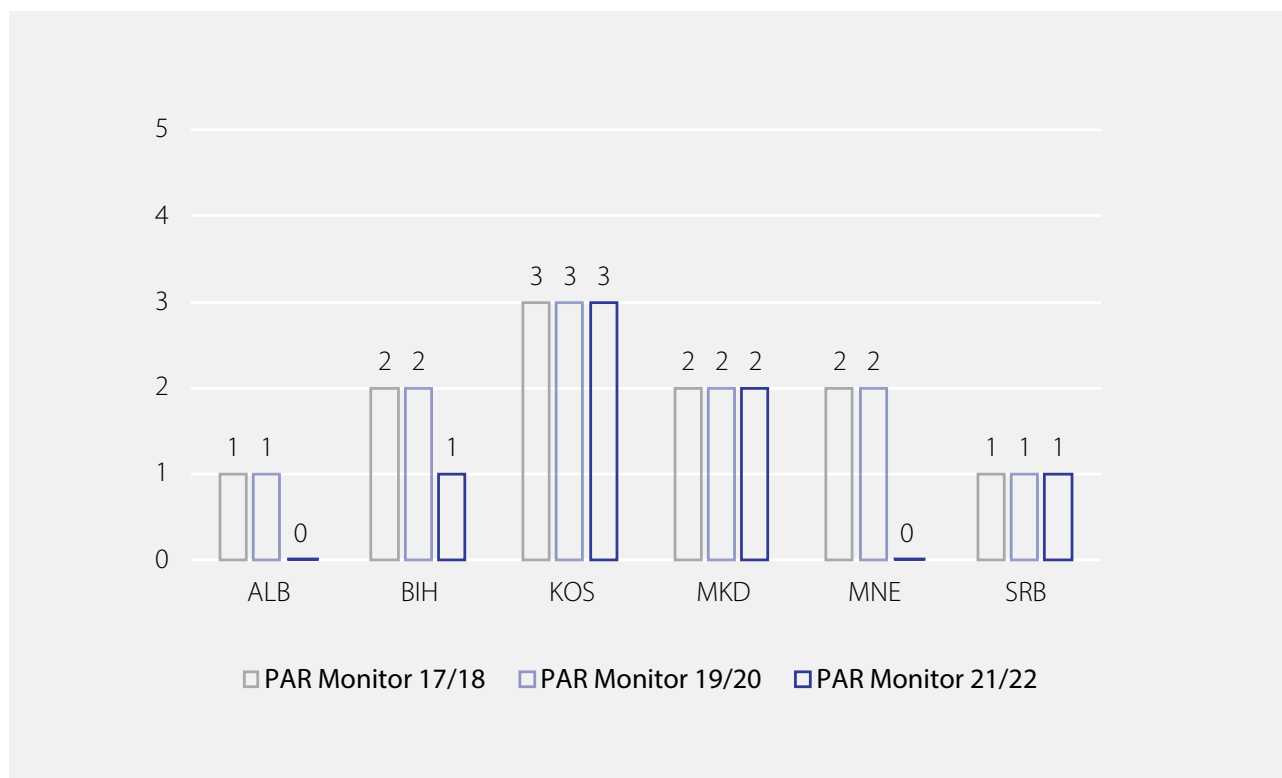
47 The researchers directly monitored the publication of decisions for all government sessions in the three-month period from the beginning of February until the beginning of May 2022.

Principle 10: The policy-making and legal-drafting process is evidence-based, and impact assessment is consistently used across ministries

In its approach to Principle 10, the PAR Monitor methodology focuses on the question of how policy research and advice generated outside of administrations, within the policy research community, is used by governments to support evidence-based policymaking. This indicator titled **"Use of evidence created by think tanks, independent institutes, and other CSOs in policy development"** (indicator PDC_P10_I1) consists of eight elements.

Table 13: Element scores and corresponding indicator values for PDC_P10_I1 "Use of evidence created by think tanks, independent institutes, and other CSOs in policy development"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. Frequency of referencing of evidence-based findings produced by CSOs in the adopted government policy documents	**4**	2	2	0	4	2	4
E2. Frequency of referencing of evidence-based findings produced by CSOs in policy papers and ex ante impact assessments	**4**	2	0	0	2	2	2
E3. Share of evidence-based findings produced by wide range of CSOs, such as think tanks, independent institutes, locally-based organisations, referenced in ex post policy analyses and assessments of government institutions	**2**	1	0	0	0	1	0
E4. Relevant ministries or other government institutions invite or commission wide range of CSOs, such as think tanks, independent institutes, locally-based organisations, to prepare policy studies, papers or impact assessments for specific policy problems or proposals.	**2**	2	1	1	1	1	1
E5. Representatives of relevant ministries participate in policy dialogue (discussions, round tables, closed door meetings, etc.) pertaining to specific policy research products.	**2**	2	2	2	1	2	1
E6. Representatives of wide range of CSOs, such as think tanks, independent institutes, locally-based organisations are invited to participate in working groups/ task forces for drafting policy or legislative proposals when they have specific proposals and recommendations based on evidence.	**4**	0	0	2	2	2	0
E7. Relevant ministries in general provide feedback on the evidence-based proposals and recommendations of the wide range of CSOs, such as think tanks, independent institutes, locally-based organisations which have been accepted or rejected, justifying either action.	**2**	0	1	0	0	1	0
E8. Ministries accept CSOs' policy proposals in the work of working groups for developing policies and legislation	**4**	0	0	2	0	2	0
Total points	**24**	**9↓**	**6↑**	**7↓**	**10↑**	**13↑**	**8↓**
Indicator value 2021/2022[48]	**0-5**	**2**	**1**	**1**	**2**	**3**	**1**
Indicator value 2019/2020	*0-5*	*2*	*0*	*2*	*1*	*0*	*2*
Indicator value 2017/2018		*1*	*0*	*3*	*0*	*0*	*1*

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48   Conversion of points: 0-5 points = 0; 6-8 points = 1; 9-12 points = 2; 13-16 points = 3; 17-19 points = 4; 20-24 points = 5.

The adopted government policy documents analysed under this indicator include currently implemented strategies, plans, programmes, and other types of documents which can reference information directly. In each administration, policy documents were analysed in three policy areas.[49] Table 14 details the number of such documents per policy area and the number of references identified.

Table 14: Frequency of references to evidence-based findings produced by CSOs in adopted government policy documents in three selected policy areas

	POLICY AREA	# OF ANALYSED POLICY DOCUMENTS	DOCUMENTS WITH REFERENCES	% OF ALL POLICY DOCUMENTS WITH REFERENCES[50]
ALB	**Anti-discrimination**	4	1	
	Social protection	5	2	27%
	Anti-corruption	2	0	
BIH	**Anti-corruption**	1	1	
	Anti-discrimination	4	0	17%
	Environment	1	0	
KOS	**Anti-corruption**	1	0	
	Public administration	5	0	0%
	Economic development	3	0	
MKD	**Anti-discrimination**	3	2	
	Social welfare	10	6	53%
	Environment	6	2	
MNE	**Anti-corruption**	4	2	
	Anti-discrimination	11	6	48%
	Environment	14	6	
SRB	**Anti-discrimination**	6	5	
	Environment	12	7	67%
	Media and culture	3	2	

The results of analysis showed that the frequency of referencing CSOs' findings in the adopted government policy documents has notably changed in every WB administration. Progress was recorded in half of them, while the other half deteriorated. However, the biggest regression was noted in Albania, from nearly 70% of documents with CSOs' references in the previous cycle, to just 27%. Significant backsliding was also recorded in BiH where now only one document contains CSOs' references. Additionally, Kosovo negatively stands out as the only example where none of the analysed government policy documents reference findings of CSOs. On the other hand, the most notable improvement was recorded in North Macedonia and Montenegro, both of which raised the level of referring to civil society findings by about 20%. It is important to note that slight progress was also noted in Serbia, which is now the regional leader in this regard, with two-thirds of policy documents citing CSO findings.

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49   Criteria were used for the selection of policy areas where a substantial number of CSOs actively work and conduct research and analyses.
50   The green colour indicates an increase in the share of government policy documents that reference evidence-based findings produced by CSOs compared to the previous monitoring cycle, while the red colour signifies a decrease within the respective country.

■ Good practices: Significant share of government policy documents reference CSO findings in Serbia

In all three monitoring cycles, CSOs' references could be found in more than half of government policy documents in **Serbia**. Moreover, small improvements were noted from cycle to cycle, which indicates that Serbia's government is increasing relying on CSOs in public policy development, at least in the three analysed policy areas. In this regard, the newly adopted Anti-discrimination strategy, as well as Strategy for gender equality, with 84 and 60 CSOs' references respectively, stands out as excellent examples of valuing the expertise and experience of civil society.

However, the use of CSO findings is significantly lower regarding ex-ante or ex-post analysis and assessments. In terms of ex-ante impact assessment documents, they almost never contain any CSO reference, with very few exemptions. Namely, in Albania, out of 17 ex-ante documents that were analysed, only two of them referenced some CSO publications. Furthermore, in Serbia, North Macedonia, and Montenegro, only one CSO reference was found per country among dozens of analysed ex-ante documents.

The situation is even poorer regarding ex-post policy analyses and assessments. The share of findings produced by CSOs referenced in ex-post documents was once again minor or non-existent across the region. In Montenegro, CSOs' references could be found in two ex-post reports in the anti-discrimination area. Albania is the second exception, where CSO findings were referenced in one out of 11 ex-post analyses. Although ex-post analyses produced by Serbian authorities usually quoted CSO evidence in the past, this was not the case in this monitoring cycle. It is also important to note that in Serbia, as well as BiH and North Macedonia, no ex-post documents could be found on the websites of the ministries in charge of implementing analysed strategies, action plans, legislation, or programmes.[51]

■ Practices to avoid: Non-disclosure of ex-post analyses and assessments

Responsible institutions across the entire region are neglecting to produce ex-post analyses and assessments of adopted government documents. Even in cases where evaluations of government documents are carried out, they are frequently not made publicly available. This is, for example, the case with the Evaluation of the National Strategy for Gender Equality 2016–2020 in Serbia, which was produced but could not be found online.

The remaining elements in this indicator are based on the opinions of CSOs concerning the extent and way government institutions use civil society inputs and evidence in policymaking processes. When asked if they invite their CSOs to prepare or submit policy papers, studies, or impact assessments in the development of policy proposals, 44% of CSOs across the region confirm that this is the case, which is a 6% higher result compared to previous monitoring cycles. The highest agreement with the statement is once again found in Albania (61%), followed by Kosovo (54%), whereas it was the lowest in BiH and Serbia (38% and 31%).

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51   Since it was not possible to find any publicly available ex-post analyses in the selected policy areas in Serbia, six FOI requests were sent to the four different administration bodies. The Ministry of Environmental Protection did not answer a FOI request regarding ex-post analyses of the previously applicable Law on Nature Protection and Waste Management Strategy 2010-2019. Although other ministries answered, only the Ministry of Human and Minority Rights and Social Dialogue delivered one requested ex-post analyse – Evaluation of the National Strategy for Gender Equality for the period from 2016 to 2020 – which was used as a sample in the research.
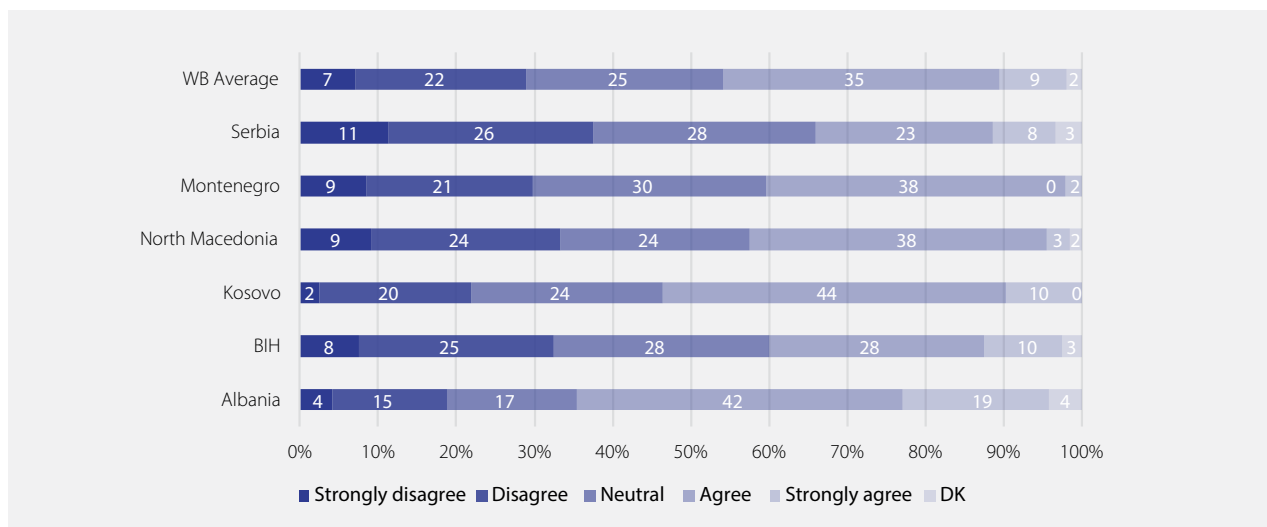
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 515 and refers to the total number of respondents in the WB.*

When asked how frequently representatives of relevant government institutions participate in events organised to promote policy products developed by civil society when invited, respondents have quite positive views. Same as in the last monitoring, more than half (53%) of surveyed CSOs at the regional level state that this is the case often or always, whereas only 22% report that this is the case rarely or never. In Kosovo, 71% respond to this question with "always" and "often", whereas Serbian CSOs are on the other end with only 31% saying so. These trends have stayed the same since the 2017/2018 PAR Monitor.

Chart 14: CSO responses to the question "When invited by my organisation, representatives of relevant government institutions participate in events (such as roundtables, discussions, and others) organised to promote our policy products (such as reports, policy briefs, and others)" (%)
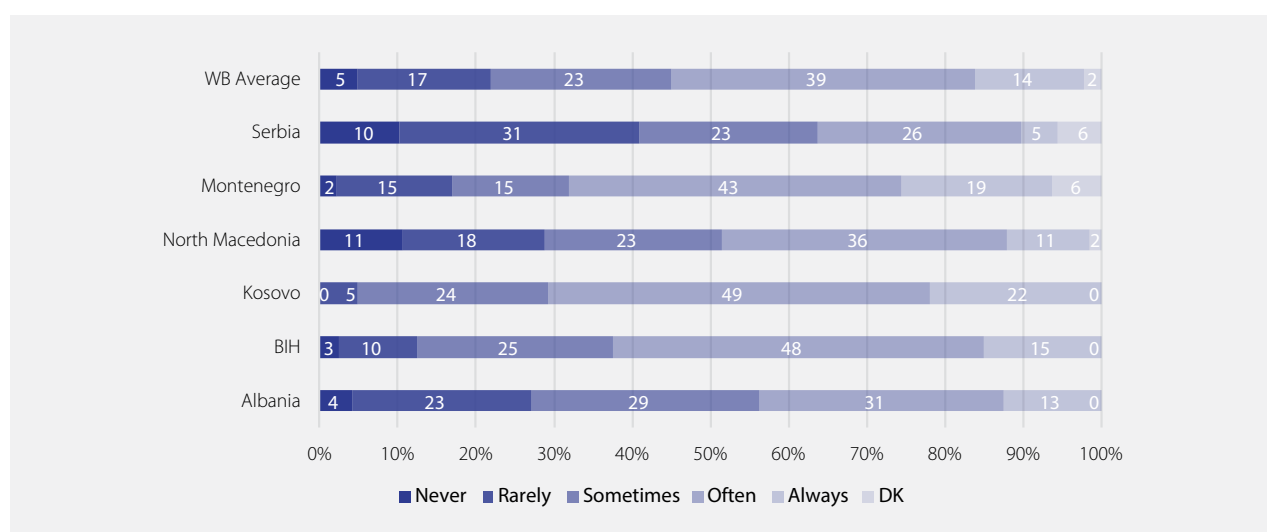
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 515 and refers to the total number of respondents in the WB*

On the question of how often ministries invite CSOs to participate in working groups for drafting policy or legislative proposals in the past two years, CSO perceptions are less favourable, except in Kosovo. It should nevertheless be noted that the response "sometimes" could also be considered a positive response for this question, although for the calculation of points only the "always" and "often" responses applied.[52] At the level of the WB, 32% of the surveyed CSOs responded with "often" and "always" to this statement, but if the "sometimes" responses are added, this share goes up to 63%. Serbian CSOs are the most negative on this issue, with 54% stating that this never or rarely happens. On the other hand, 56% of Kosovo CSOs report that ministries "always" or "often" invite them to take part in working groups, and when the "sometimes" answers are added, it results that an overwhelming 88% of surveyed CSOs in Kosovo confirm that this is an occasional or frequent practice. Albania, BiH, and North Macedonia have similar results (between 30 and 40%), while Montenegro comes out with slightly better results (27%).

Chart 15: CSO responses to the question "Relevant ministries invite my organisation to participate in working groups/task forces for drafting policy or legislative proposals when we have specific evidence-based proposals and recommendations" (%)
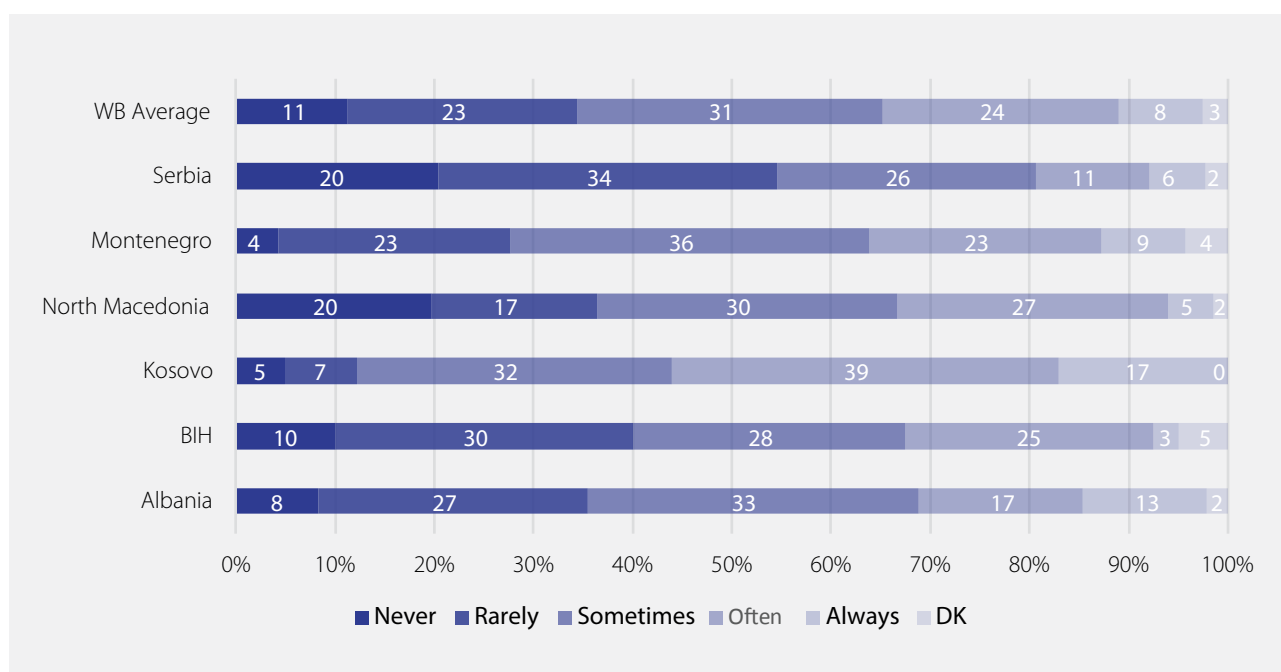
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 515 and refers to the total number of respondents in the WB*

The survey also inquired how frequently ministries provide reasons for accepting or rejecting CSOs' proposals and recommendations during working groups' meetings. Half of the respondents at the regional level state that this is never or rarely the case, whereas only 21% claim this to be the case always or often. Although these results are unsatisfactory, they show a shift compared to the previous monitoring, when the share of never or rarely responses was 57%, and 14% CSOs answered always or often. CSOs in Serbia are by far the most negative, with 75% denying that ministries provide such reasons.

52   Same as in the previous research cycle, 23% of CSO representatives answered "sometimes" to the question: "When invited by my organisation, representatives of relevant government institutions participate in the events organised to promote our policy products."

Chart 16: CSO responses to the question "Relevant ministries provide feedback explaining the reasons for either the acceptance or rejection of evidence-based proposals and recommendations coming from my organisation during participation in working groups" (%)

Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 515 and refers to the total number of respondents in the WB*

Finally, CSOs recognise that relevant ministries occasionally accept the policy proposals they produce and present to them, although only 1 in 5 state this is the case always or often. Around a third recognise this to happen sometimes, while 39% say that this is never or rarely the case.

Chart 17: CSO responses to the question "Relevant ministries generally consider the policy proposals made by my organisation" (%)
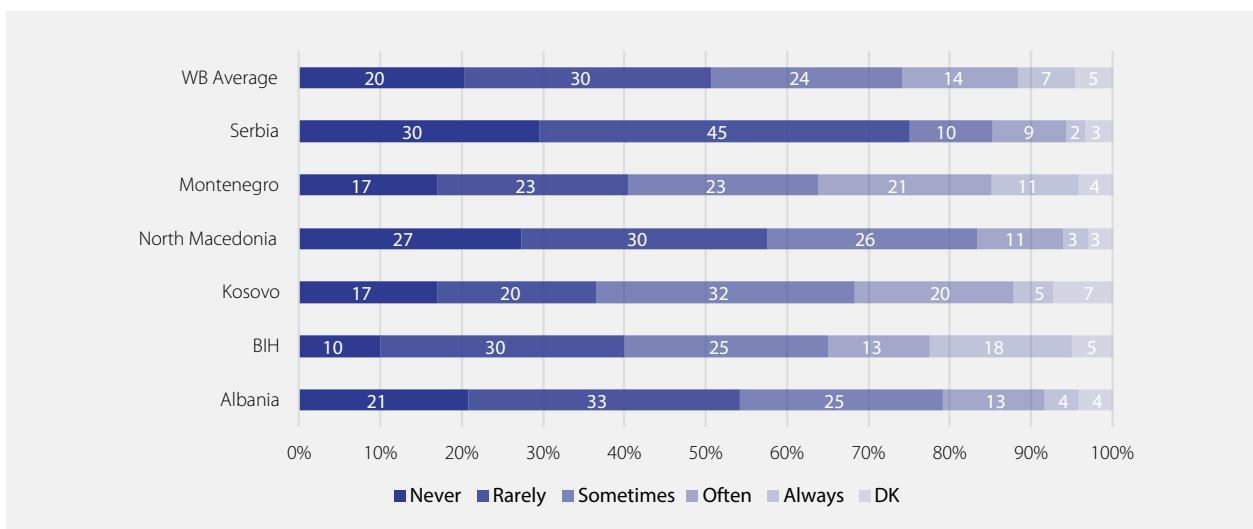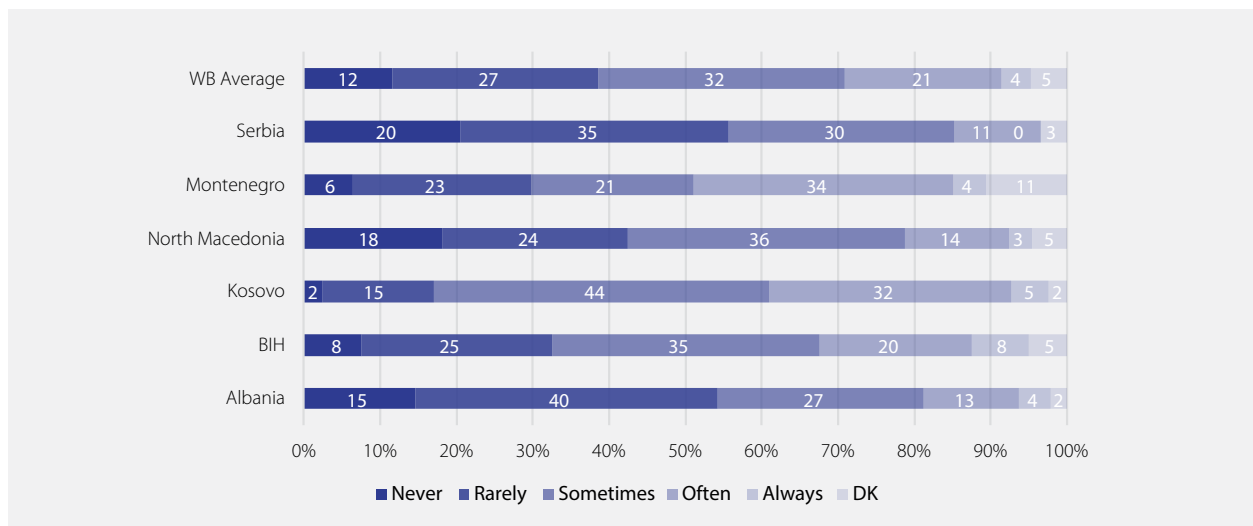

Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 515 and refers to the total number of respondents in the WB*

Although numerous positive trends in the CSO perception were recorded in this monitoring cycle, civil society's views on its role in the policy-making process are still largely unfavourable. Civil society in the region tends to be more positive on various aspects of their contribution to evidence-based policy development than on other examined aspects of policy planning and policymaking. The contrast remains particularly stark compared to perceptions regarding government reporting practices and the transparency of government decision-making processes.

Indicator value changes can be observed in all countries except Albania. Kosovo and Serbia experienced negative developments, while the remaining three administrations improved. This is particularly the case with Montenegro, which received 0 indicator value in the previous two and a value of 3 in the 2021/2022 monitoring cycle. In Montenegro, there has been improvement in all aspects, both in the perception of civil society and in the practice of referencing CSO findings. On the other hand, the frequency of referencing decreased in Kosovo, and the indicator value was reduced by one. BiH owes better results to the perception of civil society, and in North Macedonia improved assessment is due to the higher share of CSOs' references in government policy documents and ex-ante impact assessments.

Chart 18: Indicator values for PDC_P10_I1 – comparison of values for the 2019/2020 and 2021/2022 monitoring cycles
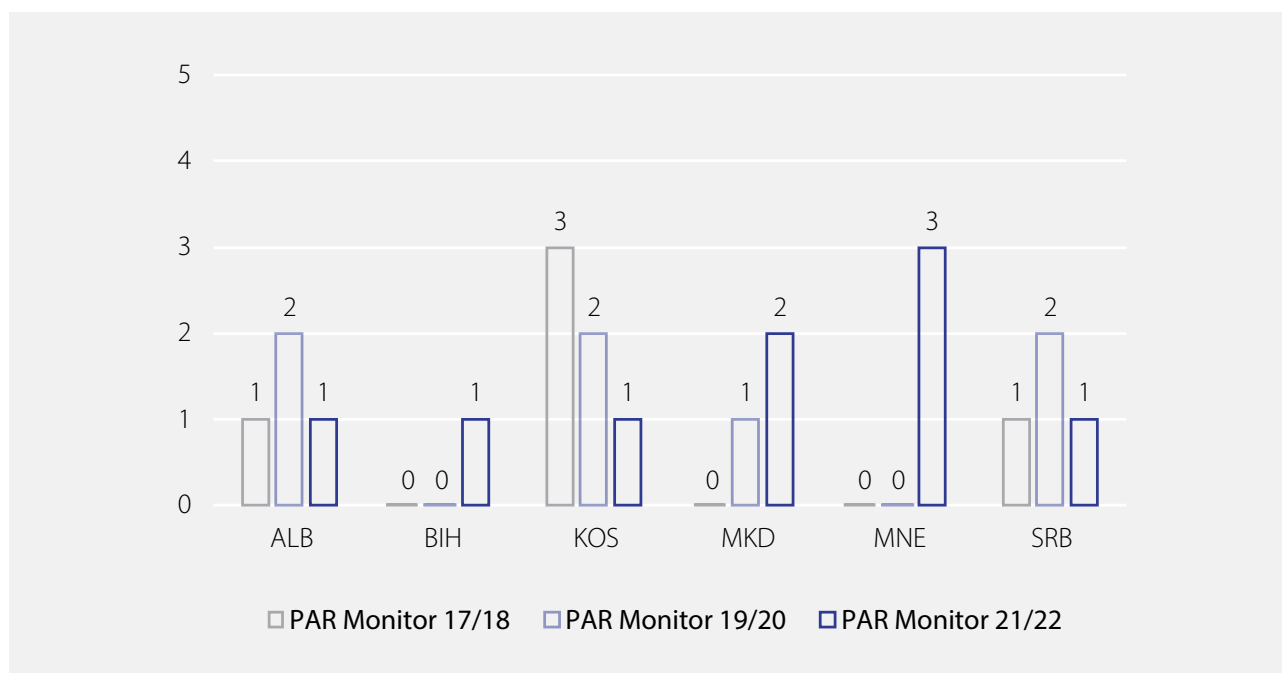
Principle 11: Policies and legislation are designed in an inclusive manner that enables the active participation of society and allows for co-ordination of different perspectives within the government

The indicator measuring Principle 11 in the PAR Monitoring methodology has been revised to ensure a balance between an analysis of practices based on administrative documents and evidence on the one hand, and civil society perceptions on the other. To the previously existing 10 perception-based elements, an additional 10 document-based elements have been added. One element was removed due to its duplication (Elements 2 and 6 in the previous monitoring cycle). Therefore, this indicator cannot be compared with the previous monitoring cycle.

In the revised indicator, WeBER still retains its focus on external consultation processes, but the part of Principle 11 dealing with internal (intra-governmental or cross-ministerial) coordination and consultation processes is left out, as it does not have a direct, citizen-facing purpose. The indicator "Inclusiveness and openness of policymaking" (indicator PDC_P11_I1), consists of 19 elements.

Table 15: Element scores and corresponding indicator values for PDC_P11_I1 "Inclusiveness and openness of policymaking"

Indicator element	Max	ALB	BIH	KOS	MKD	MNE	SRB
E1. Scope of public consultations on policy documents in central administration	4	2	4	0	4	2	2
E2. Scope of public consultations on legislation in central administration	4	2	4	2	4	2	2
E3. Availability of reporting on public consultations on policy documents by central administration	4	1	4	0	0	2	2
E4. Availability of reporting on public consultations on legislation by central administration	4	0	0	4	0	2	2
E5. Basic functionality of a national public consultation portal	4	2	2	2	2	0	4
E6. Advanced functionality of a national public consultation portal	2	1	1	1	1	1	1
E7. Proactiveness of informing on public consultations	4	0	0	0	0	0	0
E8. Embeddedness of early public consultations in practice	2	0	0	1	0	0	0
E9. Quality of reporting on public consultations	2	0	0	1	0	0	1
E10. Impact of public consultation results on policy making	2	0	0	2	0	0	1
E11. CSOs consider formal consultation procedures create preconditions for effective inclusion of the public in the policy-making process	2	1	1	1	0	0	0
E12. CSOs consider formal consultation procedures are applied consistently	2	1	1	1	0	0	0
E13. CSOs consider that they are consulted at the early phases of the policy process	2	0	0	0	0	0	0
E14. CSOs consider consultees are timely provided with information on the content of legislative or policy proposals	2	0	0	0	0	0	0
E15. CSOs consider consultees are provided with adequate information on the content of legislative or policy proposals	2	0	0	1	0	0	0
E16. CSOs consider sponsoring ministries take actions to ensure that diversity of interests is represented in the consultation processes (women's groups, minority rights groups, trade unions, employers' associations, etc.)	2	0	0	0	0	0	0
E17. CSOs consider ministries (sponsors of policy and legislative proposals) provide written feedback on consultees' inputs/comments	2	0	0	0	0	0	0
E18. CSOs consider ministries (sponsors of policy and legislative proposals) accept consultees' inputs/comments	2	0	0	1	0	0	0
E19. CSOs consider ministries (sponsors of policy and legislative proposals) hold constructive discussions on how the consultees' views have shaped and influenced policy and final decision of Gov.	2	0	0	0	0	0	0
Total points	**50**	**10↑**	**17↓**	**17↓**	**11↓**	**9↓**	**15↑**
Indicator value 2021/2022[53]	**0-5**	**1**	**1**	**1**	**1**	**0**	**1**
Indicator value 2019/2020	*0-5*	*0*	*2*	*1*	*1*	*1*	*0*
Indicator value 2017/2018[54]		*0*	*0*	*1*	*0*	*0*	*0*

53 Conversion of points: 0-9 points = 0; 10-17 points = 1; 18-25 points = 2; 26-33 points = 3; 34-41 points = 4; 42-50 points = 5.
54 The indicator values are not comparable for the two monitoring cycles due to indicator revision. In the baseline PAR Monitor 2017/2018, conversion of points was the following for a total of 30 points: 0-6 points = 0; 7-10 points = 1; 11-15 points = 2; 16-20 points = 3; 21-24 points = 4; 25-30 points = 5.

Regional governments still underperform regarding the inclusiveness of policy making. Analysis of the share of policy documents, adopted by governments in the last six months of the year preceding measurement (from July to December 2021), that underwent some form of consultation, informs that only few policy documents were adopted in BIH and North Macedonia (one and three, respectively), but they all underwent consultations before being approved. In Albania, Montenegro, and Serbia, more documents were adopted, with more than 80% consulted with stakeholders. On the other hand, for five policy documents adopted in Kosovo in the analysed period, only two were subject to public consultations.

The analysis of proposals of laws adopted by the governments in the same period yields a similar picture. Authorities in Albania, BIH, and North Macedonia adopted fewer law proposals than other administrations, but those in BIH and North Macedonia organised consultations in 100% of cases, and Albanian authorities did so in more than 80%. Kosovo also has a high rate of public consultations (almost 90%) for adopted laws. Regarding Montenegro and Serbia, the public was consulted in around 50% of cases, although more laws were adopted (52 and 59, respectively).

However, consultations with stakeholders in the early stages of policy development are practically non-existent across the region, except in Kosovo where responsible authorities held them for almost two-thirds of policy documents and law proposals observed. Policy authorities BIH and Albania did not hold a single early consultation, while in North Macedonia, Montenegro, and Serbia they did so only occasionally, insufficient for allocating points in this element.

The public availability of reports on implemented public consultations on policy documents is quite uneven in the region. While authorities in Kosovo and North Macedonia did not publish a single report for the observed period, the ones in Montenegro and Serbia did so in over 80% of cases, and Albanian authorities published them for 50% of consultations on the observed policy documents.

Regarding publicity of reports from public consultations on law proposals, assessment similarly indicates diverging practices. For instance, authorities in Kosovo and Montenegro have been the most diligent with around 90% of published reports. In contrast, BIH and North Macedonian authorities did not publish a single report online, and the ones in Albania only. Between these two extremes is Serbia, with available reports for 76% public consultations on law proposals analysed.

On the other hand, the quality of reporting remains generally poor. In few cases (partially in Kosovo and Serbia), they contain all the comments and proposals submitted during public consultation, listed individually without aggregated inputs. The same goes for the existence of clear feedback information on each proposal, i.e., if proposals are accepted, rejected, or partially accepted. In these two administrations, published consultation reports contain justifications for accepting or rejecting submitted comments in, but not universally. Thus, the actual impact of public consultations on policy documents and law proposals could be determined only in Kosovo and Serbia, where the share of accepted comments by consultees was 73% and 62%, respectively. In the rest of the region, there are either no consultation reports publicly available or they do not reveal how submitted comments were addressed.

This indicator further looks at the functionalities of online public consultation portals run by government authorities to provide information and ensure citizens' participation in public consultation processes (e-consultation, wider e-participation or e-government portals). The indicator separately analyses what can be considered basic criteria of functionality and those that can be considered advanced criteria. Although public consultation portals do exist across the region, only in Serbia they satisfied all the basic criteria of functionality that this indicator looks for.

The portals of all countries meet the first criterion. However, with the exception of Serbia, in all other countries, at least one criterion has not been met. In Albania and BiH, search engines do not contain searches based on basic categories, in North Macedonia and Kosovo, consultation reports are not systematically published along with other information on past consultations, while in Montenegro, both criteria have not been met.

Regarding the criteria for advanced portal functionalities, the regional picture is slightly poorer than. North Macedonia and Kosovo's portals satisfy almost all the advanced criteria (4 out of 5). In the rest of the cases, consultation portals meet 3 out of 5 listed criteria.

Table 16. Functionalities of e-consultation portals in the region

|	ALB	BIH	KS	MKD	MNE	SRB
BASIC CRITERIA						
2-year search history[55]	✓	✓	✓	✓	✓	✓
search filters[56]	X	X	✓	✓	X	✓
availability of public consultation reports	✓	✓	X	X	X	✓
ADVANCED FUNCTIONALITIES						
option to be notified if public consultations are opened	X	✓	✓	X	✓	✓
option to submit comments directly in the text	✓	X	X	✓	X	✓
option to be notified when feedback is provided	X	✓	✓	✓	✓	✓
option to see the submitted comments	✓	X	✓	✓	✓	✓
availability other accompanied documents	✓	✓	✓	✓	X	✓

Administrations are not proactive in informing the public about public consultations in the region. None of the administrations use a variety of channels for reaching out to the interested public, and these trends have remained the same since the previous PAR Monitor. Namely, WB administrations use 2 to 3 channels, at most, to inform about the intention to hold public consultations. Webpages of authorities holding consultations are most likely to contain this information, as well as websites of relevant government offices and e-consultation portals, but social media and traditional media are rarely used in practice for these purposes.

Regarding civil society's perceptions of the quality of public consultations, CSOs are first asked whether formal consultation procedures provide conditions for the effective involvement of the public in policymaking processes. Over a third of surveyed CSOs (31%) do agree with this statement, which is 3 percentage points less than in the last monitoring cycle. The agreement has notably dropped in North Macedonia, from 34% in the previous cycle to 28% in this cycle. The most positive CSOs' responses are again in Kosovo, but also with a drop in percentage of 5 percentage points. Respondents from Montenegro and Serbia emerge as the most critical on this issue, with 48% and 50% disagreeing, respectively. Additionally, no CSO expressed strong agreement in Montenegro. Given that public consultations in policymaking are known to be important conditions of EU accession processes, it is possible that civil society in administrations that are further along in this process have higher expectations from their governments.

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55   Searchability of database of consultations for at least 2 years back, with all the information (such as announcements, dates, and responsible authorities) relevant for fully identifying each consultation process.
56   Searchability by year, policy area, institution, and type of document.

Chart 19: CSO responses to the question "Formal consultation procedures provide conditions for an effective involvement of the public in policy-making processes" (%)
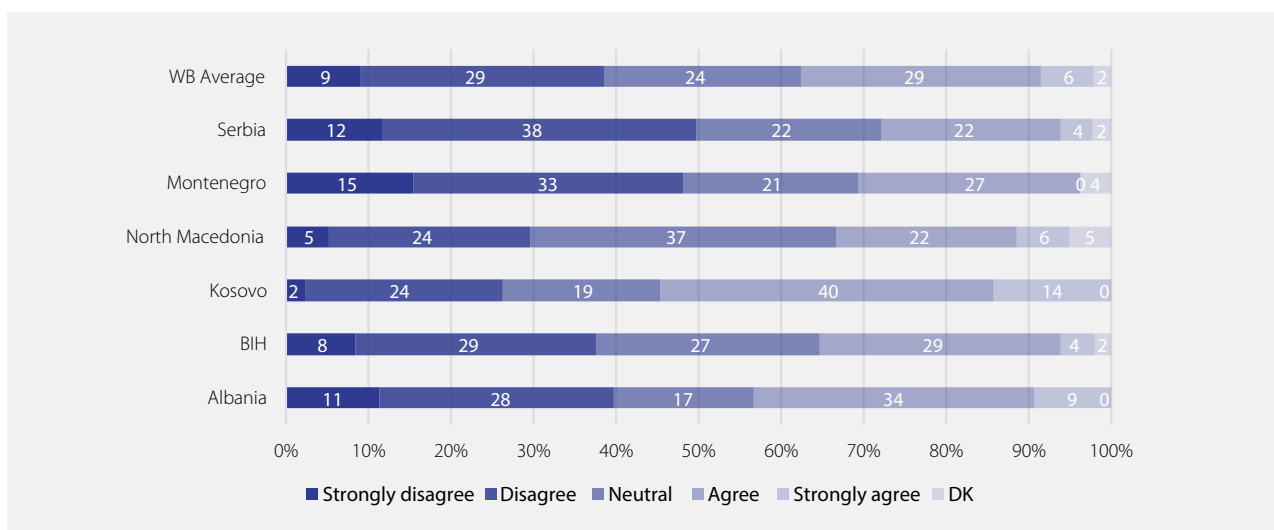
Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 515 and refers to the total number of respondents in the WB

In line with the findings from the previous monitoring cycle, few CSOs in the region agree that government institutions consistently apply formal consultation procedures when developing policy within their purview (23%). At the same time, disagreement with this statement is at 40%, 5 percentage points less than in the last PAR Monitor. Kosovo's CSOs are again more positive on this issue than their peers in the region (33% compared to regional 23%), while the most unfavourable opinions are expressed by CSOs in North Macedonian, Serbian and Montenegrin organisations, with less than 20% of agreement. It is important to note that Kosovo and Montenegrin CSOs mark the largest shares of neutral responses (43 and 40%).

Chart 20: CSO responses to the question "Government institutions consistently apply formal consultation procedures when developing policies within their purview" (%)
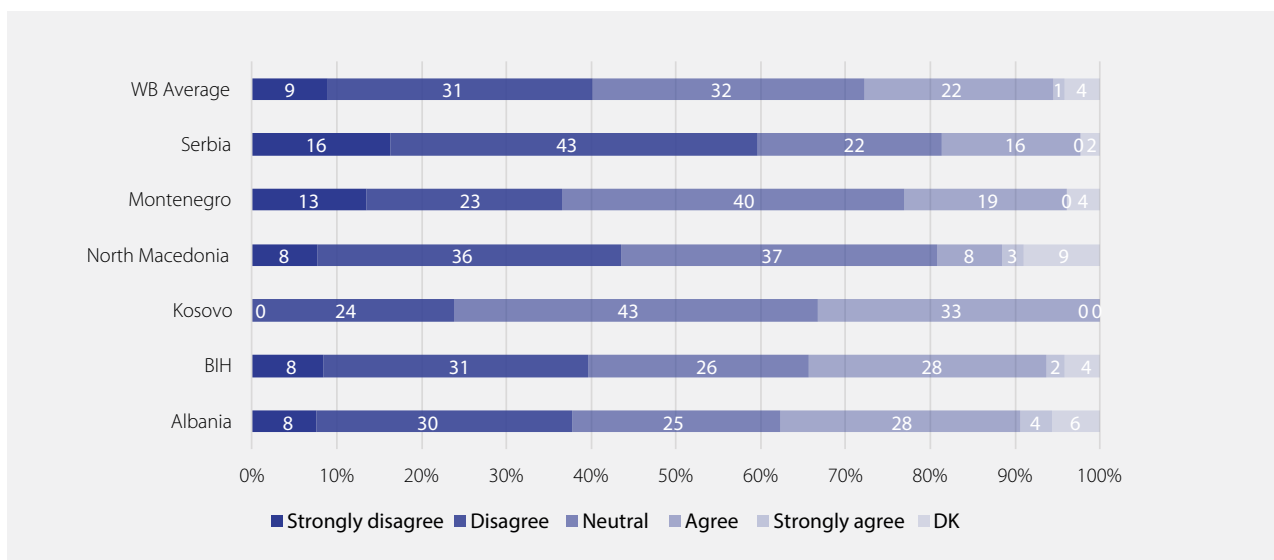
Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 515 and refers to the total number of respondents in the WB

Furthermore, over half of the surveyed CSOs across the region (53%) report they are rarely or never consulted in the early phases of policy or legislative processes, down by 3 percentage points as compared to the 2019/2020 PAR Monitor. The share of those that reply that they are "always" and "often" consulted has steadily grown, from 8% to 14%, with a third of respondents who state that they are sometimes consulted in early phases. The most negative views on this issue are held by CSOs in Serbia, where 63% reply with "never" or "rarely". At the same time, the share of "often" and "always" responses is highest in BIH (although only 24%), and 40% of respondents in Kosovo note that they are sometimes consulted in the early phases of policy or legislative processes.

Chart 21: CSO responses to the question "Relevant government institutions consult CSOs in the early phases of policy or legislative processes (before any draft documents are produced)" (%)
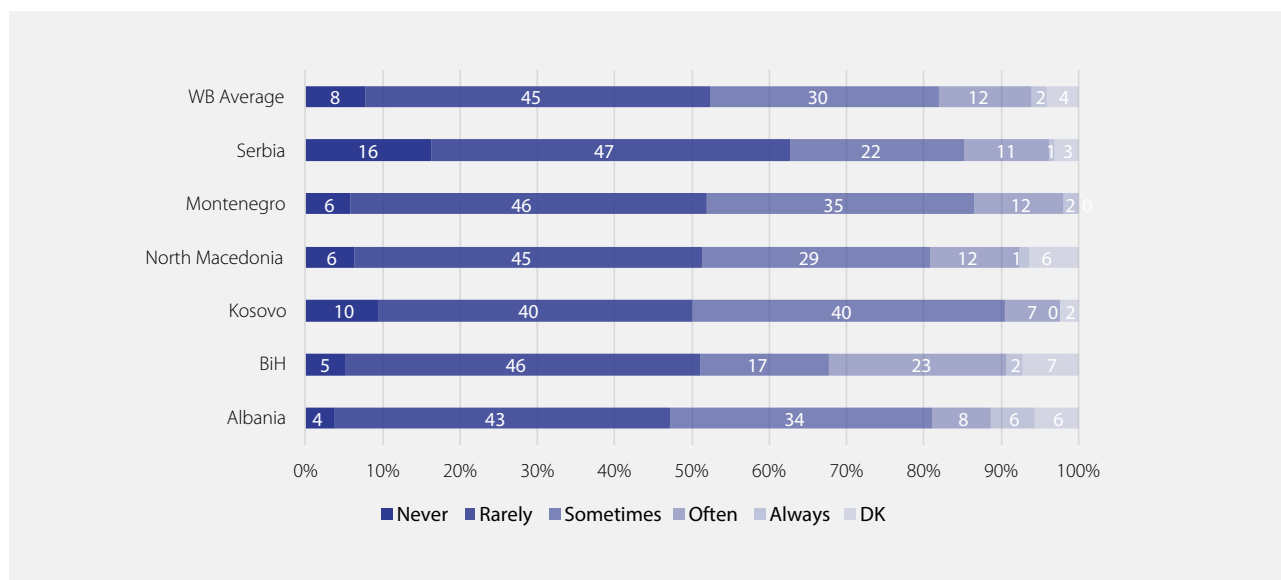
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 515 and refers to the total number of respondents in the WB*

The share of CSOs who agree that they are timely provided with information on the content of consulted proposals has grown since the 2019/2020 monitoring cycle, from 17% to 21%, and the disagreement decreased slightly, from 45% to 43%. At the national level, Serbian CSOs are the most negative in this case, with 63% disagreeing, while those in Kosovo are the most positive (36%). Also, again, just one in five CSOs thinks that the information that they are provided with adequate information on the content of legislative or policy proposals in consultation processes, while 39% disagree across the region (the results are similar to the 2019/2020 monitoring cycle when the disagreement was at 37%). A surprisingly high share of CSOs provides a neutral reply to this question (32%, 8 percentage points less than in the PAR Monitor 2019/2020), which indicates highly heterogenous practices in the region when it comes to content package that goes along with the invitations for participating in consultations.

Perceptions are quite negative when it comes to the question of how frequently relevant ministries ensure that diverse interest groups are represented (46% answered "rarely" or "never"), the percentage of respondents who state that this "never" or "rarely" case has decreased by 3 percentage points since the previous PAR Monitor, while the share of positive responses ("often" and "always") has simultaneously increased, from 10% to 17%. The most negative views are those of CSOs in BIH, North Macedonia, and Serbia, where more than half answered with "rarely" and "never".

Chart 22: CSO responses to the question "Relevant ministries ensure that diverse interest groups are represented in public consultation processes (such as women, minorities, trade unions, employers' associations, and others)" (%)
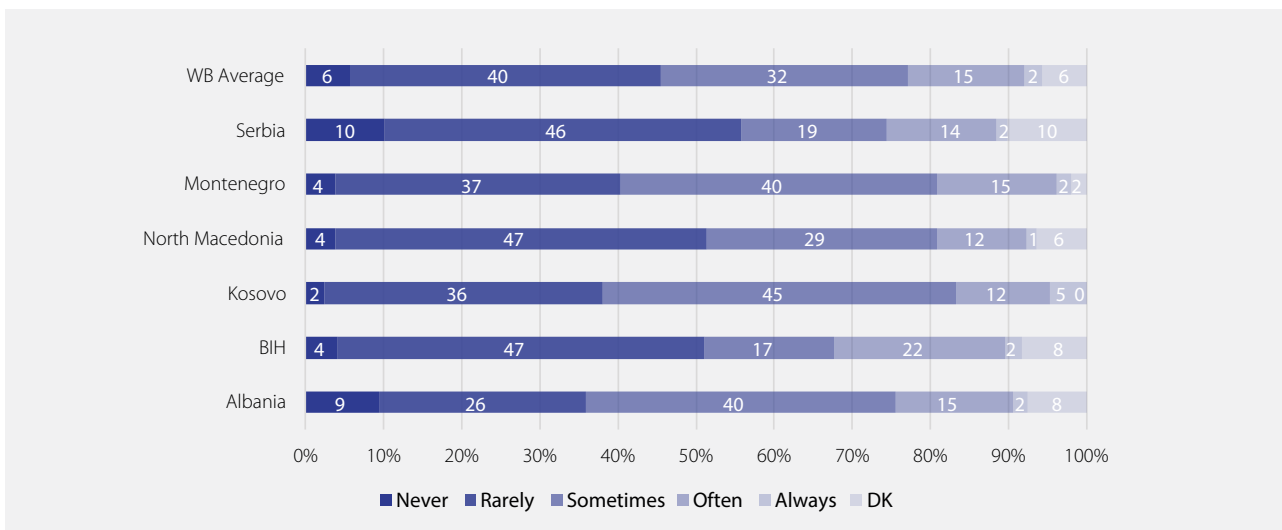

Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 515 and refers to the total number of respondents in the WB

Once again, CSOs across the WB predominantly feel that ministries "never" or "rarely" provide written feedback to consultees on how they have handled their input (55% of respondents, only for one percentage point less than in the 2019/2020 PAR Monitor). Along these lines, 12% of respondents believe that feedback is "always" or "often" given. CSOs from BIH are the most approving in this regard (a 17 percentage point increase is recorded), and those from Serbia are the most critical, with 66% denying the prevalence of this practice.

Chart 23: CSO responses to the question "Relevant ministries provide written feedback to consultees on whether their inputs are accepted or rejected" (%)
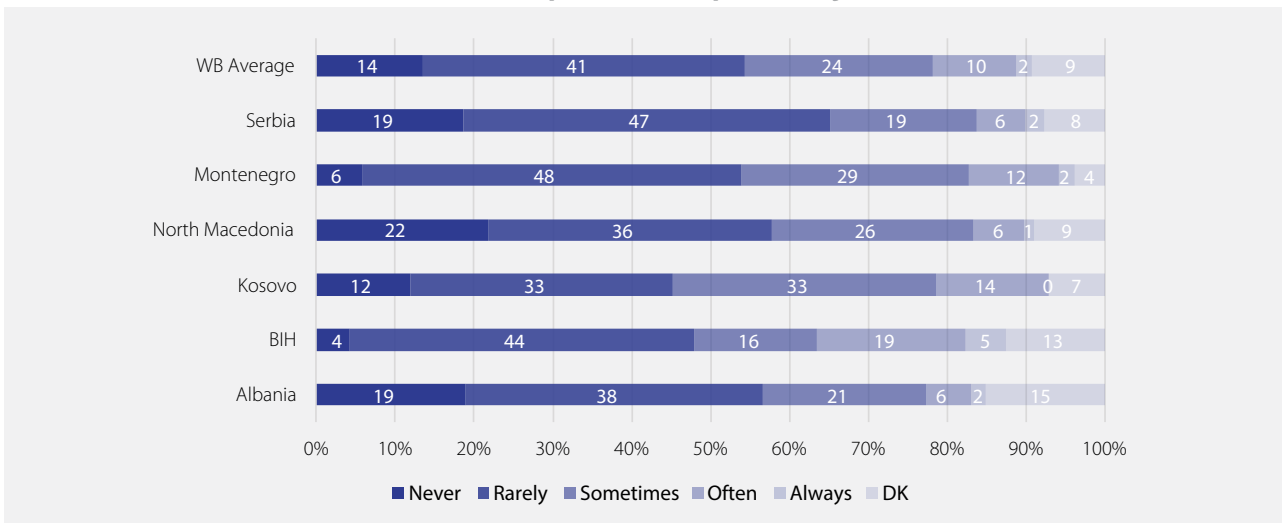
Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 515 and refers to the total number of respondents in the WB

On the other hand, somewhat better perceptions are observed regarding how often ministries accept feedback CSOs provide in consultation processes. The percentage of respondents who deny the presence of this practice by responding with "never" or "rarely" has dropped since the 2017/2018 PAR Monitor from 46% to 41%. CSOs from Kosovo stand out again as only 22% of them express dissenting opinions ("never" or "rarely"), while 43% reply with "sometimes", indicating some level of practice. At the regional level, same as in the previous monitoring cycle, almost a third of CSOs share this middle opinion.
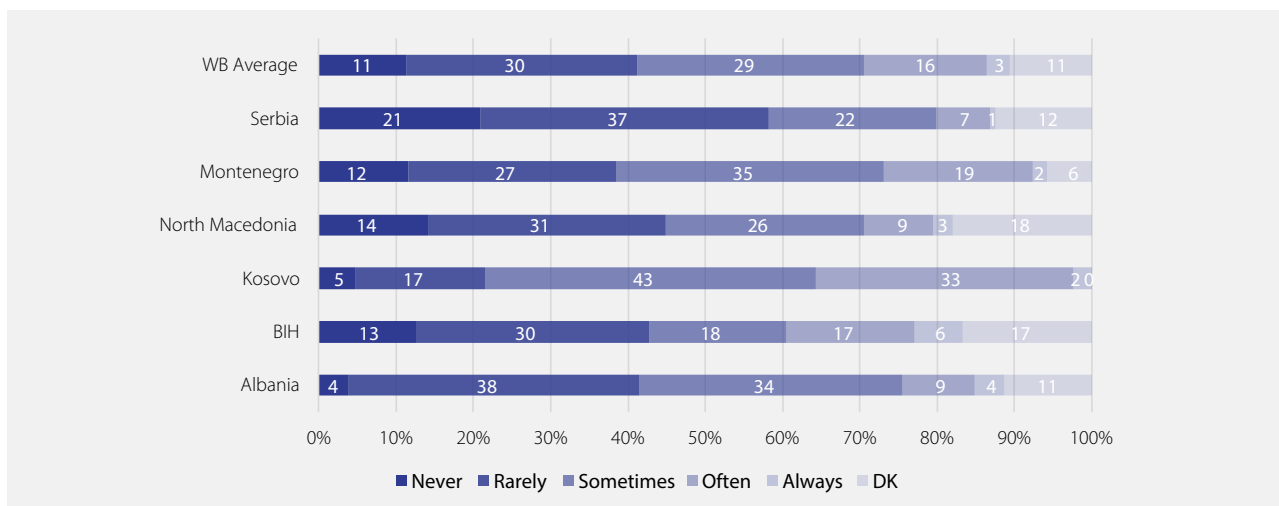
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 515 and refers to the total number of respondents in the WB*

Finally, CSOs were asked how often ministries go the extra mile by organising additional consultations with CSOs beyond the scope of formal public consultations. As in the last two monitoring cycles, a clear majority denies this practice, with 59% replying with "never" or "rarely". Only 7% of respondents at the regional level believe this is "often", and 2% it is "always" the case. CSOs in Kosovo, with 31% replying with "sometimes" and 10% with "often", remain the least negative, and BIH CSOs expressed the highest approval, with 19% of answers "often" and "always".

The indicator values have changed in four administrations. In two of them for the better (Albania and Serbia), mostly due to the improved functions of e-consultation portals and slightly better scope of conducted consultations. In Bosnia and Herzegovina and Montenegro, there was a decrease in points due to insufficient public reporting on consultations (BiH), while Montenegro received 0 points in all elements regarding CSO perception.

Overall, civil society's perceptions of the involvement of external actors in policymaking inform again that key aspects of public consultations are implemented poorly or not implemented at all. Moreover, public consultations that are conducted lack frequency, regularity in reporting, and quality in terms of the provision of feedback. For these reasons, indicator values in the entire region have remained rather low.

Chart 25: Indicator values for PDC_P11_I1 – comparison of values for the 2019/2020 and 2021/2022 monitoring cycles[57]

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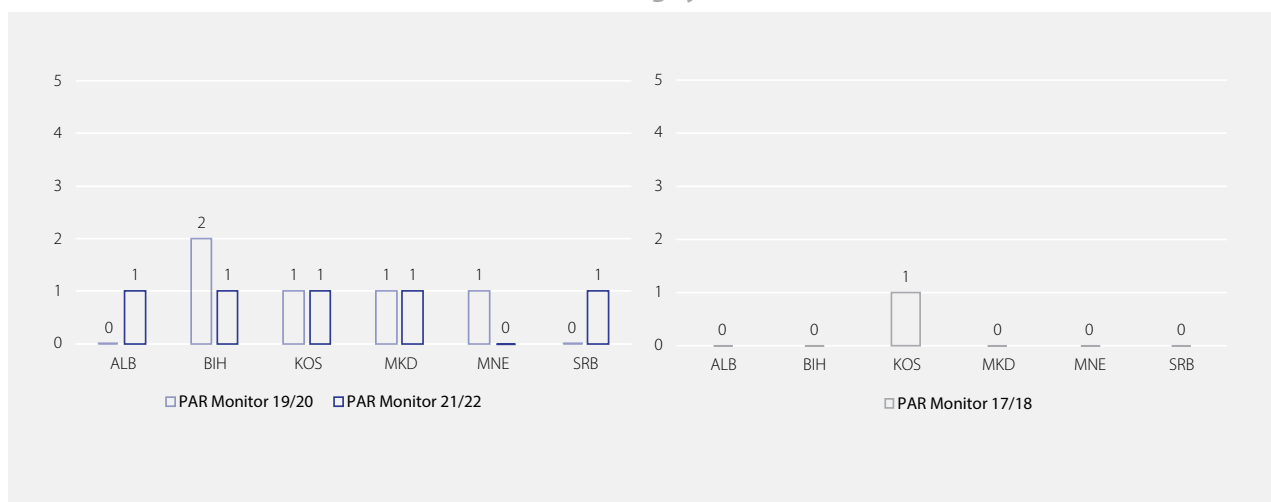
57   The results for this indicator are shown on separate charts, as the indicator was significantly changed after the first monitoring exercise. As a result of this change it is not possible to create a time series and show comparability between the two cycles.

III.4 Summary of results in the policy development and coordination area

In this area, WeBER monitors the transparency of governments' reporting and decision-making, the use of civil society analyses and evidence in policymaking, and the inclusiveness of policymaking practices through public consultations.

Public availability of information on government performance is still quite limited throughout the region. Although governments regularly communicate with the public through press releases, performance reports are frequently lacking. Half of the governments did not publish annual work reports. In BiH, Montenegro and Serbia, even though performance reports are available, information on governments' achievements remains scarce. Regarding reports on other government strategies and plans, they are not fully available in any country. Their availability varies from complete absence in North Macedonia, to two-thirds of reports being published online in Montenegro.

Civil society across the region still has largely negative perceptions of governments' efforts in achieving planned objectives. Surveyed CSOs do not consider that government work plans are directly connected with actual policy developments, nor that official strategies determine the governments' or ministries' action in certain areas (only 25% think the opposite). In addition, merely 16% of CSOs on average confirm that governments regularly report on progress to the public and the same small amount of them believe that ministries regularly publish reports on sectoral strategies. The perception is slightly better regarding governments' prioritisation of the EU accession process in its plans and reports, where CSOs from Kosovo and Albania have the most positive opinions.

Concerning decision-making transparency, the findings revealed that half of the governments deteriorated, while the other half stagnated. CSO perception on this issue does not change since the baseline PAR Monitor. Roughly half of the surveyed organisations in the region do not consider the government's decision-making process transparent, while more than 40% do not agree that exceptions to the requirements to publish the government's decisions are appropriate. When it comes to the public availability of materials from governmental sessions, only press releases are regularly published. In four administrations, governments never (Albania, Kosovo, Serbia) or very rarely (BiH) published sessions' agenda items and minutes.

When it comes to the practice of policymaking bodies in the region to reference findings produced by CSOs, the findings do not differ much compared to the previous monitoring cycle. CSOs' findings are still more frequently used in government policy documents than in ex-ante or ex-post assessments. In Albania and Montenegro, some references could be found in all three types of documents, while in Kosovo, referencing to CSOs' findings is completely absent. On the other hand, 44% of CSOs, on average, confirmed that policy makers invite them to prepare or submit policy papers or studies, and 53% of respondents said that government representatives participate in events where CSOs' policy products are promoted. Still, only 32% of organisations confirmed they get invited by relevant ministries to participate in working groups for drafting policy or legislative proposals, and even less (25%) that relevant ministries justify the acceptance or rejection of proposals they make.

In terms of inclusiveness and openness of policymaking, progress was noted in two countries (Albania and Serbia), while two of them regressed. In BiH, there was a decrease in points due to insufficient reporting on consultations, while Montenegro received 0 points in all elements regarding CSO perception. Overall, civil society's perceptions of the involvement of external actors in policymaking once again show that they see key aspects of public consultations implemented poorly or not implemented at all (such as early consultations, the provision of feedback, and other practices). Moreover, public consultations that are conducted in practice are lacking in frequency, regularity in reporting, and quality in terms of the provision of feedback. For these reasons, indicator values in the entire region have remained rather low.

IV.
Public Service and Human Resource Management

Civil servants – the administration employees who perform key policy design and service delivery tasks – greatly affect public perception of the government. Developed democracies, as a rule, boast professional, largely apolitical civil services, which have been recognised as a crucial component of good public governance. Since the work of civil servants (also referred to as public servants) is based on protecting the public interest rather than private or political interests, a modern civil service must be governed by specific rules that differ from general labour regulations. Those rules are codified in civil service legislation, which sets standards and procedures for keeping civil service merit-based and apolitical, ensuring the integrity and individual accountability of civil servants (such as in cases of breaches of administrative procedure in dealing with citizens), as well as sufficient security of their job positions, to protect them from politically motivated dismissals.

In addition to having sound legal frameworks which regulate such areas as the rights and duties of civil servants, their position and procedures for recruitment and dismissal, modern administrations also develop strategic approaches to human resource management (HRM). Strategic HRM systems serve to attract and retain high-quality staff in administrations with an understanding that the government sector cannot easily compete with the private sector, primarily in terms of financial incentives.

IV.1 State of play in the region and developments since 2020[58]

In the public service and human resource management (HRM) area, administrations in the Western Balkans have made moderate progress since the last monitoring cycle, but some crucial issues remain.

■ Institutional set-up for civil service

In all administrations, a central HR coordination body exists and is responsible for supporting and coordinating HR units in individual institutions. Nevertheless, these units are still relatively weak and only develop internal capacities to cope with everyday challenges. The Department of Public Administration (DoPA) remains a key institution for coordinating policy implementation in Albania. In Montenegro, the Human Resource Management Authority (HRMA), under the supervision of the Ministry of Public Administration, Digital Society and Media, actively promotes horizontal coordination and implementation of HRM procedures across the civil service system. However, HRM functions are still mainly focused on ensuring compliance with legislation and performing administrative tasks.

Furthermore, a fragmented organisation of the HRM function in the central government, with many public bodies having a single-officer HRM unit, contributes to this situation. Serbia's political responsibility for civil service policy and HRM is vested in the Minister of Public Administration and Local Self-government (MPALSG). Several public bodies share institutional responsibilities for the area. The main stakeholders include the MPALSG, the HRM Service (responsible for civil service recruitment and selection, mobility, and career development), the High Civil Service Council (in charge of deciding on rights and duties of senior civil servants, managing disciplinary procedures and running the competition procedures for senior civil servants) and the National Academy of Public Administration (as the central institution responsible for the system of professional training). In North Macedonia, the weakness concerning the adequacy of the institutional set-up for HRM, particularly the limited policy steering capacity of the Ministry of Information Society and Administration over the Agency of Administration, still needs to be addressed. In Kosovo, the Department for the Management of Public Officials (within the Ministry of Internal Affairs) is the central coordinating institution. At the same time, political responsibility for the civil service is established at the level of a cabinet minister.

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58   The state of play is largely based on the European Commission's reports published in 2022 (which are therefore not cited individually) and SIGMA Monitoring reports for 2021. Reports of the European Commission are available at: https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports_en, and SIGMA's reports at: https://www.sigmaweb.org/publications/monitoring-reports.htm (last accessed on 1 March 2023).

■ Scope of civil service

The scope of civil service is precisely defined by legislation in all WB countries, usually by the Civil Service Law (CSL) and some other special laws. Although the scope of the civil service is quite comprehensive, some issues in each administration could be improved. For example, in addition to CSL, the Labour Code, as an umbrella law in labour relations, also regulates certain aspects of labour relations for civil servants. However, the real problem is that the legal frameworks allow certain categories (different categories in different WB administrations) of employees to be excluded from the CSL. Therefore, in most WB countries, the civil service scope has gaps, requiring more political attention.

In general, WB administrations have a good legislative framework that adequately delineates the vertical scope of the civil service. In Albania, exclusions to vertical scope persist as the heads of certain agencies are appointed by the political authorities. On the other hand, the vertical scope in Montenegro has been improved with the latest legal amendments by including heads of public bodies subordinated to ministries in the senior civil service. In North Macedonia and Serbia, the top managerial positions in ministries and other bodies are included in the scope of the civil service. However, in North Macedonia, they are appointed without a competitive procedure assessing experience and competencies, while in Serbia, they should be appointed through competitive procedures. In practice, most of them are appointed acting heads without competition. In BIH, the vertical scope of civil service is less clear, i.e., with secretaries with special assignments, as some belong to the civil service regime and others are functionaries.

Issues with the horizontal scope exist in most administrations as well. It has become increasingly fragmented, with public bodies being removed from the common civil service systems. In some administrations, this process concerns regulatory bodies (Montenegro and Serbia); in others, the definition of "direct service delivery units" is sometimes extended to functions previously covered by civil service legislation, but the key issue of excluding government agencies from the scope of civil service remains (Albania). In North Macedonia, bodies such as the Ministry of Interior and the Customs Office have distinct regulations, not fully aligned with the civil service principles. On the other hand, the 2019 civil service legislation of Kosovo authorised the Government to issue secondary legislation binding also for several independent institutions and was therefore considered unconstitutional by the Constitutional Court. After the government's reorganisation, based on the somewhat unclear criteria of the CSL, several government agencies in Albania remained outside of the civil service scope. The working relations of their employees are governed by the Labour Code, not the CSL. In BIH, some regulatory agencies are out of the civil service system and apply only the labour law. A similar situation is in Montenegro since the staff of some regulatory and independent bodies are excluded from the civil service through special laws without clear grounds. Also, in Serbia, a few public agencies have more autonomy and are excluded from the civil service system without justified reasons. In North Macedonia, some institutions, such as the Ministry of Interior and the Customs administration, have extensive regulations outside the regular civil service, allowing for privileged salaries and creating gaps in the merit principle.

■ Recruitment

All countries in the region have regulated detailed recruitment procedures, but there are noticeable variations. Overall, the legislation provides for merit-based selection of non-senior civil servants, but all administrations in the region face difficulties in the implementation phase.

Across the public administration in Albania, job descriptions are not yet fully in line with the categories set out in the civil service law, so progress on merit-based recruitment (as well as for promotion and dismissal) needs to be consolidated by applying consistent standards across the public administration. Greater legal compliance is needed in recruitment procedures, and the merit principle must be complied with for senior and entry-level positions. Similar problems with the need for more fully aligned job descriptions, competency-based selection tools and political influence in senior civil service recruitment procedures are identified in Montenegro. The

merit-based recruitment also needs to be fully ensured in BIH, so it fails to ensure the full professionalisation of civil service. Candidates are often selected without applying merit principles. In certain recruitment procedures, particularly at the cantonal level, the final selection depends on ethnic background rather than merit.[59] On the contrary, Kosovo fails particularly in that aspect since the representation of non-majority communities in the central administration remains insufficient, especially in the number of women in senior positions. Moreover, considering that the regulatory framework for reducing political influence over top managerial positions in the civil service has been improved with the new CSL in Kosovo, a political influence in practice is yet to be assessed. Finally, the Serbian CSL provides for merit-based recruitment in general, but there were no developments regarding hiring temporary staff. A mandatory competition procedure for recruiting temporary staff in cases of increased workload is envisaged by the CSL amendments, but the implementation of these provisions has been postponed from 2021 to 2023. Nevertheless, the biggest issue in Serbia remains around senior civil service. The government frequently uses the legal provision allowing for appointments to acting positions for six months (with a maximum extension of 3 months) to appoint non-civil servants, which is directly opposed to the CSL, and beyond legal duration limits. Finally, administration bodies in North Macedonia also frequently use procedures to convert temporary or service employment contracts into permanent ones.

■ HRM information systems

Most administrations in the region have started developing new Human Resource Management Information Systems (HRMIS) in the last few years, but they still struggle with regular updates. There is significant progress in populating the HRMIS in Albania; however, it only includes partially up-to-date data on civil servants. In Montenegro, the gradual implementation of a new HRMIS is ongoing, including the interoperability with the centralised payroll system; however, for the time being, data in the HRMIS still needs to be completed and updated. A similar situation is in Serbia, where the setting up of a new HRMIS is delayed, but its development is ongoing. In addition, the current system still needs to be connected to other national databases, such as the treasury payroll registry. Use of the HRMIS increased in North Macedonia, whereas in BIH, there is still no legal basis for the state-level HRMIS.

■ Remuneration systems

Remuneration systems are defined by the legal acts in all administrations of the region, but there are variations. All administrations need to ensure full transparency, especially when it comes to supplements. The lack of a salary policy in Albania based on clear criteria for pay supplements and salary increases weakens the fairness and coherence of the system. Although the Law on Wages of Public Sector Employees in Montenegro defines all salary elements for all public employees, it does not provide clear criteria for awarding specific salary components. Fair allocation of the base salary is hampered by insufficient development of job descriptions and classification, and heads of institutions have broad discretion to award bonuses. Civil servants' remuneration in BIH remains inconsistent across public institutions and lacks transparency. This is due to the differences across the country in salary legislation, job classification, pay grades, and the lack of job evaluations.

Furthermore, the criteria for awarding salary supplements are unclear, and there is no basic salary information or statistics. The legal basis of the remuneration system in Kosovo remains fragmented as well, and it fails to ensure the principles of transparency, merit, and equal treatment. Despite the wage system reform in Serbia, progress has yet to be made regarding the remuneration of civil servants. Implementing the Law on the Public Sector Salary System, adopted in 2016, which introduces the principle of equal pay for equal work for all public sector employees, is further delayed until 2025.

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59   Which aligns with constitutional provisions on the general population's representation in public administration.

IV.2 WeBER monitoring focus

WeBER monitoring within the PSHRM area covers five SIGMA Principles and relates exclusively to central administration (centre of government institutions, ministries, subordinated bodies, and special organisations). In other words, WeBER monitoring focuses on central government civil service, as defined by relevant legislation (primarily civil service laws). The selected principles focus on the quality and practical implementation of legal and policy frameworks for civil service and measures related to merit-based recruitment, the use of temporary engagements, the transparency of remuneration systems, and integrity and anti-corruption measures in civil service. The WeBER approach was based on elements that SIGMA does not strongly focus on in its monitoring but are significant to civil society from the perspective of the transparency of the civil service system and government openness, and the public availability of data on the implementation of civil service policy.

The following SIGMA principles were selected for monitoring, in line with the WeBER's selection criteria:

Principle 2: The policy and legal frameworks for a professional and coherent public service are established and applied in practice; the institutional set-up enables consistent and effective human resource management practices across the public service.

Principle 3: The recruitment of public servants is based on merit and equal treatment in all its phases; the criteria for demotion and termination of public servants are explicit.

Principle 4: Direct or indirect political influence on senior managerial positions in the public service is prevented.

Principle 5: The remuneration system of public servants is based on the job classification; it is fair and transparent.

Principle 7: Measures for promoting integrity, preventing corruption and ensuring discipline in the public service are in place.

The monitoring of these principles combines WeBER monitoring with findings of SIGMA's assessments within specific sub-indicators. In addition, WeBER monitoring is based on expert review of legislation, documents, and websites, including collecting and analysing government administrative data, reports, and other documents searched for online or requested through freedom of information (FOI) requests. Furthermore, to follow a more balanced qualitative and quantitative approach, the research methods included measures of the perceptions of civil servants, CSOs, and the wider public gathered through perception surveys. Finally, data collection included semi-structured, face-to face-interviews and focus groups with relevant stakeholders such as senior civil servants, former senior civil servants, and former candidates for jobs in civil service, as well as representatives from government institutions in charge of human resource management policy.

Surveys of civil servants and CSOs across the Western Balkans were implemented using an online surveying tool between April and August 2022.[60] In most administrations, the civil servants' survey was disseminated through a single contact point originating from national institutions responsible for the overall civil service system. In Albania, the 2022 survey of civil servants was not implemented since the Department for Public Administration (DoPA), a WeBER project associate, could not assist in dissemination due to technical issues involving their internal email communication system. Unlike in previous monitoring cycles, the dissemination of the questionnaire in Montenegro was done centrally by the Ministry of Public Administration, significantly increasing the number of respondents and the distribution of institutions in the sample.

The CSO survey was distributed through existing networks and platforms of CSOs with large contact databases and through centralised points of contact such as governmental offices in charge of cooperation with

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60   Surveys were administered through an anonymous online questionnaire. The data collection method included CASI (computer-assisted self-interviewing). More information is available in the Methodological Annex.

civil society. To ensure that the CSO survey targeted as many organisations as possible in terms of types of organisations, geographical distribution, and activity areas and hence was widely representative, additional boosting was done where needed. Finally, the public perception survey included computer-assisted personal interviewing of the general public (aged 18 and older) in the Western Balkans region from 4 to 31 May 2022.[61] In all three surveys, WeBER used uniform questionnaires throughout the region and disseminated them in local languages, ensuring an even approach in survey implementation.

WeBER uses six indicators to measure the five principles mentioned above. In the first indicator, WeBER monitors the public availability of official data and reports about civil service and employees in central state administrations. In the second indicator, monitoring includes the extent to which widely applied temporary engagement procedures undermine merit-based regimes. The third indicator examines the openness, transparency, and fairness of recruitment into civil service as critical aspects of HRM in public administrations due to their public-facing character. The fourth indicator focuses on measures to prevent direct and indirect political influence on senior managerial positions in public service, while the fifth indicator analyses whether information on civil service remuneration is transparent, clear, and publicly available. Finally, in the sixth indicator, WeBER examines measures for promoting integrity and preventing corruption in civil service.

IV.3 Comparative PAR Monitor findings

Principle 2: The policy and legal frameworks for a professional and coherent public service are established and applied in practice; the institutional set-up enables consistent and effective human resource management practices across the public service

This principle is measured through the indicator "Public availability of official data and reports about the civil service and employees in central state administration" (PSHRM_P2_I1). Comprising nine elements for which monitoring is based on document and website analysis, this indicator provides insight into governments' reporting practices in public/civil service.

Table 17: Element scores and corresponding indicator values for PSHRM_P2_I1 "Public availability of official data and reports about the civil service and employees in central state administration"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. The Government keeps reliable data pertaining to the public service	**4**	2	2	2	2	0	0
E2. The Government regularly publishes basic official data pertaining to the public service	**4**	0	4	0	4	4	0
E3. Published official data includes data on employees other than full-time civil servants in the central state administration	**4**	0	0	0	0	2	0
E4. Published official data on public service is segregated based on gender and ethnic structure	**2**	0	2	0	1	0	0
E5. Published official data is available in open data format(s)	**1**	0	1	0	0	0	0
E6. The government comprehensively reports on the public service policy	**4**	4	2	0	0	2	2
E7. The government regularly reports on the public service policy	**2**	2	0	0	0	2	1

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61 Perceptions are explored with a survey targeting the public (aged 18 and older) in the Western Balkans. The public perception survey employed multi-stage probability sampling and was administered through telephone and computer-assisted web interviewing (CATI and CAWI), using a standardised questionnaire in Bosnia and Herzegovina, North Macedonia, Montenegro, and Serbia (as part of the omnibus survey), and in Albania and Kosovo (added to another survey), in the period between 4 May and 31 May 2022. More information is available in the Methodological Annex.

E8. Reports on the public service include substantiated information concerning the quality and/or outcomes of the public service work	**2**	1	0	0	0	0	1
E9. Data and information about the public service are actively promoted to the public	**2**	2	0	0	2	1	2
Total points	**25**	**11**	**11↑**	**2**	**9↓**	**11**	**6**
Indicator value 2021/2022[62]	**0-5**	**2**	**2**	**0**	**1**	**2**	**1**
Indicator value 2019/2020	*0-5*	*2*	*0*	*0*	*2*	*2*	*1*
Indicator value 2017/2018		*2*	*0*	*2*	*2*	*1*	*0*

Databases on civil servants in the region still lack reliability. According to the latest SIGMA assessments,[63] human resource information system (HRMIS) in Albania has the most operational modules, and unlike in other administrations, interoperability with the payroll system within the Treasury is ensured. In BIH, state-level HRMIS is still neither operational nor established, although there is progress at other government levels. In the rest of the region, major data gaps prevent analysis, monitoring and reporting. New HRMIS in Serbia is still under development, while the gradual implementation of the new system has started in Montenegro as interoperability with the payroll is technically enabled but not fully utilised for payroll calculation in the entire public sector.

Public availability of basic statistics on civil servants has remained the same since the previous monitoring round. In North Macedonia, the responsible ministry regularly published annual reports from the Register of Employees in the public sector that contain plenty of data on civil servants.[64] Other good examples in the region are the Civil Service Agency (CSA) in BIH, which publishes civil service statistics online, and annual personnel plans of the state administration bodies in Montenegro, which are regularly published with data on civil servants per institution and according to the ranks.[65] In half of the region, data is incomplete or needs to be published still.

Yet, published data only contain details on some employees other than full-time civil servants. Information on fixed-term employees is available in the annual personnel plans in Montenegro, while data on temporarily employed staff were excluded from the 2021 annual report from the Register of Employees in North Macedonia. Published statistics in BIH, and reports in North Macedonia, segregate data based on sex and nationality. CSA BIH has also introduced an online option for data download in an open format.

■ **Good practice: More refined civil service statistics in BIH**

With the updated website of the Civil Service Agency (CSA) of BIH, new features for the navigation of the data on civil servants in BIH institutions have been introduced, such as filtering data per state-level institution, civil service positions, and dates.[66] Irrespective of the filter applied, each search returns results on the number of employees per sex, nationality, and age group. In addition, the CSA surveys the number and structure of civil servants in BIH. Institutions that fail to submit the data to the system are automatically notified every three months. Although with no open data label as open data, all statistics available at the CSA portal can be exported in machine-readable (xlsx) data format.

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62   Conversion of points: 0-5 points = 0; 6-8 points = 1; 9-12 points = 2; 13-16 points = 3; 17-19 points = 4; 20-24 points = 5.

63   For the first element under this indicator, WeBER relies on the results of SIGMA assessments (SIGMA Sub-indicator 7 – "Existence of a functional HR database with data on civil service" of the Indicator 3.2.1 – "Adequacy of the policy, legal framework and institutional set-up for professional human resource management in public service"). SIGMA monitoring reports are available at:

64   Annual reports are available at the Ministry of Information Society and Administration website: https://www.mioa.gov.mk/?q=en/documents/reports (last accessed on 21 February 2023).

65   An example of the Annual Personnel Plan is available at: https://bit.ly/3lUQZvX (last accessed on 21 February 2023).

66   Available at: https://ads.gov.ba/bs-Latn-BA/statistics (last accessed on 21 February 2023).

The region's civil service reports are neither fully comprehensive nor regularly published online. The most comprehensive and regular reporting practices are observed in Albania, with a moderate reporting volume in the rest of the region. In three administrations, key civil service topics are reported within one document (Albania, BIH, Kosovo), and in the other three, multiple separate reports are produced. In Kosovo, annual reports on the state of civil service remain publicly undisclosed. The table below provides an overview of available reports on civil service.[67]

Table 18. Practices of reporting on civil service in WB

	Comprehensiveness[68]							Public disclosure[69]		
	Planning & Recruitment	Appraisals	Career development	Training	Salaries	Disciplinary measures	Integrity	2021	2020	2019
ALB	✓ X	✓	✓	✓	✓	X		✓	✓	✓
BIH	✓ X	✓	✓	X	✓	X		X	✓	✓
KS	✓ ✓	✓	✓	✓	✓	✓		Not available publicly		
MKD	✓ ✓	X	X	X	✓	✓		X	X	X
MNE	✓ ✓	X	✓	X	✓	X		✓	✓	✓
SRB	X X	X	✓	X	✓	✓		✓	✓	✓

■ **Good practice: Regular reporting to the public on civil service policy continues**

Continuing with the identified good practice from the baseline PAR Monitor 2017/2018, the Civil Service Law in **Albania** requires the Council of Ministers to report annually to the Parliament on public service policies and their implementation. The Department of Public Administration (DoPA) produces annual reports, and those are available online. The annual report for 2021 included sections on planning and recruitment, career development (particularly mobility in the public service), training, appraisals, salaries and wages, disciplinary procedures and decisions, and integrity issues and measures.[70]

Content-wise, reports on civil service in the region do not contain an assessment of the overall state of play and quality of work of the public service. Still, general statements on outcomes are occasionally present. For example, the DoPA in Albania informs on fulfilment of indicators on, for instance, newly appointed civil servants or an average number of applications per vacancy, while reports of the National Academy for Public Administration in Serbia contain self-assessments of training goers on their perceived level of knowledge.

On the other hand, responsible bodies practice public promotion of data on civil service more regularly. Responsible bodies in Albania, North Macedonia, Montenegro, and Serbia used their websites or social media channels to promote information on training, recruitment, or recently published civil service reports. The promotion of civil service data steadily increases since the baseline PAR Monitor, indicating that the governments are potentially starting to realise the importance of civil service image in public.

Overall, there are two noteworthy changes in the region. For instance, in North Macedonia, the indicator value has decreased due to irregular publicising reports on civil service. At the same time, the result for BIH has tangibly increased (indicator value jump from 0 to 2) due to the refreshed approach to the online data availability on civil service.

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67   For regularity, WeBER observes the last three calendar years in the moment of measurement and scores are allocated if reports are publicly disclosed.
68   The comprehensiveness of reporting depends on institutional responsibility in each administration; for instance, integrity is not necessarily done by central HRM agencies in the region.
69   Highlights in amber denote that some key topics highlighted green in the left-side part of the table, were not publicly revealed for the year in question.
70   Available at: https://www.dap.gov.al/publikime/raporte-vjetore (last accessed 7 March 2023).

Chart 26: Indicator values for PSHRM_P2_I1 - comparison of values for the 2017/2018, 2019/2020, and 2021/2022 monitoring cycles
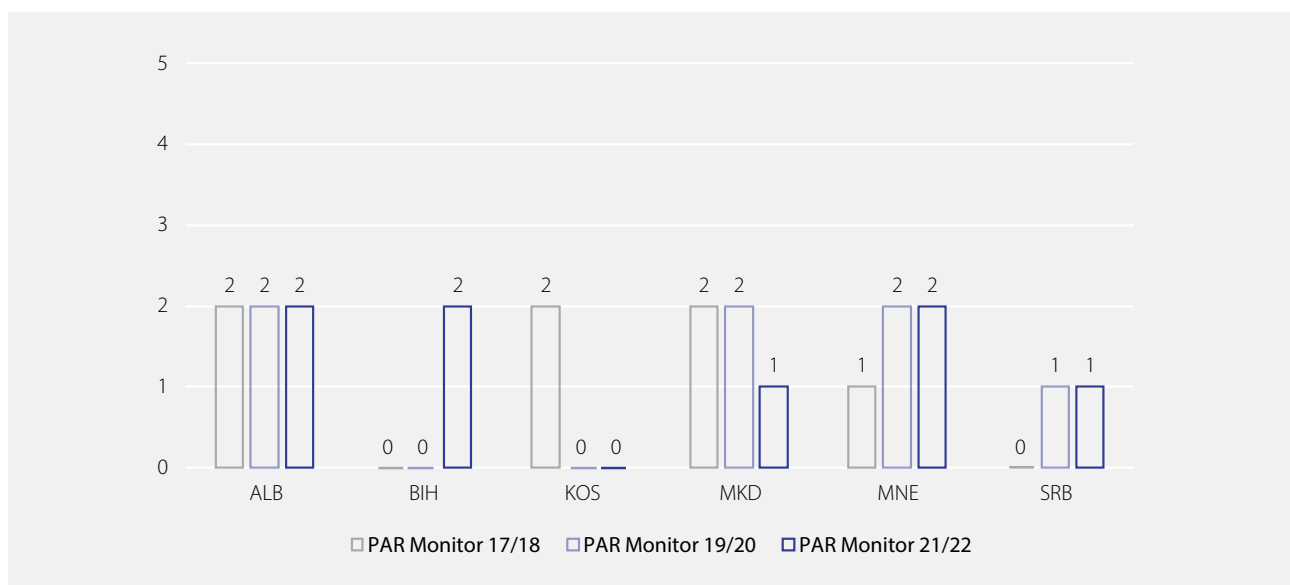
The second WeBER indicator under Principle 2 focuses on the policy and legal frameworks. This indicator analyses the "Performance of tasks characteristic for civil service outside of the civil service merit-based regime" (indicator PSHRM_P2_I2).

Table 19: Element scores and corresponding indicator values for PSHRM_P2_I2 "Performance of tasks characteristic for civil service outside of the civil service merit-based regime"

Indicator element	Max	ALB	BIH	KOS	MKD	MNE	SRB
E1. The number of temporary engagements for performance of tasks characteristic of civil service in the central state administration is limited by law	**4**	0	0	0	0	0	4
E2. There are specific criteria determined for the selection of individuals for temporary engagements in the state administration.	**4**	0	0	4	0	0	0
E3. The hiring procedure for individuals engaged on temporary contracts is open and transparent	**4**	2	0	2	0	0	0
E4. Duration of temporary engagement contracts is limited	**4**	0	2	4	2	0	0
E5. Civil servants perceive that temporary engagements in the administration are an exception	**2**	0	1	0	0	0	0
E6. Civil servants perceive that performance of tasks characteristic of civil service by individuals hired on a temporary basis is an exception	**2**	0	1	0	0	0	0
E7. Civil servants perceive that appointments on a temporary basis in the administration are merit-based	**2**	0	1	0	0	0	1
E8. Civil servants perceive that the formal rules for appointments on a temporary basis are applied in practice	**2**	0	1	1	0	1	1
E9. Civil servants perceive that individuals hired on a temporary basis go on to become civil servants after their contracts end	**2**	0	0	1	0	0	0

E10.	Civil servants perceive that contracts for temporary engagements are extended to more than one year	**2**	0	1	0	0	0	0
Total points		**28**	**2**	**7**	**12**	**2↓**	**1↓**	**6**
Indicator value 2021/2022[71]		**0-5**	**0**	**1**	**2**	**0**	**0**	**1**
Indicator value 2019/2020		*0-5*	*1*	*1*	*2*	*0*	*1*	*1*
Indicator value 2017/2018			*2*	*1*	*1*	*1*	*1*	*1*

Regulation of temporary work in civil service remains quite diverse in the region, and besides civil service laws, other legislation is frequently applied in practice. Labour law provisions are frequently used for temporary engagements in BIH, Montenegro, and Serbia. Although introduced by the CSL, formal requirements for transparent recruitment of temporary staff in Serbia were not implemented in the monitoring period and are supposed to be enforced from 2023. In North Macedonia, such engagements heavily rely on the Law on Agencies for Temporary Employments, a major deviation since using private employment agencies to broker temporary recruitments completely overruns merit principles in practice. Procedures for service contracts in Albania and special services in Kosovo, which are mainly used for hiring individuals for temporary work, are regulated by public procurement regulations (a novelty in Kosovo after the changes in civil service legislation).

Serbia remains the exception in the region where there is a statutory limitation in the number of temporary engagements - a 10% limit of the total number of employees paid from the state budget, as stipulated in the Budget System Law under fiscal rules.[72] In Albania, decisions of the Council of Ministers specify the yearly limits of employees under temporary contracts. Still, these are flexible, while institutional-level limits in North Macedonia also change frequently. In the rest of the region, there are no limits at the civil service or institutional level. In Montenegro, the limit existed in the Plan of Optimisation of Public Sector, not in legislation, but this document has expired. Overall, the question of setting hard statutory limits on temporary recruitment remains open.

Administrations in the region did not progress over time regarding the openness of hiring procedures for temporary engagements or their duration limits. There are barely any specific selection criteria that capture all such engagements. At the same time, duration limits remain uneven for different types of temporary work (Serbia, Montenegro, and Albania) or exceed one year (BIH and North Macedonia). Kosovo is, again, the most prominent exception as special service contracts remain limited to one year under the Law on Public Officials,[73] and specific requirements are laid down by the Regulation on rules for the procurement of special services.[74] As was the case in the past editions, most administrations do not publicly announce vacancies or do not do it uniformly. A new practice of announcing vacancies for temporary work through the e-procurement system in Kosovo used since 2020, does not allow full transparency for un-registered users. Overall, the lack of clear and transparent criteria and limitations on temporary engagements still hinder the achievement of merit-based central administrations in the region.

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71   Conversion of points: 0-4 points = 0; 5-9 points = 1; 10-14 points = 2; 15-19 points = 3; 20-24 points = 4; 25-28 points = 5.
72   Article 27e, the Budget System Law, available at: http://www.pravno-informacioni-sistem.rs/SlGlasnikPortal/eli/rep/sgrs/skupstina/zakon/2009/54/1/reg (last accessed on 20 February 2023).
73   Article 66, the Law on Public Officials, available at: https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=25839 (last accessed on 20 February 2023).
74   Regulation available at: https://bit.ly/3lNIEuX (last accessed on 20 February 2023).

Table 20. Rules on temporary recruitments in civil service

	Limited by law (#, %)	Limited by law (time)	Specific criteria	Transparency (public calls)
ALB	Yearly limits, changes frequently	X	X	Not for all types of temporary work
BIH	X	Two years	Only general conditions	X
KS	X	One year	As for civil servants or more stringent	Full transparency only upon registration
MKD	Institutional level changes frequently	1-5 years, with exceptions	X	X
MNE	X	Two years, with exceptions	X	X
SRB	10% by the Budget System Law	Limited but not for all types of engagements	X	X

Civil servants in the region continue to perceive temporary recruitments as insufficiently regulated and potentially harmful to the merit principles. Similar to the past PAR Monitor editions, close to half of respondents in the region disagreed that temporary hirings are exceptions in their institutions (44%), with civil servants in North Macedonia keeping the most negative attitude (with 54% of disagreement), and their colleagues in BIH being disagreeing the least (29%). In the same fashion, 45% of respondents, on average, believe that individuals hired on temporary bases, often or always, perform tasks which should normally be performed by civil servants, five percentage points up from the 2019/2020 cycle. However, this share is tangibly below the average only in BIH, as one-third of civil servants see it happening always or often (32%). Overall, perception data on these topics show similar attitudes in all PAR Monitors to date.

Chart 27: Civil servants' perceptions on the question "Individuals who are hired on a temporary basis perform tasks which should normally be performed by civil servants."
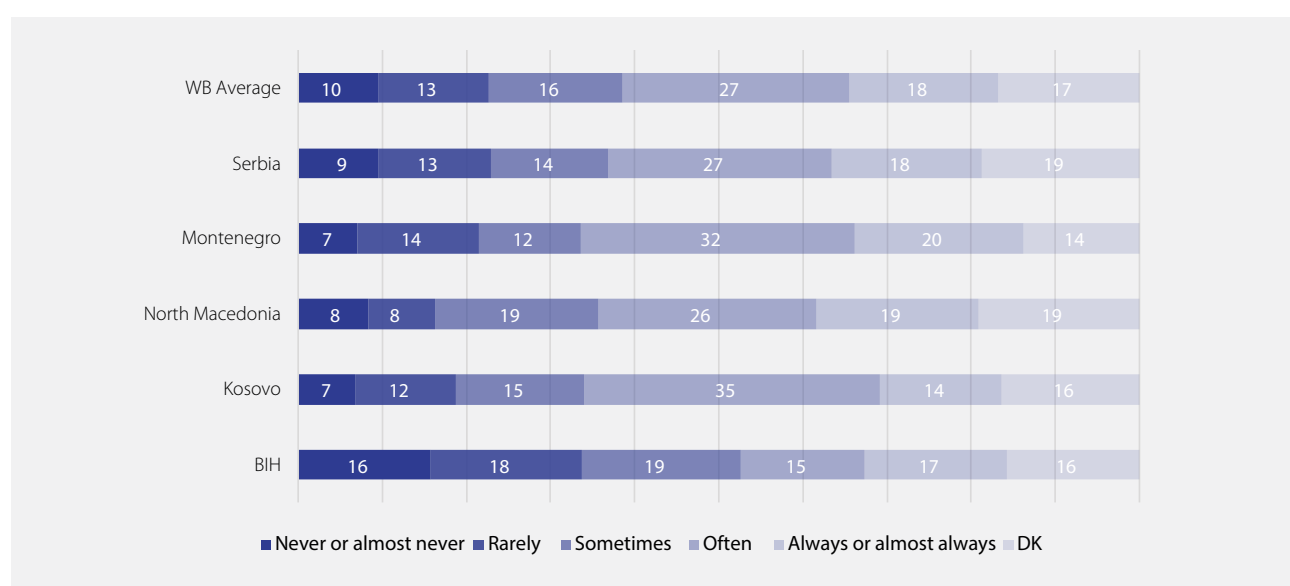
All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 2501 and refers to the total number of respondents in the WB.

Furthermore, when asked to reflect on the frequency of temporary employment based on qualifications and skills, civil servants expressed a more pessimistic opinion. With 38% of respondents saying this is never or rarely the case, and 28% saying it happens often or always, this is a noteworthy change vis-à-vis the 2020 survey (33%, and 35%, respectively). Civil servants in Kosovo and Montenegro hold the most negative views (42% responding never or rarely), and the most positive were civil servants in BIH and Serbia, with around a quarter of them saying often or always (32%).

On the other hand, more civil servants consider that formal rules for temporary hiring are often or always (36%) rather than never or rarely (20%) applied in practice, which is a continuation of a more positive perception that has emerged in the 2019/2020 monitoring cycle. Still, the share of "don't know" responses remain relatively stable and high on average (28%), and in most administrations, goes above the average (chart below). This indicates once more that the formal nature of such rules, or their existence ultimately, remains questionable to many.

Chart 28: Civil servants' perceptions on the statement "The formal rules for hiring people on a temporary basis are applied in practice."
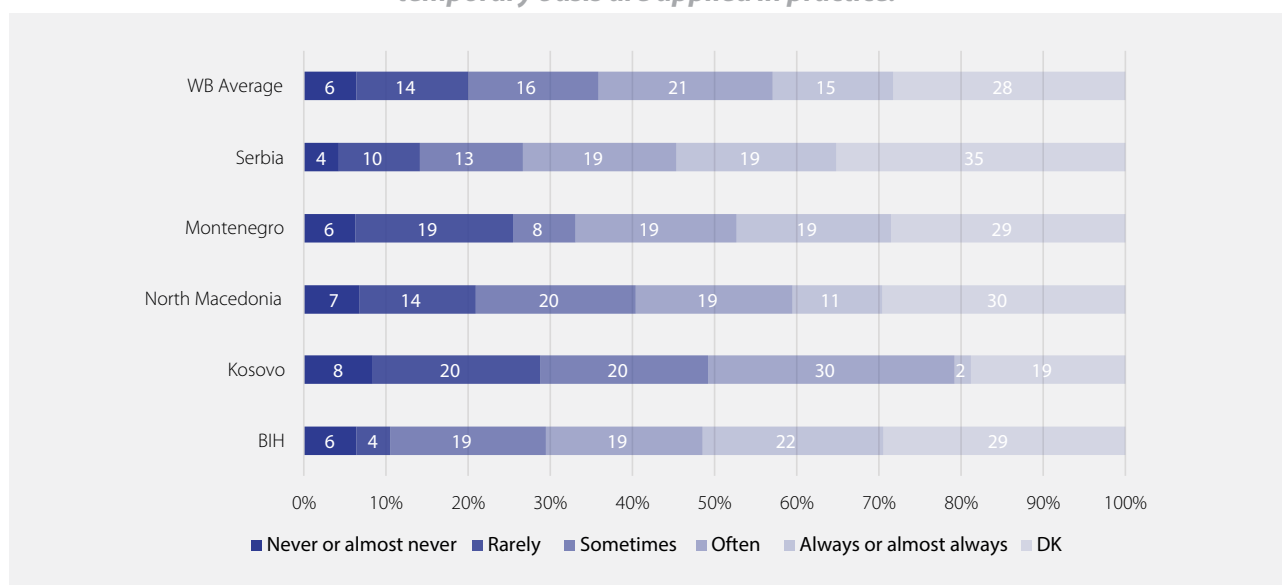

All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 2501 and refers to the total number of respondents in the WB.

A third of respondents in the region believe that individuals hired on temporary bases always or often go on to become civil servants after their temporary engagements expire (33%), which is only slightly higher than in the previous PAR Monitor edition. As in the 2020 survey, respondent civil servants in Montenegro perceive the frequency of this practice the most (44% responded often or always). The share of those who think this happens rarely or never is still below a quarter in the region (24%), but it is noteworthy that the share of respondents who did not provide an opinion dropped by ten percentage points (from 30%, to 20% in latest survey). Nevertheless, perception data informs that temporary hiring is widely present and often represents a waiting room for full civil service entry.

The biggest change in perception, though, is recorded in whether temporary contracts get extended for more than a year. Share of responses "often" or "always" now stands at 45% on average, as opposed to 30% in the previous PAR Monitor, with the share of those feeling such contracts get extended "sometimes" remaining stable. Civil servants in Kosovo and Serbia note this practice again more frequently than others, with 56% and 55%, respectively, of the opinion that this happens often or always. Those in BIH see it as the least present, with 38% claiming it never or rarely occurs. As in some other questions, the share of "don't know" answers is relatively high in the region (23%) with only slight variations.

Overall, the indicator values have decreased in Albania and Montenegro. The lack of civil servants' survey implementation in the 2021/2022 monitoring cycle has influenced the scores for the former, while more negative civil servants' opinions affected the result for the latter. The situation in the rest of the region has remained unchanged.

Chart 29: Indicator values for PSHRM_P2_I2 - comparison of values for the 2017/2018, 2019/2020, and 2021/2022 monitoring cycles
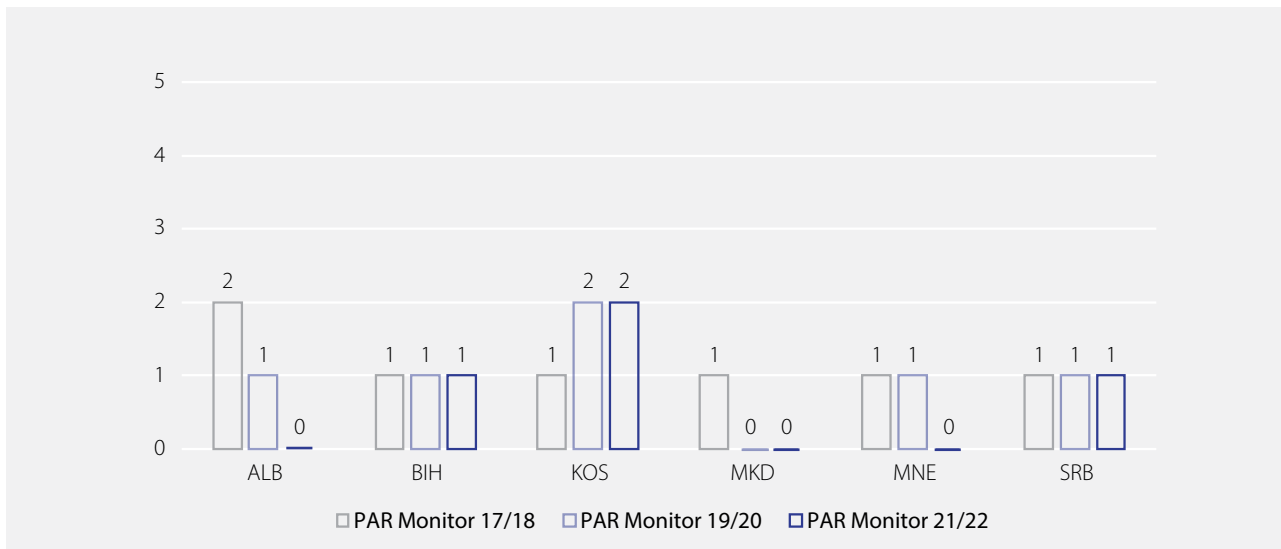
Principle 3: The recruitment of public servants is based on merit and equal treatment in all its phases; the criteria for demotion and termination of public servants are explicit

Regarding the recruitment of civil servants, WeBER uses the indicator "Openness, transparency and fairness of recruitment into the civil service" (PSHRM_P3_I1). Here, the focus is on external recruitment processes (such as public competitions for vacancies) rather than internal mobility procedures.

Table 21: Element scores and corresponding indicator values for PSHRM_P3_I1 "Openness, transparency and fairness of recruitment into the civil service"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. Information about public competitions is made broadly publicly available	**4**	2	4	2	4	2	4
E2. Public competition announcements are written in a simple, clear and understandable language	**4**	2	4	2	2	2	0
E3. During the public competition procedure, interested candidates can request and obtain clarifications, which are made publicly available	**4**	2	0	0	0	2	4
E4. There are no unreasonable barriers for external candidates which make public competitions more easily accessible to internal candidates	**2**	2	0	2	0	2	0
E5. The application procedure imposes minimum administrative and paperwork burden on candidates	**4**	2	0	4	0	0	4
E6. Candidates are allowed and invited to supplement missing documentation within a reasonable timeframe	**4**	1	0	0	0	0	0

E7. Decisions of the selection panels are made publicly available, with due respect to the protection of personal information	**4**	2	2	4	2	2	2
E8. Information about annulled announcements is made publicly available, with reasoning provided	**2**	0	0	4	0	2	0
E9. Civil servants perceive the recruitments into the civil service as based on merit	**2**	0	0	0	0	0	1
E10. Civil servants perceive the recruitment procedure to ensure equal opportunity	**2**	0	1	1	1	1	2
E11. The public perceives the recruitments done through the public competition process as based on merit	**0**	1	0	0	0	0	1
Total points	**36**	**14**	**11↓**	**19↑**	**9**	**13**	**18**
Indicator value 2021/2022[75]	**0-5**	**2**	**1**	**3**	**1**	**2**	**2**
Indicator value 2019/2020	*0-5*	*2*	*2*	*2*	*1*	*2*	*2*
Indicator value 2017/2018		*2*	*2*	*2*	*1*	*1*	*1*

Public administrations in the region continue to widely announce civil service job posts in practice, for the most part. Except for Albania, administrations use two or more nationwide sources for advertising vacancies (table below). In Albania, despite the legal requirements, vacancies are not regularly advertised on the National Employment Service portal. However, recruitment procedures still need to be assessed as sufficiently simple, especially for external candidates without prior knowledge of how the administration works. As in the previous PAR Monitor, texts of sample vacancy announcements in BIH are generally considered clear and simple. However, despite the clarity of announcements in Albania, Kosovo, North Macedonia, and Montenegro, they lack simplicity and citizen-friendly features. Once again, vacancy announcements in Serbia are assessed as insufficiently clear and simple.

Table 22. Dissemination of civil service job posts in WB (sample-based)[76]

	Central portal	Websites of hiring bodies	Media (traditional)	Social media	Other
ALB	DoPA	X	X	X	X
BIH	CSA BIH	Sporadically	Daily newspapers (3)	CSA Facebook & Twitter	X
KS	HRMIS	✓	X	Sporadically	X
MNE	HRMA	X	Daily newspaper (1)	Sporadically	X
MKD	Agency for Administration	Sporadically	Daily newspapers	X	Sporadically on different portals
SRB	HRMS; eGovernment	In most analysed cases	X	HRMS Facebook	National Employment Service

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75   Conversion of points: 0-6 points = 0; 7-12 points = 1; 13-18 points = 2; 19-24 points = 3; 25-30 points = 4; 31-36 points = 5.

76   Based on the analysis of five sample public competition vacancy announcements, except for Kosovo, where a sample of four announcements was analysed. The table presents combined data gathered from national authorities and publicly available sources.

Not all applicants can easily request and obtain clarifications in the application process. Candidates in Albania, Montenegro, and Serbia are given contact points - a reference person to ask for additional information on a given vacancy. In Albania, however, submission of requests for clarifications or complaints is possible only after candidates are disqualified in the first preliminary verification phase. In addition, in all three cases, replies to such requests are, as a rule, not published online for other candidates' review. However, the HRM Service of the Government in Serbia publicises answers to frequently asked questions (FAQ) online. This section was created after candidates expressed the need for clarifications during the application process. In addition, it uses its own Viber community to answer questions from potential candidates that can be submitted once a week, as well as through its "open doors" activities. It is noteworthy that in Kosovo, since the centralisation of the recruitment procedure, information on possibilities to request any clarifications is no longer available in the announcement calls individually. However, the central HRM platform provides a contact information section for logged-in users.

■ Good practices: User-friendly approaches towards potential hires in civil service

As highlighted in the 2019/2020 PAR Monitor, the **Serbian Human Resource Management Service (HRMS)** applies different user-friendly approaches. Over the years, options for those interested in informing and preparing themselves for applying for a job have increased. Apart from using all its channels to share information about announced competitions (website, social media), the HRMS is actively running a Viber community for Q&A,[77] and useful tips for candidates, and is present on six social media platforms. Additionally, the HRMS has established a portal, "Candidates' Corner", where additional resources are available such as a guide through the selection process for candidates, free knowledge testing of general and special functional competencies necessary for getting employed in the civil service, detailed FAQ, blog section, as well as an online survey of satisfaction with the quality of recruitment procedure.[78] Also, HRMS regularly hosts "Open doors" events online for those who want to know more about the work of the institution and job opportunities in central administration bodies.

In **Kosovo, the Human Resource Management Information System** (HRMIS) is a new central platform for all recruitments in public administration (central and local government). It provides an easy overview of vacancies per administrative levels, job positions, and types of procedures (internal or external).[79] The contact info section on the platform leads to a video explaining steps in the application procedure for candidates and for asking questions or submitting requests for clarifications regarding the procedure (this user-friendly feature is, however, available after users are logged in).

Regarding equal opportunities for external candidates, there are still requirements in the civil service legislation that pose unreasonable barriers and give internal candidates an advantage. In all monitoring cycles, passing a state exam, even before one can apply for a job or as part of the application process, remained one such requirement (in BIH for all positions and Serbia for SCS). In Montenegro, the CSL amendments from 2021 regulated that a person can be admitted to the civil service without a state exam if it is passed within a year of employment. However, supplying computer and language skill certificates instead of practical demonstration (BIH, North Macedonia) or medical statements certifying that candidates are in good health condition (North Macedonia) still represents an unreasonable barrier.

The paperwork burden for applying for a job is somewhat alleviated in half of the region. The application process in Serbia is organised in stages, whereby candidates only submit application forms in the first stage, while (certified copies of) documents come later for candidates who make it to further rounds. The process in Albania is organised in phases as well; however, all required documents for applying for vacancies are still to be submitted in the first step. A new centralised system in Kosovo organises the application process in two phases, with up to 5 easily obtained documents requested in the first, while candidates obtain necessary certificates *ex officio*. In the rest of the region, applicants must either submit complete documentation upfront, including data already kept by authorities (BIH), or there are no stages in the application process (Montenegro, North Macedonia). The fact that only candidates in Albania can supplement missing documentation, rather than being automatically disqualified for an incomplete application, is a sign of still insufficiently facilitated recruitment for candidates outside of civil service.

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77 Available at: https://bit.ly/3mh2lug (last accessed on 02 February 2023).
78 Candidates' Corner: https://kutak.suk.gov.rs/ (last accessed on 02 February 2023).
79 Available at: https://konkursi.rks-gov.net/ (last accessed on 02 February 2023).

Transparency of recruitment outcomes is only partially achieved. The decisions of selection committees are generally made publicly available, but mostly with partial or missing information on rankings of candidates or reasoning. Cases of annulled or cancelled procedures are even less transparent. With the redesign of the CSA BIH website, annulment decisions are no longer made public. Thus, the administration in Kosovo has emerged as the most transparent in this regard; however, the results should be interpreted with caution due to the comparatively lower availability of data in this monitoring cycle.

*Table 23. Public availability of outcomes of recruitment procedures[80]*

	Results of the selection process		Annulled announcements	
	Decisions of committees	Ranking	Decision	Reasoning
ALB	✓	Best-ranked candidate only	**X**	**X**
BIH	✓	Best-ranked candidate only	**X**	**X**
KS[81]	✓	List successful candidates	✓	✓
MNE	**X**	List successful candidates	✓	**X**
MKD	✓ (not the entire sample)	List successful candidates	**X**	**X**
SRB	✓ (not the entire sample)	List successful candidates	**X**	**X**

On the other hand, perception data suggests that the opinion of civil servants on the relevance of merit in recruitment processes remains mostly negative. On average, 40% of respondents disagreed that civil servants are recruited based on merit (qualifications and skills) in their institutions, compared to 31% of those who agree. Negative sentiments among civil servants in Montenegro are comparatively higher than in the rest of the region (46% of disagreement), with the perception of their colleagues in BIH and North Macedonia standing close (44% in both cases). Serbia stands out as the opposite and the only example in the region with a higher share of agreement (43% versus 27% of disagreement). When asked essentially the same but inversed question, if it is necessary to have personal and political connections to get civil service positions, 44% of civil servants agree on average. Perception of the necessity of connections is the highest in BIH, and it has remained almost unchanged since the 2020 survey (55% of those who agree). Serbian civil servants are, again, more optimistic. On both issues, the share of those undecided ("neither agree nor disagree") stands at a notable 22%.

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80 Based on analysing five sample public competition procedures, except for Kosovo.

81 For Kosovo, four procedures were analysed due to a low number of public competitions initiated in recent years. Also, for assessing transparency and public availability of their outcomes, the sample was three procedures for selection results (left column in the table) and 2 for annulled announcements (right column).
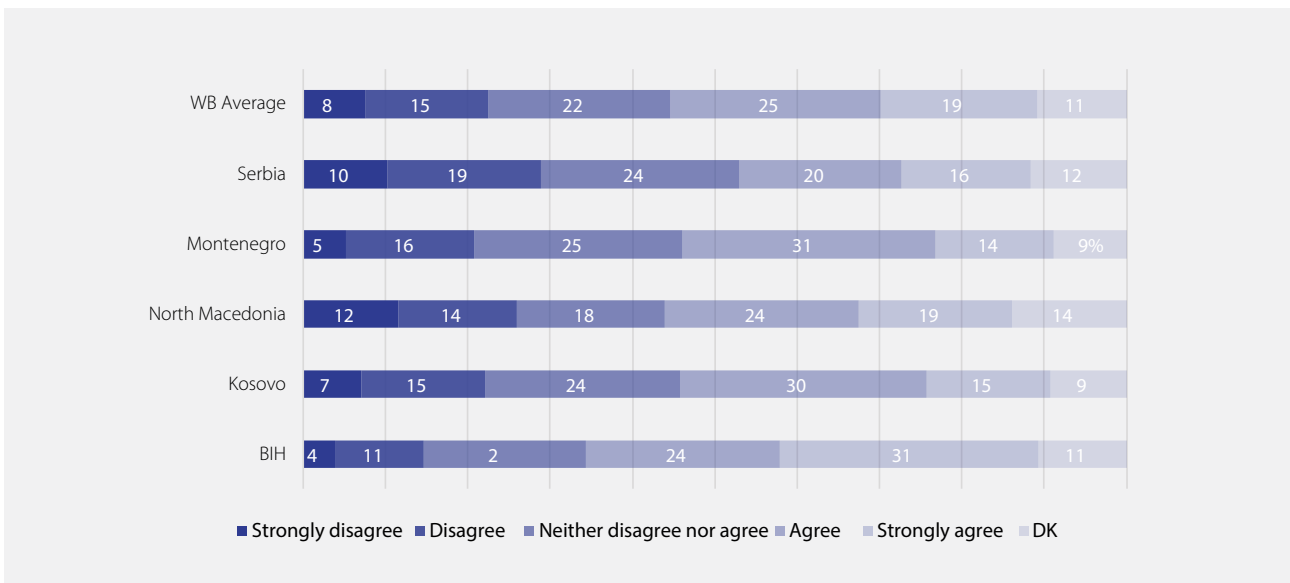
All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 2682 and refers to the total number of respondents in the WB.

Public opinion on the matter still shows that citizens in the region do not trust recruitment practices. On average, two-thirds of the population disagree that public servants are recruited through public competitions based on merit (67%). Only a quarter of citizens believe they are recruited in such a way (26%). While disagreements in all the region's administrations account for more than half of the population, and sometimes even close to 80% (in BIH, North Macedonia), Albania and Serbia citizens tend to be relatively more positive.

Chart 31: Public perceptions on the question "Public servants are recruited through public competitions based on merit (i.e. best candidates are enabled to get the jobs)."
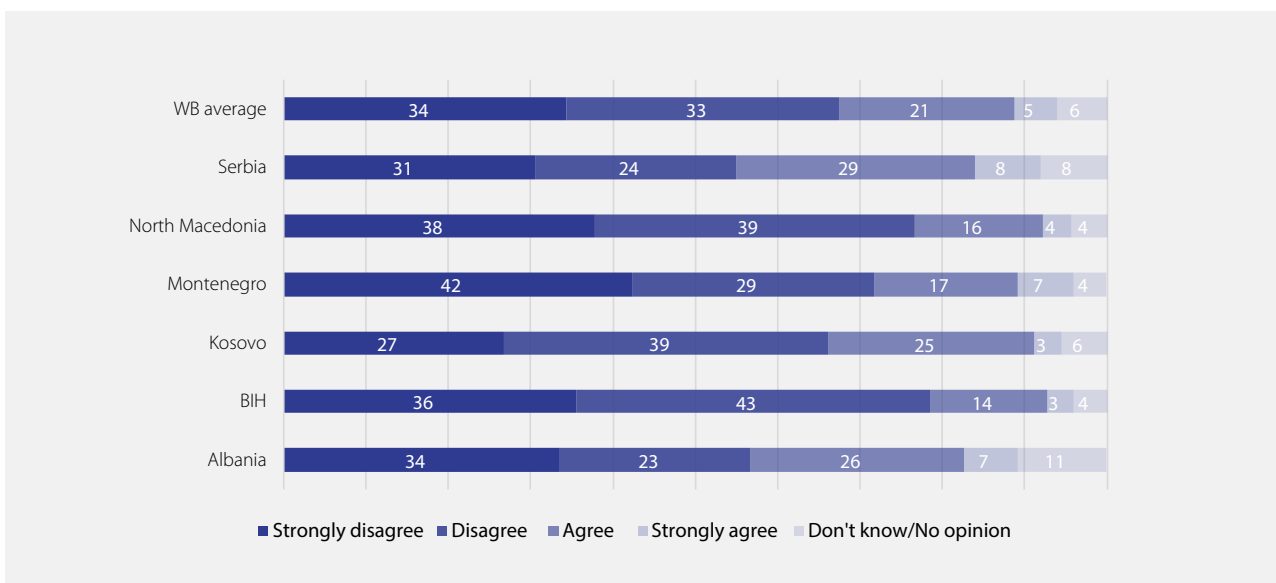
All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 6093 and refers to the total number of respondents in the WB.

Finally, civil servants' view of the equal treatment of all candidates in recruitment varies across the WB.[82] Respondents in Serbia perceive procedures least discriminatory, with 61% agreeing that equal treatment is ensured, and those in Kosovo and Montenegro agree to a lesser extent (41% and 42%, respectively). In BIH and North Macedonia, agreement is the lowest in the region, and vice versa, disagreement is the highest.

Chart 32: Civil servants' perceptions on the question "In the recruitment procedure for civil servants in my institution, all candidates are treated equally."
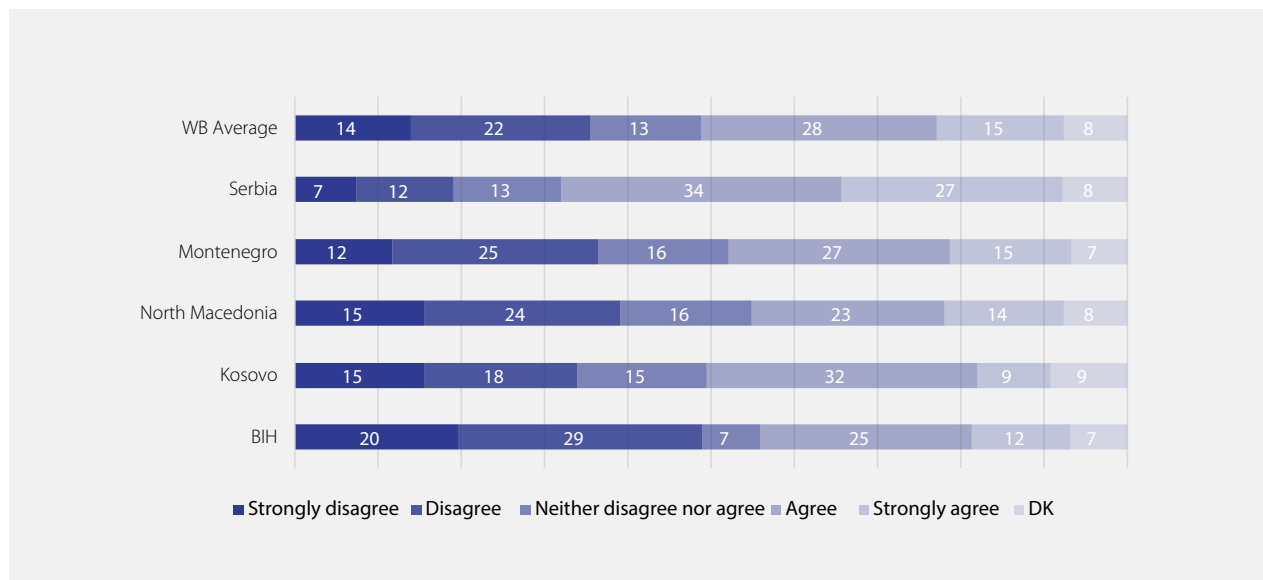
All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 2682 and refers to the total number of respondents in the WB.

Overall, no major changes are observed in the region, except for BIH and Kosovo. For the former, less information on recruitment procedures are available online after changes to the CSA BIH website. For the former, implemented civil service reforms, i.e., centralisation of information online, resulted and transparency.

Chart 33: Indicator values for PSHRM_P3_I1 - comparison of values for the 2017/2018, 2019/2020, and 2021/2022 monitoring cycles

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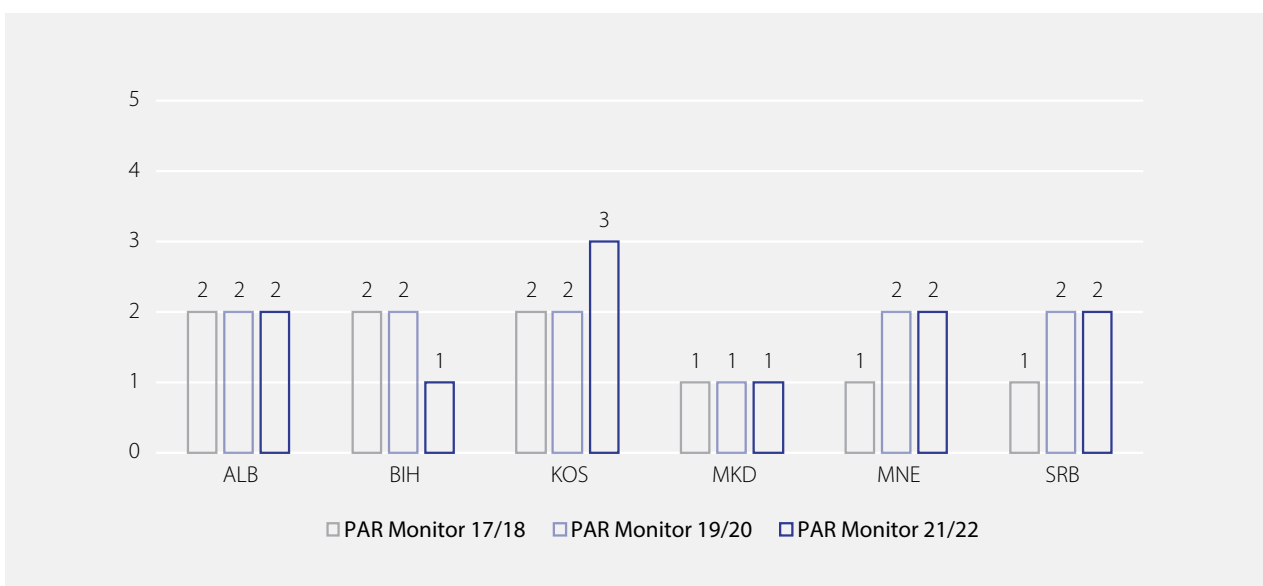
82   Regardless of gender, ethnicity or other personal traits, which could be the basis for unfair discrimination.

Principle 4: Direct or indirect political influence on senior managerial positions in the public service is prevented

WeBER strives to provide a comprehensive measurement of the "Effectiveness of the protection of senior civil servants' positions from unwanted political interference" (Indicator PSHRM_P4_I1). It combines SIGMA sub-indicators, legislation analysis, and information acquired from relevant institutions, complemented by survey data (from civil servants and CSOs).

Table 24: Element scores and corresponding indicator values for PSHRM_P4_I1 "Effectiveness of protection of senior civil servants' position from unwanted political interference"

Indicator element	Max	ALB	BIH	KOS	MKD	MNE	SRB
E1. The Law prescribes competitive, merit-based procedures for the selection of senior managers in the civil service	**2**	2	2	2	0	2	1
E2. The law prescribes objective criteria for the termination of employment of senior civil servants	**2**	2	0	2	0	0	2
E3. The merit-based recruitment of senior civil servants is efficiently applied in practice.	**4**	2	2	0	0	2	2
E4. Acting senior managers can by law, and are, only appointed from within the civil service ranks for a maximum period limited by the Law	**4**	2	0	0	0	0	2
E5. Ratio of eligible candidates per senior-level vacancy	**4**	0	0	0	0	0	0
E6. Civil servants consider that the procedures for appointing senior civil servants ensure that the best candidates get the jobs	**2**	0	0	0	0	0	0
E7. CSOs perceive that the procedures for appointing senior civil servants ensure the best candidates get the jobs	**2**	0	0	0	0	0	0
E8. Civil servants perceive that senior civil servants are appointed based on political support	**2**	0	0	0	0	0	0
E9. Existence of vetting or deliberation procedures on appointments of senior civil servants outside of the scope of the civil service legislation	**2**	2	2	2	0	0	0
E10. Civil servants consider that senior civil servants would not implement and can effectively reject illegal orders of political superiors	**2**	0	1	0	0	1	0
E11. Civil servants consider that senior civil service positions are not subject of political agreements and "divisions of the cake" among the ruling political parties	**2**	0	0	0	0	0	0
E12. Civil servants perceive that senior civil servants are not dismissed for political motives	**2**	0	1	0	1	0	0
E13. Civil servants consider the criteria for dismissal of senior public servants to be properly applied in practice	**2**	0	0	0	0	0	0

E14.	CSOs consider senior managerial civil servants to be professionalised in practice	**2**	0	0	0	0	0	0
E15.	Civil servants perceive that senior civil servants do not participate in electoral campaigns of political parties	**2**	0	0	0	0	0	0
E16.	Share of appointments without a competitive procedure (including acting positions outside of public service scope) out of the total number of appointments to senior managerial civil service positions	**4**	4	2	4	0	0	0
Total points		**40**	**14↓**	**10**	**10↑**	**1**	**5↓**	**7**
Indicator values 2021/2022[83]		**0-5**	**1**	**1**	**1**	**0**	**0**	**0**
Indicator values 2019/2020		*0-5*	*2*	*1*	*0*	*0*	*1*	*0*
Indicator values 2017/2018			*3*	*1*	*1*	*0*	*1*	*0*

Merit-based procedures for selecting senior civil servants (SCS) are in place in most administrations of the region. According to the latest SIGMA assessments,[84] legal frameworks for merit-based recruitment are well established in Albania, BIH, Kosovo, and Montenegro. For Kosovo, a new regulatory framework has been introduced with the Law on Public Officials that aims to ensure that principles of merit and professionalism are observed when recruiting SCS. In Serbia, the scope of SCS is well-defined, but there is no single senior-level administrative position in state administration bodies that decides of rights and duties of all civil servants.

The application of merit-based recruitment principles remains contested in practice for various reasons. To name a few, special procedures are being used more often than the standard ones (Albania), there are shortcomings in the specification of job requirements, selection methods, or composition of selection committees (Montenegro), or there is insufficient evidence to fully examine the recruitment practice (BIH, Kosovo, Serbia). Overall, administrations in the region tend to fare better in the adequacy of the legal framework for merit-based recruitment than in its implementation.

On the other hand, legal frameworks in Albania, Kosovo, and Serbia are assessed as objective regarding criteria for termination of employment of SCSs. However, in Serbia, the potential for arbitrary dismissals is seen in the CSL provision that allows removal from office in case work plans and strategic goals of institutions are unachieved. The 2021 CSL amendments in Montenegro similarly introduced specific cases of dismissal if the annual activity reports indicate irregularities or state administration bodies fail to submit them. Full discretion in the appointments and dismissals of persons occupying SCS positions in North Macedonia remains the issue.

Furthermore, the appointments of acting managers into vacant SCS positions are among the major causes of SCS volatility in the region. In Albania, the Law on the Organisation of the State Administration strictly confines acting appointments to civil service positions that are directly subordinate to those to which they are temporarily assigned in "acting" capacities; however, it does not limit their tenure.[85] In BIH, the Council of Ministers still appoints acting managers through very unclear procedures and criteria, whereas in Serbia, the practice of appointments of acting managers in open breach of the CSL limitations has continued, becoming a rule of law issue over the years. In Montenegro, with the 2021 amendments to the CSL, the Government has

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83   Conversion of points: 0-7 points = 0; 8-14 points = 1; 15-21 points = 2; 22-28 points = 3; 29-34 points = 4; 35-40 points = 5.

84   WeBER relies on following SIGMA sub-indicators for the adequacy of legal framework: Sub-indicator 2 – "Adequacy of the legislative framework for merit-based recruitment for senior civil service positions", Sub-indicator 3 – "Objectivity of criteria for termination of employment of senior civil servants in the legislative framework" and Sub-indicator 5 – "Application in practice of recruitment procedures for the senior civil service" of the Indicator 3.4.1 – "Merit-based recruitment and dismissal of senior civil servants". See SIGMA/OECD, "Methodological Framework for the Principles of Public Administration".

85   The secretary general position can be temporarily assigned to a director general, and the director general position can be assigned to one of the subordinate directors. Law on the Organisation and Functioning of the State Administration, no. 90/2012, https://bit.ly/3aPXJmt (last accessed on 27 February 2023).

revoked the condition that a person outside of the civil service can be recruited in acting status only if there are no candidates within the system, which marks a step back compared to the previous PAR Monitor. Finally, Kosovo was the example of the strictest regulation of the institute of acting managers in the region, but with the entry into force of the Law on Public Officials, the employments based on acting statuses were supposed to be terminated and acting SCS returned to their previous posts. However, according to the law regulating the organisation of state administration, persons can be appointed to acting statuses in practice as "replacements" with no clear duration limits of their mandate.[86] Altogether, the real or potential influence of politics over the top tier of civil service in the region remains high.

■ Practice to avoid repeated: Unrelenting breaches of CSL

As stated in the previous PAR Monitors, since the adoption of the CSL in 2005 **in Serbia**, only up to 30% of all senior positions were appointed based on competition, irrespective of the government in power. To overcome this problem in a legal sense, the CSL was amended in 2014 to allow acting managers to occupy vacant senior positions with a limited mandate of six months (with the option of exceptional extensions for another three months). Since this amendment, appointments of acting managers into vacant SCS positions have become a standard practice instead of an exception. A new amendment followed in 2018 to further limit the growing prevalence of acting heads (among other changes) by prescribing, for example, that only existing civil servants can be appointed as acting heads. The practical application of the law has yet to yield improvements, and the degree of law breach has just become more serious. The European Commission confirms that legal provision allowing for appointments to acting positions is frequently used beyond prescribed limits.[87] After years of illegal appointments, the unrelenting breach of the CSL has not only stayed the top public administration issue in Serbia, but it has also become a major rule of law concern.[88]

Moreover, direct political vetting or interference in the appointment process is present in the region, and no measures have been implemented since the baseline PAR Monitor to reduce it. As in Montenegro and Serbia, such political interference is based on bylaws not stemming from the civil service legislation. In both administrations, the government's rules of procedures prescribe that, after the completion of selection and nomination procedures prescribed by civil service legislation, its working bodies[89] discuss and propose all the SCS appointment decisions to the government. In practice, this means that political reasoning in the SCS appointments precedes and even cancels the merit-based recruitment principles. For North Macedonia, the politicisation of senior managerial remains straightforward as the appointments to the "A category" (state secretaries) are made directly by politicians. In the remaining administrations, no direct political interference takes place. Hiring authorities in BIH, though, have the discretionary power to select any of the candidates shortlisted by the selection committee, but the Civil Service Agency can make appointments *ex officio* should they fail to do so within deadlines. Overall, there are no safeguards in half the region against political influence over SCS recruitment, which mirrors the picture from the previous PAR Monitor editions.

Assessment of appointments to SCS positions without competitive procedures within one year remains an important indicator of the degree of politicisation. The table below shows that no SCS appointments were made without prior competition in Kosovo, whereas in three administrations, all or the vast majority of appointments were made without competition. In Albania, no appointments were made in 2021, but announcements were published in December of that year, which resulted in SCS appointments in 2022.

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86   The Law NO. 06/L -113 for the Organization and Functioning of the State Administration and the Independent Agencies partially regulates positions for Acting General Secretary, Acting Director of Department and the Acting Head of Division.

87   European Commission, Serbia 2022 Report, Brussels, 12 October 2022, p. 16, https://neighbourhood-enlargement.ec.europa.eu/serbia-report-2022_en (last accessed on 01 March 2023).

88   Miloš Đinđić, Milena Lazarević, The Never-ending story of senior civil service depoliticisation in Serbia, European Policy Centre (CEP), 2023, available at: https://bit.ly/3JckYZz (last accessed on 01 March 2023).

89   Commissions or committees consisting of ministers or other high-level officials.

|	ALB	BIH	KOS	MKD	MNE[91]	SRB
% of uncompetitive appointments	0%	5%	0%	100%	86%	94%
Total appointments	0	42	20	N/A	403	741

The perception among civil servants in the region of the meritocracy of SCS recruitments remains largely negative. On average, 46% of respondents disagree that the best candidates get the jobs (four percentage points more than the previous PAR Monitor), with one-fifth agreement (20%). At the national level, the agreement is below the regional average in BIH and Montenegro (15% and 14%, respectively). In three administrations, 50% or more of surveyed civil servants do not trust that the best candidates get employed at the end (BIH, Kosovo, Montenegro). Civil servants expressed more concerns on this issue region-wide than in the previous survey edition.

However, as in the 2020 survey, civil servants in Kosovo remain the most convinced that SCS in their institutions would implement illegal actions if political superiors asked them to do so, with 41% of agreement as opposed to region-wide 25%. Serbian and North Macedonian civil servants expressed the least disagreement on the other end. The share of "don't know" responses remained high on average (27%), indicating that many civil servants still choose not to respond to politically sensitive questions. The chart below provides full perception data on this question.

Chart 34: Civil servants' perceptions on the question "In my institution, senior civil servants would implement illegal actions if political superiors asked them to do so."
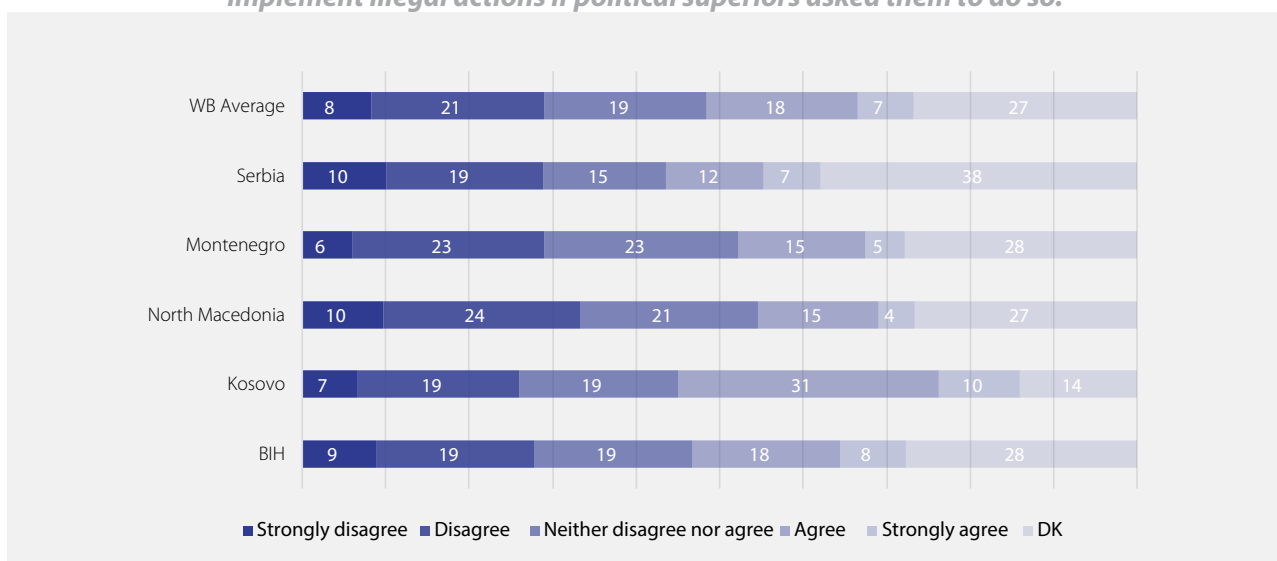
All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 2348 and refers to the total number of respondents in the WB.

Compared to the PAR Monitor 2019/2020, more civil servants, on average, agree that SCS positions are subject to political agreements and "divisions of the cake" among ruling political parties (52% as opposed to the previous 45%). With this increase, the perception share reversed back to the level of that in the baseline measurement. At the national level, this figure remains the highest in BIH (67%), closely followed by Montenegro (66%). Looking at the entire region, the share of those who disagree that SCS positions are politically allocated is close to marginal (14%).

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90 Based on the individual national-level scoring sheets produced in the monitoring process.
91 The percentage calculation refers only to the decisions for which documents were available during monitoring.

Moreover, more civil servants than in the previous cycles consider that SCSs are appointed thanks to political support often or always, reaching almost two-thirds of responses (62%). An additional 13% of those surveyed who consider that it happens "sometimes" only contributes to the widespread perception of politicisation. Respondents from Montenegro emerged as the most negative (74% of responses were "often" and "always"). In three more administrations, most respondents hold unfavourable views (BIH, Kosovo, North Macedonia). Civil servants in Serbia have come about as least disapproving, but the share of those who did not know is the highest in WB(28%).

The question of how frequently SCS participate in the electoral campaigns of political parties still draws, on average, a significant share of civil servants who "don't know" (36%). As in the previous survey edition, it goes even beyond 40% of respondents in BIH and Serbia, putting the question's sensitivity on full display. The shares of "always" and "often" responses continue to vary, albeit at least a third of respondents in Kosovo, Montenegro, and North Macedonia declare so.

Chart 35: Civil servants' perceptions on the statement "In my institution, senior civil servants participate in electoral campaigns of political parties during elections."
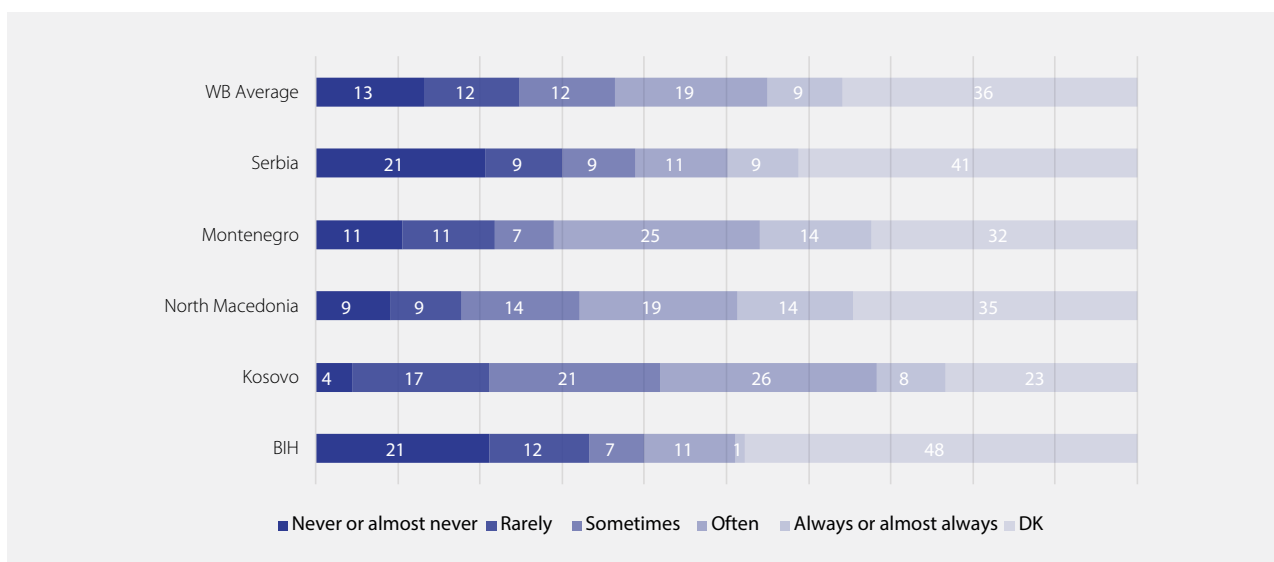
All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 2348 and refers to the total number of respondents in the WB.

Finally, CSOs in the region still doubt that senior managerial civil servants are professionals in practice rather than political favourites. With 68% of respondents, on average, contesting that they are professionals, the disagreement has only slightly decreased, looking back at past PAR Monitor editions. Despite this, perception is consistently negative across the region, and shares of disagreement go higher than two-thirds of respondents in Kosovo, North Macedonia, Montenegro, and Serbia and above half of respondents in BIH. The only exception is found in Albania, however, with shares of those who neither disagreed or agreed or refused to state an opinion being relatively high compared to the rest of the region (19% and 17%, respectively). Similarly, CSO representatives across the region maintain their negative views when asked whether procedures for appointing SCS ensure that the best candidates get the jobs: 69% disagree region-wide (9 percentage points less than in the 2019/2020 cycle), with most negative opinions (84%) recorded in Montenegro.

Since the baseline PAR Monitor, the indicator values have remained unchanged in BIH, North Macedonia, and Serbia. Albania has marked the sharpest decline since the baseline measurement, and in this cycle, backsliding is owed to the unimplemented survey of civil servants. More negative perceptions of actors in Montenegro resulted in the indicator value decrease as well, and for Kosovo, data availability on appointments to SCS positions in this monitoring cycle impacted the value change.
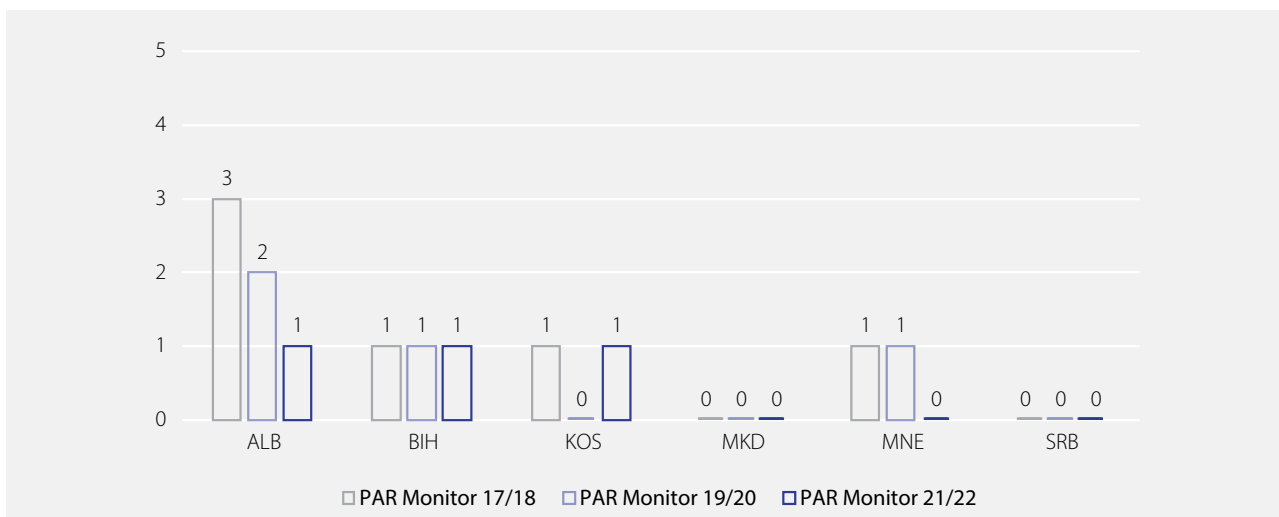
Principle 5: The remuneration system of public servants is based on the job classification; it is fair and transparent

Regarding remuneration systems for civil servants, WeBER monitors the "Transparency, clarity and public availability of information on the civil service remuneration system". Indicator PSHRM_P5_I1 consists of six elements.

Table 26: Element scores and corresponding indicator values for PSHRM_P5_I1 "Transparency, clarity and public availability of information on the civil service remuneration system"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. The civil service remuneration system is simply structured	**4**	2	4	0	4	2	2
E2. The civil service salary/remuneration system foresees limited and clearly defined options for salary supplements additional to the basic salary	**4**	4	0	0	2	2	4
E3. Information on civil service remuneration system is available online	**6**	2	2	0	2	0	0
E4. Citizen friendly explanations or presentations of the remuneration information are available online	**2**	0	1	0	1	0	0
E5. Discretionary supplements are limited by legislation and cannot comprise a major part of a civil servant's salary/remuneration	**4**	4	2	2	2	2	4
E6. Civil servants consider the discretionary supplements to be used for their intended objective of stimulating and awarding performance, rather than for political or personal favouritism	**2**	0	0	0	0	0	1
Total points	**22**	**12**	**9**	**2**	**11↓**	**6↓**	**11↓**
Indicator values 2021/2022[92]	**0-5**	**3**	**2**	**0**	**2**	**1**	**2**
Indicator values 2019/2020	*0-5*	*3*	*2*	*0*	*3*	*2*	*3*
Indicator values 2017/2018		*3*	*1*	*0*	*3*	*1*	*2*

A simple and clear-cut structure for the remuneration system is one of the first preconditions for transparency.

92 Conversion of points: 0-3 points = 0, 4-7 points = 1, 8-11 points = 2, 12-15 points = 3, 16-19 points = 4, 20-22 points = 5.

Put differently, such a system allows the public to understand how much civil servants at different stages of their careers earn. The simplicity of the structures here means that all elements of the salary structures are defined in the legislation, including their concrete values. In most administrations in the region, the salaries comprise a base and a multiplier (coefficient), the multiplication of which provides a basic salary. In North Macedonia, the system is slightly different, with salary components expressed in points (awarded for education, position level supplement and working experience), and the Law on Administrative Servants defines how the value of points is determined.

On simplicity of remuneration systems, there have been no changes in the region. BIH and North Macedonia are still in the top position as primary legislation provide clear provisions on all necessary salary components. Due to legal fragmentation or lack of clarity, salary systems in Albania, Montenegro, and Serbia remain partially simply structured. As stated in the PAR Monitor 2019/2020, these legal frameworks contain unclear rules and provisions for calculating supplements (Albania), on exceptions to the prescribed salary coefficients (Montenegro), and different base pays are determined in the annually enacted state budgets, despite the existence of unified base pay in the Law on Salaries of Civil Servants (Serbia). The salary system in Kosovo remains highly heterogenous and decentralised and is regulated by 58 internal acts. The Constitutional Court annulled the Law on Salaries in the Public Sector adopted in 2019, and the new Law entered into force in February 2023; however, only after the monitoring period.

◼ Practices to avoid: Perpetual postponing of the application of a new remuneration system

In Serbia, a new remuneration system in the public sector was supposed to be introduced in 2015, yet, the installation of the new system has been, after multiple postponements, put off again, this time until 2025.

As indicated in previous PAR Monitors, following the adoption of an umbrella Law on the Salary System in the Public Sector in 2016, a new Law on the Salaries of Civil Servants was to be introduced as one of the special laws. The new system would introduce an equal base pay and a unique system of coefficients across the public sector, ensuring the wide-ranging application of "equal pay for equal work". However, it is important to repeat that such constant delays of reforms should be avoided, as it creates legal uncertainty and mismanagement of many individuals' expectations (or fears) within the system.

Furthermore, WeBER examines whether supplements to the basic salary, which are based on several criteria such as overtime work, work on holidays, work in extreme or dangerous conditions, and others, are clearly defined in legislation, including whether there are rules on how different supplements are combined and on their mutual exclusion. That said, the situation in the region has remained intact, and Albania and Serbia are yet again the only examples with clear law provisions on 1) limits to the amounts of supplements, 2) their use, and 3) rules on how they can be combined. In North Macedonia, the so-called market adjustment supplement still needs to be more regulated with an upper limit. In Montenegro, the mutual exclusivity between different supplements is not legally set, certain types of supplements remain unclear (for work in "certain job positions"), and full regulation of limits is made through collective bargaining agreements. In BIH, despite the clarity of the salary system structure, the definitions of supplements remain unclear, with no firm limits or mutual exclusions.

◼ Practices to avoid: Introducing new, vague salary supplements in North Macedonia

The amendments to the Law on the execution of the Budget from July 2021 opened the door for awarding salary supplements of up to 30% of the basic salary for employees due to the specificity of the work and work tasks and increased volume of work. Moreover, amendments allowed another new supplement of up to 15% to be awarded to employees working on IPA-related tasks. Even if intended to solve specific challenges, such as difficulties in staff retention, the addition of such supplements distorts the overall pay system, by making it less transparent and predictable, as criteria for awarding supplements, in both cases described, are insufficiently clarified. As such, newly introduced supplements can create opportunities for misuse, with negative consequences for the whole public service.

Performance-related elements of pay can be a stimulating tool for managers. Still, unless their use is very clearly limited and carefully done, it can also distort the transparency and predictability of overall remuneration systems for civil servants. Albania and Serbia[93] are high performers in the region, as legislation does not foresee

93   In Serbia, exceptional performance-based bonuses exist in the Tax Administration and the Administration for the Execution of Criminal Sanctions;

bonuses.[94].

Although the legislation does not foresee bonuses in Kosovo, fragmentation of the system can lead to inequalities. For BIH, and Montenegro, SIGMA notes that the share of bonuses was below 20% of the total wage budget; however, managerial discretion remains high. For North Macedonia, it is assessed that the bonuses are linked to performance and that the Law on Administrative Servants is adequately applied, with a maximum of five per cent of top performers awarded in practice.

Civil servants' perceptions of using bonuses in their institutions remained mostly unchanged over the two years. On average, 41% of respondents in the region disagree that in their institutions, managers use bonuses, or increases in salary grades, to reward performance (3 percentage points up). In comparison, only 26% agree with the statement (same as in the 2019/2020 cycle). The highest level of disagreement is again recorded in Kosovo (53%), followed by BIH (47%), while Serbian civil servants expressed the least disagreement (28%).

A similar pattern vis-à-vis the previous survey edition was recorded when respondents were asked to estimate how often political and personal connections help employees to receive bonuses or increases in pay grades. With 33% of respondents on average replying it happens "often" or "always" and 28% of those who opted for "never" or "rarely", perception of civil servants did not significantly alter between the cycles. Country variations are around the average for all except Montenegro, where exactly 50% of respondents believe connections are essential for promotion.

Chart 37: Civil servants' perceptions on the question "In my institution, political and personal connections help employees to receive bonuses or increases in pay grades."
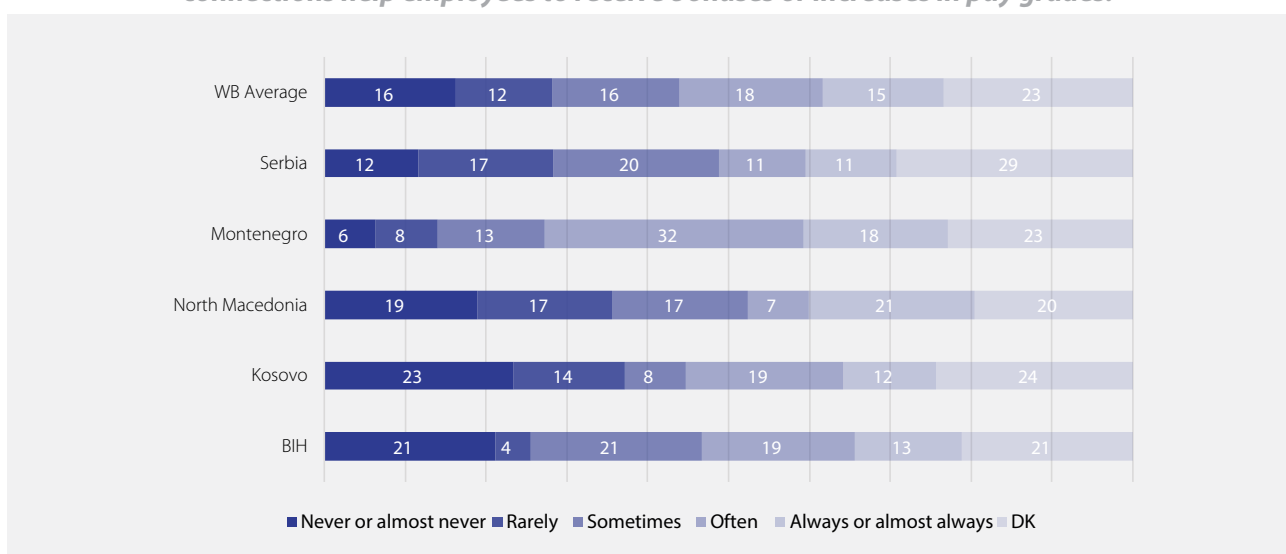
All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 2325 and refers to the total number of respondents in the WB.

Finally, when it comes to the indicator element of public availability of information about the remuneration system, PAR Monitor relies on the latest SIGMA assessments for the region.[95] According to SIGMA, some information is available in the three administrations in the region – Albania, BIH, and North Macedonia. However, in Albania, available basic remuneration data was not fully updated. Salary information in BIH and North Macedonia is published in job announcements for announced vacancies. Yet, there are no available government reports with salary statistics or information on the average total pay. In the rest of the region, there is a lack of basic transparency of salary systems to the public.

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however, according to SIGMA, the bonuses account for a share close to zero.

94   SIGMA's indicator 3.5.1, "Fairness and competitiveness of the remuneration system for civil servants", sub-indicator 6, "Managerial Discretion in the Allocation of Bonuses". See SIGMA/OECD, "Methodological Framework for the Principles of Public Administration"

95   SIGMA's indicator 3.5.1, "Fairness and competitiveness of the remuneration system for civil servants", sub-indicator 3, "Availability of salary information". See SIGMA/OECD, "Methodological Framework for the Principles of Public Administration".

Overall, there has been a slight backsliding in the region. Indicator values have decreased for a single point on the scale in Montenegro, North Macedonia, and Serbia due to insufficient availability of salary information. Perception of civil servants in Montenegro has also lowered the score for Montenegro (the survey was centrally disseminated to the entire civil service for the first time).

Chart 38: Indicator values for PSHRM_P5_I1 - comparison of values for the2017/2018, 2019/2020 and 2021/2022 monitoring cycles
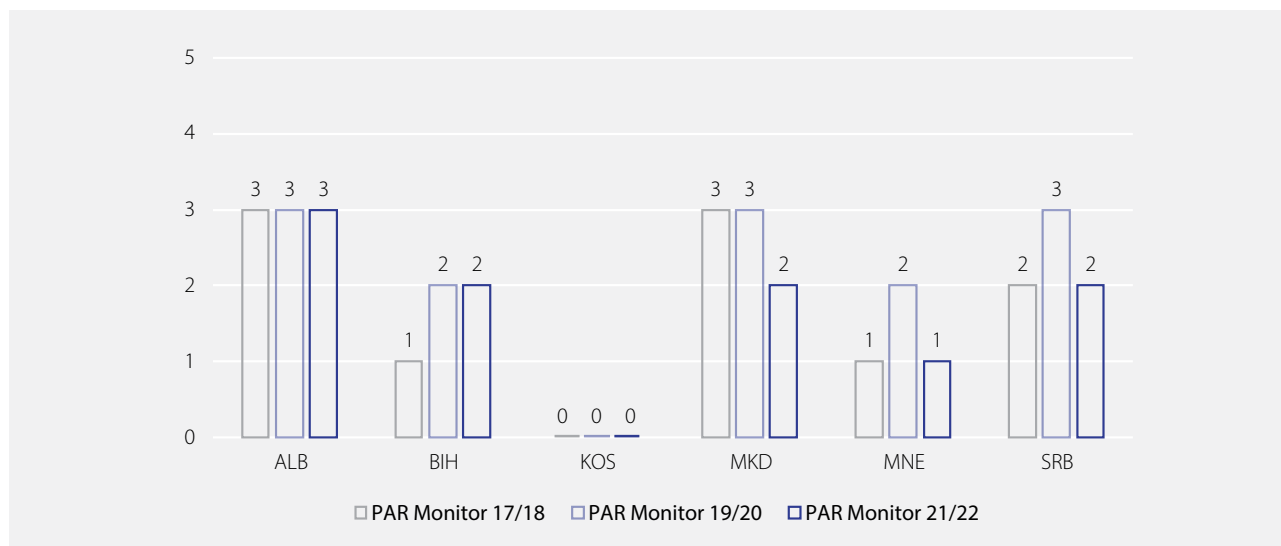
Principle 7: Measures for promoting integrity, preventing corruption and ensuring discipline in the public service are in place

While WeBER does not focus on disciplinary measures in civil service, it does measure the "Effectiveness of measures for the promotion of integrity and prevention of corruption in the civil service" through Indicator PSHRM_P7_I1.

Table 27: Element scores and corresponding indicator values for PSHRM_P7_I1 "Effectiveness of measures for the promotion of integrity and prevention of corruption in the civil service"

Indicator element	Max	ALB	BIH	KOS	MKD	MNE	SRB
E1. Integrity and anti-corruption measures for the civil service are formally established in the central administration	**4**	4	0	2	4	2	4
E2. Integrity and anti-corruption measures for the civil service are implemented in central administration	**4**	2	0	0	2	0	2
E3. Civil servants consider the integrity and anti-corruption measures as effective	**2**	0	0	1	1	0	1
E4. CSOs consider the integrity and anti-corruption measures as effective	**2**	0	0	0	0	0	0
E5. Civil servants consider that the integrity and anti-corruption measures are impartial	**2**	0	0	1	0	0	1
E6. CSOs consider that the integrity and anti-corruption measures in state administration are impartial	**2**	0	0	0	0	0	0
E7. Civil servants feel they would be protected as whistle blowers	**2**	0	0	0	0	0	0
Total points	**18**	**6↓**	**0**	**4↓**	**7**	**2↓**	**8↑**

Indicator values 2021/2022[96]	0-5	1	0	1	2	0	2
Indicator values 2019/2020	*0-5*	*2*	*0*	*2*	*2*	*1*	*1*
Indicator values 2017/2018		*2*	*0*	*1*	*1*	*1*	*2*

The first two elements under this indicator rely on the results of the SIGMA assessment for the Western Balkan administrations (E1, E2),[97] and the remaining five rely on the results of two WeBER surveys: of civil servants and civil society actors (E3-7).

SIGMA assesses the legal framework for public sector integrity as complete and integrity policy as comprehensive, with adequate action plans, in half of the region's administrations (Albania, North Macedonia, Serbia). In Kosovo and Montenegro, the biggest weakness is the absence of anti-corruption policies at the national level. Compared to the initial SIGMA 2017 measurement, this represents a step back for Kosovo, whereas assessment has remained the same for Montenegro ever since, although SIGMA noted that public bodies produce integrity plans individually. In addition, the legal framework and integrity policy in BIH are considered the least robust in the region as legislation suffers from shortcomings, such as "insufficient regulation of the statute limitations in serious offences […] or the non-inclusion of the right to be heard in appeal procedures," and the integrity policy framework does not exist at the state level.[98]

On the other hand, public sector integrity policy lacks full implementation in the entire region. As mentioned earlier, the key obstacle for BIH, Kosovo, and Montenegro is the absence of national policies. In practice, integrity mechanisms are used only at the municipal or cantonal level (BIH), or functions of central anti-corruption agencies need expansion for proper oversight of civil service integrity (Kosovo, Montenegro). Despite the higher assessments, SIGMA highlights the implementation issues in the rest of the region as well – lacking resources of the High Inspectorate for the Declaration and Audit of Assets in Albania to perform its mission fully; a low percentage of disciplinary sanctions confirmed by the courts in North Macedonia; or pending renewal of national anti-corruption framework in Serbia.

As in the previous PAR Monitor cycles, unfavourable perceptions of civil servants and civil society actors dominate on topics of public sector integrity. Asked if integrity and anti-corruption measures in their institutions are effective, just below a third of respondents agree (31%), while over a quarter disagrees (27%), marking a slightly more pessimistic opinion since the 2019/2020 edition. Again, country variations exist, most notably with 39% of agreement among Serbian and 33% of disagreement among Montenegrin civil servants, all above the regional averages. As an already established pattern, responses of CSOs get considerably disapproving on the same issue, with 10% of average agreement that these measures are effective and 66% of disagreement. CSOs in Montenegro remain the most sceptical (84% disagrees), with those in Serbia (75%) and North Macedonia (66%) being just behind.

Civil servants perceived the impartiality of integrity and anti-corruption measures the same as their effectiveness, with an average of 31% of agreement and 28% disagreement. Again, Serbian civil servants trust their impartiality to a slightly higher extent (39%), and those in Kosovo believe the least so (36%). On the other hand, CSOs remain unconvinced in the impartiality of such measures, with an average of 65% of region-wide disagreement, despite the 10-percentage point drop of those who disagree compared to the 2020 survey. From the obtained perceptions, it is learned that both surveyed groups consider the effectiveness and impartiality of integrity and anti-corruption measures as closely interlinked, if not the same issue.

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96   Conversion of points: 0-3 points = 0; 4-6 points = 1; 7-9 points = 2; 10-12 points =3; 13-15 points = 4; 16-18 points = 5.

97   For the first indicator element, WeBER combines two SIGMA sub-indicators of the Indicator 3.7.2, "Integrity of public servants". Those are Sub-indicator 1 – "Completeness of the legal framework for public sector integrity" and Sub-indicator 2 – "Existence of a comprehensive public sector integrity policy and action plan. For the second indicator element, WeBER uses SIGMA Sub-indicator 3 – "Implementation of public sector integrity policy". Monitoring reports are available at: https://www.sigmaweb.org/publications/monitoring-reports.htm (last accessed on 17 February 2023).

98   OECD/SIGMA, Monitoring Report, Bosnia and Herzegovina, May 2022, available at: https://www.sigmaweb.org/publications/Monitoring-Report-Bosnia-and-Herzegovina-May-2022.pdf (last accessed on 17 February 2023).

On whistle-blower protection, the opinion of surveyed civil servants does not show a sign of positive development. On the opposite, already high distrust in the whistle-blowing institute has become somewhat higher – on average, 12% agreed, and 49% disagreed they would feel protected as whistle-blowers (compared to 14% and 45% in the previous PAR Monitor, respectively). As in the last survey edition, the share of those who "don't know" sits at a quarter of respondents, with the highest level of disagreement in BIH (60%). In each administration of the WB region, the agreement was below a fifth of respondents.

Chart 39: Civil servants' perceptions on the question "If I were to become a whistle-blower, I would feel protected."
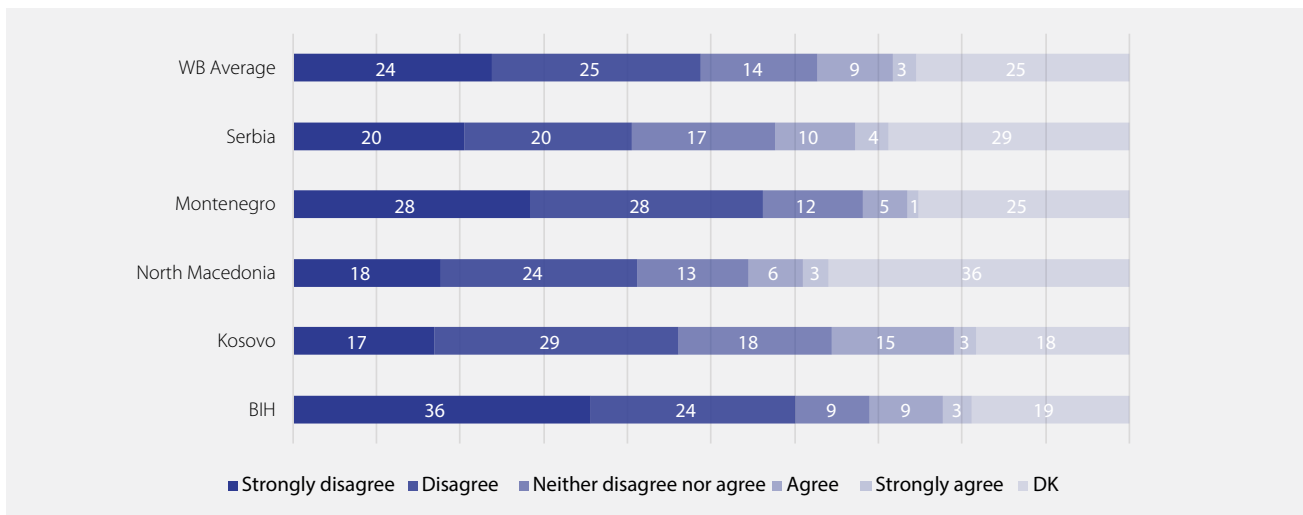
All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 2279 and refers to the total number of respondents in the WB.

Overall, indicator values for the effectiveness of measures for promoting integrity and preventing corruption in civil service improved only for Serbia. At the same time, they have deteriorated in half of the region. It should be noted that no full SIGMA assessments were available in the previous 2019/2020 cycle, and researchers have independently calculated three SIGMA sub-indicators utilised by WeBER for this purpose. Other than that, failed attempt to implement a survey of civil servants did affect the overall result for Albania, keeping in mind that Albanian civil service employees were previously the most in agreement regarding the effectiveness and impartiality of the integrity policy.

Chart 40: Indicator values for PSHRM_P7_I1 - comparison of values for the 2017/2018, 2019/2020, and 2021/2022 monitoring cycles
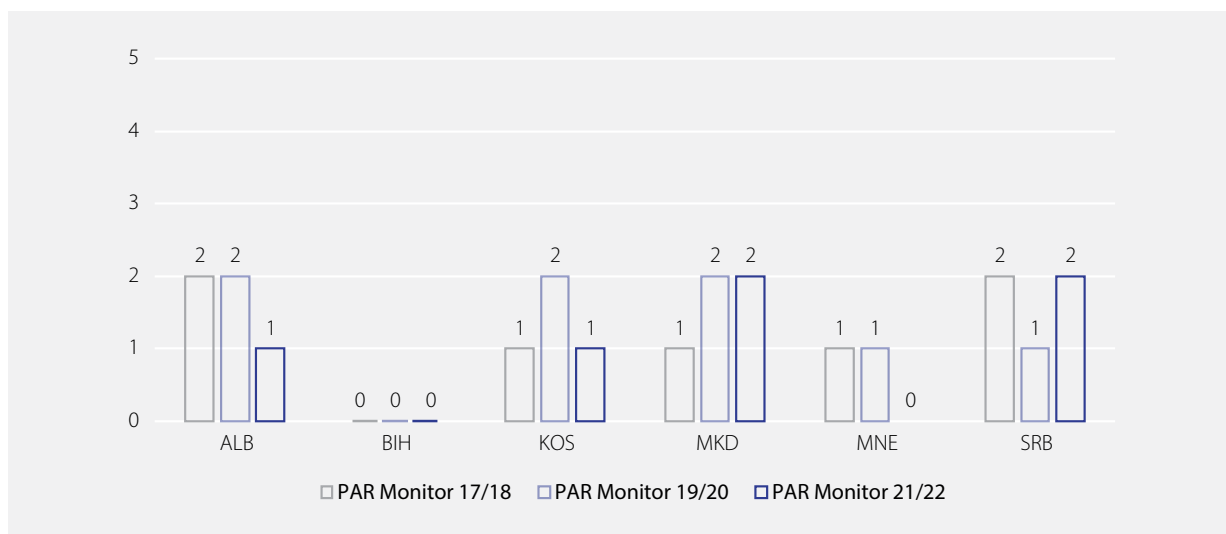
IV.4 Summary of results in the public service and human resource management area

WeBER focuses on the public availability of information related to public service, hiring of temporary staff, transparency and merit character of civil service recruitment, selection and the position of senior staff and civil service integrity measures.

Fully functioning and comprehensive HR information systems remain a challenge in the region, with Albania being the closest to the full reliability of the HR database. Data on the number of civil service employees is available in half of the WB but fully segregated only in BIH. Region-wide, reporting on CS is moderate in scope, and reports are still not publicised as a rule. However, more governments proactively disseminate and promote data on their civil service than in the previous cycle.

The regulation of temporary engagements in civil service remains an issue. Statutory limits to the number of temporary engagements remain an exception, and administrations generally do not prescribe specific criteria for selecting all temporarily engaged staff. Also, the duration of such appointments is not universally limited, except in Kosovo, and many rules apply. Kosovo remains better assessed on openness and transparency of hiring procedures too. Nevertheless, civil servants remain convinced that temporary hiring is a common and poorly regulated practice.

Fairness, openness, and transparency of recruitment to civil service remain low to moderate. Compared to the 2019/2020 monitoring, slightly higher results are observed in Kosovo and lower in BIH. Nevertheless, important deficiencies in the entire region, such as no options for candidates to supplement missing documents during application processes or lack of full public disclosure of outcomes of recruitment processes, remain present. Moreover, the public and civil servants still hold that meritocracy principles and equal opportunities do not fully permeate these processes.

Systemic problems keep affecting the senior civil service in the region. Merit-based procedures for appointments, or dismissals, of senior managers still need to be fully observed. Appointments to senior service positions, including acting statuses, are done almost without competition in North Macedonia, Montenegro, and Serbia. Most surveyed civil servants in the region continue to believe that political support is essential for getting a senior civil service job and that politics heavily affects the work of top managers. CSOs in the region concur there are high levels of political influence.

Remuneration systems are partially or fully simply structured, except for Kosovo. In three administrations, some information on salary systems is publicly available. Albanian and Serbian laws on salaries are the sole in the region with clearly defined and limited supplements, including discretionary ones. Many regional civil servants consider that bonuses are not used for awarding performance.

Legal frameworks for public sector integrity are in place; however, in half of the region, proper integrity policy frameworks do not exist yet (BIH, Kosovo, Montenegro), and issues in implementation are widespread. Civil servants remain mostly pessimistic about the effectiveness of anti-corruption measures and still do not trust they would get protection as whistle-blowers. On the other hand, CSOs have complete distrust in the public sector integrity systems as they are.

V.
Accountability

One of the most important concepts within a public governance system, accountability assumes the existence of lines of responsibility and an understanding of a relationship between the one who lays accounts and the one who is accounted to. On the most general level, accountability presumes the relationship between a government and the people who have elected it. In this relationship, the latter have the right to be informed about the government's actions and are guaranteed certain standards in treatment and compensation in cases in which this right is infringed. Accountability is also important within a system of government, presupposing clear lines of responsibility and liability between parliaments and the government, the government and ministers, and ministers and senior managers, ministries, and subordinate agencies. This means that "each part of an organisation is internally accountable, and that the institution as a whole is externally accountable to the political, judicial and social systems and oversight institutions, and is providing wide access to public information."[99]

Within the SIGMA framework of principles, accountability covers a wide range of questions related to internal accountability within an administration (Principle 1) and external accountability of the government and administration to the public. In the scope of the latter, the accountability comprises the right to access public information (Principle 2), which is a particular focus of WeBER monitoring. It also covers the protection of the rights of individuals to good administration (Principle 3), fairness of administrative disputes (Principle 4), and the functioning of systems for redressing or compensating for unlawful acts and omissions of public authorities (public liability regime – Principle 5).

V.1 State of play in the region and developments since 2020[100]

Accountability mechanisms in the Western Balkans were generally strengthened in recent years, although this reflects mainly gradual improvements in the regulatory and institutional frameworks, while actual practice and outcomes have not improved significantly, and in some cases, the situation has even deteriorated. Regarding access to public information, this dimension of the accountability area deteriorated the most. Despite adequate legislation on access to information, SIGMA noted that administrations in the region are overall less transparent in 2021 compared to 2017.

◼ Legislative and institutional framework

WB administrations have highly ranked legal frameworks for access to public information that is mostly in line with international standards. Still, Bosnia and Herzegovina is criticised by the European Commission, as its legislation is still fragmented, not aligned with European standards, and interpreted in a way that favours private interests over public ones. Despite this, according to the Global Right to Information Rating (RTI Rating), which measures the strength of the legal framework for the right to access information held by public authorities, all WB countries are ranked quite well (see Table XX below). With a score of 135 out of 150, Serbia is in third place, while Albania is also in the top 10, with a score of 127. The lowest ranked is Montenegro, with a score of 89.

Table 28: Global Right to Information rankings for Western Balkan administrations[101]

	SRB	ALB	MKD	KOS	BIH	MNE
2018	2	6	16	25	29	51
2021	3	6	23	30	36	59
2022	**3**	**6**	**26**	**31**	**37**	**60**

Source: Global Right to Information Rating (RTI)

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99   SIGMA/OECD, The Principles of Public Administration, 2017, p. 54, https://bit.ly/2Kvm4iO (last accessed on 1 February 2023).

100 The state of play is largely based on the European Commission's reports published in 2022 and SIGMA Monitoring reports for 2021 (which are therefore not cited individually). Reports of the European Commission are available at: https://ec.europa.eu/commission/presscorner/detail/%20en/ip_22_6082 (last accessed on 1 February 2023). SIGMA Monitoring reports are available at: https://www.sigmaweb.org/publications/monitoring-reports.htm (last accessed on 1 February 2023).

101 Ranks may be lower due to higher number of administrations evaluated by the RTI in this cycle. For 2022, the table shows the ranks of WB administrations out of a total of 135 administrations worldwide, for 2021 out of a total of 128, and for 2018, out of 111. The table includes rankings at the moment of writing, and rankings pertain only to the quality of the existing legal framework. Global Right to Information Rating, available at: http://www.rti-rating.org/ (last accessed on 1 February 2023).

However, there are also many shortcomings in legislation that regulates this area across the region which most often refer to the position and role of the independent control body, tough institutional setup of supervisory institutions varies from country to country (Table XX below). For instance, The Agency for Protection of the Right to Free Access to Public Information in North Macedonia does not have the jurisdiction to conduct *ex officio* inspections, while Commissioner in Albania also faces numerous challenges regarding legal instruments for enforcing its decisions. Regarding Kosovo, the main problem was that the position of Commissioner for Information and Privacy was vacant for almost three years, making it difficult to exercise the right to access public information, especially in a situation of insufficient proactivity of public bodies. Although a new Commissioner was appointed in 2022, it still lacks enough supervisory powers to ensure an independent appeal mechanism. In BiH, there is no specialised body responsible for the supervision over the implementation of the Law on Access to Information, which falls under the jurisdiction of the Institution of Human Rights Ombudsman. However, Ombudsman lacks the authority to consider appeals of refusal of access to information, conduct inspections or impose sanctions, and its powers are limited to disseminating recommendations and guidelines on law implementation.

Table 29: FOI supervisory bodies in the Western Balkans

	Supervisory body	**Position**
ALB	Commissioner for Freedom of Information and Personal Data Protection	Independent institution elected by the parliament
BIH	The Institution of Human Rights Ombudsman of BIH	Independent institution for human rights protection with three ombudspersons elected by the parliamentary assembly
KOS	Information and Privacy Agency (and the Ombudsperson)	Independent agency with a commissioner elected by the parliament
MKD	Agency for Protection of Free Access to Public Information Rights	Independent agency with a director elected by the parliament based on public vacancy call
MNE	Agency for Personal Data Protection and Free Access to Information	Three-member council appointed by the parliament with a director appointed by the council by public vacancy call
SRB	Commissioner for Information of Public Importance and Personal Data Protection	Independent institution elected by the parliament

In the case of Serbia, SIGMA previously pointed out that the Commissioner for Information of Public Importance and Data Protection lacks mechanisms to enforce its decisions and sanctions when public authorities do not act in accordance with the law. However, amendments to the Law on free access to information adopted in November 2021 empowered the Commissioner and expanded the scope of his jurisdictions. For example, Commissioner is now competent to force the authority to fulfil the obligations from its decision by imposing fines, as well as to submit a request for initiation of misdemeanour procedure.[102] Law amendments were also mentioned in the European Commission's 2022 Report for Serbia, and Commission expressed the expectation that these amendments should ensure more effective enforcement of the Commissioner's decision.

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102 Law on free access to information of public importance, Official Gazette of RS, no. 120/2004, 54/2007, 104/2009, 36/2010 and 105/2021, art. 28 (a) and 28 (b).

Regarding law amendments in Serbia, there are a few other important changes. First of all, the range of bodies subject to the obligations of the Law has been expanded and now includes every legal or natural person with public authority, authorities of city municipalities, as well as legal persons whose founder is a majority state-owned enterprise.[103] Second, amendments additionally regulated how information booklets should be written and published.[104] In this regard, the law prescribes the content of information booklets, as well as the obligation to prepare them in electronic and machine-readable form, and to publish them through the unique information system.[105] Other countries in the region are also working on legislative changes in this area. This is the case, for example, in Albania, where the Commissioner launched a public consultation on law amendments in December 2021, followed by two more rounds of consultations in 2022.[106] Also, Parliament in Montenegro has yet to adopt amendments to the Law on Access to Information, which would increase transparency and facilitate access to information.

■ Implementation

In the regional overview of monitoring reports for the WB, SIGMA unequivocally pointed out that access to public information in practice has deteriorated across the region, with Albania as the only administration that has substantially progressed since 2017. Information that should be disclosed on the websites of the public administration bodies is frequently lacking, meaning that proactive transparency is still weak throughout the region. In its annual reports, the European Commission emphasised the lack of proactive transparency in practically every administration in the region. For instance, this problem was identified in Kosovo, where public bodies do not regularly publish annual plans, reports, budgets and financial plans on their websites, and they are even less proactive than in 2017. Public administration in Montenegro stands out with the huge amount of requests for information, which can be partially explained by insufficient proactive transparency. The recommendation that disclosure of information on official websites needs to be further encouraged was also addressed to the authorities in North Macedonia, where only 32% of state administration bodies proactively published information in 2020. On the other hand, Albania stands out in a positive way, taking into account the increased number of public authorities that adopted and published transparency programmes (from 239 in 2020 to 300 in 2021).

Regarding the role of FOI supervisory bodies in practice, they face many similar issues in each country, caused by the lack of either legal authority or material capacities to fully monitor and ensure the implementation of the law. Given that the Commissioner in Serbia primarily acts as an appeals body against acts of first-instance bodies refusing access to information, he is unable to compel public bodies to publish information on their websites proactively, which is the biggest weakness of transparency in this country. This is additionally affected by the fact that the Administrative Inspectorate is in charge of inspection activities, but it did not initiate any misdemeanour proceedings against officials or institutions in 2020, in cases reported by the Commissioner as violations of the right to information. A similar situation exists in North Macedonia, where the Law on Free Access to Public Information does not authorise the Agency for Protection of the Right to Free Access to Public Information to carry out *ex officio* inspections of compliance with the transparency requirements, which is the case in Kosovo too. The Agency for Personal Data Protection and Free Access to Information in Montenegro, which also acts as a second-instance body, does not have sufficient capacity to effectively perform its function, due to a large number of appeals from citizens whose FOI requests were explicitly or implicitly denied by public administration bodies.

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103 Law on free access to information of public importance, Op. cit., art. 3.
104 Ibid., art. 39.
105 Ibid.
106 More information is available at: https://www.konsultimipublik.gov.al/Konsultime/Detaje/481.

V.2 WeBER monitoring focus

The SIGMA principle covering the right to access public information is the only principle presently monitored in the area of accountability, yet this principle looks at both the proactive and reactive sides of the issue.

> **Principle 2**: The right to access public information is enacted in legislation and consistently applied in practice.

This Principle bears utmost significance in increasing the transparency of administrations and holding them accountable to civil society and citizens, as well as in safeguarding the right-to-know by the general public as the precondition for better administration. The WeBER approach to the principle does not assess regulatory solutions embedded in free access to information acts but is based on the practice of reactive and proactive provision of information by administration bodies. On one hand, the approach considers the experience of members of civil society with enforcement of the legislation on access to public information, and on the other, it is based on direct analysis of the websites of administration bodies.

WeBER monitoring is performed using two indicators. The first one focuses entirely on civil society's perception of the scope of the right to access public information and whether enforcement mechanisms enable civil society to exercise this right in a meaningful manner. To explore perceptions, a survey of CSOs in the Western Balkans was implemented using an online surveying platform from late March to the beginning of September 2022.[107] The uniform questionnaire with 28 questions was used to assess all Western Balkan administrations, ensuring an even approach in survey implementation. It was disseminated in local languages through the existing networks and platforms of civil society organisations with large contact databases and through centralised points of contact such as governmental offices in charge of cooperation with civil society. To ensure that the survey targeted as many organisations as possible in terms of types, geographical distributions, and activity areas, and hence contributed to a representative sample, additional boosting was done where increases to overall responses were needed. Finally, a focus group with CSOs was organised to complement survey findings with qualitative data. Focus group results were not, however, used for point allocation for the indicator.

The second indicator focuses on proactive informing of the public by administration bodies, particularly by monitoring the comprehensiveness, timeliness, and clarity of the information disseminated through official websites. In total, 18 pieces of information were selected and assessed against two groups of criteria: 1) basic criteria, looking at the information's completeness, and whether it was up to date, and 2) advanced criteria, looking at the accessibility and citizen-friendliness of the information.[108] Information was gathered from the official websites of a sample of seven administration bodies consisting of three line ministries (a large, a medium, and a small ministry in terms of thematic scopes), a ministry with general planning and coordination functions, a government office with centre-of-government functions, a subordinate body to a minister/ministry, and a government office in charge of delivering services.

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107 The survey of CSOs was administered through an anonymous, online questionnaire. The data collection method included CASI (computer-assisted self-interviewing).

108 Exceptions being information on accountability lines within administration bodies, which was assessed only against the first group of criteria, and information available in open data format, which was assessed separately.

V.3 Comparative PAR Monitor findings

Principle 2: The right to access public information is enacted in legislation and consistently applied in practice

The first indicator in this section is the "**Civil society perception of the quality of legislation and practice of access to public information**" (indicator ACC_P2_I1) consists of 13 elements and is based on the survey of CSOs as its main data source, with some references made to the findings of the focus groups. The section then lays out regional comparative findings for the second accountability indicator, **"Proactive informing of the public, by public authorities"** (indicator ACC_P2_I2), which comprises 18 elements based on website analysis of seven state administration bodies.

Table 30: Element scores and corresponding indicator values for ACC_P2_I1 "Civil society perception of the quality of legislation and practice of access to public information"

Indicator element	Max	ALB	BIH	KOS	MKD	MNE	SRB
E1. CSOs consider that the information recorded and documented by public authorities is sufficient for the proper application of the right to access public information.	**4**	2	2	0	2	0	0
E2. CSOs consider exceptions to the presumption of the public character of information to be adequately defined.	**2**	1	1	1	1	0	0
E3. CSOs consider exceptions to the presumption of the public character of information to be adequately applied.	**4**	0	0	0	0	0	0
E4. CSOs confirm that information is provided in the requested format.	**2**	1	1	1	2	2	1
E5. CSOs confirm that information is provided within prescribed deadlines.	**2**	2	1	1	2	1	1
E6. CSOs confirm that information is provided free of charge.	**2**	2	2	2	2	1	2
E7. CSOs confirm that the person requesting access is not obliged to provide reasons for requests for public information.	**2**	1	0	1	1	1	1
E8. CSOs confirm that in practice the non-classified portions of otherwise classified materials are released.	**4**	0	0	0	0	0	0
E9. CSOs consider that requested information is released without portions containing personal data.	**2**	0	0	1	1	1	1
E10. CSOs consider that when only portions of classified materials are released, it is not done to mislead the requesting person with only bits of information.	**2**	0	0	0	0	0	0
E11. CSOs consider that the designated supervisory body has, through its practice, set sufficiently high standards of the right to access public information.	**4**	2	2	4	2	0	2

E12.	CSOs consider the soft measures issued by the supervisory authority to public authorities to be effective.	**2**	1	0	1	1	0	0
E13.	CSOs consider that the supervisory authority's power to impose sanctions leads to sufficiently grave consequences for responsible persons in the noncompliant authority.	**2**	1	1	1	0	0	0
Total points		**34**	**13↑**	**10↑**	**13↑**	**14↑**	**6↑**	**8**
Indicator value 2021/2022[109]		**0-5**	**2**	**1**	**2**	**2**	**0**	**1**
Indicator value 2019/2020		*0-5*	*1*	*0*	*1*	*1*	*0*	*1*
Indicator value 2017/2018			*1*	*0*	*1*	*1*	*0*	*1*

Despite slight improvements compared to the two previous monitoring cycles, overall civil society's perception of the quality of legislation and practice of access to public information remains largely negative. Except for Serbia, minor improvements have been noted in all countries, while the most significant advancement in CSOs standpoints has been made in North Macedonia, which is now, together with Albania and Kosovo, the highest-rated country. Although CSOs' perception in Montenegro has improved slightly, it continues to be the worst in comparison to other countries in the region. However, the minimal progress made in most countries is insufficient to qualify the civil society perception as satisfactory.

From a regional point of view, among 13 elements of this indicator, only one can be assessed positively, while three of them are somewhat positive. Besides areas where predominantly positive or predominantly negative perceptions are noted, perceptions on most other analysed questions fall somewhere in between. For example, only one-quarter of respondents agree that public authorities record sufficient information to enable the public to fulfil the right to free access of information. In half of the countries (BiH, Albania, North Macedonia), the share of CSOs which consider that the information recorded and documented by public authorities is sufficient for the proper application of this right is more than 30%, while in Serbia, Kosovo and Montenegro, this is the belief of only 15% of CSOs or even less.

In terms of exceptions to the presumption of the public character of information, although CSOs do not consider that they are adequately applied in practice, there is a satisfactory share (30% on average) of those who believe that these exceptions, at least at the legal level, are adequately defined. The highest share of the agreement was found in Albania (42%) and North Macedonia (39%), while the lowest is in Serbia and Montenegro (23% and 15% respectively). On the other hand, asked about the implementation of legal provisions in this regard, only 15%, on average, expressed positive attitudes.

Questions to which the largest number of organisations responded positively refer to obtaining free information, information format and deadlines respecting. Namely, vast majority of CSOs in all countries, except partially in Montenegro, confirmed that when they request free access to information, information is provided free of charge. The highest share in agreement was found in Albania, where 97% of surveyed organisations confirmed this, while this is the case with more than 80% of CSOs in North Macedonia and Kosovo. Slight majority of CSOs in the region consider that information is provided in the requested format (55% average) and within prescribed deadlines (51% average). However, there are certain differences in perception from country to country, and only in North Macedonia did more than two-thirds of CSOs positively answer both questions. The situation is worse in Serbia and Kosovo, where less than half of surveyed organisations positively evaluated these aspects of the practice of access to public information.

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109 Conversion of points: 0-6 points = 0; 7-11 points = 1; 12-17 points = 2; 18-23 points = 3; 24-28 points = 4; 29-34 points = 5.

Chart 41: Responses to the question "When your organisation requests free access to information, how often is it the case that…" (frequency scale, %)

…information is provided free of charge
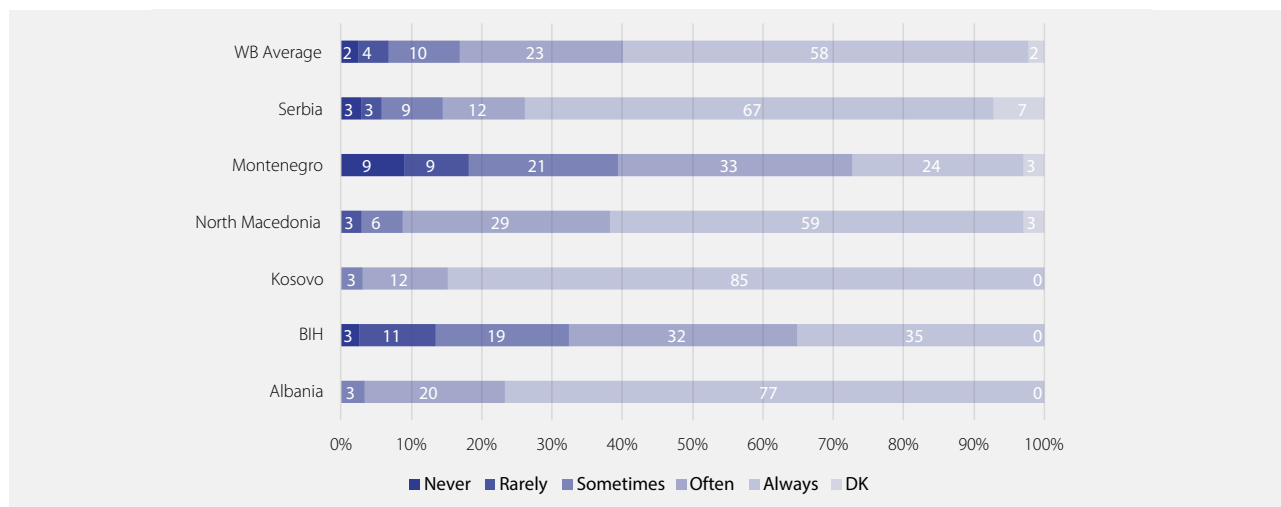
…information is provided in the requested format
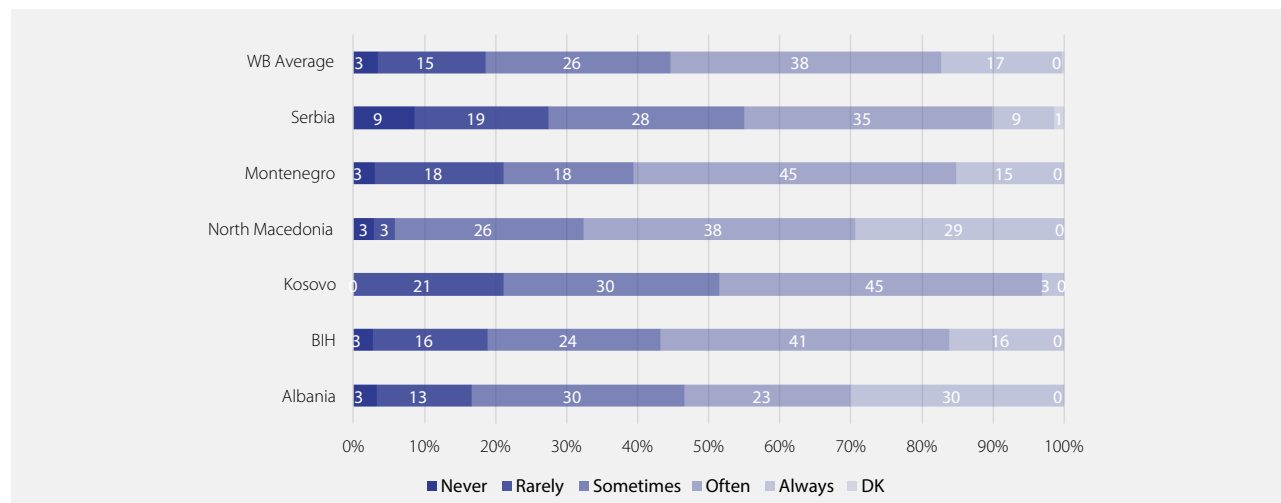
…information is provided within prescribed deadlines
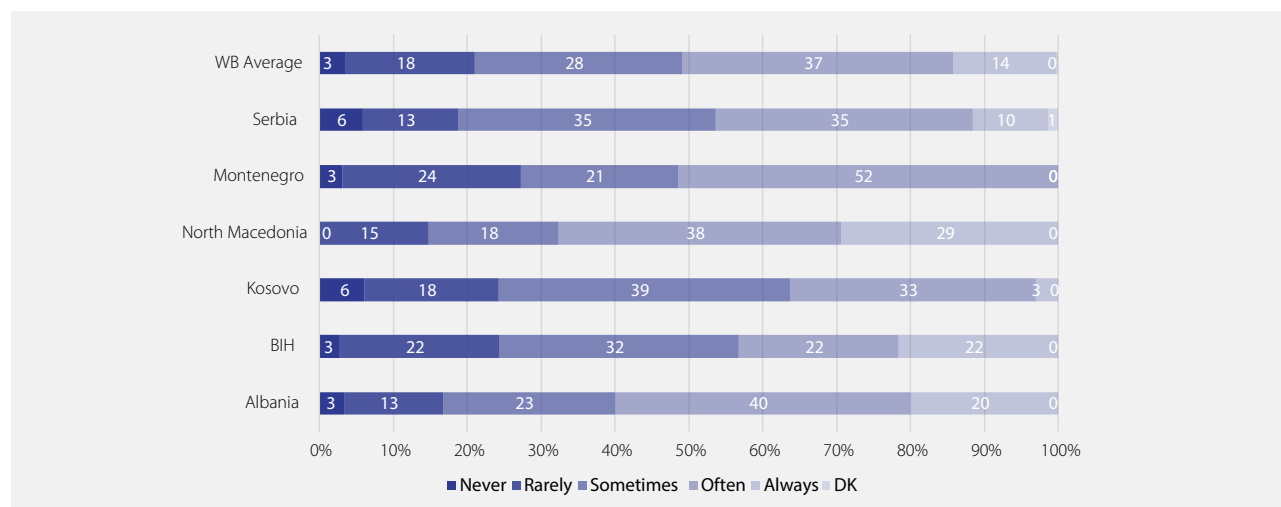
Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N=275 and refers to the total number of respondents in the WB.

As in the previous monitoring cycle, civil society perception is the worst regarding the same three elements. Less than 30% of surveyed CSOs in every country agree that exceptions to the public character of information produced by public authorities are adequately applied in practice. When looking at the regional average, the highest number of respondents (37%) disagree or strongly disagree, while one-third of the responses are neutral. Still, there are significant differences in perception between countries. Thus, only 3% of respondents in Kosovo agree with the above statement, whereas this percentage is nine times higher in BiH (27%). Also, it is important to note that there is a significant number of CSOs without an opinion on this matter (15% on average), and the share of "don't know" answers is the highest in Kosovo (23%).

The relative majority of CSOs across the region that had experience with requesting information which contains classified materials deny that non-classified portions of these materials are released in practice. Namely, 35% of respondents confirmed that non-classified parts of information are never or rarely released, while 18% said that this happens sometimes. The lowest percentage of those who think differently and believe that non-classified portions are always or often released is in Albania (3%) and Serbia (10%). The fact that the two countries with the best perception, BiH and Kosovo have only 21% agreement demonstrates how CSOs are sceptic regarding this issue.

In addition, the relative or absolute majority of CSOs in all WB countries believe that when only portions of classified materials are released, it is sometimes, often or even always done to mislead the requesting person with only bits of information. Most CSOs that think this way are in BiH, with up to 62% of them.

Chart 43: The extent of agreement with the statement "Exceptions to the public character of information produced by public authorities are adequately applied in practice"
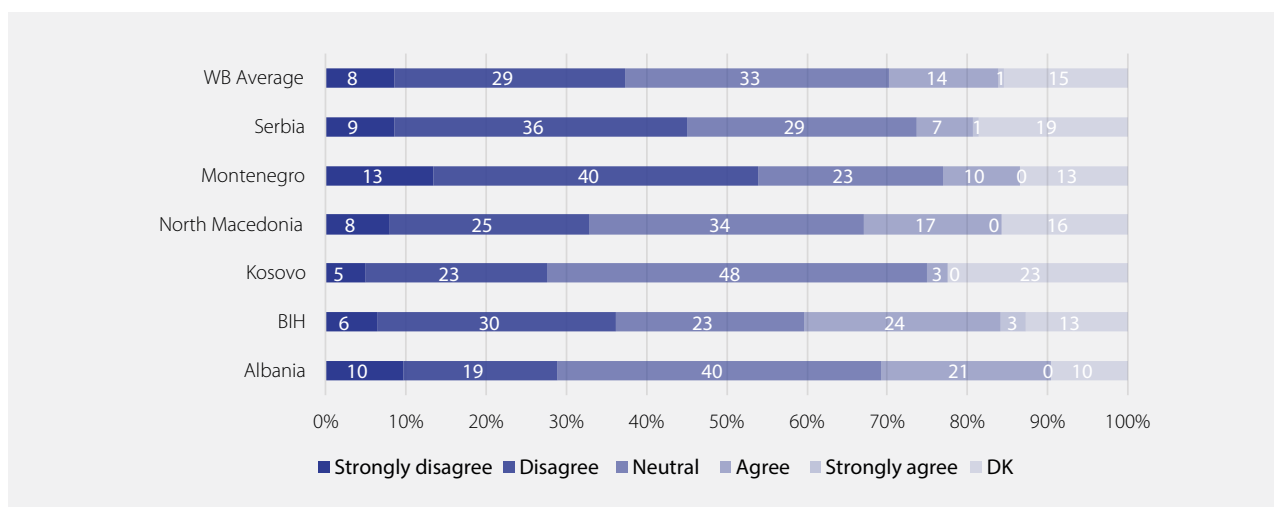
CSOs confirm that the person requesting access is not obliged to provide reasons for requests for public information.

Asked if the person requestion information is obliged to provide reasons for such request, 55% of CSOs said that this sometimes, often or even always happens. On the other hand, Serbia and Montenegro are the only two countries where the absolute majority of CSOs confirmed that the person requesting access to information is not obliged to provide any reasons for that (52% and 57%, respectively). The share of those who agree is slightly lower in North Macedonia (44%) and Albania (43%), while BiH is the only country where less than 30% confirmed the above statement.

When it comes to requesting information which contains personal data, only about 30% of CSOs, on average, confirmed that other portions of the requested information, which do not represent personal data, are often or always released. On this question, perceptions are split between North Macedonia, Montenegro and Serbia,

which are slightly above the average (38%, 36% and 33%, respectively), and Albania and BiH, which are far below it (20% and 19%, respectively), while Kosovo is at a regional average (30%).

There are some positive attitudes in response to the question of whether the designated supervisory body sets, through its practice, sufficiently high standards of the right to access public information. On average, there is 47% of CSOs in the region that either agree (39%) or strongly agree (8%) with the above statement, although findings vary among countries. Namely, most of the CSOs in Kosovo have positive views regarding this question (82%), while in Montenegro, less than one quarter answered positively. In other countries, the share in agreements varies from 38% in BiH to 53% in Albania.

The last two questions also concern the role and effectiveness of the work of the designated FOI supervisory bodies. About 34% of respondents believe that soft measures issued by the supervisory body to public authorities are effective in protecting access to information. In addition, only one-quarter of organisations agree that the sanctions prescribed for the violation of the right to free access of information lead to sufficiently grave consequences for the responsible persons. Again, the perception of CSOs in Montenegro is much worse compared to other countries in the region.

Namely, only 12% of CSOs in this country considered soft measures issued by the Agency for Personal Data Protection and Free Access to Information to be effective. The perception of CSOs is much better in other countries, though it varies from a modest 26% in Serbia and 29% in BiH to a solid 55% in Kosovo. The exact small amount of CSOs in Montenegro believe that the sanctions that are prescribed for responsible persons in the case of violation of the right to information are sufficient. The situation is only slightly better in Serbia, with 15% of agreement, while in only half of the countries, more than 30% of the surveyed CSOs responded positively to this question. The highest agreement is recorded in Albania, albeit reaching only 37%.

Chart 44: CSO perceptions on two statements related to the role of the designated supervisory body for FOI (%):

Soft measures issued by the supervisory authority to public authorities are effective in protecting access to information.
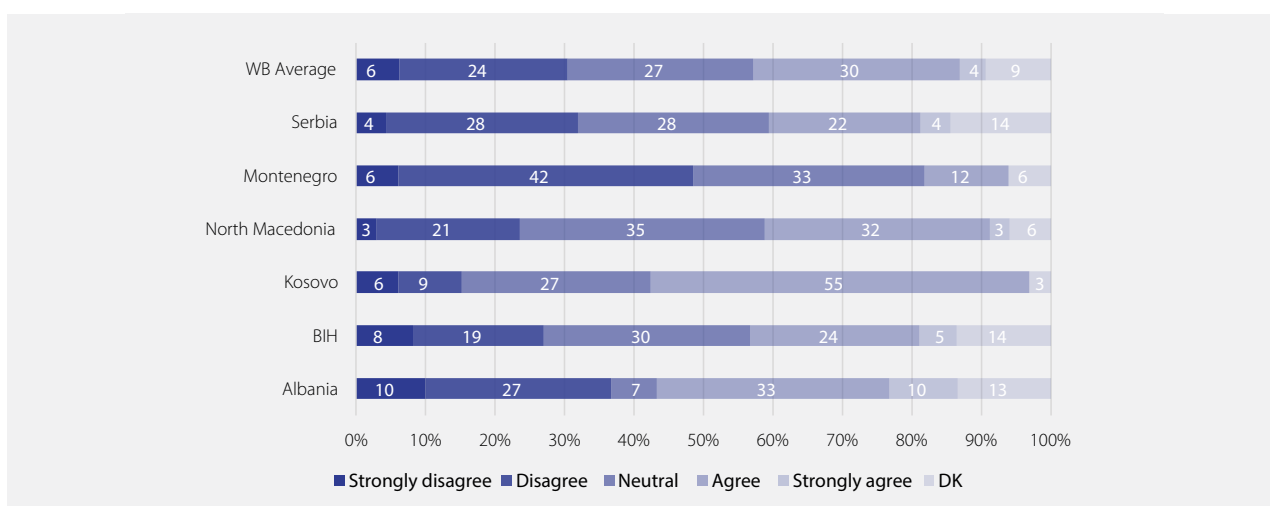
The sanctions prescribed for the violation of right to free access of information lead to sufficiently grave consequences for the responsible persons in the non-compliant authorities.
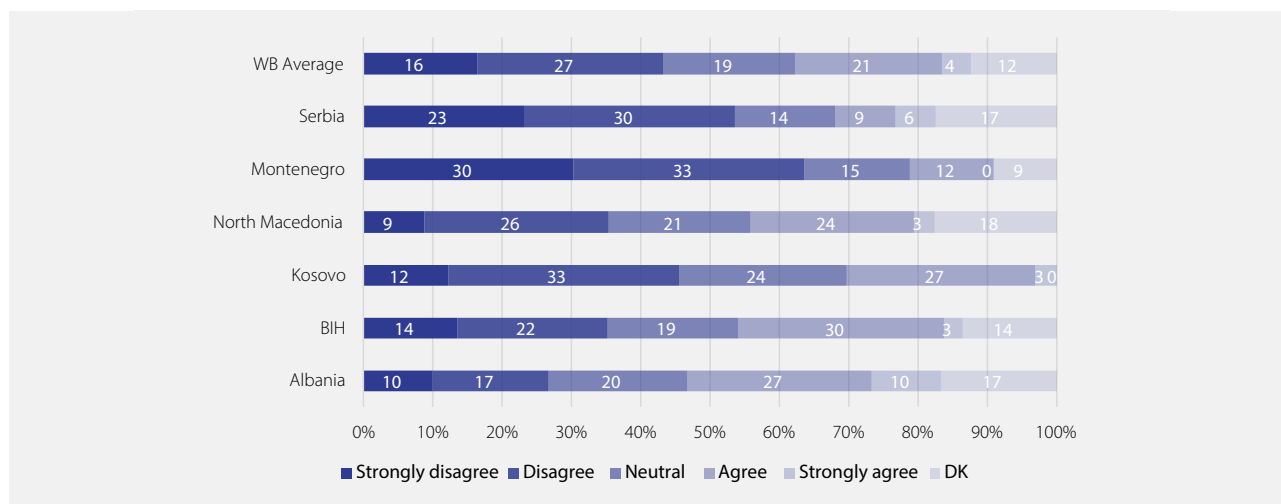
Overall, CSOs' experiences in exercising rights to FOI tend to be predominantly negative. It can be observed that CSOs from the region have had generally satisfactory experiences in very few areas, such as obtaining information of public importance in the requested format, within prescribed deadlines, and free of charge. In addition, in five administrations, with the exception of Montenegro, CSOs hold a more or less positive perception of the FOI supervisory body's effort to establish high standards of the right to access public information. However, in all other areas, the perception of civil society remains negative and practically unchanged compared to the previous two monitoring cycles.

All in all, positive changes in perception, albeit pretty limited, have resulted in four countries advancing by one point on the 0-5 scale, with the exception of Montenegro and Serbia, where the situation remains unchanged compared to the previous cycles, and Montenegro. Therefore, there is still a significant task ahead of the public authorities and oversight bodies in the region to improve the right to FOI, which would in turn enhance the positive attitudes of civil society regarding the possibilities of exercising this fundamental right.

Chart 45: Indicator values for ACC_P2_I1 - comparison of values for the 2017/2018, 2019/2020, and 2021/2022 monitoring cycles
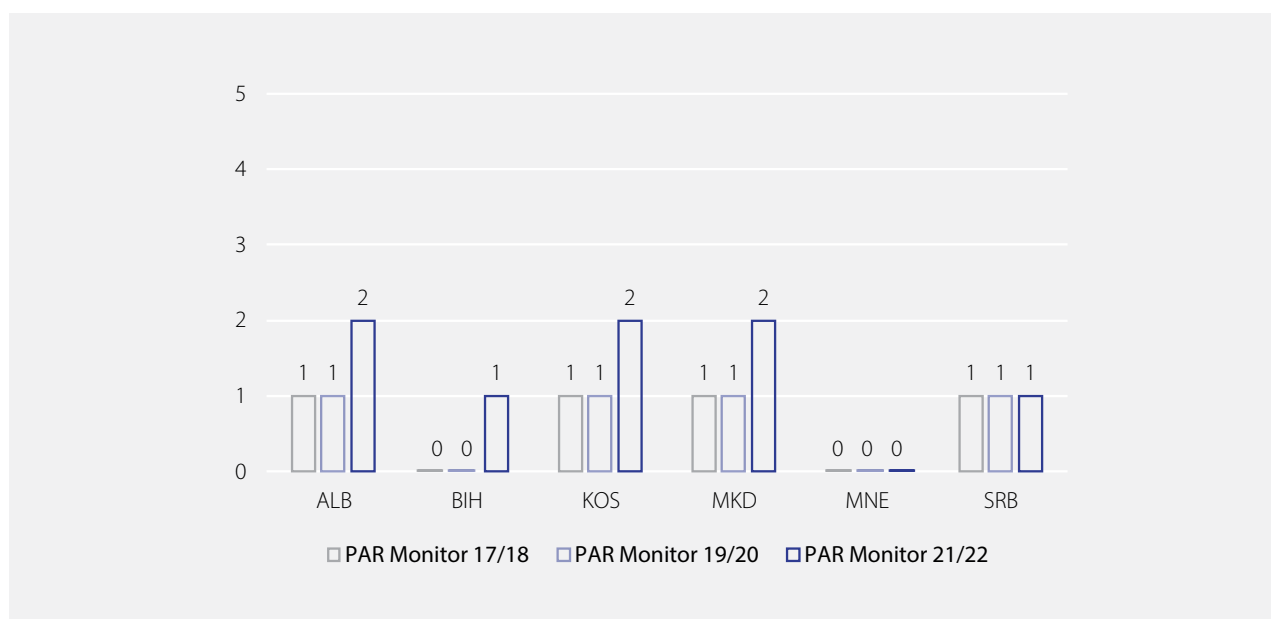
Table 31: Element scores and corresponding indicator values for ACC_P2_I2 "Proactive informing of the public, by public authorities"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
1. Websites of public authorities contain complete and up-to-date information on scopes of work	**4**	2	4	0	2	0	2
2. Websites of public authorities contain easily accessible and citizen-friendly information on scopes of work	**2**	0	1	0	2	0	1
3. Websites of public authorities contain complete and up-to-date information on accountability (who they are responsible to)	**4**	0	0	0	0	0	2
4. Websites of public authorities contain complete and up-to-date information on relevant policy documents and legal acts	**4**	2	2	2	2	2	4
5. Websites of public authorities contain accessible and citizen-friendly information on relevant policy documents and legal acts	**2**	0	0	0	0	0	0
6. Websites of public authorities contain complete and up-to-date information on policy papers, studies, and analyses relevant to policies under competence	**4**	0	0	2	0	2	2
7. Websites of public authorities contain accessible and citizen-friendly information on policy papers, studies, and analyses relevant to policies under competence	**2**	0	0	0	0	0	0
8. Websites of public authorities contain complete and up-to-date annual reports	**2**	0	2	0	0	2	0
9. Websites of public authorities contain accessible and citizen-friendly annual reports	**2**	0	0	0	0	0	0
10. Websites of public authorities contain complete and up-to-date information on institutions' budgets	**4**	0	0	0	0	0	0
11. Websites of public authorities contain accessible and citizen-friendly information on institutions' budgets	**2**	0	0	0	0	0	0
12. Websites of public authorities contain complete and up-to-date contact information (including e-mail addresses)	**4**	4	4	2	4	4	2
13. Websites of public authorities contain accessible and citizen-friendly contact information (including e-mail addresses)	**2**	1	2	2	2	2	2
14. Websites of public authorities contain complete and up-to-date organisational charts which include entire organisational structures	**4**	2	2	0	4	0	2
15. Websites of public authorities contain accessible and citizen-friendly organisational charts which include entire organisational structures	**2**	2	1	0	2	0	1
16. Websites of public authorities contain complete and up-to-date information on contact points for cooperation with civil society and other stakeholders, including public consultation processes	**4**	0	2	0	0	2	0
17. Websites of public authorities contain accessible and citizen-friendly information on ways in which they cooperate with civil society and other external stakeholders, including public consultation processes	**2**	0	0	0	0	2	0
18. Public authorities proactively pursue open data policy	**4**	0	0	0	2	0	0
Total points	**56**	**13↑**	**20↓**	**8↓**	**20↑**	**16↑**	**18↓**
Indicator value 2021/2022[110]	**0-5**	**1**	**2**	**0**	**2**	**1**	**1**
Indicator value 2019/2020	*0-5*	*0*	*2*	*1*	*1*	*1*	*2*
Indicator value 2017/2018		*2*	*2*	*1*	*0*	*1*	*3*

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110 Conversion of points: 0-10 points = 0; 11-19 points = 1; 20-28 points = 2; 29-37 points = 3; 38-46 points = 4; 47-56 points = 5.

Analysis for this indicator relies on a sample of seven central administration bodies, consisting of three line ministries (a large, a medium, and a small ministry in terms of thematic scopes), a ministry with general planning and coordination functions, a government office with centre-of-government functions, a subordinate body to a minister/ministry, and a government office in charge of delivering services. Therefore, research findings do not necessarily reflect the situation in every state administration institution but rather prevailing practice. Finally, as in the previous cycles, the monitoring included expert analysis and frequent regional comparative discussions to compare and even out approaches among researchers, thus maximising the comparability of the findings.

Table 32: Sample of state administration bodies in WB

Sample	ALB	BIH	KOS	MKD	MNE	SRB
LINE MINISTRY 1 (LARGE)	Ministry of Interior	Ministry of Foreign Affairs	Ministry of Internal Affairs	Ministry of Economy	Ministry of Education, Science, Culture and Sports	Ministry of Economy
LINE MINISTRY 2 (MEDIUM)	Ministry of Education	Ministry of Civil Affairs	Ministry of Industry, Entrepreneurship and Trade	Ministry of Foreign Affairs	Ministry of Economic Development	Ministry of Human and Minority Rights and Social Dialogue
LINE MINISTRY 3 (SMALL)	Ministry of Agriculture and Rural Development	Ministry of Communication and Transport	Ministry of Local Governance Administration	Ministry of Transport and Communications	Ministry of Health	Ministry of Family Welfare and Demography
MINISTRY (GENERAL PLANNING/ COORDINATION)	Ministry of Finance and Economy	Ministry of Finance and Treasury	Ministry of Finance, Labour, and Transfers	Ministry of Information Society and Administration	Ministry of Finance and Social Welfare	Ministry of Finance
COG BODY	Prime Minister's Office	Directorate for European Integration	Office of Prime Minister	Secretariat for European Affairs	Secretariat General of the Government	Republic Secretariat for Legislation
SUBORDINATE BODY	State Export Control Authority	Service for Foreigners' Affairs	Business Registration Agency	State Labour Inspectorate	Human Resources Management Authority	Directorate for Agrarian Payments
SERVICE DELIVERY BODY	National Agency for Information Society	Agency for identification documents, registers, and data exchange	Kosovo Medicines Agency	Employment Service Agency	Revenue and Customs Administration	National Employment Service

Proactive informing of the public, by public authorities, remains an issue in practically all countries in the Western Balkans. While half of the countries made limited progress (Albania, North Macedonia, Montenegro), the other half regressed (Bosnia and Herzegovina, Kosovo, Serbia). The largest decline was observed in Kosovo, which is the only country to receive an indicator value of 0, while Serbia lost its status as a regional leader in this area and is now ranked below both North Macedonia and BiH.

Starting from the availability of information on the scope of work, they are only partially available on public authorities' websites across the region. BiH stands out as the only country where all analysed websites contain complete and up-to-date information that is easily accessible (within a maximum of three clicks from the homepage). Still, even in BiH, this information is not published in a citizen-friendly manner in the case of four public authorities, which represents a deficiency in all administrations in the region. In other administrations, a majority of authorities in Albania, North Macedonia, and Serbia, publish information on the scope of their work in an adequate manner. Public authorities in North Macedonia also stand out positively in terms of publishing this information in a citizen-friendly manner, with 86% of them doing this. However, the weakest practices are observed in Kosovo and Montenegro, where less than 30% of the analysed authorities publish complete and up-to-date information on the scope of work.

Regarding information on accountability, websites of public authorities rarely specify who they are responsible to. The situation is extremely poor in Montenegro, where none of the analysed authorities contains this information on their website. Public authorities in Serbia are the only exemption, considering that six out of seven of them contain complete and up-to-date information on accountability.

The majority of public authorities in all countries regularly list relevant public policy documents and legal acts that they apply in their work. Serbia stands out as the most successful country in this regard, as all seven of the analysed authorities provide complete information on policy documents and regulations on their websites, although in the case of the Republic Secretariat for Legislation, this information is not up to date. Furthermore, on the website of 85% of public authorities in every country, this information is accessible within three clicks from the homepage, whereas in North Macedonia, this is the case for every sample authority. Still, in none of the countries is this information ever made available to citizens in a user-friendly manner, which is a limitation that repeats in every monitoring cycle.

On the other hand, when it comes to policy papers, studies and analyses, information on these is far less available. Namely, in Albania and BiH, this information is published in less than 30% of cases and it is not easily accessible, while the situation in North Macedonia is only slightly better. Regarding Kosovo, Montenegro and Serbia, around 80% of websites in these countries contain complete, up-to-date and easily accessible information on relevant policy papers, studies and analyses. However, similar to public policy documents and legal acts, information on policy studies and analysis is also not presented in a citizen-friendly manner in either of these countries for the third consecutive monitoring cycle.

The lack of public authorities' annual reports remains a chronic problem in the Western Balkans. Namely, in four administrations of the region, it was not possible to find complete and up-to-date reports from the vast majority of authorities. Two examples that stand out positively are BiH and Montenegro, though there are also authorities that deviate from generally good practices. Regarding BiH, that is only the case with the Service for Foreigners' Affairs, while in Montenegro, annual reports are not published by the Ministry of Health and Secretariat General of the Government. However, the mere fact that an annual report is present should not be overestimated, which is why the focus must also be put on the content and the way how these reports communicate with stakeholders and citizens. In terms of the citizen-friendliness of annual reports, only few positive examples were found among the large number of authorities observed in the region. Those are the Ministry of Education, Science, Culture and Sports and the Ministry of Finance and Social Welfare in Montenegro, as well as the National Employment Service in Serbia.

When it comes to budgetary transparency of public authorities, non-disclosure of budgetary information remains among the most serious shortage in proactive informing of the public. This is a chronic issue in all states, and even in Serbia, which used to stand out positively, the majority of analysed authorities do not comply with the requirements of budgetary transparency. In this monitoring cycle, only in BiH majority of institutions published complete, up-to-date, and easily accessible budget information, although not in a way that would be tailored to citizens. However, the fact that there has been almost no progress in terms of budgetary transparency through three monitoring cycles represents a serious problem that should concern decision-makers in the region.

One and maybe the only fully positive aspect of proactive informing is that the websites of public authorities in all countries contain complete and up-to-date contact information which are easily accessible and citizen friendly. In BiH, North Macedonia and Montenegro, all the analysed authorities meet all criteria for transparency when publishing contact information. Although there are rare exceptions to this good practice in other WB administrations, they do not change the overall picture that proactive informing of the public in this aspect is at a satisfactory level.

On the contrary, when it comes to the proactive publishing of charts that include the organisational structure of the institution, administrations in the region largely underperform. North Macedonia is the only country where all public institutions publish these charts in a fully adequate manner. In other countries, organisation charts are either missing from certain authorities' websites or do not meet some of the expected criteria (completeness, up-to-date, accessibility, citizen-friendliness). It is important to note that in Montenegro only the Ministry of Health published an organisational chart on its website, unlike the previous monitoring cycle when this was the practice of the majority. One of the possible causes for this change can be the recent reorganisation of the government which changed the number of ministries from 17 to 12 in 2020, and from 12 to 18 in 2022, causing the administration to slowly adapt to such transformation in terms of systematisations and organograms.

in terms of publishing information relevant for cooperation with civil society on the public authorities' websites, a regression has been recorded in four countries. Namely, in Albania, BiH, Kosovo, and Serbia, the number of authorities that publish information on contact points for cooperation with civil society has decreased, while in North Macedonia only one authority does so. On the other hand, the number of authorities publishing this information has increased in Montenegro, with 6 out of 7 doing so in a fully adequate manner. Thus, along with BiH, Montenegro is the most transparent in this aspect in the region. However, progress in one administration has been followed by regression in four and stagnation in one, leading to overall underperformance on a regional level.

Finally, when it comes to open data policy, most public authorities in the Western Balkans region do not share data in open formats. The exception to this trend is North Macedonia, where more than half of sampled institutions proactively pursue an open data policy.

■ **Good practices: Publishing documents in open data formats**

Four out of the seven analysed authorities in **North Macedonia** proactively pursue an open data policy, meaning that documents are published in a format which renders this data machine-readable, is downloadable by different users, and can be downloaded free of charge. Institutions that published documents in open data formats on their website and on the Open Data Portal are the Ministry of Economy, the Ministry of Transport and Communications, the Ministry of Information Society and the Administration and Employment Service Agency.[111] This represents significant progress in this country, not only in comparison to the previous monitoring cycle but also in comparison to other countries where data is rarely published in an open format.

To conclude, the overall impression is that even when public authorities publish complete, up-to-date, and easily accessible information, they remain published in a bureaucratic style, which represents a recurring issue through all three monitoring cycles. Moreover, there are only few areas where proactive public informing advanced throughout most of the region, while areas marked as the most problematic in the previous monitoring cycles remain the same. Non-disclosure of annual reports and institutions' budgets is still the biggest problem across the region. The progress made in one area is often offset by setbacks in other areas, leading to a general conclusion that the region is stagnating in terms of proactive public informing.

Chart 46: Indicator values for ACC_P2_I2 - comparison of values for the 2017/2018 , 2019/2020, and 2021/2022 monitoring cycles

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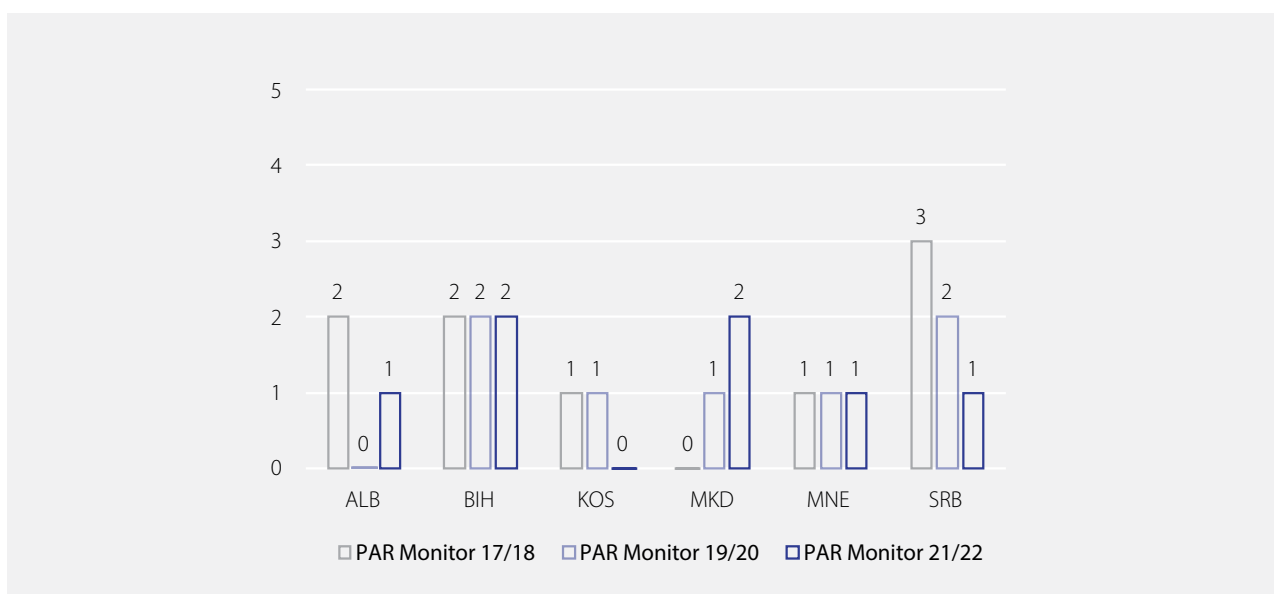
111 Ministry of Economy's documents in open data formats, which are published on its website and on the Open Data Portal, are accessible through this link: https://data.gov.mk/en/organization/ekohomnja (Last accessed 1 May 2023).

V.4 Summary of results in the accountability area

In this area, WeBER monitors the extent to which the right to access public information is consistently applied in practice. To this end, WeBER looks at the experiences CSOs in using FOI legislation and analyses the proactive informing of the public through the websites of sampled public authorities.

Despite slight improvements compared to the two previous monitoring cycles, CSOs in the WB have continued to express largely negative views on how the FOI system is implemented. Overall, only one-quarter of CSOs agreed that public authorities record sufficient information to enable the public to fulfil the FOI right, and this percentage varies from 13% in Montenegro to 40% in BiH. The perception of the legal framework is only slightly better, with about 30% agreeing that the national legislation prescribes adequate exceptions to the public character of information. Far more negative perception was noted regarding application of these exceptions in practice, where only 15% of CSOs agreed, with 37% believing the opposite.

There is a generally positive perception that public authorities provide information in the requested format, within prescribed deadlines, and free of charge. While a slight majority confirmed that information is provided within prescribed deadlines (51%) and in the requested format (55%), even 81% agreed that information is provided free of charge. In addition, 41% of CSOs said that they have never or rarely been asked for reasons when they request access to information. On the other hand, when asked about situations in which requested information contains classified or personal data, only a small number of CSOs confirmed that public authorities release other parts of the information that are not confidential or personal. In addition, half of the surveyed CSOs said they had at least occasionally encountered situations in which, when only portions of requested materials were released, it was done to mislead them with incomplete information.

Finally, in all countries, except Montenegro, high percentages of CSOs (between 38% in BiH and 82% in Kosovo) believe that the designated supervisory body sets, through its practice, sufficiently high standards of the right to access public information. On the contrary, a much lower percentage of CSOs see soft measures issued by these bodies as effective in protecting access to information while only 25%, on average agree that sanctions for the violation of the right to information are sufficiently grave.

When it comes to proactive informing of the public, the general impression is that even when public authorities proactively publish complete, up-to-date, and easily accessible information, it is very rarely done in a way that is citizen friendly. A significant portion of the information remains published in a bureaucratic fashion, without using simplified language or presentation, which represents a recurring deficiency through all three monitoring cycles. The greatest issue is the publication of annual reports and institutions' budgets. Same as in the PAR Monitor 2019/20, only in BiH and Montenegro, most institutions publish annual reports. Regarding budgetary information, non-disclosure remains a chronic shortcoming. In addition, publishing information on contact points for cooperation with civil society, assessed positively in the previous PAR Monitor, has also deteriorated. On a positive note, institutions have demonstrated more proactiveness in publishing accessible and citizen-friendly contact information.

VI.
Service Delivery

In the eyes of any citizen, the provision of public services is among the most tangible activities of public administration, enabling the citizens to exercise their rights and freedoms. The outbreak of the COVID-19 pandemic has raised citizens' demands for services, especially contactless ones. On the other hand, it has reminded public administrations of the paramount importance of providing timely, simple, and efficient services. The core services usually provided by public administrations include issuing personal documents and various permits, handling citizens' official requests, enabling citizens to pay taxes, keeping official records, and other tasks. In addition, they can be seen as *administrative services,* as they relate to resolving individual administrative cases by issuing administrative acts and undertaking administrative actions at the request of individuals or otherwise.

In addition to administrative services, the state is often the main provider of sectoral (specialised) services, such as health, education, and social protection. While these services are equally important as administrative services, they are not the state's exclusive prerogative and are frequently provided by the private sector. For this reason, they are not treated as administrative services, strictly speaking, and are not covered by either the Principles of Public Administration or the PAR Monitor.

VI.1 State of play in the region and developments since 2020[112]

■ Strategy, legal and institutional framework

●   Service delivery remains among the priorities of the governments in the region. According to the SIGMA, a sound policy framework exists across the WB, although in some cases, the expired strategic documents were not timely replaced with the new ones (Montenegro, Kosovo). Nevertheless, service delivery modernisation is either planned as part of the framework PAR strategies or other strategic documents, dealing specifically with digital government, administrative simplification, information society or similar.

Table 33: Overview of PAR strategic documents containing service delivery as a priority

ALB	Cross-cutting Public Administration Reform Strategy 2015-2020 (extended to 2022)
	Long-term Policy Document on the Delivery of Citizen-Centric Services by Central Government Institutions in Albania
	Action Plan 2020-2022 of the Cross-cutting Strategy Digital Agenda of Albania 2015-202
BIH	PAR Strategy Action Plan (state level)
KS	Public Administration Reform Strategy 2022-2027
	Administrative Burden Prevention and Reduction Programme 2022-2027
MKD	Action Plan for Public Administration Reform Strategy 2018-2022
MNE	Digital Transformation Strategy 2022-2026
	Public Administration Reform Strategy 2022-2026
SRB	Public Administration Reform Strategy 2021-2030
	Programme for Simplification of Administrative Procedures and Regulations - ePAPER (2019-2021 expired, 2022-2025 in preparation)
	eGovernment Development Programme (2020-2022 expired, 2023-2025 in preparation)

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112 The state of play is largely based on the European Commission's reports published in 2022 and SIGMA Monitoring reports for 2021 (which are therefore not cited individually). Reports of the European Commission are available at: https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports_en, and SIGMA's reports at: https://www.sigmaweb.org/publications/monitoring-reports.htm (last accessed on 1 March 2023).

The institutional responsibilities over service delivery in the region are partly in place and still occasionally fragmented. For example, the entire service delivery coordination is mandated to ministries in Montenegro and North Macedonia. However, clear ownership is missing in both cases, especially concerning modernisation and digitalisation projects. In Serbia, on the other hand, there is more than one institution coordinating different aspects of service delivery reforms, but the general responsibility over public services is similarly lacking. The institutional framework in Albania is considered the most solid, with the policy ownership vested into the Minister of State for Service Delivery and Standards and well-established agencies who set service standards and support administration bodies in digitising services. In Kosovo and Bosnia and Herzegovina, no central-level institutions clearly or largely assume leading and coordinating roles over all service delivery priorities.

Table 34: Overview of institutional responsibilities over service delivery in WB

ALB	Minister of State for Service Delivery and Standards
	Agency for Delivery of Integrated Services (ADISA)
	National Agency for Information Society (NAIS)
BIH	-
KS	Ministry of Internal Affairs
	Prime Minister's Office
MKD	Ministry of Information Society and Administration (MISA)
MNE	Ministry of Public Administration, Digital Society and Media
	Council for Electronic Administration
SRB	Prime Minister's Office
	Ministry of Public Administration and Local-Self Government (MPALSG)
	Office for Information Technologies and eGovernment
	Public Policy Secretariat (PPS)

Legal frameworks on general administrative procedures (LGAP) are in place in all the region, and they embed principles of good administration. Nevertheless, problems with implementation persist. The biggest challenge is that LGAP principles, most notably the 'once only' principle, are not systematically applied. Another issue is the slow-paced harmonisation of sector legislation with the LGAP, reducing legal certainty. For example, in Albania, the actual work on harmonising did not commence, and in Kosovo, similarly, no law has been harmonised by 2020, despite the clear annual objectives. The 'once only' principle is enacted in BIH at all government levels. However, due to insufficient administration capacities, users still need to provide evidence themselves. At the same time, all levels of government in BIH face challenges in harmonising special procedures. This process is progressing slowly in North Macedonia, with no information on progress in harmonising secondary legislation. SIGMA commended creating the LGAP unit within the MISA, which is supposed to assist administration bodies in amending and aligning relevant regulations. Likewise, there is no data on the progress of harmonising secondary legislation in Montenegro, although compared to the rest of the region, Montenegro is ahead in the harmonisation process. Finally, more than 50% of relevant legislation has been aligned with the LGAP in Serbia, but the process is taking longer than planned. In addition, laws on e-government that regulate the use of ICT in administrations and that should facilitate digital service delivery are adopted in Montenegro, Serbia, and North Macedonia, while in Albania, several laws and bylaws regulate digital services, the latest being the Council of Minister's Decision on the provision of all administrative services online.

Chart 47: Balkan Barometer 2022 - How satisfied are you with administrative services from the central government? (%) [113]
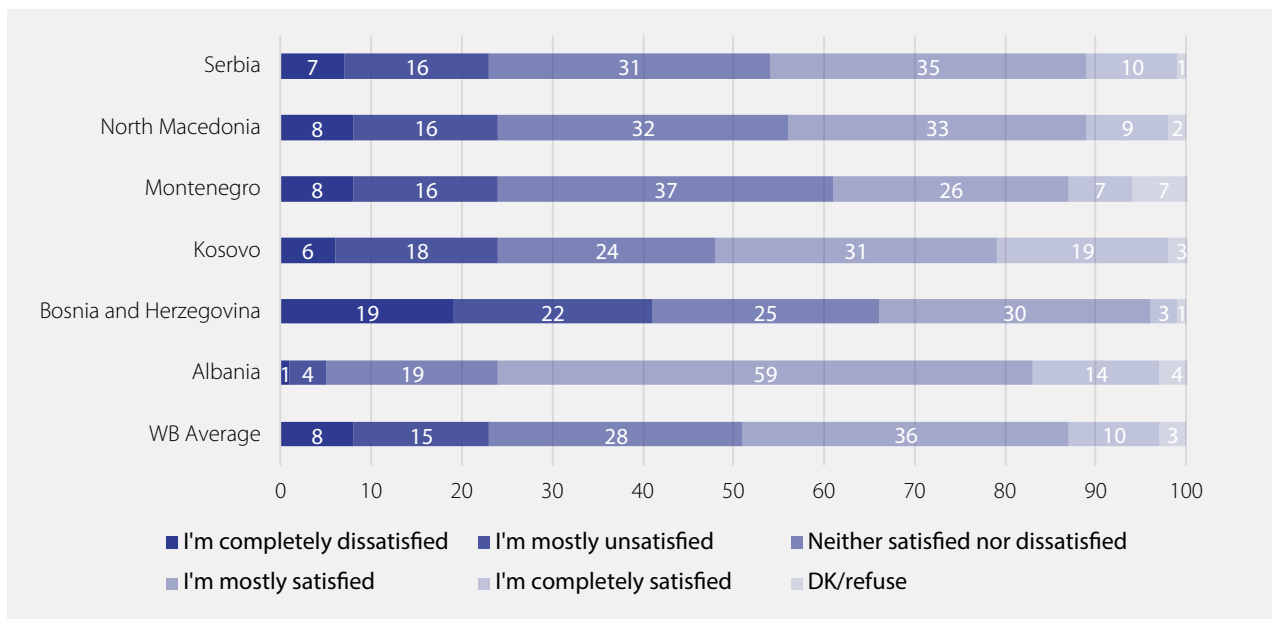
Service delivery enablers

Countries in the region have introduced a few service delivery enablers which have helped facilitate service delivery and, in some cases, even accelerate digital government. Albania has progressed the most over the years in terms of the use of enablers and their consistent implementation, followed closely by administrations in North Macedonia and Serbia. In contrast, Kosovo has manifested the slowest advancement (see table below). Nevertheless, there is still unused potential across the region and gaps to fill at the national level to enable more citizen-oriented service provision. For example, performance monitoring of services delivery, using key metrics such as volume of transactions, their costs, digital uptake, etc., is barely present in the region, while digital payments, full or partial, are available in half of WB at best. Moreover, quality management is largely done voluntarily.

Also, despite the overall progress in recent years in service delivery, each administration still faces idiosyncratic challenges and shortcomings that need to be dealt with in the period head. For instance, no electronic signature has been introduced yet for citizens of BIH, and there is no technical solution for digital signature in Kosovo. In Albania, despite the continuous improvements of enablers and the quality of services, digital payments are still impossible in practice, while in Montenegro, electronic documents are yet to be introduced, with a legal framework being recently adopted. In addition, legal requirements to use quality management tools in North Macedonia are only applied sometimes within the administration. At the same time, the largely successful administrative simplification initiative in Serbia (ePAPER) is not linked with the LGAP harmonisation process.

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113   Balkan Barometer 2022, "How satisfied are you with administrative services from the central government?" in Administrative services from the central government. Available at: http://bitly.ws/BxBf (last accessed 13 March 2023).

Table 35: Enablers of service delivery in the WB region

	QUALITY MANAGEMENT	INTEROPERABILITY FRAMEWORK	DIGITAL SIGNATURE	DIGITAL PAYMENT	USER ENGAGEMENT	PERFORMANCE MONITORING
ALB	Sporadic (CAF, ISO)	55 e-registers	✓	x	Several bodies run regular surveys	ADISA for 12 agencies; NAIS for e-services
BIH	Sporadic (CAF, ISO)	Most exchanges outside GSB	For businesses at the entity level	x	Sporadic surveys	x
KS	x	28 information systems	x	x	Sporadic surveys; e-Box	x
MKD	Sporadic (CAF, ISO)	✓	✓	✓	Sporadic	x
MNE	Limited	6 e-registries & information systems	✓	✓ (Taxation)	Very limited	x
SRB	Limited	GSB integrated with the population register	✓	✓	Sporadic	x

███ **Practices to avoid: No traces of using citizen feedback**

> As identified in the previous PAR Monitors, the main user feedback mechanism used across Kosovo's administration, the e-Box system, is still not purposeful, despite the increase in institutions over the years who use it and the rise in feedback given. According to SIGMA (2021), the e-Box, "an electronic, touch-screen-enabled feedback device installed in at least 60 institutions, has not been useful, particularly due to very limited face-to-face contacts during the COVID-19 pandemic." [114]

███ **Digital transformation**

Western Balkan administrations continue to follow trends of digital transformation. It remained high on the PAR agenda since the previous monitoring cycle, additionally underpinned by the COVID-19 pandemic management. The offer of digital services has increased for businesses and citizens; however, according to SIGMA, digital enablers have remained underutilised during this period, and country differences remain emphasised.

In Albania, the offer of e-services continued to grow. However, the government's decision to pursue fully digital service provision is the biggest development. It has resulted in the closing of a few physical service centres and over 90% of services becoming digital, raising questions about whether services are equally accessible for all. Among the biggest news in Kosovo is the launch of the e-Kosova portal offering services to businesses and citizens, as it was previously among a few administrations without a central government platform for digital services. North Macedonian authorities have been working on the e-service portal upgrade, slowly affecting the increase in digital uptake.

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114 SIGMA Monitoring Report 2021 Kosovo*, p. 120, available at: https://www.sigmaweb.org/publications/monitoring-reports.htm (last accessed on 31 March 2023).

On the other hand, the digital government in BIH has been moving forward in the field of taxation, mostly while further progress is prevented due to a lack of interoperability and complicated internal procedures. Furthermore, further digitalisation of services is ongoing in Montenegro, with a notable mention of optimised service for registering a business, which is now fully digital (unlike many e-services that remain only at the information level). Finally, as the progress in digitising services and simplifying procedures continued in Serbia, the adoption of electronic payment counts among the recently introduced highlights.

Table 36: Digital uptake for citizens - SIGMA Regional Overview of the 2021 Monitoring Reports[115]

	Renewing ID			Vehicle registration			Personal Income Tax		
	Appointment	Application prefill	Fees	Appointment	Application prefill	Fees	Appointment	Application prefill	Fees
ALB	✓	X	X	✓	✓	X	✓	✓	✓
KS	X	X	X	X	X	X	✓	✓	✓
MNE	X	X	X	X	X	X	X	✓	✓
MKD	✓	X	✓	X	X	✓	✓	✓	✓
SRB	✓	X	✓	X	X	✓	✓	✓	✓

According to the *EU eGovernment Benchmark 2022*, Serbia is the forerunner in the WB region in e-government transparency and user centricity, while Albania has been most successful in key enablers, i.e., technical preconditions for e-government. Montenegro, on the other hand, scored the best for cross-border services[116] (Kosovo and BIH were not included in the measurement). Nevertheless, WB administrations still score below the EU27 average on all four dimensions,

Chart 48: EU eGovernment Benchmark 2022: government performance against EU27 across selected policy priorities (biannual average 2020 and 2021)[117]
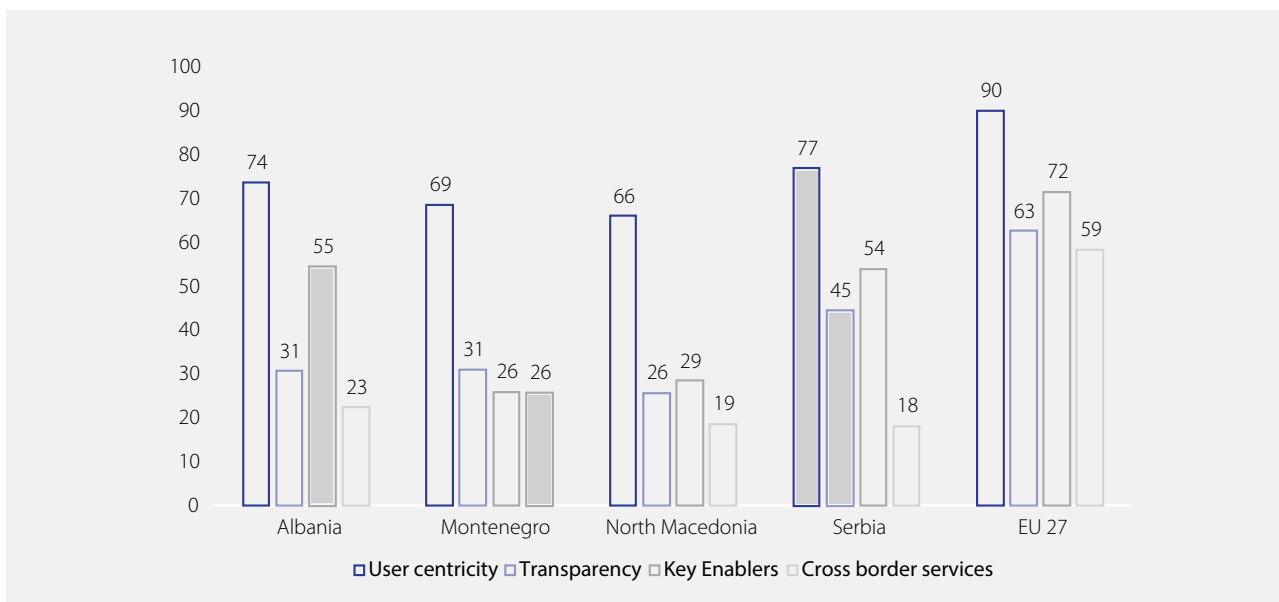
115 Bosnia and Herzegovina was not included. Regional overview available at: https://www.sigmaweb.org/publications/monitoring-reports.htm (last accessed on 31 March 2023).

116 Pertains to the ability of citizens from abroad to access and use online services, including online support and feedback mechanisms. See more at: https://digital-strategy.ec.europa.eu/en/library/egovernment-benchmark-2022 (last accessed 5 February 2023).

117 European Commission, Overall eGovernment Benchmark scores in eGovernment Benchmark 2022 Source Data. Available at: http://bitly.ws/BxuN (last accessed 13 March 2023).

■ **Practices to avoid: Discontinuity in reporting on performance data about digital services**

The National Agency for Information Society in Albania regularly published performance data about digital services offered at the e-Albania portal, which included relevant statistics on various services, user registrations, electronic payments, usage rates by different profiles (citizens and businesses), and other areas. However, after the 2019 annual report, no further performance data was published on digital service delivery for 2020, 2021, and 2022. Since the transparency of performance data enables monitoring and scrutiny by service users and other stakeholders and informs the government on its performance and necessary measures for improvement, discontinuing the publishing of annual reports represents a noteworthy step back.

■ **Accessibility**

Across the region, a framework for the physical accessibility of services is in place, except for the state-level BIH. Also, apart from Montenegro, mandatory accessibility standards and sign language are officially introduced. However, according to SIGMA, policy and legal frameworks lack implementation. One of the issues is that there are no mechanisms to monitor the application of standards and, except for Albania, no central guidance or administrative capacities for improving accessibility.

One-stop shops, single administrative points for accessing multiple services, are increasing in number in the region, though unevenly and, as in Kosovo and North Macedonia, slower than planned. Albania and Serbia are moving forward faster, making administrative service provision more accessible. Yet, in Serbia, despite the increase of one-stop shops in cities in municipalities to more than 40 at the time of writing this report, secondary legislation that is supposed to lay down common standards for their establishment is still missing. On the other hand, as part of the expansion of ADISA's network of front offices in Albania, there are more than 20 one-stop shops across the country which has rendered service provision more accessible. One-stop shops in the region are available as online service centres as well, improving accessibility of business-related services, or instance, through the separate one-stop shop network of the Central Registry in North Macedonia, a network of offices of the Business Registration Agency in Kosovo, as well as through the reduction of steps in business registration procedures at the entity- and district-level in BIH.

Finally, government websites do not fully meet accessibility standards and contain many errors. Specifically, no government is compliant with the Web Content Accessibility Guidelines (WCAG),[118] and in certain cases, there are no mandatory standards (Kosovo, North Macedonia). On average, government websites in BIH are more WCAG compliant than the rest of the region and thus more accessible for people with disabilities, while in Montenegro, greater web accessibility ensued after the introduction of the centralised government portal in 2021.

VI.2 WeBER Monitoring focus

Under the Service Delivery area of PAR, three SIGMA Principles are monitored.

Principle 1: Policy for citizen-oriented state administration is in place and applied;

Principle 3: Mechanisms for ensuring the quality of public services are in place;

Principle 4: The accessibility of public services is ensured.

From the perspective of civil society and the wider public, these principles bear the most relevance in addressing the outward-facing aspects of administration that are crucial for the daily provision of administrative services and contact with the administration. In this sense, these are the principles most relevant to citizens' quality of everyday life.

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118 See more at: https://www.w3.org/WAI/standards-guidelines/wcag/ (last accessed 3 April 2023)

The approach to monitoring these principles relies, firstly, on public perceptions of service delivery policy, including how receptive administrations are to redesigning administrative services based on citizen feedback. It is complemented by civil society's perceptions about distinct aspects of service delivery. Moreover, approaches to the selected principles go beyond mere perceptions, exploring aspects of existence, online availability, and the accessibility of information administrations provided on services.

Four indicators were used, two fully measured with perception data (perceptions from civil society and the public) and two using a combination of perception and publicly available data. The public perception surveys employed three-stage probability sampling targeting the public. They focused on citizen-oriented service delivery in practice, covering various aspects of awareness, efficiency, digitalisation, and feedback mechanisms.[119] This chapter mainly presents the results for the entire sample and, in some cases, includes data from a sub-sample, for example, of respondents that have used the services in the last two years.

Easy access to administrative services has been especially important in the context of the COVID-19 pandemic. Since public perception surveys were implemented during the pandemic, citizens were also asked additional questions on how interested they were in exploring more about electronic services since the outbreak and how frequently they have used them during the pandemic. Perception data from these questions were not used for measuring indicator values.

In the measurement of the accessibility of administrative services for vulnerable groups and in remote areas, data from a survey of civil society and a focus group with selected CSOs were used,[120] the latter for complementing the survey data with qualitative findings. The existence of feedback mechanisms was explored by combining public perception data and online data for a sample of five services.[121] Finally, the providers' websites of the same sampled services were analysed to collect information on their accessibility and prices.

VI.3 Comparative PAR Monitor findings

Principle 1: Policy for citizen-oriented state administration is in place and applied

The PAR Monitor approaches this principle from the perspective of public perceptions about administrations' citizen orientation, using the indicator "**Public perception of state administration's citizen orientation**" (SD_P1_I1). This indicator comprises 11 elements.

Table 37: Element scores and corresponding indicator values for SD_P1_I1 "Public perception of state administration's citizen orientation"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. Citizens are aware of government administrative simplification initiatives or projects	**2**	1	1	2	1	1	2
E2. Citizens confirm that administrative simplification initiatives or projects of the government have improved service delivery	**4**	4	4	4	4	4	4
E3. Citizens confirm that dealing with the administration has become easier	**4**	2	2	4	2	2	4
E4. Citizens confirm that the time needed to obtain administrative services has decreased	**4**	4	2	4	2	2	4

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119 Perceptions are explored with a survey targeting the public (aged 18 and older) in the Western Balkans. The public perception survey employed multi-stage probability sampling and was administered through telephone and computer-assisted web interviewing (CATI and CAWI), using a standardised questionnaire in Bosnia and Herzegovina, North Macedonia, Montenegro, and Serbia (as part of the omnibus survey), and in Albania and Kosovo (added to another survey), in the period between 4 May and 31 May 2022. More information is available in the Methodological Annex.
120 The survey of CSOs was administered through an anonymous online questionnaire. The data collection method included CASI (computer-assisted self-interviewing). More information is available in the Methodological Annex.
121 The five services included were 1) property registration, 2) company (business) registration, 3) vehicle registration, 4) the issuing of personal documents (passports and ID cards), and 5) value-added tax (VAT) declaration and payment for companies.

E5. Citizens consider that administration is moving towards digital government	**2**	2	1	4	1	2	2
E6. Citizens are aware of the availability of e-services	**2**	2	1	2	2	1	2
E7. Citizens are knowledgeable about ways on how to use e-services	**2**	1	1	2	1	2	2
E8. Citizens use e-services	**4**	2	0	2	2	4	4
E9. Citizens consider e-services to be user-friendly	**2**	2	2	2	2	2	2
E10. Citizens confirm that the administration seeks feedback from them on how administrative services can be improved	**2**	1	0	1	1	1	1
E11. Citizens confirm that the administration uses their feedback on how administrative services can be improved	**4**	4	4	4	4	4	4
Total points	**32**	**25**	**18**	**31↑**	**22↓**	**25**	**31**
Indicator value 2021/2022[122]	**0-5**	**4**	**3**	**5**	**3**	**4**	**5**
Indicator value 2019/2020	*0-5*	*4*	*3*	*4*	*4*	*4*	*5*
Indicator value 2017/2018		*3*	*1*	*4*	*3*	*3*	*4*

In general, administrations in the region continue to achieve high results when it comes to citizen orientation of service delivery. Four WB administrations have recorded indicator values of 4 or 5; for the remaining two, the final value is 3. Compared to the 2019/2020 monitoring cycle, the only example of regress is North Macedonia, for which the indicator value has reverted to the one achieved in the baseline monitoring.

As in the past monitoring cycle, more than half of Western Balkan inhabitants recognise the efforts of their governments to simplify administrative procedures for citizens and businesses (53%, five percentage points lower relative to 2019/2020). Also, citizens in Serbia, Albania, and Kosovo have, same as previously recognised these efforts the most, and levels of agreement go above the regional average. However, only in Serbia, there was no drop in perception in the two years since the previous survey. On the other hand, in BIH, citizens traditionally express the lowest agreement in the region (39%), and vice versa, the highest level of disagreement (50%).

Chart 49: Citizen perceptions on the statement "In the past two years, there have been efforts or initiatives by the government to make administrative procedures simpler for citizens and businesses" (%)
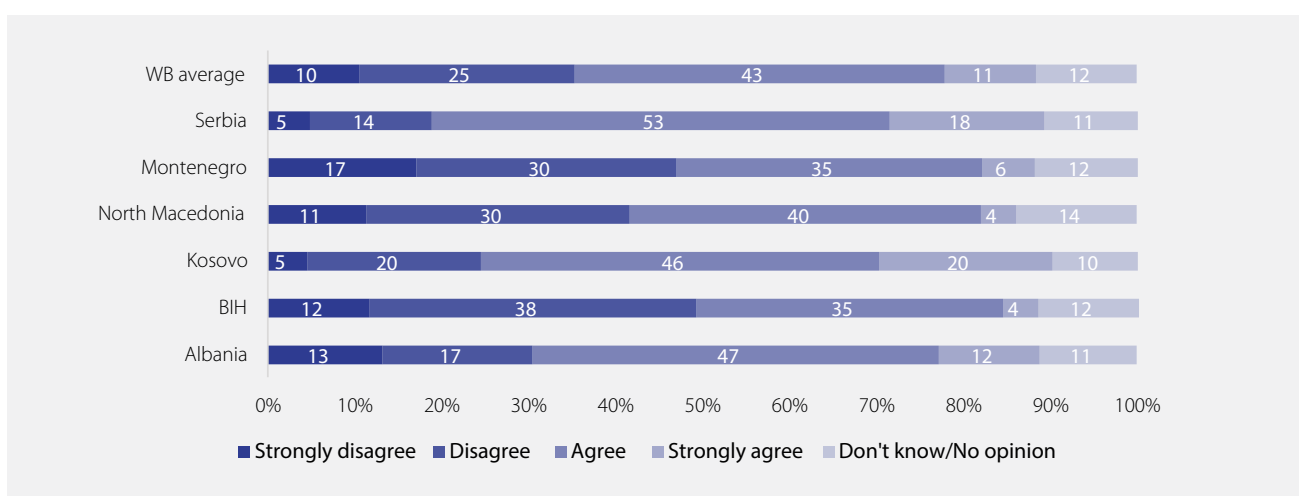
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 6093 and refers to the total number of respondents in the WB.*

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122 Conversion of points: 0-5 points = 0; 6-11 points = 1; 12-17 points = 2; 18-22 points =3; 23-27 points = 4; 28-32 points = 5

Among citizens who noted simplification initiatives,[123] landslide majority believes that they have been fruitful. Namely, 84% of respondents agreed that government activity has led to better services, and it marks a slight drop of 5 percentage points in affirmative perception compared to the 2020 public opinion poll. As has been the case in past, respondents in Kosovo agree the most (94%) and in BIH the least, although agreement amounts to 76%.

When dealing with the administration, WB citizens still express affirmative opinions. More than half of them, on average (52%), agree that dealing with the administration has become easier in the past two years. Again, a slight decline in positive perception recorder, which has at the same time translated into somewhat more citizens expressing disapproval (38% of disagreement that it is easier now to deal with administration, as opposed to 29% in the 2020 survey edition). Serbia and Kosovo share similar levels of agreement within a population (around 68% respectively), whereas the same is applied to North Macedonia and BIH, where citizens agree the least (36% respectively).

Chart 50: Citizen perceptions on the statement "In my own experience, dealing with the administration has become easier in the past two years" (%)
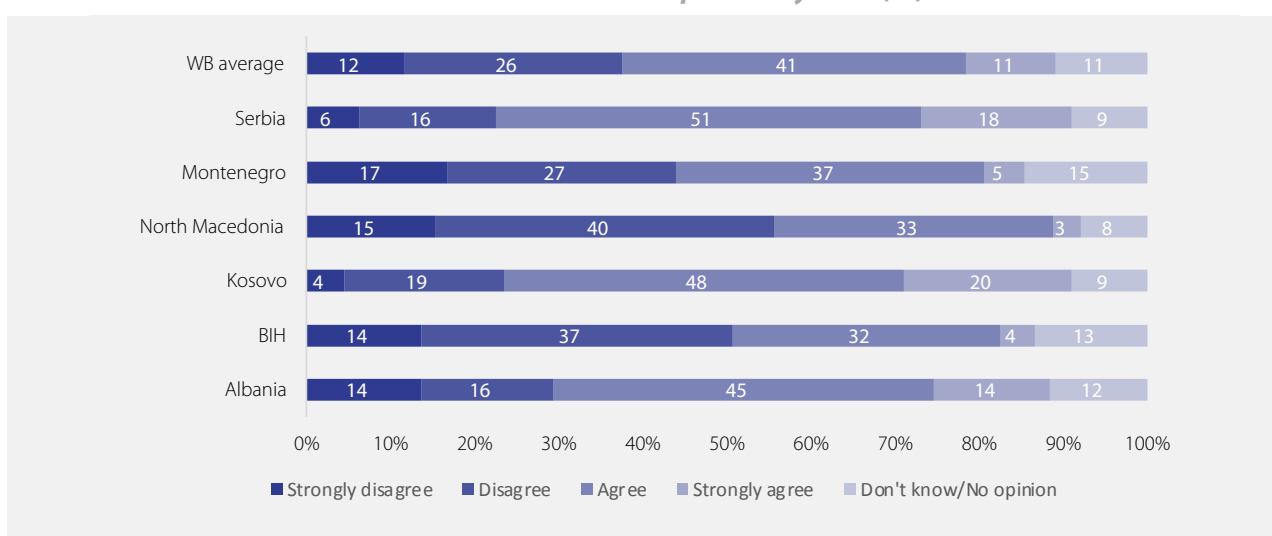
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 6093 and refers to the total number of respondents in the WB.*

Additionally, citizens recognised in 2022 that interaction with administrations has become more efficient within two years past, and the pattern is almost identical to the previous question. Namely, more than half of the region's population believes it takes less time to obtain administrative services (53%), but the share of those who agree is lower by four percentage points than in 2020. Conversely, disagreement remains close to a third of the WB population on average (36%), but it has slightly risen since the last monitoring cycle. As in the 2019/2020 cycle, citizens in Albania, Kosovo, and Serbia are the most positive (69%, 67%, and 60% of agreement, respectively), whereas, in the other half of the region, the agreement is below the regional average. BIH citizens express, on this but also all the previous questions under this indicator, the fewest agreement; nevertheless, North Macedonian citizens emerged as the most sceptical - it is the only administration in the region where the majority of the population disagrees that the time needed to obtain services has decreased (53%).

Digital transformation of governments in the region remains visible within the population. On average, two-thirds of citizens in WB see that work of administration is moving towards digital (66%), while close to a quarter of them do not think so (24%). It is, again, a slightly less favourable perception compared to the previous survey from 2020. However, it continues with generally positive attitudes from the previous monitoring cycle. At the national level, Serbian citizens continue to manifest the highest recognition of digitalisation efforts, with 85% answering affirmatively, while agreement rates above half of the population are present in other parts of the region but in BIH (48% of agreement).

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123 Those who responded "Agree" or "Strongly Agree" to the preceding statement ("In the past two years, there have been efforts or initiatives by the government to make administrative procedures simpler for citizens and businesses"), n = 3240.

When it comes to preferences of access to administrative services, the public perception results once again showed that half of the region's population prefers to access them digitally via the internet (53%). Same as in the 2020 survey, the strongest support for using digital channels is found in Serbia (70%), followed by Montenegro (61%), and the weakest in Kosovo (35%). Notably, between the two cycles, the preferences for digital access to services in BIH have dropped sharply, from 63% in 2020 to 39% in 2022. However, most WB citizens still prefer traditional access (44%), most prominently in Kosovo (65%). Thus, despite the majority preference for digital access, findings suggest that the traditional, in-person ways are almost equally important for the population in WB.

Chart 51: Citizen perceptions on the statement "What ways of accessing administrative services would you prefer using?" (%)
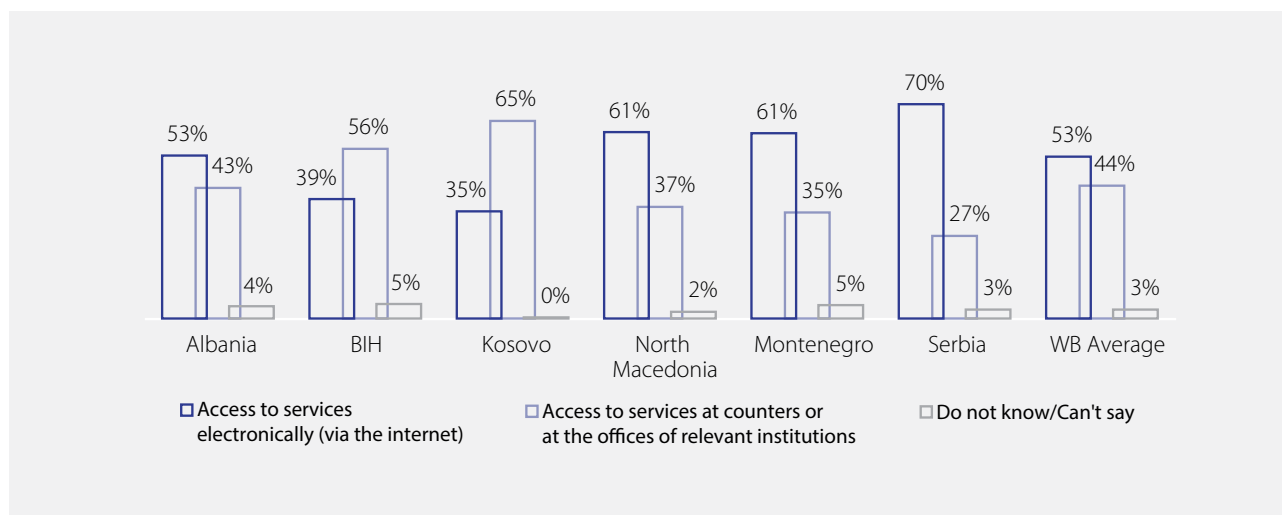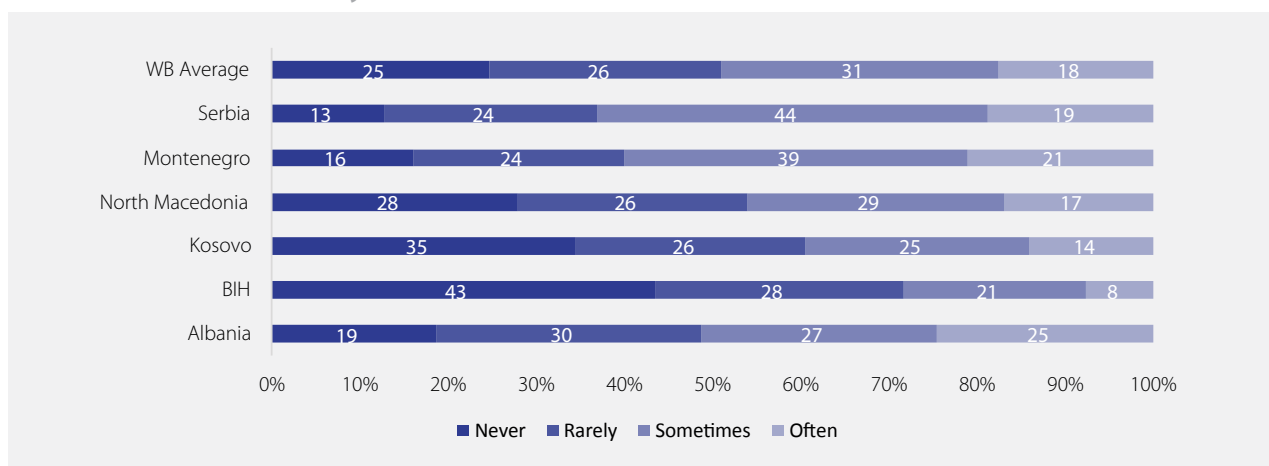

Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 6093 and refers to the total number of respondents in the WB.*

Furthermore, awareness of e-services in the region continues to grow. Starting with 41% of citizens in the baseline PAR Monitor, awareness has grown to 61% in 2020, increasing additionally in 2022 on average (68%). At the national level, awareness is once again highest among Albanian citizens (84%), with North Macedonian citizens being close (80%). Only in BIH does the minority of citizens report awareness of e-services (45%), which has dropped by ten percentage points compared to the previous survey. Despite the growing trend in awareness region-wide, a third of the population in WB remains unaware (33%).

The level of awareness of e-services in the region goes hand in hand with the level of information on how to use them. Of those WB citizens who know that their administrations offer digital services, 67% are informed on how to use them, while 31% are not. The share of those who believe they have sufficient information has decreased insignificantly compared to the 2019/2020 PAR Monitor. As in both previous cycles, Serbian citizens continue to be the best informed (90% "completely" and "mainly informed"), and citizens of Albania and BIH the least (56% and 58%, respectively).

The actual use of e-services has started to follow the rise in knowledge. Although more than half of the region's population, with some knowledge about the use of e-services, still reports they had used them rarely or never in the past two years (51%), this share has dropped significantly from 61% in the 2020 survey. Likewise, the share of those who reported more frequent usage ("often" and "sometimes") has increased by ten percentage points – from 39% in 2020 to 49% in 2022. These findings suggest that e-service uptake is starting to gain ground as the result of the focus towards digital for years by most administrations. At the national level, Serbia remains a frontrunner, with the majority of respondents declaring themselves as frequent digital service users (63% of those saying "sometimes" and "often", which marks five percentage points increase vis-à-vis the previous monitoring cycle). In comparison, the lowest frequency of use of e-services is reported in BIH (29%).

Chart 52: Citizen perceptions on the statement "Thinking about the past two years, how often have you used e-services of the administration?" (%)
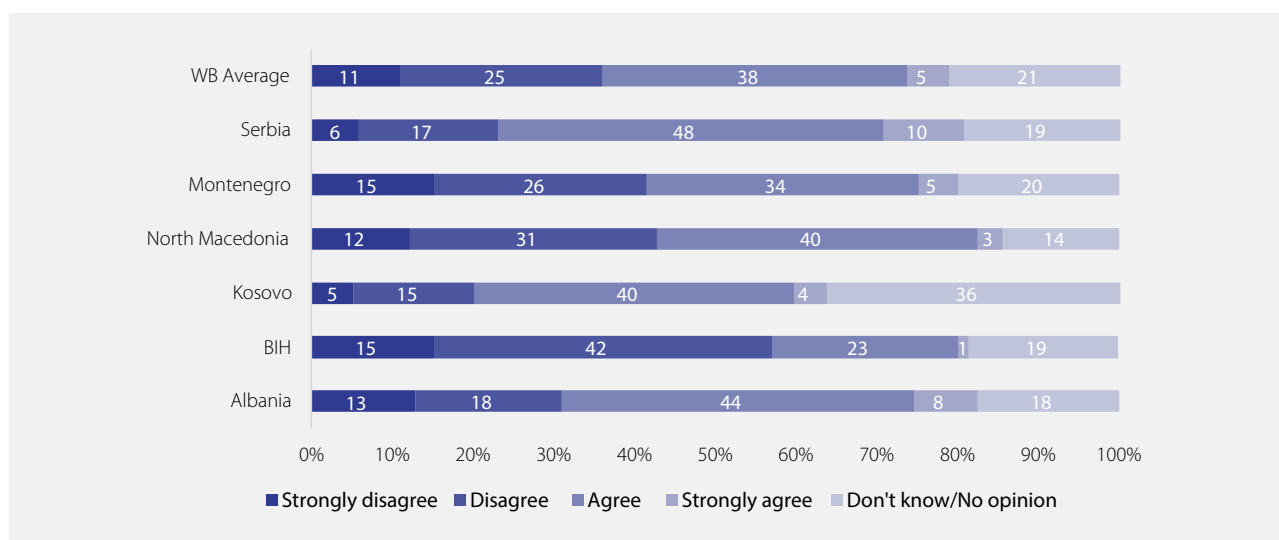

	Never	Rarely	Sometimes	Often
WB Average	25	26	31	18
Serbia	13	24	44	19
Montenegro	16	24	39	21
North Macedonia	28	26	29	17
Kosovo	35	26	25	14
BIH	43	28	21	8
Albania	19	30	27	25

Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 3554 and refers to the total number of respondents in the WB.*

Finally, around 5 in 10 WB citizens who used online services in the past two years confirm that they "always" managed to obtain the service in the end, which is only modest progress compared to the previous monitoring (4 in 10). National differences still display large variations – from 21% in BIH to 70% citizens of Albania, who confirm they have always managed to finalise the service request. On the other hand, almost four-fifths of those who used e-services (78%) consider them as either easy or very easy to use, which is only a small departure from previous monitoring cycles (82% in 2017/20118 and 2019/2020 cycles). Also, positive perceptions are present in each administration, ranging from 62% in Albania to 85% in Kosovo and Serbia.

Finally, the pulse of the public in the region is that administrations insufficiently ask citizens for their proposals on how to improve services. As in the 2019/2020 cycle, less than half of respondents (43%) agreed they had been asked for such proposals in the past two years. However, the agreement share dropped by five percentage points, and the share of those who disagree simultaneously increased (36%, compared to 31% in the previous edition). At the national level, only a quarter of the population in BIH could confirm that they have been approached to submit improvement proposals (24% of agreement), and on the opposite side are Serbian citizens who largely agree (58%). Noticeably, more than a third of Kosovo citizens could not provide an opinion (36%), which goes way beyond the regional average of those responses (21%).

Chart 53: Citizen perceptions on the statement "In the past two years, the administration has asked for citizens' proposals on how to improve administrative services" (%)

|	Strongly disagree	Disagree	Agree	Strongly agree	Don't know/No opinion
WB Average	11	25	38	5	21
Serbia	6	17	48	10	19
Montenegro	15	26	34	5	20
North Macedonia	12	31	40	3	14
Kosovo	5	15	40	4	36
BIH	15	42	23	1	19
Albania	13	18	44	8	18

Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 6093 and refers to the total number of respondents in the WB.*

Among those who agree that their administration has asked for citizens' proposals on how to improve services,[124] still, a large majority believes that governments have used such proposals to improve administrative services (79%) despite, once again, a slight decline in perception on average. While the belief that citizens' proposals have been taken on board is present in all administrations, the perception range varies greatly – from 66% to 91%.

Compared to the 2019/2020 monitoring, the public perception of citizen orientation of service delivery in the region remains quite favourable. However, these positive attitudes have subsided slightly, roughly between 4-6 percentage points on average, on almost all surveyed aspects. Nevertheless, due to largely positive public opinion, the regional picture still looks promising. Country highlights include North Macedonia, which has reverted to the value from the baseline monitoring, and Kosovo, with the achievement of the highest indicator value.

Chart 54: Indicator values for SD_P1_I1 – comparison of values for 2017/2018, 2019/2020 and 2021/2022 monitoring cycles
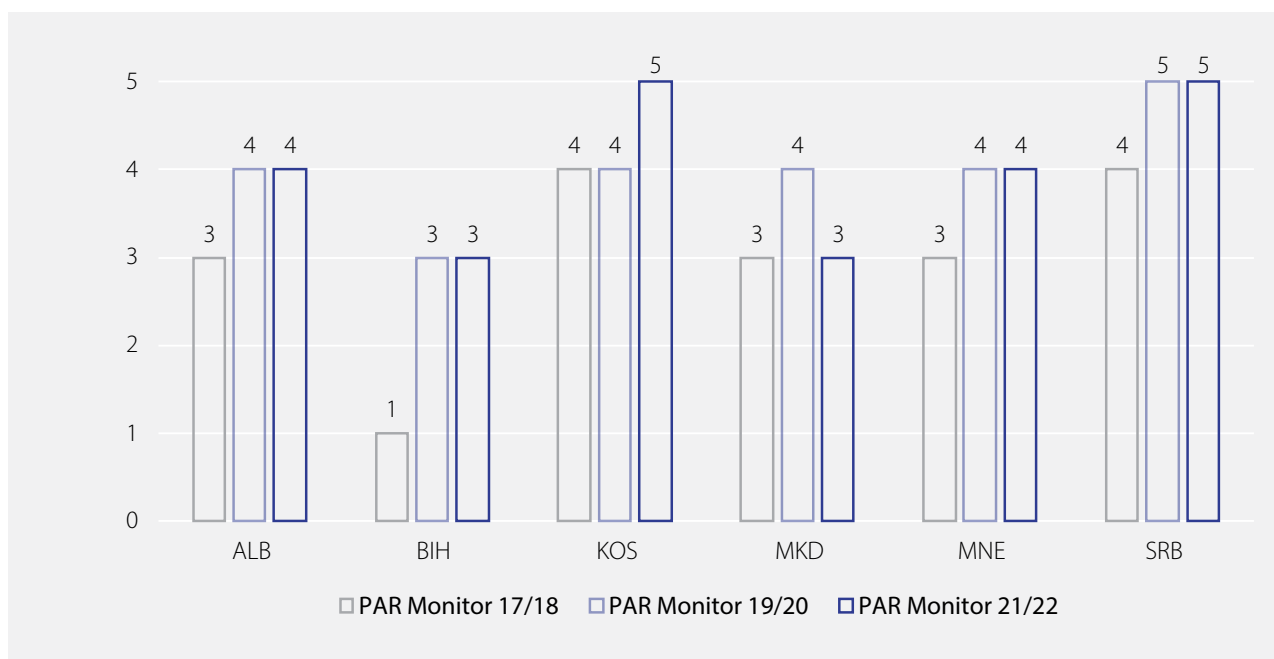
Principle 3: Mechanisms for ensuring the quality of public services are in place

PAR Monitor approaches Principle 3 of the service delivery area from the citizens' views on the quality of public services. It does so by combining the results of a public perception survey with the analysis of service providers' websites to determine the availability of information on citizen feedback. In the public perception survey, citizens were asked about the possibilities they have to provide feedback on the quality of services, about the ease of use of the channels for providing feedback, about their and civil society's role in monitoring service delivery and if such efforts result in improved service delivery. The results of these questions were used in the indicator "**Public perception and availability of information on citizens' feedback regarding the quality of administrative services**" (indicator SD_P3_I1), which comprises six elements.

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124 Those who responded "Agree" or "Strongly Agree" to the preceding statement ("In the past two years, the administration has asked for the citizens' proposals on how to improve administrative services"), n = 2618.

Table 38: Element scores and indicator values for SD_P3_I1 "Public perception and availability of information on citizens' feedback regarding the quality of administrative services"

Indicator element	Max	ALB	BIH	KOS	MKD	MNE	SRB
E1. Citizens consider they have the possibility to provide feedback on the quality of administrative services	**2**	1	0	1	1	1	2
E2. Citizens perceive feedback mechanisms as easy to use	**4**	2	2	4	2	2	4
E3. Citizens perceive themselves or civil society as involved in monitoring and assessment of administrative services	**4**	2	0	2	2	2	2
E4. Citizens perceive that administrative services are improved as a result of monitoring and assessment by citizens	**4**	4	4	4	4	4	4
E5. Basic information regarding citizens' feedback on administrative services is publicly available	**4**	4	0	0	2	0	0
E6. Advanced information regarding citizens' feedback on administrative services is publicly available	**2**	2	0	0	0	0	0
Total points	**20**	**15↑**	**6**	**11↓**	**11**	**9**	**12↑**
Indicator value 2021/2022[125]	**0-5**	**4**	**1**	**2**	**2**	**2**	**3**
Indicator value 2019/2020	*0-5*	*1*	*1*	*3*	*2*	*2*	*2*
Indicator value 2017/2018		*2*	*1*	*3*	*2*	*2*	*2*

The previous indicator observed whether survey respondents recognised any proactive initiative from their administrations seeking citizens' proposals on improving service delivery in general. This indicator takes a narrower perspective by asking citizens if they, as users of public services, can provide direct feedback on the quality of specific services they receive.

Like in the previous monitoring cycle, a significant share of the population in the region sees opportunities to submit feedback on received services; however, there has been a slight drop in positive perceptions compared to the previous PAR Monitor. Namely, 46% of the population agrees that such opportunities are in place, as opposed to 37% of those who disagree. When contrasted with the 2019/2020 monitoring cycle, this means a drop in agreement by seven percentage points and an increase in disagreement by seven percentage points. At the national level, Serbia has emerged at the top with the highest share of those who agree (62%). At the same time, the population in BIH remains the least approving, with the percentage of those who agree going much higher than the regional average (57%).

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125 Conversion of points: 0-4 points = 0; 5-8 points = 1; 9-11 points = 2; 12-14 points = 3; 15-17 points = 4; 18-20 points = 5.
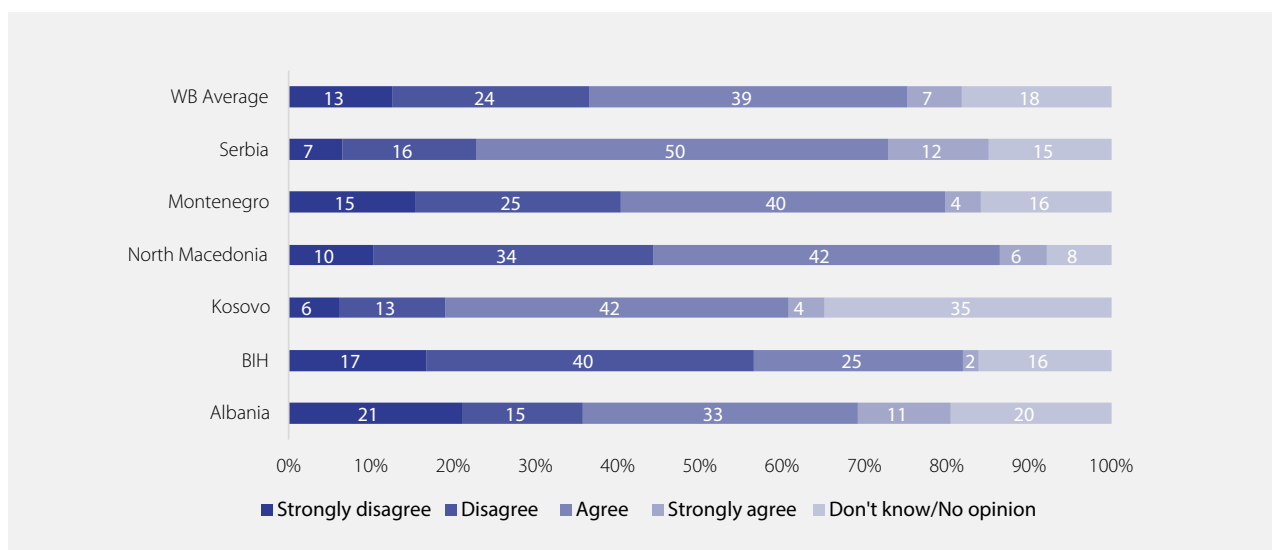
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 6093 and refers to the total number of respondents in the WB.*

Out of those who confirmed there were possibilities to provide feedback,[126] almost 60% of citizens find feedback channels easy to use which marks a significant leap of 11 percentage points compared to the previous survey edition. At the same time, more people find them difficult to deal with than two years past (27% as opposed to 18%). Notably, most respondents in all administrations find feedback channels easy to use, and in two cases, this perception is above the regional average (Kosovo, Serbia). Apart from being a somewhat more positive perception vis-à-vis the 2020 survey, these results signal that citizens are starting to voice their opinions more regularly, using whatever available channels.

Public opinion regarding citizen/CSO involvement in monitoring administrative service delivery has decreased to an extent compared to the 2019/2020 cycle. Namely, the agreement fell by four percentage points in two years, from 42% to 38%, but is still significantly higher than in the baseline monitoring (when a quarter of respondents agreed on such involvement). Regarding disagreement, the pattern is identical, but on the opposite side – 36% of citizens disagree, four percentage points more than in 2019/2020. The share of those who cannot provide an opinion remained at one-quarter of the population (25%), which still speaks of limited awareness of service delivery monitoring initiatives. Again, the most affirmative public opinion comes from Serbia, where agreement goes way above the regional average and includes most of the population (56%). In BIH, results are the opposite – 56% of the population disagrees, quite higher than the WB average. Notably, affirmative opinions in Kosovo and Montenegro fell by 14 and 16 percentage points, respectively, since the previous monitoring cycle. Altogether, there are slight changes in perceptions at the regional but quite substantial ones at the national level.

Finally, on average, citizens in the region still trust that such bottom-up monitoring of service delivery contributes to the actual improvement of administrative services. From those citizens who recognise civil society and citizen initiatives to monitor administrative services,[127] 85% share the opinion that their governments have improved administrative services as a result (responses "agree" and "strongly agree"), which is slightly higher than in the 2019/2020 cycle, for four percentage points. At the national level, people aware of civil society monitoring initiatives are overwhelmingly certain that they bring about improvements in practice, with the agreement being below the average in North Macedonia and BIH only but still significantly high (76% ad 78%, respectively).

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126 Those who responded "Agree" or "Strongly Agree" to the preceding statement ("As a user of administrative services, I have the possibility to give my opinion on the quality of the individual services that I receive (obtain)"), n=2754.

127 Those who responded "Agree" and "Strongly Agree" to the statement ("In the past two years, citizens or civil society have been involved in the monitoring of administrative services"), n = 2327.

Chart 56: Citizen perceptions on the statement "In the past two years, as a result of such monitoring by citizens or civil society, the government has improved administrative services" (%)
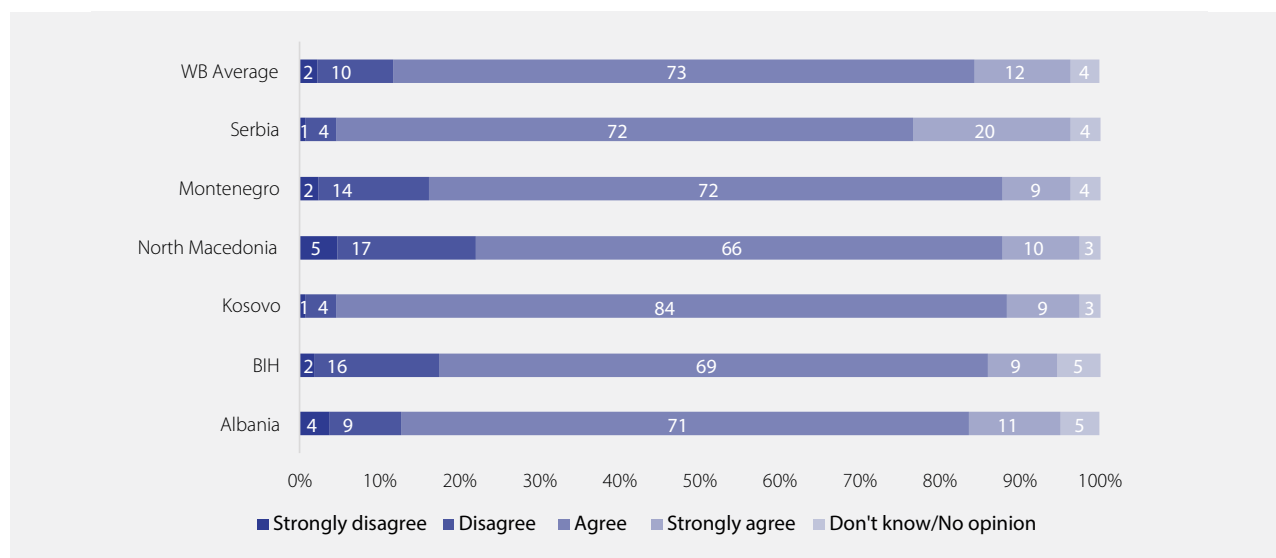
Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 2327 and refers to the total number of respondents in the WB.*

This indicator additionally included a review of the websites of the providers of a sample of five administrative services[128] in each administration. The indicator examined the public availability of "basic"[129] or "advanced"[130] information on citizens' feedback on the quality of those services.

Compared to the PAR Monitor 2019/2020, more data on user satisfaction have been collected and publicly disclosed. The major development in this regard is the implementation of thorough, countrywide user satisfaction surveys in Albania and Montenegro. In both cases, surveys have been implemented with the support of specialised agencies for public opinion polling and have covered 4 out of 5 sample services observed within the PAR Monitor. Moreover, the final reports included basic and advanced user feedback information (as foreseen by methodology in elements 5 and 6). The major difference between the two approaches is that the donor agency has published survey results in Montenegro rather than by the public authority who commissioned the research (more detailed information on both examples in the *Good Practices* and *Practices to avoid* boxes below).

Other than that, information on user feedback remains relatively scarce in the rest of the region - basic feedback is available for a single sampled service in two administrations (Kosovo and Serbia) and only in North Macedonia for two. The Tax Administration of Kosovo practised measuring taxpayers' perceptions regarding all services it offers. At the time of monitoring, the last survey was implemented in 2019, and the results were publicised in May 2020.[131] The Business Registry Agency in Serbia continues to publish general statistics on complaints from service users in its annual reports.[132] Additionally, it is possible to search for complaints in a separate database.[133] Finally, basic information on user satisfaction is available for the Ministry of Interior's services in North Macedonia (including registration of vehicles and issuance of identity documents). On the Ministry's website, two similar questionnaires are accessible online and are dedicated to measuring user satisfaction with service provision and, more generally Ministry's approach to communication with citizens.[134] Upon completion, it is possible to gain insight into the survey results.[135]

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128 These services are property registration, company (business) registration, vehicle registration, the issuing of personal documents (passports and ID cards), and tax administration (value-added tax (VAT) declaration and payment for companies).

129 With data from at least one source, be it administrative data, survey data, civil society monitoring data, or another credible source.

130 Advanced information refers to any of the three following cases: 1) Data/information on citizens' feedback includes information from at least two different credible sources; 2) Data is segregated based on gender, disabilities, or other relevant issues (such as ethnicity in countries where this relevant, region, urban and rural, and others); 3) Additional analyses are done (such as studies, cross-analyses of data from various sources, or other forms of analysis).

131 Available at: https://www.atk-ks.org/wp-content/uploads/2020/06/RaportiFinalShqip.pdf (last accessed on 21 March 2023).

132 The last report at the time of writing this PAR monitor was for 2021, available at: https://bit.ly/40lWdiZ (last accessed on 21 March 2023).

133 Available at: https://tinyurl.com/yym7756 (last accessed on 21 March 2023).

134 Questionnaires are available at: https://mvr.gov.mk/anketa/, https://mvr.gov.mk/anketa2/AnketaMk.

135 See the example at: https://mvr.gov.mk/anketa/rezultatiAnketa (last accessed on 21 March 2023).

Good practices: Comprehensive analysis of user satisfaction

In November 2020, **the Agency for the Delivery of Integrated Services in Albania (ADISA)** published a survey report on user satisfaction with access to all monitored administrative services but identity ones (issuing ID or passport). Besides providing basic information on the level of satisfaction with the service provision, accessibility, and needs for persons with disabilities, the report comprehensively segregates collected feedback based on gender, ethnicity, income level, and geographic location (urban vs rural). In addition to statistics, data is further complemented and cross-referenced with findings from focus group discussions.

This practice is considered a milestone considering that Albanian authorities revealed for the first time such exhaustive information on user feedback covering a variety of administrative services; however, to speak of improvements to service delivery as a result of user satisfaction feedback, such or similar surveys need to be done as regularly as possible, and not one-off actions.

■ **Practices to avoid: User satisfaction survey results published by the donor and not by ordering government authority**

In 2021, **the Ministry of Public Administration, Digital Society and Media in Montenegro** produced a report on the survey of satisfaction of public service users in selected institutions, including for Ministry of Interior, Cadastre, Property Administration, and Revenue and Customs Administration. This report also reveals detailed and segregated data, broken down by gender, age, education level, occupation, the time needed to obtain service, price levels, and other categories.

However, despite being a praiseworthy and rare regional practice in terms of comprehensiveness and depth of user satisfaction analysis, survey results are not publicly available at the Government's portal but on the website of the United Nations Development Programme in Montenegro. Hence, due to this technical issue, which can also be interpreted as the Ministry's lack of ownership as the ordering party or a lack of proactive transparency, no scores were recorded for Montenegro for the availability of either basic or advanced user feedback information.

Overall, compared to the PAR Monitor 2019/2020, an increase in indicator values is marked in Albania and Serbia, resulting from the public availability of advanced data on user satisfaction with services for the former and more positive public perception for the latter. On the other hand, for Kosovo, a frontrunner in this indicator until this monitoring cycle, a slight decline is due to lower public recognition of feedback mechanisms and no new developments regarding the online availability of user feedback on administrative services.

Chart 57: Indicator values for SD_P3_I1 – comparison of values for 2017/2018, 2019/2020, and 2021/2022 monitoring cycles
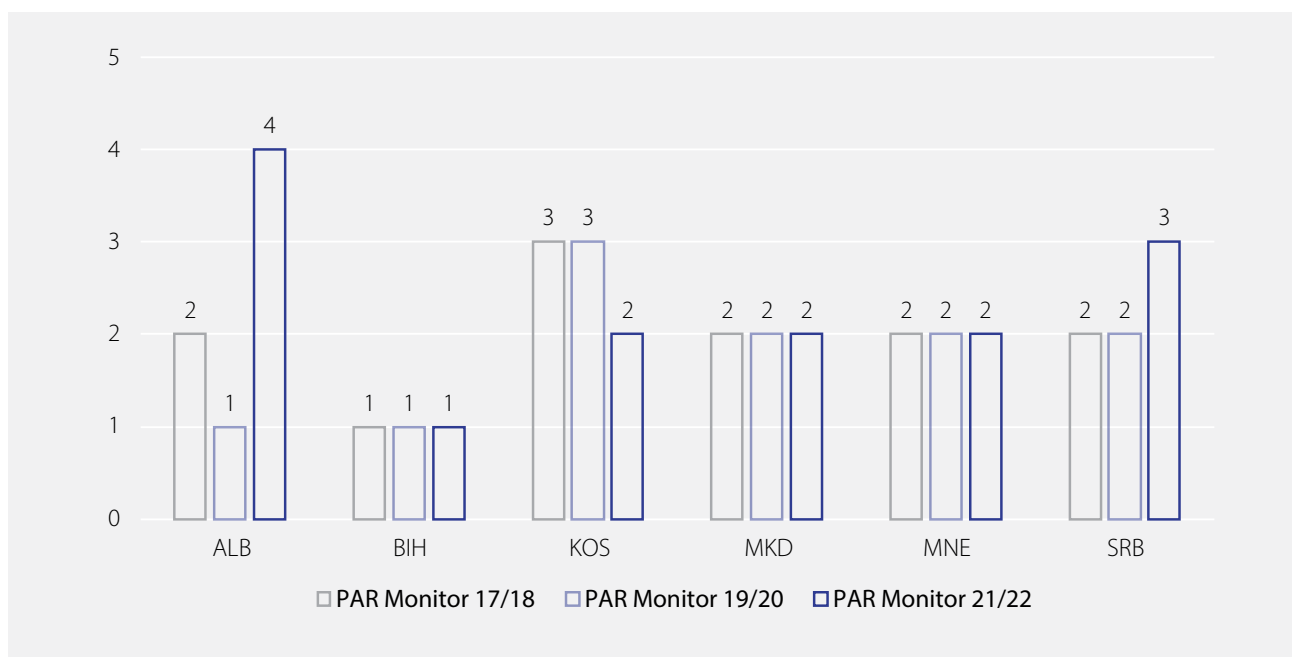
Principle 4: The accessibility of public services is ensured

The Accessibility of public services was measured with two indicators, one of which is based on the perceptions of civil society organisations and the other on the analysis of the providers' websites for a sample of administrative services.[136] The values for the first indicator, which measures "**CSOs' perception of accessibility of administrative services**" (SD_P4_I1), comprise six elements.

Table 39: Element scores and indicator values for SD_P4_I1 "CSOs' perception of accessibility of administrative services"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. CSOs confirm the adequacy of the territorial network for access to administrative services	4	2	0	0	0	0	0
E2. CSOs confirm that one-stop-shops are made accessible to all	4	2	2	0	0	0	0
E3. CSOs consider administrative services to be provided in a manner that meets the individual needs of vulnerable groups	4	0	0	0	0	0	0
E4. CSOs confirm that administrative service providers are trained on how to treat vulnerable groups	2	0	0	0	0	0	0
E5. CSOs confirm that the administration provides different channels of choice for obtaining administrative services	2	1	1	1	0	0	1
E6. CSOs confirm that e-channels are easily accessible for persons with disabilities	2	0	0	0	0	0	0
Total points	**18**	**5↑**	**3**	**1**	**0**	**0**	**1**
Indicator value 2021/2022[137]	**0-5**	**1**	**0**	**0**	**0**	**0**	**0**
Indicator value 2019/2020	*0-5*	*0*	*0*	*0*	*0*	*0*	*0*
Indicator value 2017/2018		*0*	*0*	*0*	*0*	*0*	*0*

Resembling the past monitoring cycles, CSOs remained quite sceptical that administrative service provision ensures accessibility in different aspects. Starting with territorial access, 58% of respondents, on average, believe that service providers are inadequately territorially distributed, which is three percentage points higher than the 2020 survey results. At the same time, the agreement that territorial distribution is adequate is expressed by most respondents to date, though it is still below a fifth of respondents (18%). CSOs in Montenegro emerged as the most disapproving compared to the rest of the region (82% of disagreement), whereas CSOs agreed the most in Albania (37%). Notably, in Kosovo, no respondent "strongly disagreed" with the statement, whereas in Montenegro and North Macedonia, no CSO representative "strongly agreed".

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136 The sampled services are the same as in the indicator 5SD_P3_I1 above.
137 Conversion of points: 0-3 points = 0; 4-6 points = 1; 7-9 points = 2; 10-12 points = 3; 13-15 points = 4; 16-18 points = 5.

Chart 58: Civil society perceptions on the statement, "Across the territories of the country, administrative service providers are adequately distributed in such a way that all citizens have easy access."
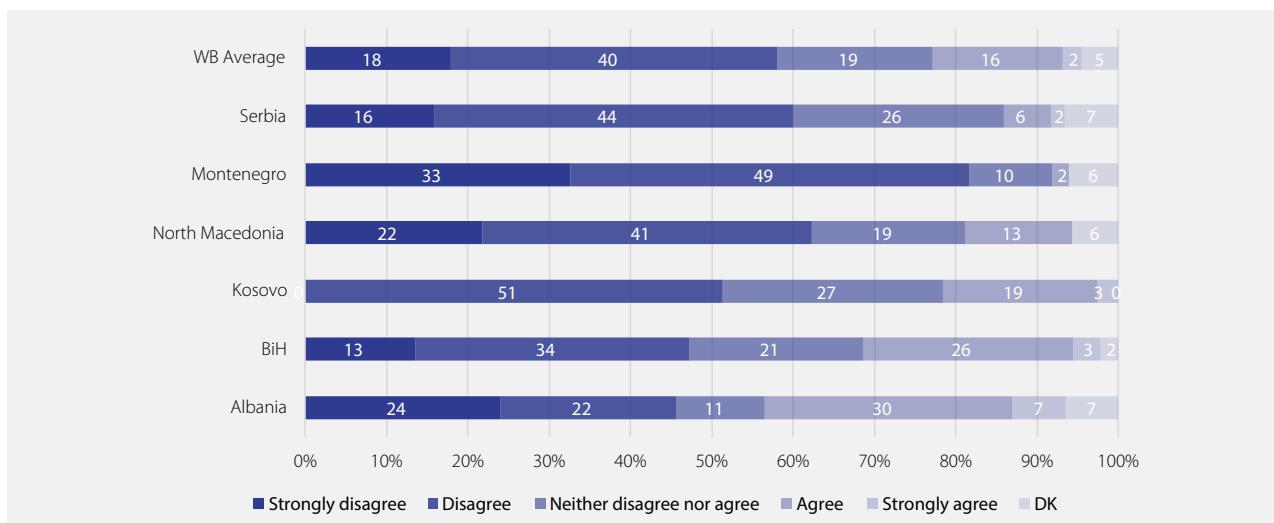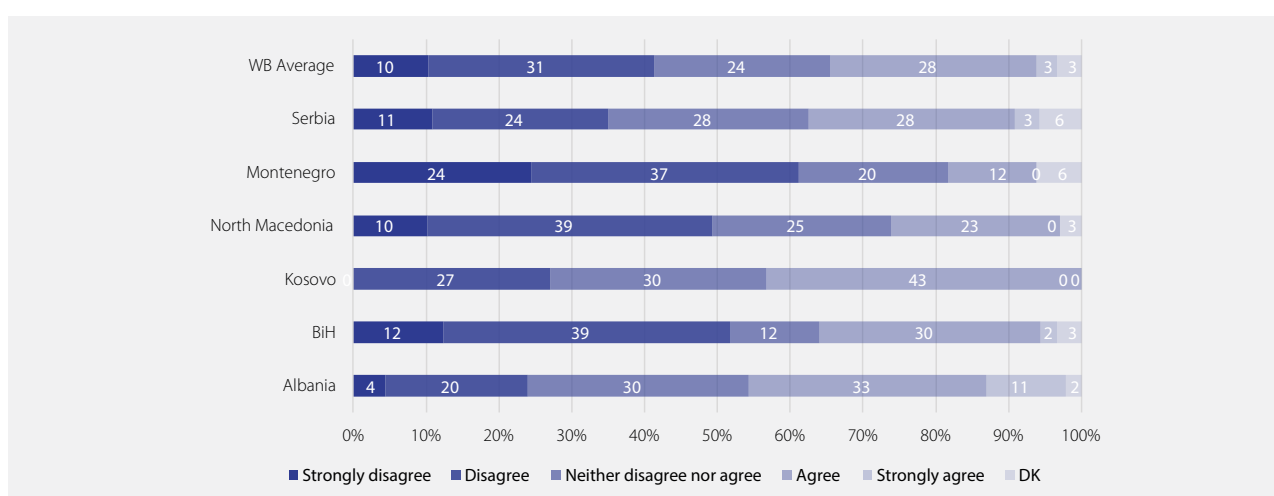

Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 410 and refers to the total number of respondents in the WB.*

Similarly, civil society actors once again assessed the geographic distribution of one-stop shops – single points for accessing different services - as inadequate, though with a slight increase in a positive attitude. On average, 21% of respondents agree that one-stop shops are easily accessible to all users, which marks a nine percentage point jump compared to the 2020 survey, but still, around half of respondents disagree (46%, as opposed to 50% in the 2020 survey). As in the previous question on of adequacy of territorial allocation of services, Montenegrin CSOs hold the most unfavourable opinion, with 68% of disagreement. On the other side are Albanian CSOs, who are traditionally most positive on territorial access to a one-stop shop, with the agreement reaching 43% - an increase of 20 percentage points compared to the previous survey edition.

CSOs have a slightly more positive outlook on the existence of various channels for obtaining administrative services when compared to the issues discussed above. Roughly one-third of respondents (31%) agree that administration bodies provide different choices for obtaining administrative services, with 41% disagreeing. Together with the highest approval by CSOs in Albania and Kosovo (44% and 43%, respectively), these perceptions resemble the ones from the 2019/2020 PAR Monitor.

Chart 59: Civil society perceptions on the statement "The public administration provides different channels of choice (in-person, electronic) for obtaining administrative services" (%)

Note: *All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 410 and refers to the total number of respondents in the WB.*

However, CSOs continue to consider administrative service provision as quite unfitting to the needs of vulnerable groups. On average, 10% of respondents agree that services are adapted to their needs. In comparison, 63% disagree, meaning no real change in perception occurred since the previous monitoring and CSOs' reactions to this question still count among the most negative ones. As in the previous survey edition, Montenegrin CSOs are the most dissatisfied, as 76% disagreed that services are adapted to vulnerable citizens, and not a single respondent agreed. CSOs in BIH, on the other hand, emerged as outliers in the region when it came to agreement level (27%).

Chart 60: Civil society perceptions on the statement "Administrative service provision is adapted to the needs of vulnerable groups" (%)
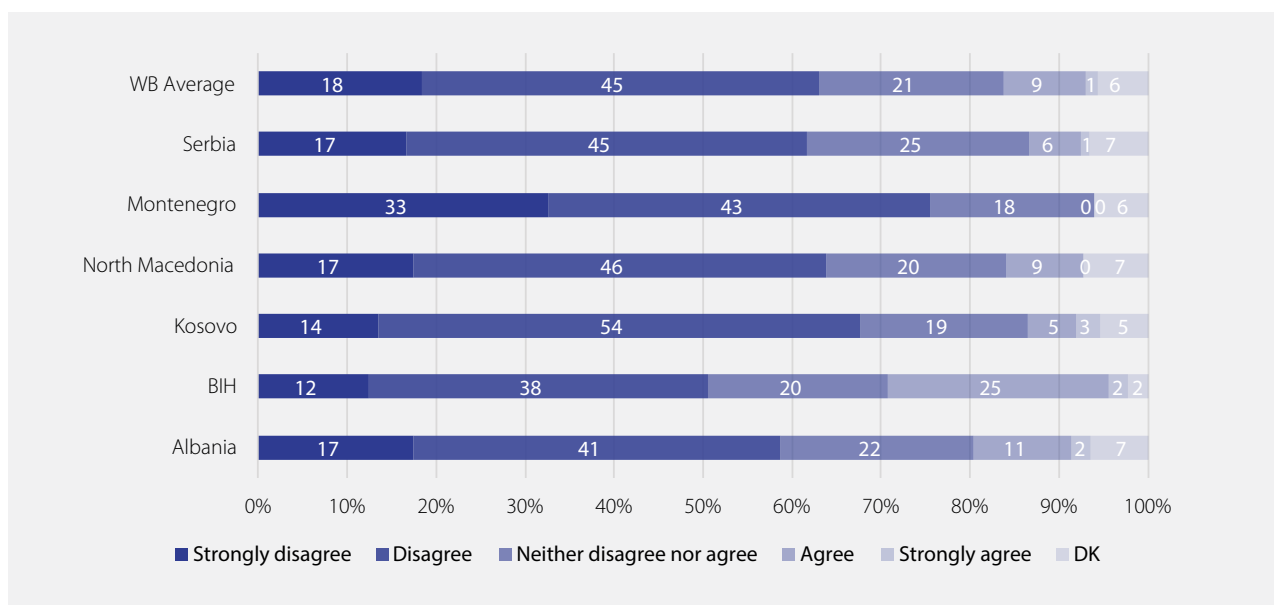

Note*: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. N = 410 and refers to the total number of respondents in the WB.*

Similarly, civil society actors in the region strongly hold that administrative staff is insufficiently trained to treat vulnerable service users. Continuing with the predominantly disapproving perception from the previous PAR Monitors, 62% of respondents, on average, disagreed that they are properly trained. However, the share of those who agreed has slightly increased compared to the previous survey edition though it still stands at a low level (12%). CSOs in Montenegro and Serbia expressed the least agreement (2% and 3%, respectively), while their peers in BIH were once again ahead of the regional average (27%).

Finally, CSOs do not see progress in making e-services accessible for vulnerable groups. Namely, more than fifty per cent of respondents in Western Balkan CSOs disagree that e-services are easily accessible for vulnerable groups (56%). The agreement on the matter has increased by five percentage points compared to the previous survey edition, though it still represents an insignificant share on average (13%). The highest level of agreement in the region is recorded in BIH (23%), followed by Kosovo (17%). Notably, the share of neutral positions on this statement ("neither disagree nor agree"), as on all other issues under this indicator, is one-fifth of respondents or higher.

An overview of all three monitoring cycles to date shows the unwavering dissatisfaction of CSOs, starting with equal territorial distribution and access and continuing with the accessibility of e-services for vulnerable groups and the capacities of service providers to attend to their needs. Indicator values reflect this highly negative attitude since the 2017/2018 baseline measurement, with only CSOs in Albania being somewhat more optimistic in the 2021/2022 edition.
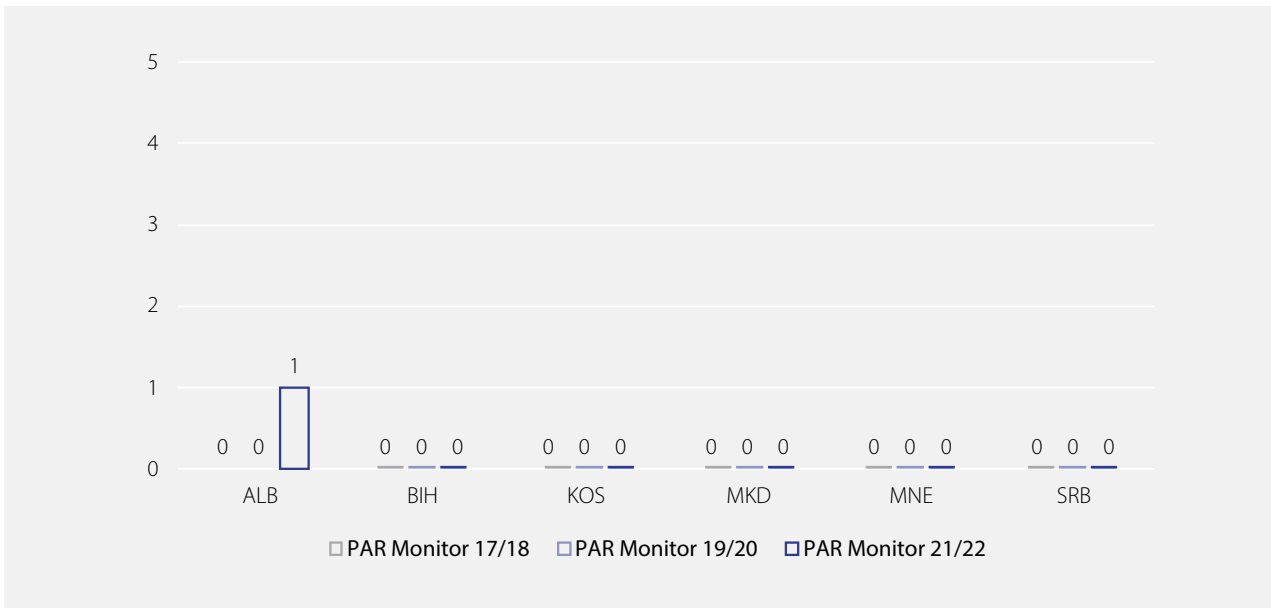
The second accessibility indicator looks at the availability of information regarding the provision of administrative services on service providers' websites (indicator SD_P4_I2) for the same sample of five services used in the previous indicators in this area. The analysed information also includes prices of administrative services, which should be presented in an accessible manner, with relevant price breakdown and transparency. The indicator relies on seven elements, which WeBER researchers fully assessed by reviewing the websites of sampled service providers.

Table 40: Element scores and indicator values for SD_P4_I2"Availability of information regarding the provision of administrative services on the websites of service providers"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. Websites of administrative service providers include contact information for provision of services	**4**	4	4	2	4	4	4
E2. Websites of administrative service providers include basic procedural information on how to access administrative services	**4**	4	0	2	4	0	4
E3. Websites of administrative service providers include citizen-friendly guidance on accessing administrative services	**2**	1	0	1	1	0	1
E4. Websites of administrative service providers include information on the rights and obligations of users	**2**	2	1	2	2	2	2
E5. Individual institutions providing administrative services at the central level publish information on the price of services offered	**4**	4	4	4	4	4	4
E6. The information on the prices of administrative services differentiates between e-services and in-person services	**2**	2	0	0	1	0	1

E7. Information on administrative services is available in open data formats	2	0	0	0	0	0	0
Total points	**20**	**17↑**	**9↑**	**11**	**16**	**10**	**16**
Indicator value 2021/2022[138]	**0-5**	**4**	**2**	**2**	**4**	**2**	**4**
Indicator value 2019/2020	*0-5*	*3*	*1*	*2*	*4*	*2*	*4*
Indicator value 2017/2019		*4*	*1*	*1*	*4*	*2*	*3*

Practices of administrative service providers across the region still vary in making key information on sampled services available on their websites.[139] As determined in the past monitoring cycles, service providers across the region mostly publish basic contact information related to specific services (such as e-mail addresses and phone numbers of relevant institutions and units). In four administrations, such information is available online for all five sampled services (Albania, BIH, North Macedonia, and Serbia). In Kosovo and Montenegro, complete contact information is available for most services. However, citizens in Kosovo are still not offered information on who to contact to register vehicles or obtain ID cards and passports (services delivered by the Ministry of Interior).

Different from contact information, whose availability is slightly higher than in the previous monitoring round, basic procedural information on accessing administrative services remains less easily available.[140] At the time of monitoring, complete procedural information was available for all services in Albania and North Macedonia, and in Serbia, for four out of five. In BIH and Montenegro, clear information on procedural steps is difficult to find in general, while in Kosovo, there is no information on services provided by the Ministry of Interior.

Where available, procedural information is still not, as a rule, followed by simple, citizen-friendly guidance to support users through procedures.[141] Albania, Kosovo, and Serbia still stand out since three sample services are accompanied by citizen-friendly approaches to explaining procedures and necessary steps to be taken, and two of them in North Macedonia. These approaches include audio-visual tutorials, infographics, illustrations, or simply user manuals and handbooks, for the most part. In BIH and Montenegro, barely any administrative service provider offers similar citizen-friendly support, except for the Tax Administration in the Federation of BIH.[142]

On the other hand, in keeping with the positive practices from the past, service providers in the region almost entirely make available online information on the rights and obligations of users (what documentation they need to submit themselves and what information the administration collects internally) and on service fees. The exceptions are found only in BIH, where information on rights and obligations is available for 3 out of 5 sampled services. Service providers publish pricelists, however, with no exception.

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138 Conversion of points: 0-4 points = 0; 5-8 points = 1; 9-11 points = 2; 12-14 points =3; 15-17 points = 4; 18-20 points = 5.

139 Based on the same sample as in SD P3 I1: property registration, company (business) registration, vehicle registration, the issuing of personal documents (passports and ID cards), and tax administration (value-added tax (VAT) declaration and payment for companies).

140 Minimum procedural information is considered to be descriptions of services, where and how to obtain them, and original forms (such as downloadable files or online forms).

141 Visual presentations and audio-visual guidance are intended to help citizens request and obtain services.

142 Because of the constitutional division of competencies in BiH, different levels of government were analysed (state level, entities, ten cantons, and Brčko District).

Yet, the price information does not fully differentiate between obtaining service in person and online, often because services are not digitised. Albania holds the first position, as all sampled services are digitised, and information on fees for traditional and online service delivery, if the cost exists, is available. North Macedonia and Serbia come second, with only two sampled services containing such cost division (in both cases for registering a business and declaring and paying VAT). Generally, services of tax authorities across the region are available for electronic completion, sometimes exclusively.

Finally, information on sampled services is unavailable for download in machine-readable formats. However, unlike in the past two monitoring cycles, such practices have started to emerge, with data on vehicle registration in Albania and tax services in North Macedonia available in open formats.

■ Good practices: Open data dashboard on vehicle registrations in Albania

General Directorate of Road Transport Services in Albania, in charge of providing services related to the registration of vehicles, has an open data section available from the homepage, which leads to a detailed open data dashboard. The English page of the dashboard contains two types of datasets for the 2020-2023 period on annual vehicle registration and on the size and distribution of vehicle fleets in the country. They are already visualised with charts and tables for selected categories, while data can be easily exported via right-click if visitors use their own Google accounts. Data provides insight into registrations by month, type of vehicle, car brands, year of production, and territorial organisation. In addition, a separate sheet is reserved for vehicle registrations by fuel or power source type, including the count of green, electric vehicles.

Compared to the previous monitoring cycle, 2019/2020, service providers in Albania and BIH have been more proactive, and the regional outlook has somewhat improved. As a result, administrations are split into two groups – the first with higher assessments (Albania, North Macedonia, Serbia) and the second with indicator values 2 (BIH, Kosovo, Montenegro).

Chart 62: Indicator values for SD_P4_I2 – comparison of values for 2017/2018, 2019/2020, and 2021/2022 monitoring cycles
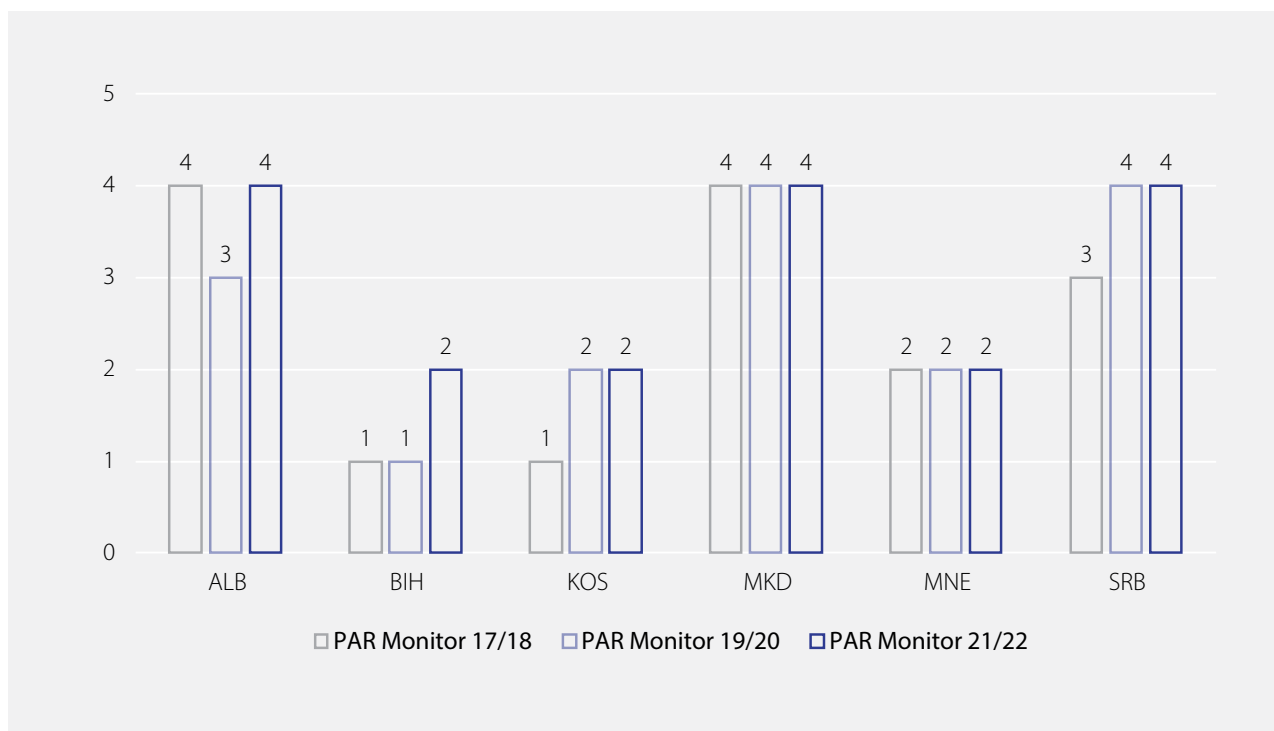
VI.4 Summary of results in the service delivery area

WeBER's approach to monitoring administrative service delivery is citizen-oriented, relying largely on public and civil society perceptions about the availability and accessibility of services. Overall, there is a continuity of positive public opinion across the region compared to the 2017/2018 and 2019/2020 monitoring cycles. However, on the opposite, civil society actors keep emphasising key issues with the accessibility of services.

Public perception of citizen-oriented service delivery remains on a positive trajectory. Although positive perceptions have decreased to an extent, the overall public attitude in the region remains favourable. Still, more than half of Western Balkan citizens believe that dealing with their administrations has become easier and that it takes less time to obtain administrative services (51-52%, on average). Likewise, two-thirds of WB citizens remain highly aware of governments' efforts to digitalise public administration work. A large share of citizens in the region remains adequately informed about how to use e-services (68%), but this needs to be translated into higher usage rates (half of those informed reported they had used them rarely or never in the previous two years). As in the previous cycles, most of those using e-services rate them as easy to use (78%). Finally, less than half of the population in the region recognise that administrations proactively asked for proposals to improve service delivery, but those that do largely trust that such proposals have been used and implemented in practice (79%).

Slightly fewer citizens in the Western Balkans confirm that they have opportunities to provide direct feedback on the quality of services they receive; however, those who do, find them mostly easy to use. Additionally, in the past two years, opinions regarding citizen or CSO involvement in monitoring service delivery have only slightly changed at the WB level. Still, there are more tangible changes in perception at the national level. Nevertheless, most citizens in the region still hold that bottom-up monitoring of service delivery practices is important for improving its quality. Finally, although administrative service providers seldom reveal reports on user feedback, major development is seen in Albania and in Montenegro, where government authorities have commissioned nationwide surveys on user satisfaction.

As in previous monitoring cycles, the critical view of civil society organisations in the region on the accessibility of administrative services to vulnerable groups directly opposes the positive public opinion on service delivery in general. Except for slightly favourable opinions regarding the possibility of choosing channels for accessing services (such as digital or face-to-face), CSOs express widespread negative views on the adequacy of territorial distribution of service providers and on how adapted service provision is for vulnerable groups.

Finally, regional practices continue to vary regarding making service-related information available online. Administrative service providers mostly publish information on contact points, rights and obligations, and fees. What is still insufficiently available is information on basic procedures and how to access services, including simple and user-friendly guidance. Moreover, not all administrative services are digitised. Nevertheless, the first examples of open data on service delivery have emerged, most notably on vehicle registrations in Albania.

VII.
Public Financial Management

Public financial management (PFM) concerns all critical aspects of public finances at the central level. It lays down rules and procedures to be followed in line with the general framework for budget users and budgetary control and oversight processes (internal and external). In broad terms, the Principles of Public Administration cover four PFM sub-areas: 1) budgetary policy and budget management, 2) public internal financial control,[143] 3) public procurement, and 4) external audit.

Revenues of national budgets stem largely from taxpayers' money, so the proper management of public finances becomes a principal concern of public administrations and the public alike. Well-functioning public finance management should ensure that public funds are used to the maximum benefit of citizens and society. Moreover, PFM should ensure transparency and hold governments fiscally accountable for successes or failures of budgetary policy.

VII.1 State of play in the region and developments since 2020[144]

PFM strategic reforms are continuously implemented in all WB administrations. However, when it comes to PFM segments in the focus of the WeBER monitoring, they are captured by either overall PAR and PFM strategies or separate policy documents. The table below provides an overview of PFM-related strategies implemented at the beginning of 2023 or are soon to be adopted.

Table 41: Overview of PFM-related strategic documents

	PFM overall	Public Internal Financial Control (PIFC)	Public Procurement	External Audit
ALB	PFM Strategy 2019-2022 (expired)	PIFC Policy Document 2021-2022	Public Procurement Strategy 2020-2023	Supreme State Audit Institution Development Strategy 2018-2022
BIH[145]	PFM Improvement Strategy in BIH Institutions 2021-2025	PIFC System Development Strategy 2020-2025	Public Procurement Development Strategy 2023-2027	Strategic Development Plan of the Audit Office of BIH 2021-2025
KOS	PFM Reform Strategy 2022-2026	Covered under PFM Reform Strategy	Covered under PFM Reform Strategy	Strategic Development Plan of the National Audit Office 2022-2025
MKD	PFM Programme 2022-2025	Covered under PFM Programme	Public Procurement Strategy (2022-2026)	State Audit Office Development Strategy 2023-2027
MNE	PFM Reform Programme 2022-2026	Covered under PAR and PFM strategic framework	Public Procurement Improvement Strategy 2021-2025	Strategic Development Plan of the State Audit Institution 2018-2022
SRB	PFM Reform Programme 2021-2025	Covered under PAR and PFM strategic framework	Public Procurement Development Programme 2019-2023	Strategic Plan of the State Audit Institution 2019-2023

Note: *Certain PFM sub-areas are fully or partially integrated into overall PAR or PFM strategic documents.*

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143 Also referred to as internal control and audit in the 2014 SIGMA Principles of Public Administration.

144 The state of play is primarily based on the European Commission's reports published in 2022 (which are therefore not cited individually), whilst other sources used are quoted separately. Reports of the European Commission are available at: https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports_en (last accessed on 1 February 2023).

145 For BIH, documents for state-level institutions are presented (not entity-level governments).

◼ Budget transparency

Since the second edition of the PAR Monitor, budgetary transparency in the WB region has mainly remained uneven. In its 2022 country reports, the EC has recorded no tangible improvements in BIH and Serbia, but it has noted efforts of other administrations or slight drawbacks. In Albania, the publication of all key budgetary documents is commended, with an emphasis on the need for timeliness in the publication of budget execution reports. Similarly, in BIH, budgetary reporting at the central necessitates improvements with a prevalent issue in the incompleteness of available budgetary information and in relying on decisions for temporary financing in the previous period.

In Kosovo, and North Macedonia, where budget execution's transparency has been advancing over the years, the Commission has remarked that, for the former, there was no update of budget implementation data on the fiscal transparency portal, and for the latter, it has continued to publish quarterly information and introduced new transparency tools on public debt. In Montenegro, continuous improvements in programme-based budgeting have, according to the EC, contributed to better budget transparency overall, but weaknesses remain on reporting side. Serbia is the rare example of no positive aspects to highlight, and the Commission has again stressed the inexistence of some key pre-budgetary documents and reports. Finally, the last results of the Open Budget Survey (OBS) show low-to-moderate standings for WB administrations on all three observed dimensions.

Table 42: 2021 Results for WB countries that the OBS captures[146]

	Albania	**BIH**	**North Macedonia**	**Serbia**
Public participation	Few	Few	Few	Few
Budget oversight	Adequate	Limited	Limited	Limited
Transparency	Limited information	Minimal information	Minimal information	Limited information

◼ Public internal financial control (PIFC)

For all WB administrations, the EC sees legislative frameworks for internal control and internal audit as largely, or broadly, in line with the international standards, with consistent implementation being a challenge across the region. Risk management is one of the critical internal control segments that need enhancement on all levels (Serbia), upgrade from operational to strategic level (Montenegro), or incorporation into the decision-making cycle (Albania, BIH, Kosovo). Based on the Commission's assessment, despite the increase in certification of auditors in some instances (Albania, BIH), the inadequacy of staffing and capacities for internal audit activity at all levels still needs to be addressed (Kosovo, North Macedonia, Montenegro, Serbia).

Central Harmonisation Units of ministries of finance (CHU) remain the key actors for coordinating and driving forward the PIFC reforms, but also for the overall transparency of the system through the publishing of consolidated, annual PIFC reports. Nevertheless, the Commission holds that the quality of PIFC reporting needs improvement in parts of the region by, for instance, the inclusion of risk management and performance indicators for public enterprises (BIH), more evidence-based recommendations with systematic follow-up data (Kosovo), or by generally improving capacities for monitoring and reporting work (North Macedonia). In Serbia, the EC has acknowledged the CHU's reporting improvement, but it still needs to be recognised as a tool for PIFC improvements and timely publicised. Since the last PAR Monitor, the work on internal control and internal audit quality reviews has continued, with the Commission singling out the CHUs in Kosovo, Montenegro, and Serbia.

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146 For the details, see: https://internationalbudget.org/open-budget-survey/rankings (last accessed on 1 February 2023).

■ Public procurement

In the opinion of the EC, public procurement legislation in the region is either largely (Albania, North Macedonia), partially (BIH, Kosovo), or broadly aligned (Serbia) with the *acquis*. The exception is Montenegro, where the legal framework is considered well-aligned. Nevertheless, basic principles in conducting public procurement still need to be adhered to in the entire region. Therefore, additional efforts are necessary to ensure that procedures are carried out by those principles, especially concerning major projects. Specifically, the Commission emphasises that "*All legal and financial instruments used in the area of public procurement and concessions, including inter-governmental agreements concluded with third countries for the implementation of joint projects, should comply with the principles of transparency, competition, equal treatment and non-discrimination*" (Albania, BIH, Kosovo). Still, it also raises concerns over particular concessions (Montenegro) or legislation (North Macedonia, Serbia) that allows for exemptions from or circumventions of public procurement legislation.

On the other hand, transparency of public procurement is gradually improving due to the introduction of e-procurement systems in recent years. However, whereas all the public procurement portals are used for publishing tender documentation, guidance and other important information, administrations differ in the sophistication, functionality, and usage of such portals. For instance, in Albania, the use of portal is mandatory, even for low-value procurements; however, a contract management system is in the pilot phase; in BIH, procedures are still not fully digitised; in Kosovo and Montenegro, interoperability and connections of e-procurement with other relevant systems need to be strengthened; in North Macedonia, development of e-marketplace and e-catalogues is ongoing, whereas, in Serbia, training for bidders and contracting authorities have been frequently held in the recent period.

■ External audit

Supreme audit institutions (SAI) in the region have been steadily shifting their focus towards auditing performance in recent years. In the view of the Commission, the Albanian and Serbian SAIs have additionally increased their capacities by improving methodologies and manuals and capacities for performance audits. At the same time, there is progress on average when it comes to the impact of the external audit, as some SAIs have improved their capacities for monitoring and following up to audit recommendations (Montenegro, Serbia) and reached out to external stakeholders such as civil society or media (Kosovo, Serbia, North Macedonia). In terms of engagement with the stakeholders, the EC notes adopting new communication strategies by SAIs and consultation with civil society in some administrations (BIH, Kosovo).

In the region, there is standing communication between SAIs and the parliaments, and annual activity and audit reports are regularly submitted for parliamentary review. Still, the EC highlights that the level of parliamentary scrutiny can be highly uneven, which sometimes necessitates closer collaboration with the legislature to ensure that different levels of government take up SAI recommendations (BIH) or a structured follow-up (Montenegro). Therefore, as a way of improving audit oversight, WB administrations are recommended in the OBS 2021 to ensure either that audit processes are peer-reviewed by an independent agency (Albania, North Macedonia) or to establish formal mechanisms for the public to assist in developing its audit program, or to contribute to relevant audit investigations (BIH, Serbia).[147]

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147 For more information, see OBS country results at: https://internationalbudget.org/open-budget-survey/country-results.

VII.2 WeBER monitoring focus

The monitoring of the PFM area is performed against six SIGMA Principles.

> **Principle 5**: Transparent budget reporting and scrutiny are ensured.
>
> **Principle 6**: The operational framework for internal control defines responsibilities and powers, and its application by the budget organisations is consistent with the legislation governing public financial management and the public administration in general.
>
> **Principle 8**: The operational framework for internal audit reflects international standards, and its application by the budget organisations is consistent with the legislation governing public administration and public financial management in general.
>
> **Principle 11:** There is central institutional and administrative capacity to develop, implement and monitor procurement policy effectively and efficiently.
>
> **Principle 13:** Public procurement operations comply with basic principles of equal treatment, non-discrimination, proportionality and transparency, while ensuring the most efficient use of public funds and making best use of modern procurement techniques and methods.
>
> **Principle 16**: The supreme audit institution applies standards in a neutral and objective manner to ensure high-quality audits, which positively impact on the functioning of the public sector.

As SIGMA thoroughly assesses these principles, WeBER focuses on and enhances elements of the transparency and accessibility of information, external communication, and proactive and citizen-friendly approaches to informing citizens.

The first indicator assesses the transparency and accessibility of budgetary documents, measuring how accessible key budget documents (such as annual state-level budget and budget execution reports) are to citizens and to what extent budgetary information is presented and adapted to the needs of citizens and civil society. To this end, the primary online sources are the data available on the websites of ministries in charge of finance and the data available thereon, as well as official government portals and open data portals.

The second indicator measures the availability and communication of essential information on PIFC to the public and other stakeholders (including consolidated reporting, IA quality reviews, and FMC procedural information). The analysis considers official websites and available documents from government institutions in charge of PIFC policy. The websites of all ministries are analysed for the availability of specific FMC-related information. At the same time, official parliamentary documentation serves for the measurement of the regularity of parliamentary scrutiny of PIFC.

In the external audit area, the indicator approach considers SAI's external communication and cooperation practices with the public. This area covers a strategic approach to external communication, means of communication used, citizen-friendliness of audit reporting, channels for reporting on issues identified by external stakeholders, and consultations with civil society. For this purpose, a combination of expert analysis of SAI documents and analysis of SAI websites was used, complemented by semi-structured interviews with SAI staff to collect additional or missing information.

Finally, in the public procurement area, the indicator measures the availability of public procurement-related information to the public. It focuses on whether central procurement and key contracting authorities publish annual plans and reports and how informative and citizen-friendly central public procurement portals are for the interested public. Additionally, this indicator looks into the availability of open procurement data and the percentage of public procurement processes done in open procedures. This indicator is entirely based on the review of official documentation on public procurement policy.

VII.3 Comparative PAR Monitor findings

Principle 5: Transparent budget reporting and scrutiny are ensured

Regarding this principle, WeBER monitoring focuses on segments of enhanced transparency and accessibility of budget documentation and data in WB administrations. More closely, the indicator measures specific elements of accessibility and transparency of online budget information at the central government level. The "**Transparency and accessibility of budgetary documents**" (PFM_P5_I1) indicator consists of seven elements.

Table 43: Element scores and corresponding indicator values for PFM_P5_I1 "Transparency and accessibility of budgetary documents"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. Enacted annual budget is easily accessible online	**4**	0	4	4	4	4	2
E2. In-year budget execution reports are easily accessible online	**4**	4	2	2	2	2	2
E3. Mid-year budget execution reports are easily accessible online	**4**	0	2	4	0	0	0
E4. Budget execution reports (in-year, mid-year, year-end) contain data on budget spending in terms of functional, organisational, and economic classifications	**4**	2	4	4	4	0	0
E5. Annual year-end report contains non-financial information about the performance of the Government	**2**	2	1	0	1	0	2
E6. Official reader-friendly presentation of annual budget (citizen budget) is regularly published online	**4**	4	0	4	4	2	4
E7. Budgetary data is published in open data formats	**2**	2	0	2	2	0	2
Total points	**24**	**14**	**13**	**20**	**13↓**	**8**	**12**
Indicator value 2021/2022[148]	**0-5**	**3**	**3**	**4**	**3**	**1**	**2**
Indicator value 2019/2020	*0-5*	*3*	*3*	*4*	*4*	*1*	*2*
Indicator value 2017/2018		*2*	*2*	*4*	*4*	*1*	*2*

Since the PAR Monitor 2019/2020, enacted budgets in the region have mainly remained accessible to the public. It takes three or fewer clicks for interested parties to access them via the websites of finance ministries, except in Albania, where enacted budget documents are still the least accessible in the entire region. Also, most ministries keep state budgets for the previous calendar years accessible from the exact location, the exception here being Serbia, where the expired budget laws, as already established practice, are uploaded in the archive section.

Availability and accessibility of budget reports, on the other hand, remain mostly uneven across the region, and administrations are using different types of reports and data formats. For in-year data, monthly reports are easily accessible but not necessarily timely publicised (Kosovo, Montenegro, Serbia), and they can be accessed as fiscal statistics reports (Albania),[149] statistical time series updated monthly (Kosovo),[150] public finance bulletins covering broader macroeconomic and fiscal data (Serbia),[151] Or budget execution reports (North Macedonia,

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148 Conversion of points: 0-4 points = 0; 5-8 points = 1; 9-12 points = 2; 13-16 points = 3; 17-20 points = 4; 21-24 points = 5.
149 See the example at: http://www.financa.gov.al/buxheti-ne-vite/ (last accessed on 3 February 2023).
150 See the example at: https://mf.rks-gov.net/page.aspx?id=2,125 (last accessed on 3 February 2023).
151 See example at: https://www.mfin.gov.rs/vrsta-aktivnosti/bilten-javnih-finansija (last accessed on 3 February 2023).

Montenegro).[152] Apart from monthly data, publishing quarterly budget execution reports/statistics is usual practice in the region (BIH, Kosovo, North Macedonia, Montenegro).[153] Unlike monthly or quarterly, mid-year budget execution reviews remain mostly undisclosed for public insight, save for Kosovo and BIH. In general, a substantial amount of in-year execution data is available in the region but with varying degrees of online accessibility and regularity in publicising. For example, in Montenegro, the MoF started publishing individual transaction data from the treasury on a monthly basis.

■ **Good practices: Monthly transaction data publicly available in Montenegro**

In **Montenegro**, budget transparency has been increased by monthly publication of transaction data from the state treasury.[154] This practice is not based on any legal obligation, and it illustrates proactiveness on the part of the Ministry which is why it is considered an early, good regional example. Although a commendable step, the method of implementation could still be improved. Data are published in a bulk way, with varying formats used (PDF, xlsx, docx), making these datasets of around 50 thousand monthly transactions hard to filter and navigate. Additionally, a significant percentage of transactions are redacted due to data confidentiality. To be fully recognised as good regional practice in the future, the Ministry should continue with monthly data publishing, regardless of personnel or policy changes, and find ways to make public spending data more discernible for the interested public.

Moreover, although moving forward over the years, the comprehensiveness of available budget reports to the public still needs to be improved. Albania, BIH, and Kosovo can be singled out in terms of details provided in execution reports, as they display data in economic, functional, and organisational terms.[155] For North Macedonia, due to the unavailability of mid-year execution data in this monitoring cycle, the comprehensiveness of budget reporting was assessed as insufficient. At the same time, Montenegro and Serbia remain lagging behind by mostly disclosing the economic type of expenditures. Thus, at the level of the entire region, the scope of budget reporting can be further broadened to include important information on how institutions spend their budget and for what purposes.

Tangible progress has been recorded in the public availability of non-financial performance information. Previously, Albania was leading regarding the availability of such information in year-end reports, and the 2021/2022 monitoring cycle observed similar practices in four administrations. The table below summarises practices found in the 2021 year-end execution reports.

Table 44: Availability and examples of non-financial performance data

	AVAILABILITY	EXAMPLES
ALB	✓	The budget execution report for 2021 includes key performance indicators by line ministries. For example, statistics on the number of young people benefiting from government scholarships are presented, compared to policy targets.[156]
BIH	✓	Only overall, summarised performance data is included in the 2021 budget execution report for BIH institutions.[157]

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152 In Montenegro, monthly budget execution reports are prepared in line with the general data dissemination system (GDDS), available at: https://www.gov.me/vijesti?sort=published_at&ou=13&tags=1283 (last accessed on 3 February 2023).

153 For in-year reporting, the last six months before monitoring are considered (not necessarily within the same fiscal year). By definition, monthly publication means quarterly publication of budget reports. The PAR Monitor methodology considers any in-year reporting as sufficient.

154 See the March 2022 treasury transactions example: https://www.gov.me/clanak/izvjestaj-o-placanjima-iz-drzavnog-trezora-mart-2022-godine (last accessed on 26 April 2023).

155 Expenditure classifications were analysed in the last available monthly, quarterly, mid-year, and year-end reports.

156 Available at: https://financa.gov.al/paketa-e-projektligjit-te-buxhetit-faktik-2021/ (last accessed on 3 February).

157 Available at: https://bit.ly/3Yki6OL (last accessed on 3 February).

KOS	**X**	The year-end report for 2021 contains some performance data, but it is reported in financial terms.
MKD	✓	Non-financial performance information is available in a summarised form and in terms of gender mainstreaming into policy areas. For example, the Ministry of Finance has reported on the increase in approved housing loans for women, elaborating further on the trend of approving loans to married and unmarried women over the years.[158]
MNE	**X**	The year-end report contains some non-financial data based on activity indicators. For example, the number of decisions adopted or reviewed, the number of organised trainings and similar. Still, it is assessed as insufficient to qualify as performance information (no output or outcome measurements).
SRB	✓	In the year-end report for 2020 (last available at the time of the assessment),[159] Performance information is expressed per sector (e.g., agriculture and rural development), a user (e.g., ministry), and programme budget targets, detailing the fulfilment of indicators defined at the output level.

Citizen budgets remain to be published as a rule by four administrations (Albania, Kosovo, North Macedonia, and Serbia). However, they are continuously available at a single website location from 2016 in Albania, 2015 in Kosovo, and 2017 in North Macedonia. In addition, highlighted in the 2019/2020 monitoring cycle as good regional practices, authorities in Kosovo and North Macedonia are maintaining online portals that increase fiscal transparency on the budget planning and execution side - fiscal transparency portal for the former and separate platforms for citizen budget, budget realisation, and tracking of capital expenditures for the latter.[160] In Serbia, the practice of accessibly publicising citizen-friendly annual budget guides is also present and goes back several years; however, at different online locations for the current and past editions. In BIH, after its initial publishing in 2020, presenting citizen budgets to the public has ceased. In Montenegro, after the parliament publicised the guide for the annual budget for 2021, the Government produced the official budget visualisation for 2022, in the form of a basic PowerPoint presentation. Overall, since the baseline PAR Monitor to date, regular disclosure of citizen budgets has been missing in BIH for the most part.

◼ Practices to avoid: Decreasing achieved transparency levels in BIH, Kosovo, and North Macedonia

In **BIH**, the citizen budget has been published for the first time for 2020. However, despite the intention of the Ministry of Finance and Treasury to release them regularly, they were not released for the 2021 and 2022 budgets. In **North Macedonia**, which was among regional leaders in budgetary transparency practices, transparency has decreased because of a break in public disclosure of mid-year reports on budget execution online for 2021 and 2022. Similarly, in **Kosovo**, although remaining highly assessed over the years, the ministry in charge of finance still needs to update Fiscal Transparency Portal for the final quarter of 2021 and onwards.

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158 Available at: https://bit.ly/3T7JOvt (last accessed on 3 February).

159 Information is available as part of the Proposal of the Law on the Final Account of the Budget for 2020 from the website of the National Assembly: http://www.parlament.gov.rs/upload/archive/files/cir/pdf/predlozi_zakona/2021/1954-21.pdf (last accessed on 3 February).

160 Fiscal Transparency portal of Kosovo, updated until 2021, available at: https://ptmf.rks-gov.net/Budget/2021/9; Open Finance portal in North Macedonia available at: https://open.finance.gov.mk/en/home; Citizen Budget portal in North Macedonia, available at: http://budget.finance.gov.mk/; portal on the performance of capital investments in North Macedonia, available at: https://kapitalni-rashodi.finance.gov.mk/?lang=english (last accessed 7 February 2023).

When it comes to open budget policies, notable developments have yet to take place. As identified in the previous PAR Monitor cycles, administrations either publicise budgetary data series in an open format, which usually stretches back to more than a year (Kosovo, Montenegro, Serbia) or make annual state budgets plans separately available as open format files (Albania). Still, these examples cannot be fully recognised as open data policy yet as they need to be clearly labelled and standardised. Annual budget data is missing from the national open data portals almost exclusively.

Overall, budgetary data transparency has remained at the same level since the PAR Monitor 2019/2020. The highlight of this cycle is more availability of annual non-financial performance data. As a result, the indicator values have remained unchanged, except for North Macedonia, where diminished transparency of in-year budget reporting has affected the result. Consequently, Kosovo remains alone at the top, while Montenegro and Serbia are once again sharing lower positions on the regional scale.

Chart 63: Indicator values for PFM_P5_I1 - comparison of values for the2017/2018, 2019/2020 and 2021/2022 monitoring cycles
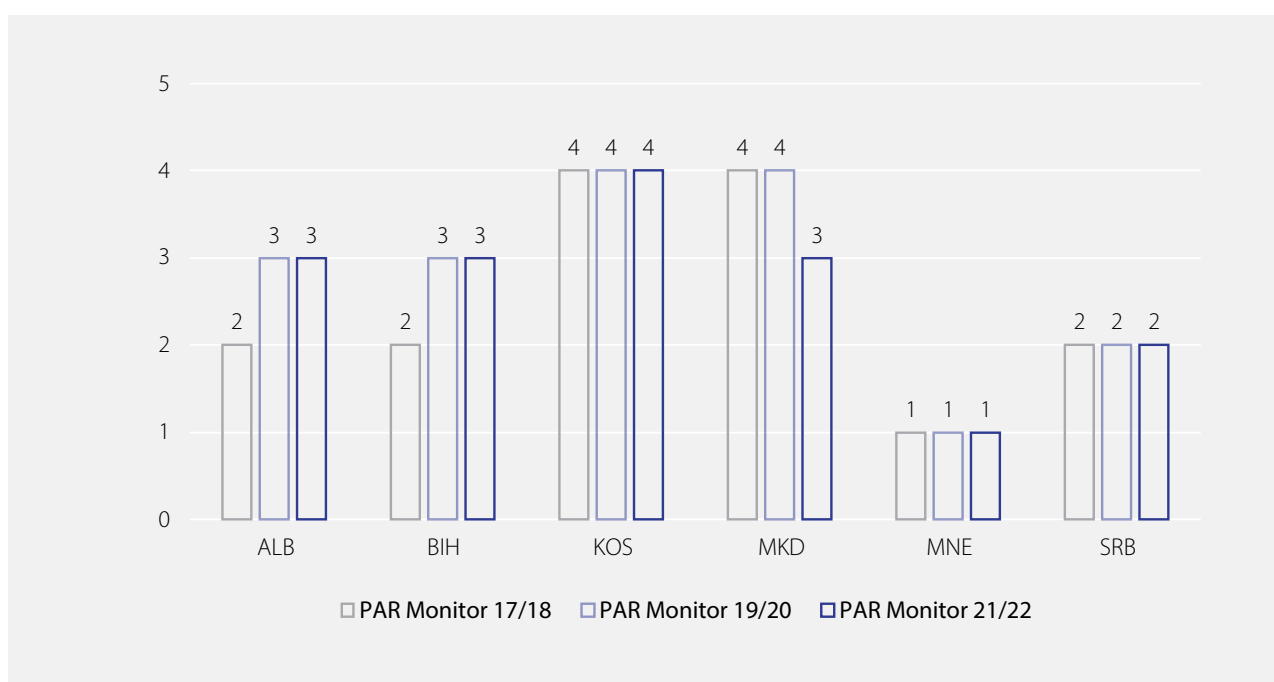
Principle 6: The operational framework for internal control defines responsibilities and powers, and its application by the budget organisations is consistent with the legislation governing public financial management and the public administration in general

Principle 8: The operational framework for internal audit reflects international standards, and its application by the budget organisations is consistent with the legislation governing public administration and public financial management in general

The WeBER monitoring approach to these two principles is based on the transparency of the public internal financial control system (PIFC), including financial management and control (FMC), internal audits (IA), and central harmonisation units (CHUs). Therefore, the corresponding indicator, **"Public availability of information on public internal financial controls and the parliamentary scrutiny"** (6PFM_P6&8_I1) is composed of five elements.

Table 45: Element scores and corresponding indicator values for PFM_P6&P8_I1 "Public availability of information on public internal financial controls and the parliamentary scrutiny"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. Consolidated annual report on PIFC is regularly produced and published online	4	4	4	0	4	4	4
E2. Quality reviews of internal audit reports are regularly produced and published online	2	0	0	0	0	0	1
E3. Ministries publish information related to financial management and control	2	2	0	0	2	2	1
E4. CHUs proactively engage with the public	2	0	0	0	0	0	0
E5. Parliament regularly deliberates on/reviews the consolidated report on PIFC	2	0	1	0	0	0	0
Total points	12	6	5	0	6	6↑	6↑
Indicator value 2021/2022[161]	0-5	2	2	0	2	2	2
Indicator value 2019/2020	*0-5*	*2*	*2*	*0*	*2*	*1*	*1*
Indicator value 2017/2018		*3*	*2*	*0*	*2*	*1*	*1*

No major transparency measures have been observed in the PIFC area. As in the previous PAR Monitor edition, the publication of consolidated reports on PIFC in the public sector is mostly in place. The CHUs have published them regularly for 2020 and 2021 in all administrations but in Kosovo, where a trend of non-publication of these reports exists since the baseline measurement. In four administrations, PIFC reports are available at the designated locations on the websites of ministries in charge of finance (Albania, BIH, North Macedonia, Serbia), where all the past versions can be easily accessed. On the opposite pole are Montenegro, where no such location exists, and reports are available only by using the search on the central portal of the Government,[162] and BIH, with a dedicated and public CHU portal.[163] The most notable development is the full regularity of reporting in Serbia for the first time, although PIFC reports are still released at the end of the year.[164]

Besides the publication of annual consolidated reports, CHUs in the region barely practice transparency regarding their work on internal audit quality reviews or public engagement. Quality reviews are published only by the Serbian CHU, while occasional but still scarce communication with the public occurs through press releases (BIH) or media appearances by CHU staff (Serbia).

■ **Good practices: Continuous publishing of internal audit quality reviews**

The **Serbian** CHU remains the only institution in charge of PIFC in the region with established practices of publishing internal audit quality reviews online. As noted in the previous PAR Monitors, CHU started publicising them in 2016. They are accessible from the designated website location, used to publish consolidated reports on PIFC, and have been produced in the same fairly formalistic structure and style over the years. Since 2016, public disclosure of such review documents has been skipped only in 2018; nevertheless, when published, these documents cover one year and nine months. For instance, e.g., in the quality review from June 2021, the internal audit work of selected budget beneficiaries from January 2020 to September 2021 was assessed.[165] As noted in the previous PAR Monitor editions, it would benefit the interested public if quality reviews were promoted online and made more reader-friendly.

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161 Conversion of points: 0-2 points = 0; 3-4 points = 1; 5-6 points = 2; 7-8 points = 3; 9-10 points = 4; 11-12 points = 5.
162 At the time of monitoring, PIFC reports for Montenegro were available as proposals. 2021 report available at: https://www.gov.me/dokumenta/910af910-20f2-4040-bdef-25d494d07dba (last accessed on 7 February 2023).
163 Available at: https://chj.mft.gov.ba/ (last accessed on 7 February 2023).
164 During the initial monitoring work in August 2022, the 2021 PIFC report was not published but later in early October.
165 It should be highlighted that the 2021 internal audit quality review for 2021, dated 14 June 2022, was not available online at the time of monitoring in August 2022. Available at: https://mfin.gov.rs/o-ministarstvu/dokumenti (last accessed on 7 February 2023).

Regarding ministries in the region, their practices of publicly releasing basic FMC information remain mostly scattered, with no firm standards as to what information needs or should be publicly promoted. Ministries in Montenegro are most proactive in publishing risk registers or books of procedures, whereas those in North Macedonia frequently inform on persons appointed to oversee FMC. Despite the slight increase in the number of such disclosures, in only two administrations, most ministries publish basic FMC information (table below). Given the importance of PIFC in EU accession processes, which is part of the fundamental cluster, it needs to be reiterated that access to at least basic information, and greater public scrutiny, remain essential from the perspective of civil society. The table below summarises the transparency of FMC elements among regional ministries.

Table 46: Publishing of basic FMC information by ministries in the region

# of ministries		# of FMC information publicly released			% of all ministries publishing at least a single piece of information	Percentage point difference as compared to PAR Monitor 19/20
		Risk register(s)	Book of procedures	Appointed FMC Managers		
ALB	11	2	0	8	**82%**	**+27**
BIH	9	0	0	0	**0%**	**-**
KOS	18	0	1	5	**33%**	**+20**
MKD	16	1	0	14	**88%**	**-**
MNE	18	6	6	0	**50%**	**+21**
SRB[166]	21	4	2	4	**38%**	**+9**

Note: in some instances, the percentage point difference was affected by the availability of observed FMC information and the different number of ministries covered compared to the 2019/2020 PAR Monitor.
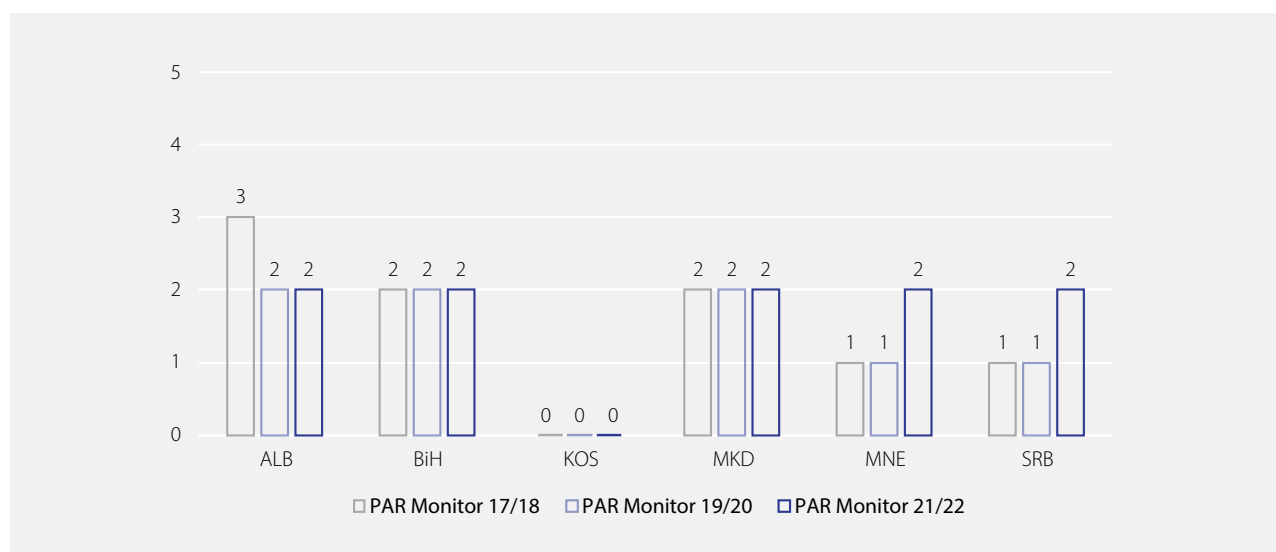
Finally, as in the 2019/2020 cycle, the Parliamentary Assembly of BIH practised parliamentary scrutiny of annual PIFC reports only. However, unlike in the previous measurement, consolidated reports for a single and not two consecutive calendar years were adopted.[167] That said, practices of parliamentary review of PIFC reports have continually decreased since the baseline monitoring.

Overall, the indicator values have increased in Montenegro and Serbia due to slightly more information available compared to the 2019/2020 monitoring cycle. Apart from Kosovo, all the region's administrations are assessed with a value of 2.

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166 Calculation excluded cabinets of ministers without portfolio (2) in the Government that was formed in October 2020 and dissolved in October 2022.
167 The Parliamentary Assembly reviewed consolidated reports covering 2020 (for both FMC and IA) in May 2021, available at: https://www.parlament.ba/act/ActDetails?actId=1436 and https://www.parlament.ba/act/ActDetails?actId=1437 (last accessed on 7 February 2023).

Principle 11: There is central institutional and administrative capacity to develop, implement and monitor procurement policy effectively and efficiently

Principle 13: Public procurement operations comply with basic principles of equal treatment, non-discrimination, proportionality and transparency, while ensuring the most efficient use of public funds and making best use of modern procurement techniques and methods

WeBER approach to these principles emphasises the public availability and online accessibility of specific public procurement policy information and documents. It focuses on the practices of central procurement authorities, ministries (as one of the key contracting authorities), and national public procurement portals. The transparency of procurement policy is essential for governmental financial accountability and effective policy outcomes from public procurements. For the indicator "**Availability of public procurement-related information to the public**" (PFM_P11&13_I1), baseline values are determined in PAR Monitor 2019/2020, and it consists of eight elements.

Table 47: Element scores and corresponding indicator values for PFM_P11&13_I1 "Availability of public procurement related information to the public"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. Central procurement authority regularly reports to the public on the implementation of overall public procurement policy	**4**	4	0	4	2	4	4
E2. Central review body regularly reports to the public on procedures for the protection of rights of bidders in public procurement	**4**	4	4	4	2	2	2
E3. Reporting on public procurement by the central procurement is citizen-friendly and accessible	**2**	2	1	1	2	2	1
E4. Public procurement portal is user-friendly	**2**	2	0	2	2	1	2
E5. Central-level contracting authorities regularly publish annual procurement plans	**4**	0	4	4	4	0	4
E6. Central-level contracting authorities regularly publish annual procurement reports	**4**	0	0	0	0	4	0

E7. Central procurement authority publishes open procurement data	**2**	2	0	0	0	0	2
E8. Open and competitive procedures are the main method of public procurement	**4**	4	0	2	0	0	4
Total points	**26**	**18↑**	**9↑**	**17↓**	**12↓**	**13↓**	**19↑**
Indicator value 2021/2022[168]	**0-5**	**4**	**1**	**3**	**2**	**2**	**4**
Indicator value 2019/2020	*0-5*	*3*	*0*	*4*	*4*	*4*	*2*

Central procurement bodies continued to report on the annual stock of procurements implemented by contracting authorities and the cases of appeals for the protection of rights. Although central reporting practices are no new development in WB, reports are not entirely or timely accessible still, or approaches to reporting are fragmented. For instance, central bodies in Albania and Kosovo regularly reported online for three consecutive years, while those in Montenegro and Serbia were slightly less diligent. In BIH, the Public Procurement Agency separately reports on its annual activity, contract awards, and monitoring procedures. Coupled with irregularity in the publication of reports over the years, it makes for the region's narrowest opportunities for public access. The table below displays only two cases of entirely regular online reporting in the observed period (Albania, Kosovo), compared to three cases in the 2019/2020 cycle, when the same pattern was observed in Montenegro.

Table 48: Public procurement reporting regularity by central authorities (October 2022)

	Central procurement authority			Review body		
	2019	2020	2021	2019	2020	2021
ALB	Public Procurement Agency			Public Procurement Commission		
	✓	✓	✓	✓	✓	✓
BIH[169]	Public Procurement Agency BIH			Procurement Review Body		
	X	**X**	**X**	✓	✓	✓
KOS	Public Procurement Regulatory Commission			Procurement Review Body		
	✓	✓	✓	✓	✓	✓
MKD	Public Procurement Bureau			State Commission for Public Procurement Appeals		
	✓	✓	**X**	✓	✓	**X**
MNE	Directorate General for Public Procurement			Commission for the Control of PP Procedures		
	✓	✓	✓	✓	✓	**X**
SRB	Public Procurement Office			Republic Commission for Protection of Rights		
	✓	✓	✓	✓	✓	**X**

As determined in the previous monitoring round, annual reports compiled by central procurement authorities (indicated in the left column in the above table) remain citizen-friendly and accessible for the most part. In half of the administrations, annual reports contain reader-friendly summaries of the main procurement outcomes in the reporting period (except in BIH, Kosovo, and Serbia). Once again, featured examples are reports of the Directorate General for Public Procurement in Montenegro, containing key trends over the years and the

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168 Conversion of points: 0-5 points = 0; 6-9 points = 1; 10-13 points = 2; 14-17 points = 3; 18-21 points = 4; 22-26 points = 5.

169 For the state level in BIH, annual reporting on public procurement is done separately for awarding contracts and monitoring public procurement procedures. Both reports were available for 2019 only at the time of measurement.

"personal ID" of public procurements – a sheet with all the key numerical information. In all administrations, annual reports use visual data presentations that resonate with broader audiences and are stored at designated, easily accessible locations online. Overall, the approach to reporting has remained at a moderate-to-high degree of citizen-friendliness, with no notable developments between the two monitoring exercises.

Central procurement authorities in the region maintain public procurement portals - essential transparency tools for actors in public procurement procedures and the interested public. In terms of the content and functions offered, no major developments have been observed. In Kosovo, visitors do not have to registere anymore to be able to explore data on the portal, which leaves only the portal BIH with such a restriction.[170] As before, access to tender documentation via portals is available at no cost and unlike glossaries of public procurement terms, how-to guides and frequently asked questions are mostly available for easier navigation. In addition, most portals support extensive search functions per free text, notice types, contracting authorities, and other key categories.[171] It is noteworthy that even after introducing a new e-procurement system in Montenegro in January 2021, the same user-friendly functionalities remain uninstalled.[172] The table below provides an overall summary of procurement portals' user-friendly features.

Table 49: Public procurement portal user-friendly functionalities and contents

	Registra-tion-free access	Charge-free	Glossary	How-to guide	FAQ	Search	Open data export
ALB	Yes	Yes	No	Yes	Yes	Yes	CSV (change)
BIH	No	Yes	No	Yes	No	No	-
KOS	Yes	Yes	Yes	Yes	Yes	No	-
MKD	Yes	Yes	No	Yes	Yes	Yes	-
MNE	Yes	Yes	No	No	No	Yes	-
SRB	Yes	Yes	No	Yes	Yes	Yes	xlsx, xml, json

Ministries in the region, as central contracting authorities, still lack the basic transparency levels on their annual public procurement activity. As in the PAR Monitor 2019/2020, all administrations regularly publicise annual procurement plans, save for Albania. In contrast, reports on implementing such plans are mainly absent from their websites or public procurement portals. Aside from Montenegro and Serbia, which remain at the forefront regarding the public availability of ministries' annual reports, there is barely a report published in the rest of the region (table below). Overall, since the previous monitoring cycle, when the baseline measurement was done for this indicator, a slight increase in practices of publicising annual public procurement documents has been recorded in Albania, BIH, and Serbia.

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170 Registration for full access to the entire tender documentation is sometimes required, as in Kosovo, North Macedonia, and Serbia.
171 Specific portals have more extensive search options than the PAR Monitor methodology requires.
172 Available at: https://cejn.gov.me/tenders (last accessed on 15 February 2023).

Table 50: Public availability of annual procurement documents by ministries

		Procurement plans		Procurement reports	
		2021	**2022**	**2020**	**2021**
ALB	#	2	1	1	1
	%	18%	9%	9%	9%
BIH	#	9	9	1	1
	%	100	100%	11%	11%
KOS	#	18	18	0	0
	%	100%	100%	-	-
MKD	#	16	16	0	0
	%	100%	100%	-	-
MNE[173]	#	17	18	17	17
	%	100%	90%	100%	100%
SRB[174]	#	23	23	19	22
	%	100%	100%	82%	95%

Open procurement data remain scarcely available in the region for further use through public procurement or national open data portals. Only in Serbia did the central authority, the Public Procurement Office, integrate the option for data export from almost all sections on the public procurement portal in different open formats (xlsx, xml, json),[175] whereas such an opportunity is no longer freely available from the Kosovo portal, open data can be accessed only upon registration. The most significant step forward, however, has been made by the Public Procurement Agency in Albania, which has published, on its website, multi-year open procurement data series.

■ **Good practices: Publishing of annual open data time series on public procurements**

> As a new development since the 2019/2020 cycle, the Public Procurement Agency in **Albania** has included open datasets on the annual implementation of public procurement procedures on its website. The open data tab, directing visitors to the said datasets, is easily accessible from the Agency's homepage, and, at the moment, published data goes back to 2010.[176] Regarding content, users can access annual data according to contracting authorities, types of procedures, procurement subjects, number of bids submitted, awarded contracts, suspended or cancelled public procurements, and more.

When it comes to the main method for operating public procurements in the region, the assessment has shown that open methods remain prevalent but not fully used. According to the 2021 annual reports of central procurement authorities, in two administrations, open and unrestricted methods constituted 95% or more of all annual procurements implemented within a year (Albania, Serbia); in Kosovo, it stood at 85%, and in Montenegro, only at 73%.[177] As in the 2019/2020 PAR Monitor, no information was available for BIH due to the unavailable report for 2021 at the time of monitoring with the addition of North Macedonia in this cycle.[178]

Overall, publicity of basic procurement information remains moderate. The indicator values have shifted in all administrations in this cycle due to new practices introduced or cease of previously established ones. There was a positive development in three administrations due to open data availability (Albania) and more ministries disclosing public procurement annual documents (BIH, Serbia). Similarly, the lower results are mainly due to breaks in publicising annual reports by central procurement bodies or ministries (Montenegro, North Macedonia) and restrictions to open data access (Kosovo).

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173 Due to governmental re-organisation in April 2022, there is a difference in the total number of ministries for 2022 and previous years.

174 The calculation included cabinets of ministers without portfolio (2) in the Government that was formed in October 2020 and dissolved in October 2022.

175 Available at: https://jnportal.ujn.gov.rs/postupci-svi (last accessed on 15 February 2023).

176 Available at: https://www.app.gov.al/eksportimi-i-procedurave-te-publikuara/ (last accessed on 15 February 2023).

177 For maximum points, the WeBER methodology stipulates that the percentage of procedures other than open and competitive is up to 5%.

178 Open and competitive procedures are the main method of public procurement in North Macedonia, according to the 2020 annual activity report of the Public Procurement Bureau.
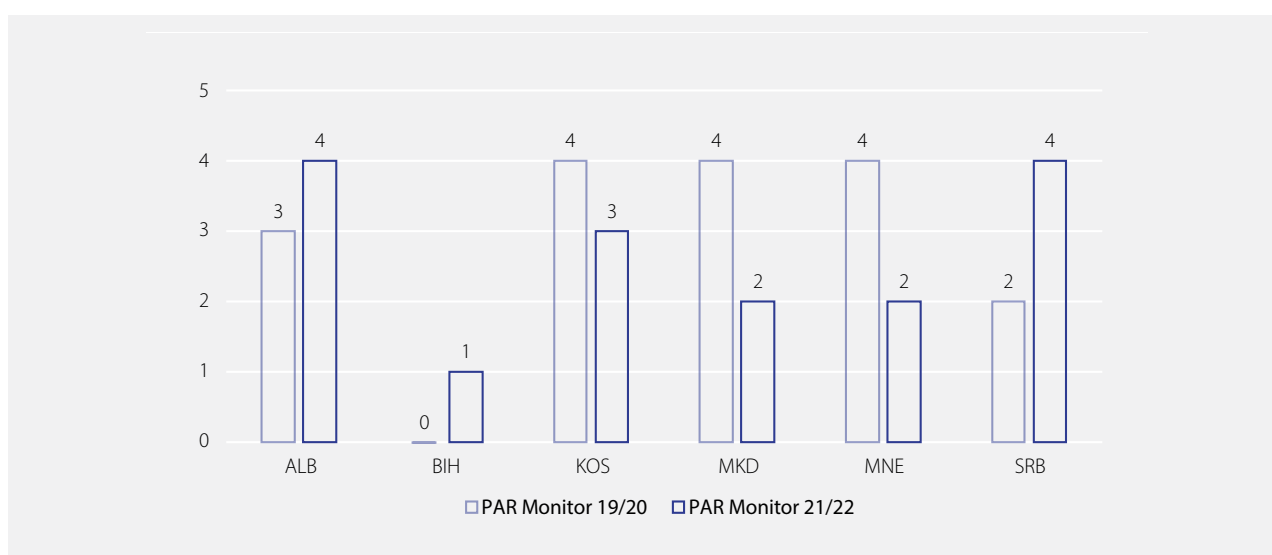
Principle 16: The supreme audit institution applies standards in a neutral and objective manner to ensure high-quality audits, which positively impact on the functioning of the public sector

WeBER approaches this principle from the perspective of SAIs' external communication to all interested stakeholders outside of the parliament, as such practices can help improve the culture of accountability in society. The **"Supreme audit institution's communication and cooperation with the public pertaining to its work"** (PFM_P16_I1) indicator consists of six elements.

Table 51: Element scores and corresponding indicator values for PFM_P16_I1 "Supreme audit institution's communication and cooperation with the public pertaining to its work"

Indicator element	MAX	ALB	BIH	KOS	MKD	MNE	SRB
E1. SAI develops a communication strategy for reaching out to the public	**4**	4	4	4	4	4	4
E2. SAI has dedicated at least one job position for proactive communication and provision of feedback to the public	**4**	4	4	2	4	2	4
E3. SAI utilises various means of communication with the public	**2**	1	1	2	2	1	1
E4. SAI produces citizen-friendly summaries of audit reports	**4**	0	4	0	4	4	4
E5. Official channels for submitting complaints or initiatives to SAI by external stakeholders are developed (wider public, CSOs)	**2**	2	2	0	2	0	0
E6. SAI consults CSOs and their work for the purpose of identifying risks in the public sector	**2**	0	2	1	2	0	0
Total points	**18**	**11**	**17↑**	**9**	**18↑**	**11**	**13**
Indicator value 2021/2022[179]	**0-5**	**3**	**5**	**3**	**5**	**3**	**4**
Indicator value 2019/2020	0-5	3	4	3	3	3	4
Indicator value 2017/2018		4	1	3	0	1	2

In line with the developments over the past monitoring rounds, regional administrations have continued to

[179] Conversion of points: 0-3 points = 0; 4-5 points = 1; 6-7 points = 2; 8-11 points = 3; 12-15 points = 4; 16-18 points = 5.

record improved results in the communication of external audits. For the first time since the baseline PAR Monitor 2017/2018, all regional SAIs have adopted and are implementing external communication plans or strategies. Needs for establishing or strengthening communication activities with the main stakeholders, both state and non-state, have already been recognised in the strategic development plans of SAIs, and dedicated documents now operationalise these. The table below provides a brief overview of currently implemented communication plans.

Table 52: Overview of communication strategies of SAIs in WB

	document	overall goal
ALB	Communication Strategy 2022-2025 https://panel.klsh.org.al/storage/phpnl7OKn.pdf	To build trust with relevant stakeholders; to ensure that the impartiality, fairness, and professionalism in the work of ALSAI is effectively communicated; and to broaden the reach of its work and its impact.
BIH	Communication Strategy 2022-2025 https://bit.ly/3K6mIEl	To increase the understanding of the role and mandate of the institution; to increase its visibility, reputation, and influence, and to increase the implementation of its recommendations.
KOS	Communication Strategy 2020-2022 https://bit.ly/3XokO52	To enhance impact and raise public awareness of KNAO's role.
MKD	Communication Strategy 2020-2023	To increase awareness among the public on the role and task of the institution and to strengthen its position as institution that serves the public interest.
MNE	Communication Strategy 2020-2024 https://bit.ly/3YB5Wlm	To strengthen the trust of key stakeholders in the institution' to increase the visibility of audit reports and awareness and understanding of key stakeholders.
SRB	Communication Strategy 2022-2025 (*not available publicly*)[180]	/

Note: links to documents last accessed on 15 February 2023

Practices to avoid: Communication strategy does not get published

Based on its Strategic Plan for 2019-2023, the Council of the **SAI of Serbia** adopted the Communication Strategy in December 2021. With this strategy in place, the SAI intends to preserve its reputation and influence through partnerships with key stakeholders, to increase audit impact.[181] Nevertheless, the Communication Strategy was not a publicly available document at the time of monitoring or writing this report – the only such case in the WB region. Since the strategic communication approaches are designed to increase trust, mutual understanding, and cooperation among key stakeholders in the external audit process, informed public and civil society included, transparency of planned measures and activities would only contribute to such goals.

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180 The SAI of Serbia confirmed the existence of the Communication Strategy. Internal act on the adoption of the Strategy received as evidence.
181 Goal 3, Objective 3.4 of the Strategic Plan of SAI, available at: https://dri.rs/strategic-plan (last accessed on 15 February 2023).

Furthermore, all SAIs have kept at least a job position for proactive external communication, tasked with entail at least one of the following tasks: 1) the preparation of information, documents, and other materials for proactive communication with the public, 2) answering citizens' questions and queries related to SAIs' scopes of work, and 3) handling citizens' inputs regarding the utilisation of public funds. However, planning and staffing such job posts only sometimes mean using many tools for proactive communication in practice, although each regional SAI does proactively reach out. For example, all institutions produce promotional and informative materials, mainly as brochures (BIH, Kosovo, North Macedonia), infographics (BIH, Montenegro), or recently made video material (Serbia North Macedonia). In addition, in half the region SAIs utilise social networks regularly, while press conferences are occasionally organised. On the other hand, SAIs still need to engage in online data visualisations and rarely organise public events for external stakeholders. Notably, the Albania Supreme State Audit Institution has discontinued its good practice of hosting the annual event "Open Month for Citizens", which allows citizens, civil society, academia, and professionals to get acquainted with the institution. The table below summarises information on the communication channels used.

Table 53: Communication means used for proactive external communication

	Press conferences (min. two annually)	Social networks (at least one)	Promo materials (leaflet, video, etc.)	Events/ campaigns (fairs, stands etc.)	Data visualisations
ALB	X	LinkedIn (inactive)	Audit bulletins	X	X
BIH	X	Twitter	Brochures Infographics	X	X
KOS	✓	Facebook	Brochures	X	X
MKD	✓	Facebook LinkedIn	Brochures YouTube videos	X	X
MNE	X	X	Infographics	X	X
SRB	X	X	Videos	✓	X

■ **Good practices: Exploring new ways for promotion and engaging with the stakeholders**

The **State Audit Office of North Macedonia** has visibly enhanced its stakeholder engagement since the baseline PAR Monitor. Among the new ways of communication is a YouTube video, produced with the support of the Twinning project, summarising a completed audit on the exploitation of water resources in electricity production.[182] It remains to be seen whether such a good practice will be continued in the future with more audits being presented using short video formats. Also, within the same project, a brochure was prepared that details how the State Audit Office communicates and cooperates with partners and stakeholders. The Audit Office has previously installed an online feedback poll on stakeholders' satisfaction with cooperation and communication practices.[183]

As mentioned in the previous PAR Monitor edition, **the Audit Office of BIH** institutions has significantly improved the volume of content and user experience on its portal over the years, offering plenty of resources and possibilities, with key information being accessible already from the homepage. In addition, the Audit Office introduced in December 2022 an online satisfaction poll for website users to gather their feedback.[184]

The State Audit Institution of Serbia revamped its website at the end of 2022. Among the key improvements is a facilitated search of reports on completed audits through different filtering options per audit subject, year, types of audits or audit products, and SAI sectors.[185] With the new website, the SAI has also created an online open data section containing two datasets on certified SAI auditors in two different formats.[186] It is noteworthy that SAI of Serbia additionally publishes two reports from the audit cycle online - response reports by auditees and post-audit reports.

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182 Available at: https://www.youtube.com/watch?v=1WtJlcCM9y8 (last accessed on 15 February 2023).
183 Available at: https://dzr.mk/en/public-poll (last accessed on 15 February 2023).
184 Available at: http://revizija.gov.ba/Poll/Vote/7?lang=bs (last accessed on 15 February 2023).
185 Available at: https://dri.rs/izvestaji (last accessed on 15 February 2023).
186 Available at: https://dri.rs/open-data (last accessed on 15 February 2023).

Since the 2017/2018 baseline monitoring, the trend of making audits more reader-friendly has continued. The State Audit Office of North Macedonia has joined its peers in BIH and Serbia in publishing concise summaries of all audit reports with key audit results and conclusions. Noteworthy is the example of the State Audit Institution in Montenegro, as it has started publicising summaries for all the completed reports, and a high majority has been assessed as citizen friendly. As a positive development, the Supreme State Audit Institution in Albania has recently started to issue press releases for its 2022 audits; however, with telling inconsistencies in formats. The table below provides an overview of the assessment of audit reports in the observed period.

Table 54: Citizen-friendliness of published audit reports[187]

PAR Monitor 21/22	ALB	BIH	KOS	MKD	MNE	SRB
# of reports	105	79	46	66	36	263
# of citizen-friendly	0	79	0	66	31	263
% citizen-friendly audit reports	**0%**	**100%**	**0%**	**100%**	**86%**	**100%**
PAR Monitor 19/20 %	*0%*	*100%*	*0%*	*0%*	*71%*	*100%*
PAR Monitor 17/18 %	*0%*	*6%*	*71%*	*0%*	*14%*	*1%*

■ **Good practice: Citizen-friendly audit digests - continued**

The SAI in Serbia has maintained publishing one-page summaries of all audit reports. Even after renewing its website, it has dedicated an online section where such audit summaries are available.188 They have remained consistent in structure and style over the years; depending on the audit type, they can vary slightly in length. Nevertheless, the SAI maintains brief and concise descriptions of main audit findings and recommendations while approaches to summarising performance audit work remain distinct, language- and content-wise.

The Audit Office in BIH has kept the practice of annually summarising all audit reports. Accordingly, the latest annual summary was published in October 2022 for the audit work performed in 2021.189 These publications characterise a clear and citizen-friendly approach to explaining completed audits, per their type. In addition, the Audit Office has continued to publicise the annual reports on the main findings and recommendations from audit reports, the latest issue being November 2022.190

As in the 2019/2020 monitoring cycle, three SAIs allow two-way communication via tailored online channels (Albania, North Macedonia, BIH), asking the citizens and other stakeholders to submit their concerns and audit tips for potential consideration. In Albania, it maintains a channel for complaint submission on potential abuses,[191] while North Macedonian citizens can still submit the so-called requests for revision and attach evidence,[192] and both SAIs keep basic statistics on their processing. In BIH, the Audit Office invites stakeholders to send feedback, enquiries, and suggestions in a more general form; however, the usage rate is still quite low. In all cases, established channels are functional in practice (confirmed after completed tests by researchers). There are no similar mechanisms in the region, although SAIs receive citizens' initiatives and process them internally.

Finally, all the institutions in the region remain open to cooperation with civil society, manifested mostly in participation in events and collaborations on donor-funded projects. Still, regarding seeking feedback from CSOs during audit plan preparations, SAIs in BIH, Kosovo, and North Macedonia practice such consultations

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187 All audit reports published in the twelve months preceding the measurement were analysed, and only finalised audits were considered. In most cases, a period of twelve months preceding October 2022 was observed, apart from Serbia, due to slightly earlier start dates of measurement.
188 Available at: https://dri.rs/sazeci-izvestaja (last accessed on 15 February 2023).
189 Available at: http://www.revizija.gov.ba/Content/Read/skraceni-izvjestaji (last accessed on 15 February 2023).
190 Available at: http://www.revizija.gov.ba/Content/Read/godisnji-izvjetaji-revizije-o-glavnim-nalazima-i-preporukama (last accessed on 15 February 2023).
191 Available at: https://www.klsh.org.al/denunciations (last accessed on 15 February 2023).
192 Available at: https://dzr.mk/mk/contact/barane_za_revizija (last accessed on 15 February 2023).

more regularly. As stated in the previous PAR Monitor, the Audit Office of BIH holds such consultations annually.[193] Kosovo's National Audit Office held one consultation within two years before the measurement in June 2022.[194] State Audit Office in North Macedonia has signed memoranda of cooperation with CSOs, according to the 2021 annual activity report, and has held a consultative meeting with civil society in 2021.[195] National Audit Office in Kosovo remains the only SAI that has formally committed to practice consultations with civil society on audit issues.[196]

Efforts of SAIs in the region to reach out to external stakeholders remain positively assessed. Communication strategies are being implemented, and new initiatives and ideas are tested or implemented for better outreach and communication of external audit work. On average, indicator values remain high in the entire region, with the SAIs in BIH and in North Macedonia receiving the highest assessments.

Chart 66: Indicator values for PMF_P16_I1 - comparison of values for the 2017/2018, 2019/2020, and 2021/2022 monitoring cycles
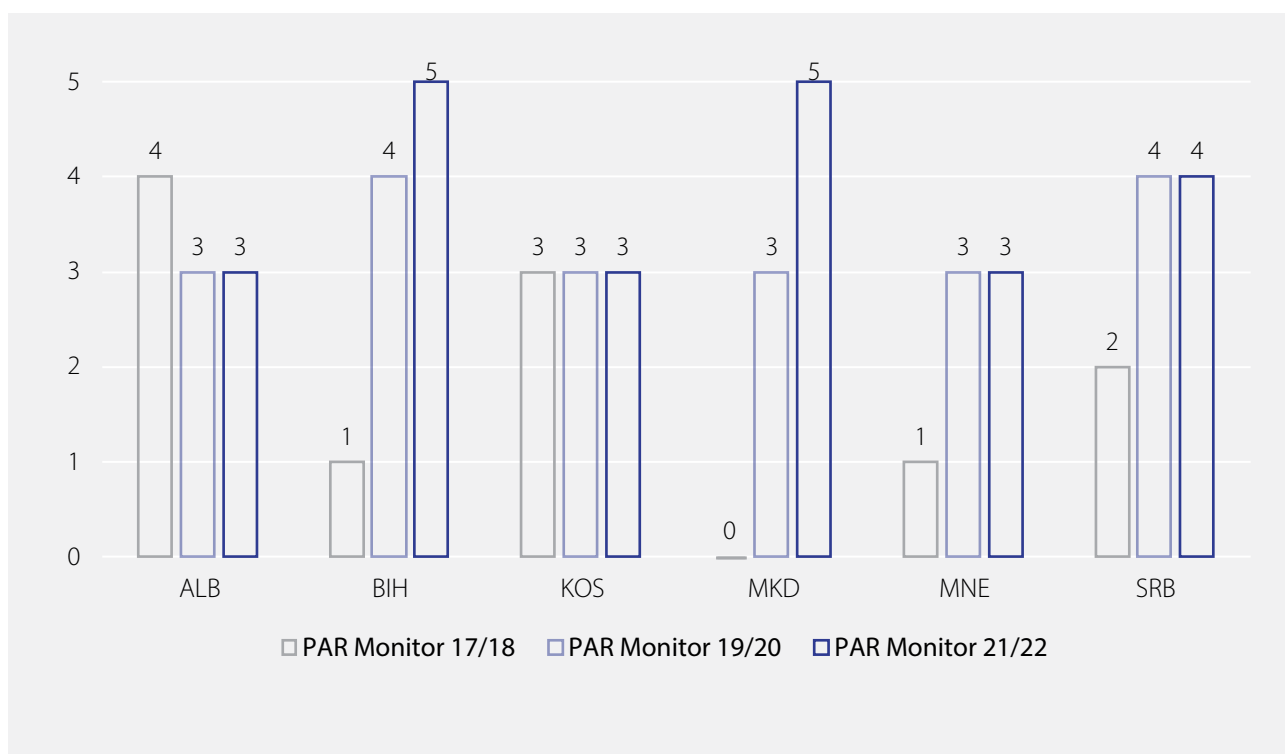
193 The information in the 2021 and 2020 annual reports of the Audit Office is available at: https://bit.ly/39hrCvu (last accessed on 15 February 2023).
194 Available at: https://bit.ly/3Eb0qgP (last accessed on 15 February 2023).
195 See more information about signing memoranda with civil society and consultative meetings at: https://znm.org.mk/znm-i-dzr-potpishaa-mem-orandum-za-sorab/, https://dzr.mk/mk/200110-rabotna-sredba-megu-dzr-i-centarot-za-graganski-komunikacii, and https://dzr.mk/mk/220929-pot-pishan-memorandum-za-sorabotka-so-institutot-za-demokratija (last accessed on 15 February 2023).
196 Regulation (NAO) No. 01/2021 on internal organisation and systematisation of job positions, available at: https://bit.ly/3Ke6lph (last accessed on 15 February 2023).

VII.4 Summary of results in the public financial management area

In this area, WeBER monitors the availability of budgetary data along with external communication practices. Official websites are reviewed to assess: 1) the transparency and accessibility of annual budget data, 2) how governments communicate with citizens about PIFC, 3) the availability of public procurement information, and 4) the degree to which information is publicly available about the work of SAIs.

Budgetary transparency has remained at a moderate level in the region. Ministries of finance regularly publish annual state budgets, and various in-year budgetary reports are publicly available, but these documents need to be regularly or accessibly published in each case. In Montenegro and Serbia, mid-year reports remain unpublished, and in this cycle, in North Macedonia. At the same time, publicly available budget execution reports in these three administrations are the least comprehensive. In contrast, expenditures by budget users and government functions are frequently reported in the rest of the region. Availability of non-financial performance information has increased, with four administrations disclosing some performance data, except for Kosovo and Montenegro. Citizen budgets have yet to be prepared in BIH since 2020. Annual budgetary data is largely available in some open data formats, but all administrations still need to follow the open data policy strictly.

PIFC transparency in the region has only slightly improved in Montenegro and Serbia; however, opportunities for public scrutiny still need to be expanded overall. Ministries of finance (except for Kosovo) publish annual consolidated reports. However, they still need more proactivity regarding the publication of internal audit quality reviews - except for Serbia - and more engagement with the public. Regional ministries scarcely disclose basic FMC information online, although slight improvements are observed. The Parliamentary Assembly in BIH was, once again, the only parliament in the region to review annual PIFC reports, although only partially regularly this time around.

In the region, central procurement bodies are practising the publication of annual reports with the least regular timeline in BIH. The main procurement outcomes are generally reader-friendly, and report documents are easily accessible. Public procurement portals offer different user-friendly functions, but practices vary across the region regarding access levels for unregistered users and options for assisting users in portal navigation. Ministries in the region publicise annual procurement plans more often than reports, and those in Montenegro and Serbia are the most diligent. Serbia's public procurement portal is the only one with an open data export option; however, the Public Procurement Agency in Albania has published open procurement data for 2010-2023. In 2021, open procedures were still the main method used; however, they constituted more than 90% of the procedures in just two cases.

Public communication practices of supreme audit institutions received high assessments once again. All SAIs have adopted communication strategies between two monitoring rounds and kept job positions for proactive communication with stakeholders. New communication tools and products for public information are being tested; however, SAIs still need to embrace social media fully. SAIs in BIH, Serbia, and North Macedonia are creating citizen-friendly digests for all finalised audits, and the one in Montenegro is just a little behind. As before, Albanian and North Macedonian SAIs invite citizens to submit their audit tips online, joined this time with the Audit Office in BIH (although with a more general invitation to submit "information, inquiries and suggestions"). Lastly, three regional SAIs remain devoted to consulting CSOs on audit priorities (BIH, Kosovo, North Macedonia); however, such consultations were only partially regular in the 2021/2022 monitoring cycle (Kosovo, North Macedonia).

VIII.
Conclusion

Regional PAR picture improves, but at what pace?

Completing the third PAR Monitor cycle is a milestone for the WeBER monitoring of administrative reforms. Built upon the baseline PAR Monitor 2017/2018 and the subsequent 2019/2020 cycle, its results allow civil societies, the interested public in the region, and the EU and other regional and international partners to trace back and follow PAR developments in the past five years, in those areas that matter the most in every-day life, such as openness and transparency of public administrations, and its accountability to citizens. The three completed monitoring cycles are a solid base of accumulated knowledge that helps us understand the pace and direction of PAR in the WB and are a springboard for rethinking the PAR Monitor approach in the future based on the lessons learned from the completed monitoring cycles. Even more so, purposeful rethinking and redesign are necessary considering the planned revisions of the EU approach to PAR in the accession process, i.e., modifications of the SIGMA Principles of PA and their monitoring framework, which is supposed to refresh and align the EU-sponsored PAR requirements with the modern-day administration needs.

That said, the 2021/2022 PAR Monitor exposes slight improvement regionally. At the same time, it has brought to light recurring practices of the administrations, who still face shared challenges and vulnerabilities. Normally, with each new monitoring, the WeBER team recognises and duly notes developments and highlights good regional examples. Still, the largely unchanging circumstances in many areas in the PAR Monitor's spotlight mean that for tangible improvements in all citizen-facing elements of PAR, we need continuous research and advocacy efforts and more direct citizen engagement in PAR. Finally, it means that stronger citizen-centred reform goals should still be a paramount concern for governments and other stakeholders.

The third PAR Monitor cycle results inform that many good PAR practices in the region come across as random examples without clear intention or effort to institutionalise them. What was a more open public administration in a specific PAR area can easily slide into regional underperformer. Or vice versa, the national assessments can swiftly improve due to small proactive measures that can significantly add to the transparency of specific corners of the administration's work. For these reasons, most WB administrations perform at an easy pace that, coupled with thematic backslidings and the introduction or dismantling of *ad hoc* practices with each new monitoring cycle, question the citizen-centricity of national PAR agendas. That said, regional practices remain fragile and highly prone to inconsistencies, which necessitates further commitment of governments in the WB to increase transparency and openness towards citizens.

Nevertheless, the results show that four administrations have gained more total scores (points) against the previous PAR Monitor for 2019/2020, except for North Macedonia and Montenegro. The overall improvement in performance, however, differs country by country and is tangibly higher in the case of Serbia (257 points versus 218 in the previous monitoring) or results in low-to-moderate increases in the rest of the region – from 6 points in Kosovo, up to 17 in BIH. For North Macedonia and Montenegro, the decrease in total score, for 8 and 4 points, means that the overall assessment has essentially remained similar as in the 2019/2020 cycle, with slight backsliding.

Such results point to at least three immediate conclusions. Namely, with the comparatively highest score in WB for the 2021/2022 cycle, Serbia emerges for the first time ahead of the rest of the region, changing places with Albania. Additionally, the lower end of the regional scale has been rearranged – with incremental score decreases, Montenegro is now behind the others due to fewer points gained on average, with North Macedonia taking the penultimate position (positions previously held by BIH and Kosovo). These backslidings could be attributed to, at least to a degree, political crisis and prolonged period of technical government in Montenegro, as well as slowly declining reform enthusiasm in North Macedonia due to the protracted process of EU integration. Finally, when total scores are expressed as a percentage of achievement, the regional picture sends the same message as in past monitoring cycles – no WB administration has achieved at least 50% of available points. Although Serbia and Albania are closer than others, with 42% and 38%, respectively, the rest of the WB ranges between 34 and 35%. In this monitoring cycle, Serbia and Albania went above the WB average, leaving other administrations slightly behind.
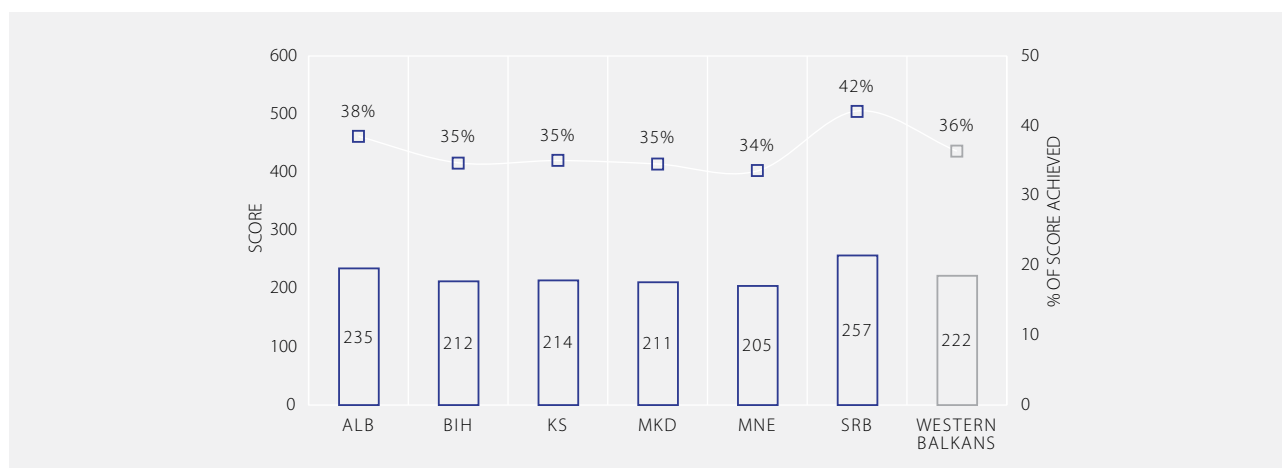
Looking at individual PAR areas, positive developments are seen in SFPAR, as WB administrations achieved 33% of available scores, compared to 29% in the previous cycle (charts 68 – 69). PAR authorities in Montenegro and Serbia are the main reasons for the improved SFPAR performance, as they have approached the development of a new PAR strategic framework in a more participatory manner (Serbia) while giving slightly more room for civil society organisations in the work of PAR monitoring and coordination bodies (Montenegro). The rest of the administrations did not improve their weak performance in this area over the past seven years.

Nevertheless, as in all monitoring cycles to date, WB administrations perform the best in SD and PFM, the only PAR areas in which they constantly achieve more than half of available scores – 57% for the former, and 58% for the latter, in the 2021/2022 edition. In SD, the majorly positive public perception of administrative service provision and moderate-to-high online availability of information for obtaining administrative services remain the main reasons for comparatively higher regional assessment. The regional outlook has also slightly improved on the availability of citizens' feedback on the quality of administrative services, which is owed primarily to greater transparency in Albania.

In PFM, traditionally positive assessments of the external communication practices by SAIs have improved even more, with SAIs in BIH and North Macedonia receiving the highest indicator values for the first time, which are at the same time the highest for the entire PFM when looking back to all past monitoring cycles. Additionally, contribution to the improved PFM performance regionally is owed to only slight but noteworthy improvements in public availability of PIFC information in Montenegro and Serbia, an area commonly receiving low assessments across PAR Monitors. Overall, performance in SD and PFM across monitoring cycles suggests that political commitment is among the key obstacles, or drivers, for PAR progress in WB.

As before, administrations in the region recorded tangibly poorer performance in all the other PAR areas, achieving less than 30% per area. Namely, PDC remains the area with the lowest achievement (26%, a percentage point up compared to 2019/2020), closely followed by weak performance in PSHRM (29%, a percentage point down) and ACC (29%, two percentage points up). It is important to highlight that, in these areas, PAR Monitor strongly relies on perceptions of civil society actors that are generally highly critical towards governments, as evidenced by all implemented monitoring cycles.

*Chart 68: PAR Monitor 2021/2022 - Average achievement per PAR area (%)*
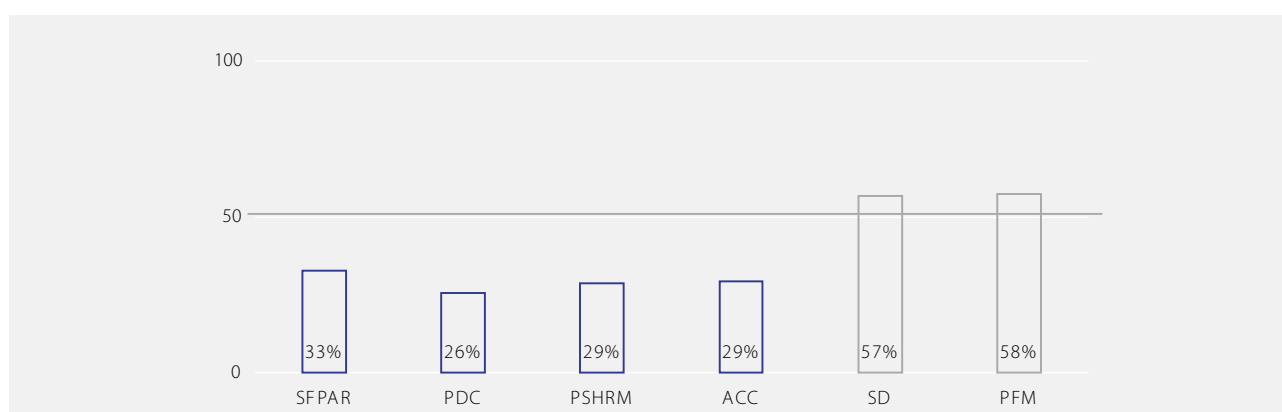
(Re)positioning across the six PAR areas

PAR Monitor 2021/2022 saw a change in leadership in four out of six PAR areas. As noted in the previous editions, such repositioning could indicate the changing priorities in WB administrations between monitoring cycles but also unstable and inconsistent practices over the years (see Charts 69 – 74). In certain cases, administrations have retaken lead positions occupied in the baseline monitoring, e.g., Albania in the SD area, or are leading for the first time, such as with Serbia in SFPAR or North Macedonia in ACC. Kosovo and Montenegro are the only administrations without a lead position. The table below gives a quick insight into performance per PAR area.

SFPAR	**Serbia takes over the leader's position in SFPAR** due to applying a more participatory approach in the development of the new PAR strategic framework. Montenegro, now placed second, still performs higher than the rest of the region, which has stayed at the same level of performance retrospectively.
PDC	**BIH remains the leader in the PDC area**, with Kosovo still following closely, despite a slight decrease in scores in both cases. Notably, due to the increased scope of conducted consultations and the new e-consultation portal, Serbia saw the clearest score improvement; however, only enough for the third spot. Reporting to the public by the BIH Council of Ministers remains among the key factors for the top position. In contrast, the lack thereof in Albania largely accounts for the still lowest regional outcome. The first position of BIH, for a third consecutive cycle, clearly shows that administration in BIH can demonstrate good performance and stability over time, when only state-level competencies are observed.
PSHRM	**Albania has led the PSHRM area** since the baseline PAR Monitor; however, good practices of depoliticisation and transparency continue to dissipate. As a result, the score difference with other administrations is slowly fading, and Serbia is now a close runner-up. Due to implemented reforms, Kosovo has jumped to the third spot in the region, switching places with Montenegro, which is holding the back of the queue with a tangible score drop. In Kosovo, though, comparatively fewer public competitions for filling in vacancies in civil service since the previous PAR Monitor meant that, in this cycle, assessments were based on smaller samples.
ACC	**North Macedonia has taken the lead in the ACC area** as the only administration that continuously improves proactive informing of the public. After being ahead for two consecutive cycles, Serbia saw an exact reverse development over the years, leaving even second position to BIH. For the first time, Montenegro has vacated the bottom spot, with Kosovo holding the last position due to the mix of its own poorer performance and small improvements in Albania and Montenegro.
SD	After the baseline PAR Monitor, **Albania retakes the first position in the SD area,** largely but not exclusively due to greater feedback transparency from service users. Despite taking a second position, Serbia remains a very close high performer. These two, together with Kosovo, perform above the regional average. Overall, almost all WB administrations continue to advance, also visible by the rising regional averages with each new monitoring. The same applies to BIH, despite being behind its regional peers ever since the start of the PAR Monitor implementation.
PFM	**PFM area saw a change in leadership, with Serbia being the frontrunner**, though by a very small margin vis-à-vis Albania, North Macedonia, and Kosovo. It means that traditionally good regional performers have remained highly positioned, with changing leadership with each monitoring. Four administrations have gained more total scores than the 2019/2020 cycle, and four perform above the regional average. It is owed to even more enhanced communication practices of SAIs (BIH, North Macedonia) and changing patterns in budgetary and PIFC transparency. Notably, only Montenegro and North Macedonia did not improve their overall PFM result due to tangible drops in public procurement transparency.

Chart 69 – 74: Scores and regional averages in three PAR Monitors (2017/2018 in blue, 2019/2020 in orange, 2021/2022 in grey)
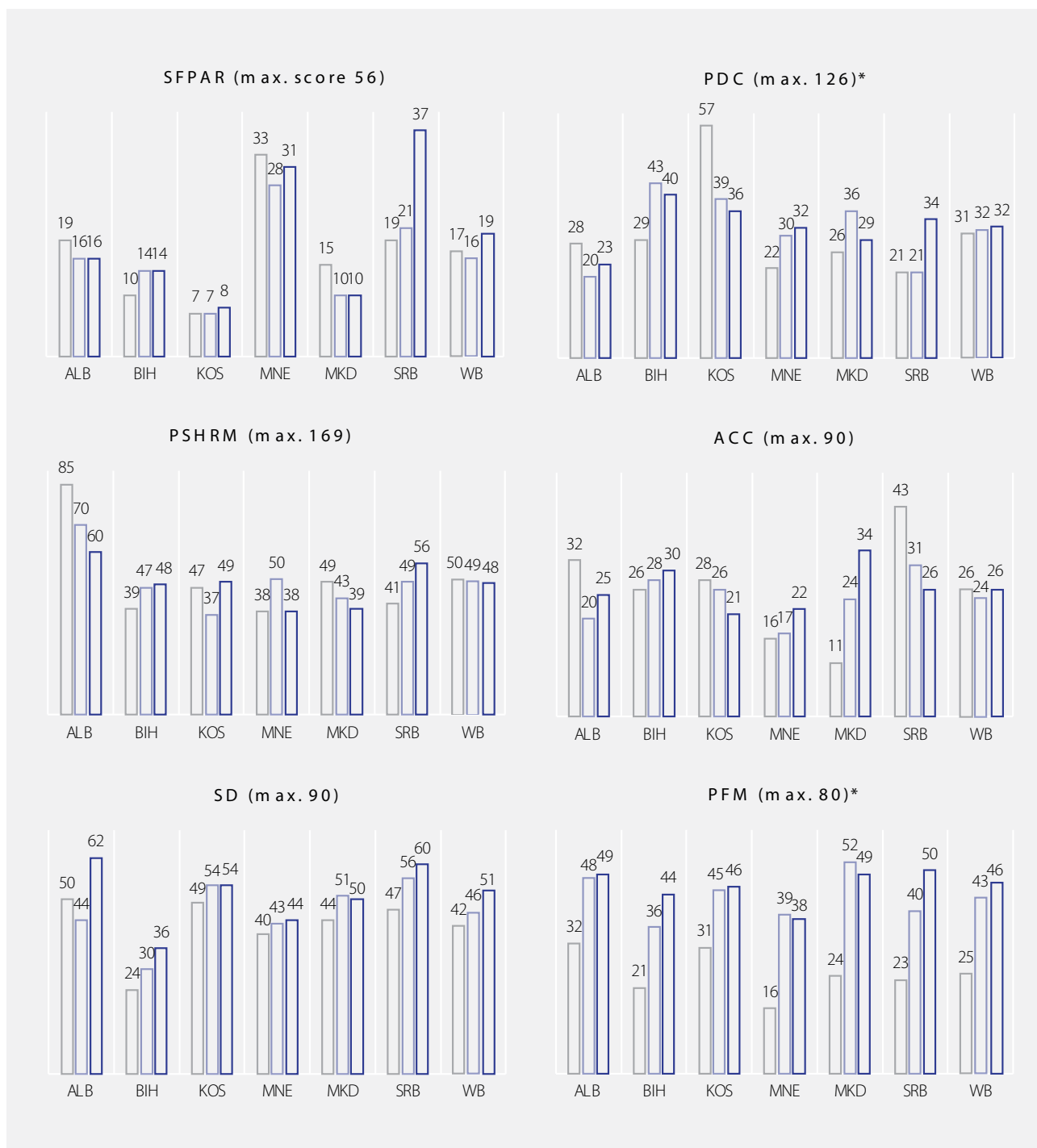
Note: Due to changes in methodology in PDC and PFM areas, scores from the baseline PAR Monitor 2017/2018 are not comparable with scores from the subsequent monitoring cycles.

Keeping PAR demands high: What future strategies?

The third PAR Monitor edition, as its predecessors, should be used to inspire regional dialogue and experience exchanges in the WB. Also, its purpose is to nudge governments in the region to further open public administrations for improving daily lives, strengthening the prosperity in societies, and accelerating the EU accession of our region. As usual, the regional, comparative PAR Monitor does not offer definite solutions or recommendations but relies on regional comparisons and trends, highlighting shared strengths and weaknesses – all based on collected evidence – to create a credible space for regional peer competition and learning. Ultimately, the Western Balkan PAR Monitor should be seen as contributing to inciting visible and purposeful change in regional PAR, i.e., more human-centred administrative affairs.

The results of the WeBER PAR Monitors are visible. Monitoring reports have been used to inform relevant national assessments of PAR by the EC and OECD/SIGMA. Moreover, WeBER partners, and other WeBER Platform members from civil societies in the region, are contributing to national, regional, and European PAR dialogue through the PAR Special Groups[197], the EU Delegations in the region, the Regional School for Public Administration, the Regional Cooperation Council, and other suitable venues. It is our hope and suggestion to our partners in the EU institutions, SIGMA/OECD, and national administrations to explore new but also enhance existing spaces for dialogue and civil society impact. At the same time, we strongly support the idea that the EC, OECD/SIGMA, and other partners should incentivise governments in the region, more openly and strongly, to be receptive to inputs from civil society, as true and lasting changes come only through continued and honest dialogue with stakeholders.

Nevertheless, aiming to bring PAR closer to citizens, the WeBER initiative should and has already started employing different strategies or actions for the future. Namely, PAR is only successful to the extent citizens can experience its fruits, and more voice should be given to people to express themselves through different involvement methods. Stronger citizen engagement means more real-life examples for advocating PAR policy changes. Starting with the freely available online platform for citizens of the region, WeBER has commenced collecting and promoting personal experiences and stories of dealing with administrations that illustrate what PAR means in reality. These personal experiences should be utilised as a complementary, first-hand body of evidence for assessing citizen orientation of PAR in our region.[198] In the coming period, the WeBER initiative will develop and apply new approaches for directly involving and consulting citizens on pertinent PAR matters.

Next, there is a need for more "zooming in" of PAR. In other words, PAR is not an abstract process but, on the opposite, it intrinsically belongs to every area that is in the public interest – culture, health, social protection, education etc. With the research on the so-called "sectoral PAR mainstreaming," the WeBER team has piloted the idea of monitoring how deeply PAR principles are embedded into policy and institutional settings in the WB, with quite diverse regional examples and outcomes.[199] In parallel to continuing with this novel task, WeBER will seek to additionally highlight that PAR responsibilities are spread within our states and that despite the existence of nominal PAR authorities who are owners of the process as such, a variety of public administration institutions is also accountable for PAR successes or failures. That said, besides this sectoral prism of PAR, its horizontal ties with other key reforms should be additionally highlighted and correlated. PAR developments in civil service management, transparency of budget transactions, or external oversight and control do have great repercussions on the region's anti-corruption and the rule of law policies. WeBER will be more dedicated to explaining and unravelling these relationships in the next phase.

Finally, PAR monitoring will continue as the key component of WeBER. With the acquired experience, it is essential that the PAR Monitor continues to be implemented with relevance based on the lessons learned. Importantly, the development of a revised set of Principles of Public Administration by the OECD/SIGMA, the framework WeBER firmly relies on from the start by seeking complementarity and synergies, represents an important reason for refreshing the PAR Monitor approach. Taking onboard both lessons learned and changes in the Principles, the immediate next step for the WeBER team will be to assess what has worked and what has not, as well as the most relevant PAR aspects that should be enhanced and closely observed in the future.

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197 PAR Special Groups have been established under the Stabilisation and Association Agreements (SAA) as forums for policy dialogue on PAR between the Commission and governments in WB.

198 The citizen portal can be accessed at: https://citizens.par-monitor.org/

199 Reports on Mainstreaming Principles of Public Administration into policy sectors can be accessed at: https://www.par-monitor.org/mainstreaming-principles-of-public-administration-into-policy-sectors/.

IX.
METHODOLOGY APPENDIX
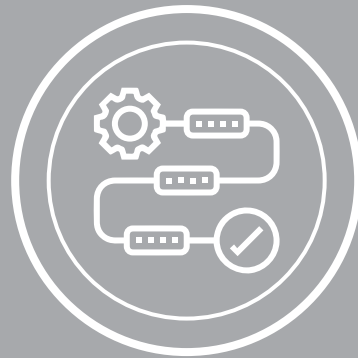
The PAR Monitor methodological approach

■ EU principles as a starting point and common framework of reference

WeBER approaches the monitoring of PAR in the Western Balkans from the perspective of uniform requirements posed by the EU accession process for the entire region. As the EU and SIGMA/OECD have developed a comprehensive set of principles for all countries to transform their administrations into modern, EU member states, WeBER has used these principles as the golden standard and a starting point for, firstly, developing and then implementing its own monitoring methodology. Moreover, in line with its overall rationale, WeBER has emulated SIGMA's methods to create its own indicators, using a similar compound-indicator structure and the same scoring approach, with the quantification of elements (sub-indicators) and total scores assigned to indicator values on a scale from 0 to 5.

This approach acknowledges that SIGMA's comprehensive approach cannot and should not be replicated by local actors, as it already represents a monitoring source independent from national governments in the WB. In this sense, WeBER does not seek to present a contesting (competitive) assessment of how these principles are fulfilled in the WB administrations, but rather offer a complementary view, based in local knowledge and complementary research approaches.

The PAR monitor methodology was developed by the WeBER research team and was thoroughly consulted among the WeBER expert associates. Overall, the methodology is based on 21 SIGMA principles within six key areas of PAR. These principles are monitored through 23 indicators that analyse different aspects of PAR key areas.

■ The regional approach

Since the baseline WeBER monitoring of PAR, an important facet is its regional character. The regional approach implies that all indicators are framed and phrased in a manner which enables application to six different systems that are assessed. Second, the regional approach means that findings are regionally comparable.

Such a regional approach admittedly results in some degree of loss of detail and national specificity in the monitoring work. However, it presents many benefits compared to nationally specific approaches. First and foremost is the potential to compare different national results, which allows the benchmarking of countries and their systems, the recognition of good, as well as the rise of positive competition between governments. Last, but not least, it allows for the creation and increase of regional knowledge and peer learning regarding PAR among CSOs, particularly useful for inspiring new initiatives and advocacy efforts at the national level.

■ Selection of principles "for and by civil society"

The PAR Monitor maintains a basic structure which follows the six chapters of the Principles of Public Administration. It does not attempt to monitor all the principles under each chapter, nor does it seek to monitor them in a holistic manner, but it rather adopts a more focused and selective approach. The criteria for selecting the principles to be monitored (and their sub-principles) were developed with three main ideas in mind:

- There are certain principles in which civil society is more active and consequently has more knowledge and experience.
- To gain momentum, the PAR Monitor will need to be relevant to the interests of the wider public in the region.
- The approach should ensure an added value to SIGMA's work and not duplicate it.
- The WeBER monitoring approach utilises the experience and expertise accumulated within the civil sector in the region to the maximum extent possible. Therefore, a number of indicators rely on civil society as a core source of knowledge.

■ Focus on the citizen-facing aspects of administration

● Another key criterion which has guided the WeBER's selection of principles (and sub-principles) **is their relevance to the work and interests of the wider public.** This means that both the selection of the principles and the design of the indicators included questions such as: "Does the public care about this?" or "Is this aspect of public administration visible to ordinary citizens?" In keeping with this approach, the WeBER methodology retains a focus on the points of interaction between the administration and its users (citizens and businesses), while leaving out issues that constitute the internal operating procedures of the administration invisible to the public.

■ WeBER indicator design

The WeBER research team designed a set of compound indicators in 2016, that was modified in 2019, with each indicator comprising several elements (essentially sub-indicators), elaborating various aspects of the issue addressed by the entire indicator. The entire design of indicators is quantitative, in the sense that all findings – based on both quantitative and qualitative research – are assigned numerical values. Findings are used to assess the values of individual elements, assigning them total element scores of either 0 or 1 (for less complex assessments, such as those where a simple yes or no answer is possible) or 0 or 2 (for more complex assessments). Only integer values are assigned to elements.

Furthermore, for each element a weight of either 1 or 2 is applied. In principle, a weight of 2 is assigned to those evaluated as basic, key requirements in relation to a certain practice. A weight of 1 is applied to more advanced requirements, i.e., higher and more complex standards. For example, a weight of 2 would be applied for an element assessing a basic government reporting practice, whereas a weight of 1 would be applied to an element assessing whether the data in a report is gender sensitive or whether it is available in an open data format. Moreover, as most indicators combine different research approaches and data sources, in cases where perception survey findings are combined with hard data analysis, a weight of 1 is assigned to the former and a weight of 2 to the latter.

For each indicator there is a conversion table for transforming total scores from analyses of individual elements into values on a common scale from 0 to 5. The final indicator values are assigned only as integers, meaning, for instance, there are no half points assigned. Scoring and methodology details for each indicator are available on the PAR Monitor section of the WeBER website - https://www.par-monitor.org/par-monitor-methodology/.

Finally, there were no methodological changes in the 2021/2022 monitoring cycle. WeBER research team has made noteworthy revisions ahead of the second PAR Monitor 2019/2020, pertaining to:

● Policy Development and Coordination, i.e., introduction of additional elements to the indicator on public participation in policymaking (extension from analysing solely CSOs perceptions, to assessing the quality of public consultations in practice), and exclusion from the monitoring framework an indicator on the accessibility of legislation and explanatory materials to the public

● Public Finance Management, i.e., introduction of a new indicator covering transparency of public procurement policy at the central level, which was measured for the first time in 2019/2020 cycle.

With the expected adoption of a new SIGMA Principles framework in 2023, the first step for the WeBER research team will be to revise the PAR Monitor methodology accordingly. It also means that starting from the next cycle, implementation of the PAR Monitor will depart from the methodological approach applied in this, and previous two PAR Monitor reports (the extent of such departure will be determined by WeBER research team subsequently). Due to expected revisions, familiarisation process, and testing of the new framework by the WeBER researchers, the next monitoring cycle is planned for 2024/2025 period.

■ The PAR Monitor package

The PAR Monitor is composed of one regional, comparative report of monitoring results for the entire region and six national reports that elaborate the monitoring findings for each administration in greater detail. In line with this approach, the regional report focuses on comparative findings, regional trends, and examples of good or bad practices, but does not provide recommendations. The national reports, on the other hand, provide in-depth, country-specific findings and identify a set of recommendations for national policy makers for each PAR area.

The added value of the entire monitoring exercise is that it allows monitoring changes vis-à-vis indicator values from the baseline monitoring conducted in 2017/2018 as well as comparing progress between the three completed cycles to date. It also allows stakeholders to reflect on the most important developments and trends in the implementation of policy and in the perceptions of key targeted groups. In certain cases, this reflection allows for some comparisons of results over time, as in the case of public perception surveys on administrative service delivery practices conducted on a representative sample of citizens. In cases of surveys of civil servants and CSOs, the 2021/2022 PAR Monitor allows us to monitor prevailing trends in the opinions of these stakeholder groups as compared to the 2019/2020, and the baseline surveys.[200]

The "Master Methodology" document and the detailed indicator tables, all available on the WeBER website,[201] should also be considered as part of the entire PAR Monitor package and can be used to fully understand the details of all monitoring exercises implemented to date.

The entire package of reports is also accompanied by an online tool for viewing and comparing the findings from different WeBER monitoring cycles, the Regional PAR Scoreboard. This database of all indicator values and the tables and graphs presenting those values can be found on the project website, under the heading "PAR Monitor".[202] The scoreboard also includes a section for viewing and comparing SIGMA's latest monitoring results for the whole region.

■ Quality assurance procedures within the monitoring exercise

The quality assurance approach, established at the start of the baseline monitoring, is still applied. WeBER team relies on a multi-layered quality assurance procedure to guarantee that the PAR monitoring findings are based on reliable and regionally comparable evidence. That process included both internal and external expert checks and reviews of data. The internal process of quality control comprised two main elements:

- a peer-review process, which involved different collaborative formats, such as written feedback, online team meetings and workshops.
- once the scoring for each administration was finalised, the WeBER lead researcher and team leader performed a horizontal cross-check of the findings to ensure their regional comparability and an alignment of assessment approaches, thus preparing the analysis for the external review.

The two phases of the external quality control process include:

- fact-checking by government institutions in charge of the given assessed area;
- Following the drafting of the regional report, members of the WeBER Advisory Council and recognised international experts performed an expert review of the regional PAR Monitor chapters in line with their areas of expertise.

The national reports also underwent standard internal review procedures by each WeBER partner organisation.

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200 In each monitoring cycle, it was not possible to create representative, random samples for the populations of CSOs and civil servants, and these two surveys were distributed throughout these two populations, and analysis was done on the received complete responses. Since the samples in the baseline, second, and third monitoring cycle are, thus, not identical, the results are not fully comparable.

201 PAR Monitor methodology, available at: https://www.par-monitor.org/par-monitor-methodology/.

202 Regional PAR scoreboards, available at: https://www.par-monitor.org/regional-par-scoreboards/.

■ PAR Monitor 2021/2022 timeframe

The monitoring exercise was conducted between January and November 2022. For the most part, monitoring focuses on practices implemented in 2021 and the first half of 2022. The exception are those indicator elements looking at regularity of governmental reporting practices, where 2020 or 2019 were included as the base years due to the governments' reporting cycles or the requirements of specific indicators.

The individual indicator scorings indicate the exact periods of measurement, kept comparable across the region as much as possible, which allow for the clear identification of timeframes of reference for all findings in the reports.

■ Limitations in scope and approach

As explained in the previous editions, the main limitation facing this project stems from the fact that the PAR Monitor does not cover the entire framework of SIGMA principles, but only those in which the interest of, and added value from, civil society is strongest in the pre-accession period. Moreover, selected principles are not always covered in every angle, but rather in those specific aspects which have been determined by the authors as the most relevant to approach them from the perspective of civil society monitoring. The specific WeBER approach used in all such cases is described in the project's methodology and individual indicator tables.

Lastly, some of the principles are still approached from a rather perception-based point of view. This is mainly the case for those principles thoroughly monitored by SIGMA, as the most useful way to complement its approach was deemed to be by monitoring perceptions of certain key stakeholder groups (such as public servants and CSOs). This is a deliberate component of the WeBER approach from the start, and those indicators should be looked at as complementary to the assessments conducted by SIGMA for the same principles. Nevertheless, as experience from the baseline monitoring cycle exposed limitations in certain cases when relying solely on perception data, the indicator on the inclusiveness and openness of policy making was complemented during the 2019/2020 cycle with hard evidence so as to have a more balanced assessment. WeBER team collects lessons learned from each monitoring cycle and deliberates internally on the necessity for potential changes or adjustments, with the view of improving the overall quality of its monitoring albeit keeping in mind the need to maintain a level of comparability between WeBER findings from different monitoring cycles.

In terms of geographical scope, the monitoring exercise and report cover the six administrations of the WB region, in accordance with the EU definition of the region.[203] For BIH, WeBER deliberately focuses on state level institutions wherever the structures and practices of institutions are analysed. The only exceptions to this are the service delivery indicators, where sampled administrative services include those provided by lower levels of governance (such as entities).

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203 European Commission's Enlargement package, and progress reports, are available at: https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports_en.

Data collection methods

The data from all six individual countries are used and compared. These data were collected through the following methods:

- Focus groups
- Interviews with stakeholders
- Public perception survey
- Survey of civil servants
- Survey of civil society organisations
- Analysis of official documentation, data, and government websites
- Requests for free access to information.

■ Focus groups

Focus groups were conducted for collecting qualitative inputs from stakeholders for certain indicators. Focus group data are most often use to complement or corroborate data collected by other research tools. When it was not possible to conduct focus groups, researchers held interviews with relevant target groups instead. More specifically, the PAR monitor methodology anticipated focus groups for:

- Strategic Framework of PAR, with civil society organisations (for indicators SFPAR_P1_I1, SFPAR_P2&4_I1);
- Policy Development and Coordination, with civil society organisations (covering PDC_P5_I2, PDC_P6_I1, PDC_P10_I1, PDC_P11_I1)
- Public Service and Human Resource Management, with former candidates who previously applied for a job in central state administration bodies (for indicator PSHRM_P3_I1; however, in this monitoring cycle, interviews were held with former candidates, instead of the focus groups);
- Accountability, with civil society organisations (for indicator ACC_P2_I1), and
- Service Delivery, with civil society organisations specifically dealing with accessibility issues, vulnerable groups and persons with disabilities (for indicator SD_P4_I1).

The selection of participants was based on purposive non-probability sampling which targeted CSOs with expert knowledge on the issue in question. These focus groups were held in all six countries:

Table 56: Focus groups conducted at the WB level

Country	Group	No. of FGs	PAR Area
ALB	Civil society	2	Service Delivery; Policy Development and Coordination
BIH	Civil society	2	Strategic Framework of PAR; Policy Development and Coordination; Service Delivery,
KS	Civil society	1	Policy Development and Coordination; Service Delivery
MKD	Civil society	1	Policy Development and Coordination; Service Delivery; Accountability
MNE	Civil society	1	Policy Development and Coordination; Accountability
SRB	Civil society	1	Strategic Framework of PAR

Interviews with Stakeholders

Interviews were conducted to collect qualitative inputs from stakeholders on monitored areas. Similar to focus groups, interviews were largely used to complement and verify data collected by other methods.

Interviews were semi-structured, composed of a set of open-ended questions which allowed for a discussion with interviewees and on-the-spot sub-questions. Selection of interviewees was based on purposive, non-probability sampling and targeted experts relevant for a given thematic area.

Overall, a total of 64 interviews were held during the monitoring period. Interviewees were given a full anonymity in terms of any personal information, in order to ensure higher response rate and facilitate open exchange.

Table 57: Interviews conducted at WB level

Country	Interviewee (number of interviews)	PAR Area
ALB	Representative of the DoPA (3)	Public Service and Human Resource Management
	Former civil service candidate (4)	Public Service and Human Resource Management
	Former senior civil servant (1)	Public Service and Human Resource Management
	PAR expert (1)	Policy Development and Coordination
	Representative of SAI (1)	Public Finance Management
BIH	Ministry of Finance and Treasury representative (1)	Public Finance Management
	PARCO representative (1)	Strategic Framework of PAR
	CSA representative (1)	Public Service and Human Resource Management
	Experts (2)	PSHRM
	Senior civil servants (4)	Public Service and Human Resource Management
	Candidates for civil service (9)	Public Service and Human Resource Management
	AOI representative (1)	Public Finance Management
KS	NAO representative (1)	Public Finance Management
	Senior civil servant, former and current (3)	Public Service and Human Resource Management
MKD	Civil servants (3)	Public Service and Human Resource Management
	Experts (2)	Public Service and Human Resource Management
	Civil service candidates (4)	Public Service and Human Resource Management
	Agency for Administration representative (1)	Public Service and Human Resource Management
	SAO representative (1)	Public Finance Management
MNE	Representatives of CSO (1)	Strategic Framework of PAR
	Senior civil servants (4)	Public Service and Human Resource Management; Service Delivery; Public Finance Management
	Former civil service candidates (2)	Public Service and Human Resource Management

SRB	Civil servants (3)	Public Service and Human Resource Management; Public Finance Management
	Senior civil servants (2)	Public Service and Human Resource Management; Public Finance Management
	Former civil service candidate (1)	Public Service and Human Resource Management
	Experts (2)	Public Service and Human Resource Management
	CSO representatives (4)	Service Delivery
	SAI representative (1)	Public finance management

■ Public Perception Survey

The public perception survey is based on a questionnaire targeting the general public (18+ permanent residents) of 6 Western Balkan countries. The survey was conducted through computer-assisted telephone interviewing (CATI) in combination with computer assisted web interviewing (CAWI), using a two-stage random representative stratified sampling (primary sampling unit: households, secondary sampling unit: household member).

The survey was conducted between 4th and 31st May 2022. At WB level, the margin of error for the total sample of 6093 citizens is ± 3.15%, at the 95% confidence level.

Table 58: Public perception survey methodology framework

Location	Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro, and Serbia
Time	4 – 31 May, 2022
Data Collection Method	CATI in combination with CAWI
Sampling Frame	Entire 18+ population of permanent residents of target countries
Sampling	Two stage random representative stratified sample (PSU: Households, SSU: Household member)
Margin of error	Average margin of error per country is ± 3.15% at the 95% confidence level

■ Survey of Civil Servants

Civil servants survey was implemented based on a unified questionnaire targeting civil servants working in the central state administrations of Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro and Serbia. In Albania, the 2022 survey of civil servants was not implemented since the Department for Public Administration (DoPA), a WeBER project associate, could not assist in dissemination due to technical issues involving their internal email communication system. The questionnaire was translated and adapted to local languages. It generally covered 5 main sections: recruitment of civil servants, temporary engagements in the administration, status of senior civil servants, salary/remuneration and integrity and anti-corruption. Data collection was conducted using a self-administered questionnaire on SurveyMonkey platform. At WB level, a total of 2682 civil servants participated in the survey.

Table 59: Breakdown of the sample for survey of civil servants

	N	% (of observations)
TOTAL	**2682**	**100%**
Key groups		
Civil service position		
Senior civil service manager – head of authority	60	2.24
Senior civil service manager – not a head of authority	455	16.96
Non-senior civil service manager (executorial)	538	20.06
Civil servant in non-managerial expert position	1079	40.23
Administrative support civil servant position	205	7.64
Civil servant on fixed-term contract or otherwise temporarily engaged	233	8.69
Political appointment (minister's cabinet or otherwise)	9	0.34
Other	103	3.84

State administration institution		
Ministry	1287	50.18
Subordinate agency	460	17.93
Centre-of-government institution (PM office, government office, government service)	286	11.15
Autonomous agency within the central state administration	415	16.18
Other	117	4.56

Gender		
Male	1000	37.29
Female	1603	59.77
Other	25	0.93
Do not want to respond	54	2.01

Years working in the administration		
Mean= 13 years; Range= 0-50 years		

Sector worked before joining the administration		
Local or regional administration	220	8.85
Other branch of power	148	5.96
Public services	359	14.45
International organisation	69	2.78
Non-governmental organisation	72	2.90
Media	78	3.14
Private sector	972	39.11
This was my first job	480	19.32
Other	87	3.50

Table 60: Margin of error (MoE) per question at the 95% confidence level

Question	MoE range (BIH)	MoE range (KOS)	MoE range (MKD)	MoE range (MNE)	MoE range (SRB)
Civil servants in my institution are recruited on the basis of qualifications and skills	2.42-2.86	2.9-3.25	2.92-3.16	2.58-2.81	3.14-3.27
In the recruitment procedure for civil servants in my institution all candidates are treated equally (regardless of gender, ethnicity, or another personal trait which could be basis for unfair discrimination)	2.51-3.07	3.11-3.46	3.08-3.32	2.95-3.22	3.59-3.72
To get a civil service job in my institution, one needs to have connections	3.51-4.0	3.43-3.75	3.52-3.78	3.25-3.48	3.06-3.21
Hiring of individuals on a temporary basis (on fixed-term, service and other temporary contracts) is an exception in my institution	2.89-3.41	3.17-3.58	2.81-3.09	2.67-2.91	2.44-2.57
Individuals who are hired on a temporary basis perform tasks which should normally be performed by civil servants	2.68-3.29	3.70-4.05	3.85-4.10	3.37-3.65	3.28-3.44
Such contracts get extended to more than one year	2.49-3.16	3.88-4.22	4.12-4.35	3.87-3.38	3.75-3.9
When people are hired on a temporary basis, they are selected based on qualifications and skills	2.54-3.18	2.98-3.38	3.23-3.54	2.62-2.92	3.12-3.28
Individuals hired on a temporary basis go on to become civil servants after their temporary engagements	2.83-3.43	3.24-3.63	3.55-3.81	3.17-3.41	3.29-3.42
The formal rules for hiring people on a temporary basis are applied in practice	3.36-3.95	3.34-3.72	3.89-4.16	3.19-3.52	3.52-3.69
Procedures for appointing senior civil servants ensure that the best candidates get the jobs in my institution	2.01-2.55	2.67-3.07	2.76-3.02	2.22-2.47	2.83-3.0
In my institution, senior civil servants would implement illegal actions if political superiors asked them to do so	2.66-3.25	3.42-3.79	3.45-3.75	2.73-3.0	2.69-2.87
Senior civil servants can reject an illegal order from a minister or another political superior, without endangering their position	2.87-3.39	3.28-3.67	3.54-3.80	3.01-3.31	3.03-3.20
Senior civil service positions are subject of political agreements and "divisions of the cake" among the ruling political parties	3.77-4.20	3.54-3.91	3.79-4.06	3.91-4.12	3.34-3.51
Senior civil servants are at least in part appointed thanks to political support	3.69-4.20	3.80-4.11	4.03-4.27	4.07-4.29	3.49-3.66
In my institution, senior civil servants participate in electoral campaigns of political parties during elections	1.86-2.57	3.68-4.07	4.10-4.39	3.12-3.48	2.51-2.73

In my institution senior civil servants get dismissed for political motives	1.5-2.06	3.51-3.91	3.32-3.67	3.45-3.76	2.45-2.67
Formal rules and criteria for dismissing senior civil servants are properly applied in practice	3.07-3.97	3.29-3.72	4.29-4.54	2.87-3.22	3.15-3.37
In my institution, bonuses or increases in pay grades are used by managers only to stimulate or reward performance	2.27-2.83	2.76-3.22	3.20-3.50	2.55-2.82	3.02-3.17
In my institution, political and personal connections help employees to receive bonuses or increases in pay grades	2.65-3.32	3.30-3.80	3.62-3.91	3.46-3.76	2.72-2.92
Integrity and anti-corruption measures in place in my institution are effective in achieving their purpose	2.60-3.12	3.27-3.69	3.68-3.96	2.65-2.91	3.29-3.44
Integrity and anti-corruption measures in place in my institution are impartial (meaning, applied to all civil servants in the same way)	2.62-3.18	3.17-3.58	3.51-3.80	2.76-3.04	3.26-3.42
If I were to become a whistle-blower, I would feel protected	1.74-2.28	2.89-3.34	3.44-3.79	1.86-2.11	2.31-2.48
How important do you think it is that the civil society organisations (NGOs) monitor public administration reform	1.9-2.47	1.81-2.12	2.41-2.66	1.90-2.14	2.54-2.70
How important do you think it is that the public (citizens) perceive the administration as depoliticised	1.22-1.54	1.27-1.48	1.24-1-38	1.2-1.34	1.37-1.47

■ Survey of Civil Society Organisations

CSO survey results are based on a standardized questionnaire targeting representatives of CSOs working in Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro and Serbia. The questionnaire included nine sections covering:

- CSOs' involvement in evidence-based policy-making,
- Participation in policy- and decision-making,
- Exercising the right to free access of information,
- Transparency of decision-making processes,
- Accessibility and availability of legislation and explanatory materials,
- CSO's perceptions on government's planning, monitoring and reporting on its work,
- Effectiveness of mechanisms for protecting the right to good administration,
- Integrity of public administration, and
- The accessibility of administrative services.

Data collection was conducted using a self-administered questionnaire on SurveyMonkey platform.

At the WB level, a total of 515 CSOs participated in the surveys conducted between 23rd March and 14th July 2022.

ALB	BIH	KS	MKD	MNE	SRB
23/03 – 21/06	07/04 – 11/07	13/04 – 14/07	04/04 – 01/06	11/04 – 13/06	23/03 – 28/06

Table 61: Breakdown of the CSO survey sample in at WB level

	N	% (of observations)
TOTAL	**515**	**100**
Key groups		
Type of organisation[204]		
Policy research/Think-tank	125	13.87
Watchdog	97	10.77
Advocacy	230	25.53
Service provider	160	17.76
Grassroot	152	16.87
Other	137	15.21
Field of operation		
Governance and democracy	143	6.01
Rule of law	143	6.01
Human rights	257	10.81
Public administration reform	107	4.50
European integration	123	5.17
Gender issues	153	6.43
Children and youth	213	8.96
Environment and sustainable development	215	9.04
Education	206	8.66
Culture	137	5.76
Health	96	4.04
Media	86	3.62
Economic development	118	4.96
Civil society development	177	7.44
Social services	133	5.59
Other	71	2.99
Year of registration of the CSO		
Mean= 2007; Range=1869-2022		
Position of the respondent in the organisation		
Senior-level management	314	59.81
Mid-level management	71	13.52
Senior non-management	35	6.67
Mid-level non-management	34	6.48
Other	71	13.52
Years working with the organisation		
Mean=9.64 years; Range=0-40 years		

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204 Multiple choice possible.

■ Analysis of official documentation, data and official websites

Monitoring heavily relied on the analysis of official documents publicly available on the websites of the administration bodies. The analysed documents include:

- legislation (laws and bylaws);

- policy documents (strategies, programmes, plans, action plans, etc.)

- official reports (implementation reports, public consultation reports etc.);

- analytical documents (impact assessments, explanatory memorandums to legislation, policy concepts, policy evaluations etc.);

- individual legal acts (decisions, conclusions etc.);

- other documents (agendas, meeting minutes and reports, announcements, guidelines, directives, memorandums etc.);

Additionally, official websites of public authorities were used as sources of data and documents for all indicators, except for the ones completely based on survey data. In certain cases, the websites of public authorities were closely scrutinised as they were the key sources of information and units of analysis.

■ Requests for free access to information (FOI)

The PAR monitor methodology relies on publicly available data. Researchers sent FOI requests in cases where methodology asks for certain institutional practices that could not easily be covered by online available data, but, in certain cases, it was necessary to send additional FOI request to obtain clarification, even though not foreseen by the methodology. Therefore, when an indicator did require information available online, FOI requests were not sent.

That said, the researchers widely used FOI requests as a data collection tool primarily in three areas:

- Policy Development and Coordination (indicators PDC_P6_I1, PDC_P10_I1).

- Public Service and Human Resource Management (PSHRM_P3_I1, PSHRM_P2_I1).

- Accountability (ACC_P2_I2).

Table 62: FOI requests per country (110 total)

Albania	14
Bosnia and Herzegovina	17
Kosovo	27
Montenegro	16
North Macedonia	15
Serbia	21

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"WeBER's Western Balkan PAR Monitor is a valuable contribution to better understanding the state of play and developmentsin regional public administrations. In SIGMA we particularly appreciate it because it builds on the Principles of Public Administration and effectively complements SIGMA's monitoring work without overlaps or duplications. Civil society insights shed a new light on regional public administrations, and I can only hope that the findings will be considered by the governments and will inform their policy decisions."

Gregor Virant
Head of SIGMA Programme,
OECD, and former Minister of Public Administration of Slovenia

"Taking the perspective of citizens and civil society, the PAR Monitor presents invaluable new evidence and an effective benchmarking tool to assess the quality of public administration in the Western Balkans."

Jan-Hinrik Meyer-Sahling
Professor of Political Science, Faculty of Social Sciences,
University of Nottingham

"WeBER's Western Balkan PAR Monitor provides high valuable insights on the status quo of Public Administration Reform in the Western Balkan countries. The view of civil society and civil society organisations on the governance, effects and reform of public administration is of highest importance for the future development and the EU-accession of the countries. I am always impressed of the great engagement and profound knowledge of the WeBER team and the Civil Society organisations contributing to the PAR Monitor."

Thomas Prorok
Deputy Managing Director,
Centre for Public Administration Research – KDZ

"The role of the WeBER project in building capacity of civil society organisations and strengthening democratic processes in Western Balkans cannot be underestimated. This will hopefully bring the governments closer to citizens, promote evidence-based policy-making and enable theWestern Balkan statesto learn from each other."

Tiina Randma-Liiv
Professor and Chair of Public Management and Policy,
Tallinn University of Technology

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